

# WEST BRIDGFORD U3A DATA PROTECTION POLICY 2020-2021

(Updated & Revised: Compliant as of March 2020)

**This policy applies to the work of West Bridgford U3A ('WBU3A'). It sets out the requirements that the WBU3A has to gather personal information for membership purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation (2018). It is reviewed on an ongoing basis by the WBU3A Committee members to ensure that the WBU3A is compliant and should be read in tandem with the U3A's Privacy Policy.**

## WHY THIS POLICY EXISTS

This data protection policy ensures that the WBU3A:

- Complies with current data protection law and good practice.
- Protects the rights of members, staff, clients and partners.
- Is open about how it stores and processes members' data.
- Protects itself from the risks of a data breach.

## GUIDELINES FOR COMMITTEE MEMBERS, GROUP CONVENORS OR OTHERS WHO MAY HAVE LEGITIMATE ACCESS TO DATA



- On completion of a Membership Application Form, Renewal Form, Gift Aid Declaration or any other means of providing personal information/data to WBU3A such information (digital or paper) will be held only by the Membership Secretary who will ensure that only those with a legitimate reason for accessing such data are able to do so.
- The only people able to access data covered by this policy should be those who need to communicate with, administer the membership of a member, or provide a service(s) to the member(s) of the WBU3A.
- Data must not be shared informally or outside the WBU3A
- The WBU3A will provide training and advice to Committee Members and Group Convenors to help them:
  - understand their responsibilities when handling personal data
  - ensure that they have the knowledge and facilities to ensure that data is kept secure
- The Committee will monitor and review the formal and informal processes used by all who have legitimate access to personal data to ensure that it complies with the requirements of this policy and all statutory requirements

- Committee Members and Group Convenors should keep all data secure, by taking sensible precautions and following these guidelines.
- Strong passwords must be used and never be shared.
- All group emails sent by Committee Members/Group Convenors etc. must be sent using "blind copies" (Bcc) so that email addresses of others are not displayed to any individual on the mailing list.
- Personal data should not be shared outside the WBU3A unless with prior consent or for specific/agreed reasons.
- Member information should be reviewed and consent refreshed periodically via the membership renewal process or when policy is changed.
- WBU3A will request help from National Office if they are unsure about any aspect of data protection.

## DATA PROTECTION PRINCIPLES

The General Data Protection Regulation (2018) identifies 8 data protection principles:

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

**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.

**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.

**Principle 4** - Personal data held should be accurate and up to date. Every reasonable step must be taken to ensure that inaccurate data that is erased or rectified without delay.

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

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

**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.

**Principle 8** - Personal data cannot be transferred to a country or territory outside the EU - or, post-Brexit, outside the UK - unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the use of personal data.

## **LAWFUL, FAIR AND TRANSPARENT DATA PROCESSING**

- The WBU3A requests personal information from applicants and members for the purpose of sending communications about their membership of WBU3A.
- The forms used to request personal information will contain a privacy statement informing applicants and members as to why the information is being requested and what the information will be used for.
- Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held.
- In giving their consent members will also have the opportunity to restrict who has access to such data. A member may indicate that they wish only that the Membership Secretary has access to their personal information and that it should not be shared – formally or informally - with others within the WBU3A.
- WBU3A members will be informed that they can, at any time, remove their consent and will be informed as to who to contact should they wish to do so. Once a WBU3A member requests not to receive certain communications this will be acted upon promptly and the member will be informed as to when the action has been taken.

## **PROCESSED FOR SPECIFIED, EXPLICIT AND LEGITIMATE PURPOSES**

West Bridgford U3A's lawful basis for collecting this information is legitimate interest. In processing your information members will be informed as to how their information will be used and the Committee of the WBU3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about WBU3A's events and activities
- Group Convenors communicating with their group members about specific group activities.
- Adding members' details to the direct mailing lists for the U3A magazine(s) – "Third Age Matters" & "Sources" – and in the mailing of WBU3A's bi-monthly Newsletter.
- Sending members information about Third Age Trust events.
- Communicating with members about their membership and/or renewal of their membership.
- Providing members' details to HMRC for the administration of Gift Aid (only for those members who donate via Gift Aid)
- Communicating with members about specific issues that may have arisen during the course of their membership.

The WBU3A will ensure that Group Convenors are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending WBU3A members marketing and/or promotional materials from external service providers. The WBU3A will also ensure that all Group Convenors and others who may wish to legitimately communicate with members are aware of the required processes for so doing i.e. always using "blind" (Bcc) copies emails when sending group mails.

The WBU3A will ensure that members' information is managed in such a way as to not infringe an individual member's 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.

## **RELEVANT AND LIMITED DATA PROCESSING**

Members of the WU3A will only be asked to provide only information that is relevant for membership 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 specific consent of the member who will be informed as to why this information is required and its purpose.

