u3a Wadhurst & District

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Wadhurst & District u3a Data Protection Policy

DOCUMENT STATUS:

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APPROVED BY:	Wadhurst & District Trustees & Committee
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SIGNED	*(on behalf of the Wadhurst & District u3a Trustees)*
DESIGNATION	Chair
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Scope of the Policy

This policy applies to the work of Wadhurst & District u3a (hereafter 'the u3a'). The policy sets out the statutory requirements that the u3a must fulfil in order to collect members' personal information. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the u3a committee members to ensure that the u3a remains compliant. This policy should be read in tandem with the u3a's Privacy Notice.[1]

Why this Policy exists

This data protection policy ensures that the u3a:

- Complies with UK GDPR and data protection law and follows good practice
- Protects the rights of members and other u3a partners
- Is open about how it stores and processes members' personal data
- Protects itself from the risks of a data breach.

General Guidelines for Committee Members and Group contacts

- The only people able to access personal data covered by this policy should be those who **need** to communicate with or provide a service to the members of the u3a
- Personal data should not be shared informally or outside the u3a
- The u3a will provide induction training to committee members and group contacts to help them understand their responsibilities when handling personal data
- Committee members and group contacts should keep all personal data secure, by taking sensible precautions and following the guidelines below:

[1] *Personal data is any information that enables an individual to be identified, either directly or indirectly*

- Passwords must be used, and they should never be shared
- Personal data should not be shared outside the u3a unless there is a lawful and legitimate reason for doing so, and any necessary approval has been obtained from the Trustees. Membership information should be refreshed as and when required and via the membership renewal process or when the policy is changed
- We shall seek advice/guidance from the Third Age Trust National Office if we are unsure about any aspect of data protection.

Data Protection Principles

Since 25 May 2018, the UK follows the UK GDPR + Data Protection Act 2018 which sets out the following seven data protection principles:

Principle 1 - Lawfulness, fairness, transparency

We shall collect and use personal data in a lawful and fair way, and we shall be open with members about how their information is used.
"Personal data shall be processed lawfully, fairly and in a transparent manner."

Principle 2 - Purpose limitation

We shall only collect personal data for clear, specific purposes related to membership and u3a activities, and we shall not use it for anything incompatible with those purposes.
"Personal data can only be collected for specified, explicit and legitimate purposes..."

Principle 3 - Data minimisation

We shall only collect the information we genuinely need to run the u3a safely and effectively.
"The collection of personal data must be adequate, relevant and limited to what is necessary"

Principle 4 - Accuracy

We shall keep personal information accurate and up to date, and members can ask for corrections at any time.
"Personal data held should be accurate and, where necessary, kept up to date."

Principle 5 - Storage limitation

We shall not keep personal data for longer than necessary. Information is retained only for as long as it is needed for membership administration, legal obligations, or safeguarding.
"Personal data... shall not be kept for longer than is necessary."

Principle 6 - Integrity and confidentiality (security)

We shall protect personal data using appropriate technical and organisational measures to prevent loss, misuse, unauthorised access, or accidental disclosure.
"Personal data must be processed in a manner that ensures appropriate security..."

Principle 7 - Accountability

We shall be responsible for demonstrating compliance with data protection law. This includes maintaining appropriate policies, training, records, and safeguards.
"The controller shall be responsible for, and be able to demonstrate compliance."

Purposes

The u3a requests personal information from potential members and members for the purpose of sending communications about their involvement with the u3a. The forms used to request personal information will contain a privacy statement informing potential and existing members as to why the information is being requested and how the information will be used.

u3a members will be informed as to who they need to contact should they wish for their personal data **not** to be used for specific purposes.

Once a u3a 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

Members will be informed as to how their information will be used and Wadhurst & District u3a Committee will seek to ensure that member information is not used inappropriately.

