

## **Report prepared by Data Protection Lead, Andrew Devin, For Stoke-on-Trent South U3A Committee Meeting 8<sup>th</sup> March 2018**

The General Data Protection Regulation will apply in the UK from 25 May 2018 and will replace the current Data Protection Act. All aspects of the new Regulation were discussed at the Committee Meeting held on February 8<sup>th</sup> 2018. The following notes record what was agreed at the meeting; work undertaken since the meeting; and further actions considered necessary.

The main changes that affect us are the requirements relating to consent and accountability. We will need to gain consent from our members to obtain, retain and use their personal information. Due to the nature of the work of our U3A, it is perfectly legitimate for us to request personal information. If we ask for additional information, providing we can substantiate the basis for gathering it, and we have obtained the relevant member's consent, then the requirements of the new Regulation have been met.

It is unlikely that we will be gathering special categories of personal data, however, should this arise the preceding comments referencing basis and consent will apply.

The eight principles established under the former Data Protection Act have been moderately revised by the new Regulation. Each Principle will now be examined to show actions taken/agreed, and where we still need to show compliance.

*Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner.*

**The newly prepared Privacy Statement included within the Membership Application/Renewal form satisfies the requirements of principle 1.**

*Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.*

**The Committee agreed that Group leaders be requested: (a) to provide an additional consent, (b) to acquaint themselves with the Privacy Policy, and (c) to store securely Group Contact Details and Attendance Registers. See copy document that will be included in the Group Leaders Information Pack.**

**The Committee accepted that it may need additional consents for transferring data outside the U3A (e.g. to a travel company for trips, because these could have marketing consequences). This will be addressed with the appropriate Group Leaders. **Action Required****

*Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.*

**The Committee reviewed the personal information currently collected, and agreed that it is limited to what is needed for membership and accounting purposes only. It was agreed that this would be reviewed on an ongoing basis.**

*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 are erased or rectified without delay.*

**The Committee agreed that regular reminders would be issued via the Monthly Newsletter and the Website requesting members to keep their information up to date. Consents will be refreshed when updates are received.**

*Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.*

**The Committee agreed the Statement relating to retention that is included within the Privacy Policy.**

*Principle 6 - Personal data must be processed in accordance with the individuals' rights.*

**The Committee agreed that by following the key principles detailed within this paper, Stoke-on-Trent South U3A would not be infringing the rights of its members.**

**The Committee also agreed that new committee members and group leaders would be immediately made aware of our Privacy Policy (reference included within their induction packs via their extra Consent Forms). See copies of these Forms.**

*Principle 7 - 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.*

**The Committee considered that full or partial membership information is presently restricted to only those officers who need access to fulfil their duties.**

**The Membership Secretary confirmed that he remains very aware of the issues relating to the security of all data held, both electronic and physical. He also stated that:**

**(a) He operates password access control to his computer, and stores the membership data on the hard drive of this computer.**

**(c) Back-up files of the data are stored in the “Cloud”, and also on a securely held data stick.**

**The Membership Secretary also acknowledged that secure physical storage arrangements will be effected for documents used to gather consent, and accepted that these documents would provide the necessary evidence needed to demonstrate compliance.**

*Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.*

**The Committee considered that no action was necessary.**

## **Accountability and governance**

*The Committee recognised that the new Regulation requires organisations to be able to demonstrate that they comply with the data protection principles. Accordingly, the Committee needs to:*

- **Approve, and implement the Data Protection Policy and the Privacy Policy prepared in respect of Stoke-on-Trent South U3A.**
- **Add data protection to the agenda of U3A committee meetings.**
- **Ensure appropriate training for committee members and other data users.**

**Action Required**