

## Stanford-le-Hope and District u3a - Data Protection Policy

### Scope of the Policy

This policy applies to the work of Stanford-le-Hope and District u3a. The policy sets out the requirements that Stanford-le-Hope and District u3a has to collect and process information for membership purposes. The policy details how personal information will be collected, stored and managed in line with data protection and the General Data Protection Regulations (GDPR). The policy is reviewed on an ongoing basis by Stanford-le-Hope and District u3a committee members to ensure that Stanford-le-Hope and District u3a remains compliant with GDPR. This policy should be read in tandem with the Stanford-le-Hope and District u3a Privacy Policy.

### The policy exists because Stanford-le-Hope and District u3a;

- Complies with data protection
- Protects the rights of membership
- Is open about how it stores and processes member's data
- Protects itself from the risks of data breach

### General guidelines for committee members and group leaders

All the information and data that you supply to Stanford-le-Hope and District u3a through the membership form is stored on an online management system called Beacon, which is available to all u3a's through the u3a National Office. It is a secure system allowing limited access to only those people who need to communicate with, or provide a service to, Stanford-le-Hope and District u3a members.

Stanford-le-Hope and District u3a will provide induction training to committee members and group leaders in how to access Beacon and help them understand their responsibilities when handling data.

Committee members and group leaders should keep all data secure by taking sensible precautions and following guidelines below.

Data should not be shared outside of the u3a unless with prior consent and/or for specific and agreed reasons. Example would be HMRC or information provided to the distribution company for the Trust publication.

Members information should be refreshed periodically and to ensure accuracy, via the membership renewal process or when a policy is changed.

Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

### Data protection principles.

The GDPR 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 specific 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 historic 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 purpose for which they are processed.

**Principle 4** Personal data should be accurate and., where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data is accurate, having regard to the purpose 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 purpose for which the personal data is processed, personal data may be stored for longer periods in so far as the personal data is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to the implementation of the appropriate technical and organised 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 personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using inappropriate technical or organisational measures.

### **Lawful, Fair and Transparent Data Processing**

Stanford-le Hope and District u3a requests personal information from potential members and members for membership application and for sending communications regarding members' involvement with the u3a. Members will be informed as to why the information is being requested and what the information will be used for. The lawful basis for obtaining the information is due to the legitimate interest relationship that the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs. Stanford-le Hope and District u3a members 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 the members will be informed as to when the action has taken.

### **Processed for Specific, Explicit and Legitimate Purposes.**

Members will be informed about Stanford-le-Hope and District u3a events and the committee will seek to ensure that the members information is not used inappropriately. Appropriate use of information provided by members will include;

- Communication with members about Stanford-le Hope and District u3a's events and activities
- Group leaders communicating with their group members about specific group activities.
- Member information will be provided to the distribution company that sends out Trust publication – Third Age Matters. Members will be informed and have the choice as to whether or not, they wish to receive the publication.
- Sending members information about Third Age Trust events and activities.

- Communicating with members about their membership and/or renewal of their membership.
- Communicating with members about specific issues that may have arisen during the course of their membership. Stanford-le-Hope and District u3a will ensure that group leaders are made aware of what would be considered appropriate and inappropriate communications. Inappropriate communications would include sending u3a's members marketing and/or promotional material from external providers.

Stanford-le-Hope and District u3a will ensure that members information is managed in such a way to infringe an individual members 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

### **Adequate, Relevant and Limited Data Processing**

Members of Stanford-le-Hope and District u3a will only be asked to provide information that is relevant for membership purposes. This will include;

- Name
- Postal address
- Email address
- Telephone number
- Gift aid entitlement
- Next of kin.

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

Next of kin details are collected as part of the membership application/renewal process as this data is collected under the Legitimate Interest assessment.

### **Photographs**

Photographs are classified as personal data. Where group photographs are being taken, members will be asked to step out of shot if they do not wish to be included in the photo. Otherwise, consent will be obtained from the members in order for photographs to be taken and members will be informed as to where the photographs will be displayed. Should a member wish at any time to remove their consent and to have the photograph removed then they

should contact the secretary to advise that they no longer wish their photograph to be displayed.

### **Accuracy of Data and Keeping Data up to Date**

Stanford-le-Hope and District u3a has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary if any of their personal information changes. In addition, on an annual basis the membership renewal process will provide an opportunity for members to inform Stanford-le-Hope and District u3a as to any changes in their personal information.

### **Accountability and Governance.**

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

### **Secure Processing**

Stanford-le-Hope and District u3a Committee Members have the responsibility to ensure data is both securely held and processed. Data security and processing are achieved through the use of the afore mentioned Beacon on-line management system and the training given to its users.

### **Subject Access Request**

u3a members are entitled to request access to the information that is held by Stanford-le-Hope and District u3a. The request needs to be received in the form of a written request to the Membership Secretary of Stanford-le-Hope and District u3a. On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that the information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. Stanford-le-Hope and District u3a will provide a written response detailing all information held on the member. A record shall be kept of the date of the request and the date of the response.

### **Data Breach Notification**

Were a data breach to occur action will be taken to minimise the harm. This will include insuring that all Stanford-le-Hope and District u3a Committee Members are made aware that a breach had taken place and how the breach occurred. The Committee shall then seek to rectify the cause of the breach as soon as possible to prevent further breaches. The Chair of Stanford-le-Hope and District u3a will contact National Office as soon as possible after the breach has occurred to notify of the breach. A discussion would take place between the Chair and National Office as to the seriousness of the breach, action taken and where necessary, the Information

Commissioners Office would be notified. The Committee shall also contact the relevant u3a members to inform them of the data breach and the actions taken to resolve the breach.

Where a u3a member feels there has been a breach by the u3a, a committee member will ask the member to provide an outline of the breach. If the initial contact is by telephone, the committee member will ask the member to follow this up with an email or letter detailing their concern. The alleged breach will then be investigated by members of the committee who are not in any way implicated in the breach. Where the committee needs support or the breach is serious, they should notify National Office. The u3a member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from the u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.