

## **POLICY DRAFT**

### **STANDING ORDERS on Holding, Processing and Sharing Membership Details – GDPR.**

#### **Basics:**

- Uttoxeter U3A holds personal contact information necessary to provide members with U3A services and is legally bound to hold and use this information in a secure and confidential manner and to control access and its distribution.
- Application/renewal forms completed by members are held by the Membership Secretary [MS] providing the member's name, home address and also an email address, telephone numbers and Gift Aid option.
- Uttoxeter U3A does not hold or add any further information of a personal nature for members, except for trustees where further personal identification data required by the Charity Commission is held only by the Secretary.
- Members have the right to see the information we hold and to know where it is held.
- Master Membership records will be held on a secure computer and remotely duplicated and secured on web-based cloud storage.
- The Membership Secretary (MS) is, on this basis, the Data Controller (DC). Anyone assisting or deputising for the MS must be positively instructed and acquainted with the requirements of the GDPR and acknowledge that they will operate in line with these Standing Orders.
- The MS may appoint and remove assistants as and when required and will ensure that the appointee is provided with a copy of this policy document and ensure that the appointee positively acknowledges the sensitivity and security requirements of handling personal data. Assistants must delete membership data upon the direct request of the MS.

#### **Sharing of Information by Data Controller.**

##### **Data Used and processed by nominated assistants from the MS's master file.**

- **Third Age Matters** requires, from time to time, a file of names and addresses for postal delivery. These files are provided on a restricted use basis and via a secure mechanism.
- **Magazine/ Newsletter** distribution requires a file of names and addresses for labels for hard copies and email addresses for digital distribution.
- **Gift Aid** reclaim requires a file of names, postcodes and or other HMRC designated identification data to be shared with HMRC. These files are provided on a restricted use basis and via a secure mechanism.
- **AGM and similar** papers require labels to be prepared for postal or hand-delivery.
- **Membership card processing** requires a file of names and membership numbers available to the printer.
- **Monthly Bulletin** distribution requires a file of email addresses.
- **Trustee / Committee members** are required to be identified to the Charity Commission by the Business Secretary. This will required additional personal data to be confidentially shared between the BS and the trustee. Names and roles will be public information on the public area of the CC website whereas detailed contact and identification data will be held in the secure [non-public] area of the CC system.

##### **Data Used and processed by Group Leaders and administrators**

- A member giving any details to a group leader does so by choice and therefore with their consent. When an email address is given to a group leader, members have the opportunity to say whether they are content for other group members to see their email address. If everyone agrees, the leader will send out group emails under the "copy" facility, C.C. If they prefer to keep their email private, the leader can send emails using the BCC. Group leaders should be furnished with a copy of these Standing Orders and assisted to work to their contents.

- **Uttoxeter U3A website, magazine, publicity materials and monthly bulletins** routinely includes contact data in the manner provided by the member or group leader concerned in notices or articles. Contributors should indicate any restrictions on the publication of personal contact data each and every time a contribution is made. Officers and group leaders may opt for anonymous email links by arrangement with the Uttoxeter U3A web editor.

#### **Requests for Personal Information.**

- **If someone (A) wants to contact a** member (B) or any data assistant for their email or telephone number, remember that this is confidential information. If you have the details, it is best practice to tell whoever requests the info(A) that you will contact the person whose details they want(B) and ask them to contact (A) directly. In this way, (B)'s information is not given out without their permission

#### **Practical Guide lines**

- The GDPR requires us to tell members about who has access to their personal information and the restrictions on its use. These Standing Orders satisfy this requirement and should reassure members that their data will remain private by default and not circulated unless expressly permitted.
- When sending a bulk email, use BCC unless you have explicit permission to disclose email addresses for group communication purposes.
- Access to membership data is best restricted to people with specific roles.
- Full data is best stored on dedicated laptops where security systems are known.
- The MS controls who has copies of data, why and where.
- Everyone to be in the mind set to **review what they do and think GDPR** .

Althea 07/09/2018

Converted to draft Standing Orders by Ken 17/09/2018 – changes 21 Sept 2018