The information members (and prospective members) supply to us will be stored securely for membership purposes and used by Wadhurst & District u3a in the following ways:

- Communicating with members about the u3a's events and activities
- Enabling Group Contacts (convenors) to contact their group members about activities
- Communicating with members about their membership and renewals
- Communicating with members about specific u3a issues that may have arisen
- Notifying HMRC if members wish to Gift Aid their membership fee (if applicable)
- Sending members information about events and activities organised by the Third Age Trust (the u3a national organisation)
- Sharing members' name, email and/or postal address with (i) the Third Age Trust for direct mailing of its magazines: Third Age Matters and Sources, (ii) with our nominated print/mailing company for the distribution of our Wadhurst & District u3a News magazine, and (iii) with other GDPR/DP compliant companies for the purposes of sending surveys to elicit members' views.

The u3a Groups Co-ordinator will ensure that Group Contacts receive guidance on the appropriate and inappropriate use and disclosure of members' personal data.

The u3a 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 the rectification of errors
- The right to erasure (deletion of personal data)
- The right to restrict processing
- The right to data portability
- The right to object.

Adequate, Relevant and Limited Data Processing

Members of the u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Full Name
- Postal address
- Email address
- Telephone number
- Year of Birth
- Gift Aid entitlement
- Name and contact details of an emergency contact (**Note:** Emergency contact details will only be used in genuine emergencies affecting the member concerned.)

There may be occasional instances where a member's personal data needs to be shared with a third party due to an accident or incident involving **statutory authorities.** Where personal data must be shared to protect the vital interests of a member or to comply with a legal obligation, consent may not be required.

Accuracy of Data and Keeping Data up to date

The u3a has a responsibility to ensure members' information is kept up to date. Members should inform the membership secretary of any changes in their personal information. In addition, the online "*change of details*" form will provide an opportunity for members to submit any changes in their personal information.

Accountability and Governance

The u3a Committee is responsible for ensuring that the u3a remains compliant with data protection legislation and can evidence this. Members' consent will be securely held as evidence of compliance.

All new u3a Committee members will receive an induction into how data protection is managed within the u3a 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 u3a Committee will review its data protection arrangements on a regular basis.

Security

The u3a committee members have a responsibility to ensure that personal data is both securely held and processed. This will include:

- Committee members using strong passwords
- Committee members not sharing passwords
- Restricting access to member information to those on the committee who need to communicate with members on a regular basis
- Using password protection on all devices that contain or access personal information
- Using password protection or secure cloud systems when sharing personal data between committee members and/or group contacts (convenors).

Committee members should ensure appropriate security and virus checking software is installed on all devices used to access member information.

The committee will seek assurance that the systems and procedures of all third parties are secure and comply with current legislation.

Subject Access Request

u3a members are entitled to request access to the information that is held by the u3a. The request needs to be received in the form of a written request to the Membership Secretary. On receipt of such a request, a formal acknowledgement will be sent, and the request will be dealt with within one month unless there are exceptional circumstances as to why the request cannot be granted. Where a request is particularly complex, the response period may be extended in accordance with applicable data protection legislation.

The 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. Members have the right to raise concerns with the Information Commissioner's Office (ICO) if they believe their personal data has not been handled in accordance with data protection legislation.

Data Breach Notification

Should a data breach occur, action shall be taken to minimise the harm by ensuring all committee members are aware that a breach has taken place and how the breach has occurred. The committee shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of the u3a shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion shall take place between the Chair and National Office as to the seriousness of the breach, and any actions to be taken. Where a breach is likely to result in a risk to individuals' rights and freedoms, the Committee will consider whether notification to the Information Commissioner's Office (ICO) is required and will do so within the timescales required by data protection legislation.

The committee will also contact the relevant u3a members to inform them of the data breach and actions taken to resolve the breach.

If a member contacts the u3a to report a suspected breach, a committee member will ask the member to provide an outline of their concerns. If the initial contact is by telephone, a nominated committee member will ask the member to follow this up with an email or a letter detailing their concern. The concern 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 if the breach is serious, they should notify National Office. The 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.

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