

Data Protection Policy [Approved by **Trustees 14-03-2024]**

1. Introduction

South East u3a Forum (Forum) regards Data Protection as a fundamental element of its operations.

2. Policy

2.1 Scope of the policy

This policy applies to the work of the Forum. The policy sets out the requirements that the Forum has to collect and process information for Forum Event purposes. The policy details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the Forum Trustees to ensure that the Forum remains compliant. This policy should be read in tandem with the Forum's Privacy Policy.

2.2 Why this policy exists

This data protection policy ensures the Forum

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects itself from the risks of a data breach

2.3 General guidelines for Trustees and Event Organisers (e.g. The Summer School Sub-Committee Team).

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Forum Event attendees.
- The Forum will provide induction training to Trustees and event organisers to help them understand their responsibilities when handling data.
- Trustees and event organisers should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used, and they should never be shared.
- Data should not be shared outside of the Forum unless with prior consent and/or for specific and agreed reasons. Examples would include Gift Aid information provided to HMRC or information provided to the distribution company for the Trust publications.
- Event attendee information is relevant for a particular event only and should not need to be refreshed on a regular basis.
- Additional support will be available from The Third Age Trust where uncertainties or incidents regarding data protection arise.

2.4 Data protection principles

The General Data Protection Regulation identifies key data protection principles:

- Principle 1 – Personal data shall be processed lawfully, fairly and in a transparent manner
- Principle 2 – Personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Principle 3 – The collection of personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Principle 4 – Personal data held should be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- Principle 6 – Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2.5 Lawful, fair and transparent data processing

The Forum requests personal information from Trustees, event organisers and for event attendees and for sending communications regarding their involvement with the Forum. They will be informed as to why the information is being requested and what the information will be used for. The lawful basis for obtaining their information is due to the legitimate interest relationship that the Forum has with them. In addition, they will be asked to provide consent for specific processing purposes such as the taking of photographs. They will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received, they will be acted upon promptly and they will be informed as to when the action has been taken.

2.6 Processed for specified, explicit and legitimate purposes

Trustees, event organisers and event attendees will be informed as to how their information will be used and the Forum Committee or Event Organisers will seek to ensure that their information is not used inappropriately. Appropriate use of information provided by them will include:

- Communicating with Trustees, Event Organisers, current and past event attendees (where the latter have specifically agreed to this) about events and activities
- Event Organisers communicating with event attendees about specific event activities
- Communicating with member Networks about their Forum membership and/or renewal of their membership
- Communicating with Network members and Trustees about specific issues that may have arisen during the course of their membership

The Forum will ensure that event organisers are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending event attendees marketing and/or promotional materials from external service providers.

The Forum will ensure that all information is managed in such a way as to not infringe individual Trustees, Event Organisers and Event attendees' rights which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

2.7 Adequate, Relevant and Limited Data Processing

Forum Trustees, event organisers and event attendees will only be asked to provide information that is relevant for Forum and Forum event purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement

Where additional information may be required such as health related information this will be obtained with the consent of the individual who will be informed as to why this information is required and the purpose that it will be used for.

Where the Forum organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

2.8 Photographs

Photographs are classified as personal data. Where group photographs are being taken individuals will be asked to step out of shot if they don't wish to be in the photograph. Otherwise, consent will be obtained from Trustees, event organisers and event attendees in order for photographs to be taken and they will be informed as to where photographs will be displayed. Should they wish at any time to remove their consent and to

have their photograph removed then they should contact a Trustee or event organiser to advise that they no longer wish their photograph to be displayed.

2.9 Accuracy of data and keeping data up-to-date

The Forum has a responsibility to ensure Trustees, event organisers and event attendees' information is kept up to date. They will be required to let the Forum Chair or the event organiser know if any of their personal information changes. In addition, on an annual basis, the Forum will provide an opportunity for Trustees to inform the Forum as to any changes in their personal information. (NB Event attendees will normally provide information for the duration of that event alone)

2.10 Accountability and governance

The Forum Committee are responsible for ensuring that the Forum remains compliant with data protection requirements and can evidence that it has. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. The Forum Committee will ensure that new individuals joining the Committee or the event subcommittee (event organisers) receive an induction into the requirements of GDPR and the implications for their role. The Forum will also ensure that event organisers are made aware of their responsibilities in relation to the data they hold and process. Committee Members (Trustees) will stay up to date with guidance and practice within the u3a movement and will seek advice from The Third Age Trust National Office should any uncertainties arise. The Forum Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted. When Trustees and event organisers relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

2.11 Secure Processing

Forum Trustees and event organisers have a responsibility to ensure that data is both securely held and processed. This will include:

- Them using strong passwords
- Them not sharing passwords
- Restricting access of sharing member information to those on the Committee or event organisers who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain personal information
- Using password protection, a membership database or secure cloud systems when sharing data between committee members and/or group conveners
- Paying for firewall security to be put onto Trustee and event organisers' laptops or other devices.

2.12 Subject Access Request

Forum Trustees, event organisers and event attendees are entitled to request access to the information that is held by the Forum. The request needs to be received in the form of a written request to the Chair of the Forum. On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances

as to why the request cannot be granted. The Forum will provide a written response detailing all information held on the individual requesting the information. A record shall be kept of the date of the request and the date of the response.

2.13 Data Breach Notification

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring that all the Forum Trustees and event organisers are made aware that a breach has taken place and how the breach occurred. The Trustees shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of the Forum will contact National Office as soon as possible after the breach has occurred to notify them of the breach. A discussion will take place between the Chair and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Trustees shall also contact the relevant Forum Network members to inform them of the data breach and actions taken to resolve the breach.

Where an individual feels that there has been a breach by the Forum, a Trustee will ask the individual to provide an outline of the breach. If the initial contact is by telephone, the Trustee will ask the individual to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by Trustees of the Forum who are not in any way implicated in the breach. Where the Trustees need support, or if the breach is serious, they should notify National Office. The individual should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from the Forum. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

South East u3a Forum Data Protection Policy		The Third Age Trust
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