

Witham and District (Essex) U3A

Privacy Policy

The General Data Protection Regulations (GDPR) came into effect on 25 May 2018 , replacing the Data Protection Act (1998) This policy updates the practices of Witham and District (Essex) U3A with respect to data protection, utilising the guidelines from the Third Age Trust.

The policy incorporates the good practice already adopted by W&D (Essex) U3A at the membership level and additionally brings the group leaders, who also hold personal data, into line with the GDPR requirements. The policy centres not only on the collection, purpose, use, storage, access and disposal of information but also on how this information is provided to members, complaints from members and how any complaints will be dealt with.

The GDPR requires that the request for information from members must be done on a lawful basis. For U3As, contract is the lawful basis. Our normal application process and payment of a fee is sufficient to meet this requirement. We must ensure that members give consent with respect to Gift Aid and to pass on their information for Third Age Matters. Members give this consent on our application/renewal forms. Members opt in to these issues.

Information we gather

- Name
- Address
- Telephone numbers
- Email
- Gift aid information

We do not currently request any other personal information. However, emergency contact details can be collected by the group leaders on an opt-in basis. This information will be held securely by the group leader.

Personal data must be processed lawfully, fairly and transparently

- a) Our application/renewal form tells our membership what their personal information will be used for. This information is held by the Membership Secretary only. It is kept electronically, password protected. It is also kept securely on locked premises in paper format.
- b) Group leaders also hold personal information. The register of attendance should be kept separately from the group member details. Both should be kept securely and password protected if held electronically or on secure premises (i.e. the Group leaders home) if held in paper format.
- c) The group membership forms shall include a privacy statement.

- d) If group members want to share their personal information within the group, the group leader shall ensure that the consent each member has been obtained
- e) When the Membership Secretary or a Group Leader is using email to more than one member then they **MUST** use the BCC facility, even when consent to sharing has been obtained.
- f) The Committee shall review annually, who needs access to this information and will keep a record of this. The outcome of the review would be available to the membership through the minutes of committee meetings available on the website.

1. Data must be collected for specified, explicit and legitimate purposes

- a) W&D U3A will only use the information for purposes specified on our application/renewal form; it will get consent for sharing information with specified third parties (i.e. HMRC for Gift Aid; Third Age Trust for the magazine); and will not use members data for sending information that could be considered 'marketing' Information from other U3As may be circulated to the membership (e.g. information about upcoming events).
- b) The Committee will provide training to existing and new group leaders as to what is considered appropriate
- c) Members who feel that they have received inappropriate communications should contact a member of the committee in the first instance who will pass the matter to the Web Manager for further investigation and report back on the outcome.
- d) The Committee will communicate about GDPR through existing channels – i.e. the website and the newsletter.
- e) The Treasurer may request banking details from those members claiming expenses. This information will be kept securely by the Treasurer.

2. Collection of personal data must be adequate, relevant and limited to what is necessary

- a) W&D (Essex) U3A will collect only the information identified in this policy.
- b) The membership secretary will review this requirement regularly.
- c) The Web Manager will keep a record of any complaints about breaches and how they are dealt with

3. Personal data should be accurate and up to date

- a) The Membership Secretary is responsible for collecting members details. The annual renewal procedure ensures that members details are kept up to date.

4. Personal data is retained only so long as it is needed for its stated purpose

- a) The Membership Secretary retains records for six years for gift aid purposes. The records are deleted or shredded annually on rotation.
- b) Other records are kept for two years – i.e. the current and the previous year and shredded on rotation.

- c) The Groups Organiser shall hold only the records for the current year and will shred or delete record annually.
- d) Group Leaders will shred paper records annually following renewal.
- e) Incident forms must be retained for 3 years (for insurance purposes). The Membership Secretary will hold the paper copies.

5. Data must be processed in a way that ensures security of that data

- a) Data is kept securely in a data base that it password protected. Only the membership Secretary has access to this information.
- b) Data is sent to TAT on a quarterly basis
- c) Group leaders who leave must provide a written statement to confirm that they have deleted all information and/or that they have handed over all the information to the new group leader.
- d) Our application/renewal form states that W&D (Essex) U3A never passes data on to outside parties other than those already identified (i.e. HMRC and TAT)
- e) Group leader's personal details are not available through the website which is public. There is a 'Bluebird' system form non members to request information about groups which the relevant group leader will respond to. Group leaders contact details are available to members through the groups directory.

6. Individual's Rights

Our members have the right

- To be informed
- To access
- To rectification
- To erasure
- To restrict processing
- To data portability
- To object

Members can make a 'subject access request' to view the data that is held about them. This should be in the form of a written request to which they will receive a reply within 14 days.

W&D (Essex) U3A will keep their practices under review and report the outcome of the review through the newsletter which is provided to all members.

New members to the committee will be inducted to ensure ongoing effectiveness of the policy.

7. Data Security and emails

- a) All committee members must have firewall software on their PCs
- b) Committee members should have external storage (e.g. external hard drive, memory stick etc) which should be kept separate and secure.
- c) If a laptop containing large amounts of information is lost or stole this must be reported to national office.

8. Accountability

- a) The committee of the W&D (Essex) U3A will assume joint responsibility for how data is processed and managed even when it is not accessed by all committee members.
- b) Data protection will be a standard item on the committee meeting agenda and will be reported in the minutes
- c) The policy will be on the website
- d) New committee members and group leaders will be inducted into the principles and practice of GDPR
- e) There will be an initial meeting for group leaders to introduce the policy; thereafter there will be an annual meeting to ensure ongoing good practice.

9. Breaches

GDPR will require certain types of breaches to be reported to the relevant authority and in some cases to the individual affected. This part of the requirements has not been developed yet but in the meantime W&D (Essex) U3A will investigate the extent of the breach, keep a record of actions taken; discuss the breach with national office within 72 hours and inform members of serious breaches.

Privacy Policy Review

Policy signed off	Next Policy review date	Review completed	Signed by Chair
October 2018	n/a	n/a	Terry Slater
	October 2019	1/11/2019	Judith Biddle
	October 2020		