Where an event that requires next of kin information to be provided, the U3A will require the member to gain consent from the identified next of kin. The consent will provide permission for the information to be held only for the purpose of supporting and safeguarding the member. Information that is needed as a one off for a particular event will be deleted once that event has taken place unless it is to be required – with agreement – for a longer period. The same would apply to carers who, with the agreement of WBU3A may attend either a one-off event or longer to support a U3A member.



Where a member's data needs to be shared with a third party (e.g. following an accident or for statutory reasons), where it is in the best interests of the member or WBU3A or where the WBU3A has a substantiated concern then the member's consent need not be sought.

An important aspect of personal data is one's image/photograph. On joining the WBU3A and signing the Data Consent Form members agree to their photograph/image being taken and perhaps reproduced in the monthly Newsletter or on the web site. However, the member's specific consent must be gained if their name is attached to the image and the member may at any time refuse to be included in any photograph.

All members have a unique membership number allocated when they join WBU3A. This number is deemed personal information and as such will be retained securely by the WBU3A and subject to all the requirements of this policy.

### ACCURACY AND KEEPING DATA UP TO DATE

The WBU3A has a responsibility to ensure members' information is kept up to date. Members will be asked to let the Membership Secretary know if any of their personal information changes. In addition, on an annual basis, the Membership Renewal Forms will provide an opportunity for members to resubmit their personal information and reconfirm their consent for the WBU3A to hold personal information and to communicate with them/administer their membership in accordance with this policy.



### ACCOUNTABILITY AND GOVERNANCE

The WBU3A Committee are responsible for ensuring that the WBU3A remains compliant with data protection requirements and can evidence that it meets those requirements. Consequently, members will be asked to annually (upon joining the WBU3A & at each annual renewal point) to provide written consent. The evidence of this consent will then be securely held by the Membership Secretary as evidence of compliance.

The Committee will ensure that new Committee members receive an induction into how data protection is managed and the reasons for this. Committee Members will also stay up to date with guidance and practice within the U3A movement and shall seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee will its review data protection practice (including who has access to information) on a regular basis as well as reviewing what data is held.

The WBU3A have appointed from the general membership a Data Protection Officer (DPO) who is independent of the Committee. The DPO will monitor, advise and report to the Committee on the administration and efficacy of Data Protection within WBU3A and upon WBU3A's compliance with the General Data Protection Regulation (2018)

### SECURE PROCESSING

The Committee Members of the U3A have a responsibility to ensure that data is securely held and processed. This will include:

- The use of the national U3A secure data administrative BEACON system
- Committee members using strong passwords.
- Committee members not sharing passwords.
- Restricting access to personal information to Committee Members or, where necessary, Group Conveners, who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs

- Using password protection or secure cloud systems when sharing data between Committee Members and/or Group Conveners.
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

### THIRD PARTY ACCESS TO DATA

Where there is a need to provide data to a third party to ensure communication or a member's participation in activities the member will be informed and their consent obtained before giving such information to that third party. Included in this might be: the WBU3A use of the Abacus Printing & Postal Delivery service for the bi-monthly newsletters or organisations providing holidays for WBU3A groups.

In each case the Terms and Conditions of such supplier(s) will be reviewed to ensure that they are GDPR compliant.

### SUBJECT ACCESS REQUEST

WBU3A members are entitled to request access to the information that is held by the WBU3A. The request needs to be received in the form of a written request to the Membership Secretary (details below). On receipt, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The WBU3A will provide a written response detailing all information held on the member. A record will be kept of the date of the request and the date of the response.

### DATA BREACH NOTIFICATION

If a data breach to occurs action must be taken to minimise the harm by ensuring all Committee Members are aware of the breach and its cause. The Committee will seek to rectify the breach as soon as possible to prevent any further breaches. The Chair of the WBU3A will contact National Office within 24 hours to notify them and discuss the seriousness of the breach, the action to be taken and, where necessary, to notify the Information Commissioner's Office. The Committee will also contact the relevant U3A member(s) to inform them of the breach and actions taken.

If a member reports a suspected data breach then WBU3A will ask the member to provide an outline of their concerns. Members will be advised on Application, Renewal, and Data Consent Forms the contact details of the Membership Secretary who is the first contact for reporting a data breach. If the initial contact is by telephone, the Membership Secretary will ask the member to follow this up with an email or a letter detailing their concern. This will then be investigated by members of the Committee who are not implicated in the breach and, if necessary, by the Data Protection Officer. Where the Committee needs support or if the breach is serious they will notify National Office. The member will also be informed that they can report their concerns to National Office if they are dissatisfied with the WBU3A response. Breach matters will be subject to a full investigation, records will be kept and all involved notified of the outcome.

**DATA PROTECTION CONTACT: Tony Beale, Membership Secretary. Tel: 07788853157 or email [wbu3a.members@gmail.com](mailto:wbu3a.members@gmail.com)**