

Data Protection Policy

Category: Keeping it Legal

1. Introduction

This template document has been adapted from the u3a sample policy.

2. Policy

2.1 Scope of the policy

This policy applies to the work of **Chinnor & District u3a**. It sets out the requirements that **Chinnor & District u3a** has to collect and process information for membership purposes.

It details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation (GDPR).

This policy will be reviewed bi-annually by the **Chinnor & District u3a** trustees to ensure that **Chinnor & District u3a** remains compliant.

This policy should be read in tandem with **Chinnor & District u3a's Confidentially Agreement**.

2.2 Why this policy exists

This data protection policy ensures **Chinnor & District u3a**:

- Complies with data protection law and follows good practice
- Protects the rights of members
- Is open about how it stores and processes members data
- Protects the organisation from the risks of a data breach

2.3 General guidelines for Trustees and Group Leaders

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to all current **Chinnor & District u3a members, including guest/associate members**.
- **Chinnor & District u3a IT Officer** will provide training to **Trustees and Group Leaders** as they are introduced to the use of Beacon so that they understand their responsibilities when handling data.
- **Trustees and Group Leaders** should keep all data secure, by taking precautions and following the guidelines below.
- Strong passwords must be used, and they should not be shared.
- Data should not be shared outside of the u3a unless with prior consent and/or for specific and agreed reasons. (Examples would include Gift Aid information provided to HMRC or information provided to the distribution company for the Trust publications).

- Member information should be refreshed annually (as necessary) to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

2.4 Data protection principles

The General Data Protection Regulation 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 specified, explicit 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 historical 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 purposes for which they are processed;
- Principle 4: Personal data held should be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes 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 purposes for which the personal data are processed; personal data may be stored for longer than 7 years insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational 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 the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2.5 Lawful, fair and transparent data processing

Chinnor & District u3a requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with the u3a.

Members will be given the reason that the information is being requested and what it will be used for. The lawful basis for obtaining member information is due to the legitimate interest that the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes. Information regarding the use of photographs will be provided on the website and available on request.



Chinnor & District u3a members* will be asked to contact the **Membership Secretary** should they wish to change the conditions of their consent. The **Chair** will respond to the member and inform them that appropriate action has been taken.

2.6 Processed for specified, explicit and legitimate purposes

Members will be informed about how their information will be used and the Trustees of **Chinnor & District u3a** will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about u3a events and activities
- Group Leaders communicating with group members about specific group activities
- Providing member information to the distribution company that sends out the Trust publication – Third Age Matters.
- 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

Chinnor & District u3a will ensure that **Trustees and Group Leaders** are aware of what would be considered appropriate and inappropriate communication

Chinnor & District u3a will ensure that members' information is managed in such a way as to not 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

2.7 Adequate, Relevant and Limited Data Processing

Members of **Chinnor & 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
- Previous Occupation

If there are occasions where additional information may be required such as health related this will be obtained with the consent of the member who will be informed as to why this information is required and the purpose that it will be used for.



When an outing or other activity is organised by **Chinnor & District u3a** and an emergency contact number is requested, members will be informed about the purpose and it will be destroyed after the event.

2.8 Photographs

Photographs are classified as personal data. The Chinnor & District position on the use of photographs is available on the website and will be communicated through the newsletters.

2.9 Accuracy of data and keeping data up-to-date

Chinnor & District u3a has a responsibility to ensure members' information is kept up to date. Members will let the membership secretary know of any changes in their personal information. The annual membership renewal process will provide an opportunity for members to inform the **Membership Secretary** about any changes in their personal information.

2.10 Accountability and governance

The Chair of the Chinnor & District u3a Committee is responsible for ensuring that the u3a meets the data protection requirements

Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely.

The Chair of the Chinnor & District u3a Committee will ensure that there is a process for Trustees to have access to the GDPR policy and they should have the opportunity to discuss the implications for their role.

The Special Interest Group Secretary will also ensure that **Group Leaders** have access to the GDPR policy and are aware of their responsibilities in relation to the data they hold and process.

All Trustees should be up to date with guidance and practice within the u3a movement and will be encouraged to seek advice from the Third Age Trust National Office should any uncertainties arise.

Chinnor & District u3a Trustees will review data protection requirements bi-annually, in particular, who has access to date and how data is stored and deleted.

When **Trustees/ Group Leaders** relinquish their roles, they will be asked to delete or pass on Personal Data to their successor or other as agreed by the Committee.

2.11 Secure Processing

Chinnor & District Trustees have a responsibility to ensure that data is both securely held and processed. This will include:

- The use of strong passwords
- The confidentiality of passwords

- The sharing member information restricted to Trustees who need to communicate with members on a regular basis
- The use of password protection on laptops and PCs that contain personal information
- The use of password protection, a membership database or secure cloud systems when sharing data between committee members and/or group conveners
- The use of a firewall security to be put onto Trustees laptops or other devices.

2.12 Subject Access Request

u3a members are entitled to request access to the information that is held by **Chinnor & District u3a**. This request needs to be received using written communication to the Membership Secretary of **Chinnor & District u3a**. On receipt of the request, the request will be formally acknowledged and dealt with expediently. The information should generally be provided within 28 days unless there are exceptional circumstances). **The Chair of the Chinnor & 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.

2.13 Data Breach Notification

If there is a Personal Data breach there will be an investigation, records will be kept and all those involved will be notified of the outcome.

The **Chair** should be informed so that immediate action can be taken to minimise the harm. They will also ensure that all Chinnor & District u3a Trustees are aware of the breach and the circumstances.

The **Chair** is responsible for exploring the cause of the breach as soon as possible to prevent any further occurrence. **The National Office** will be informed and a discussion will take place between the **Chair and National Office** to assess the seriousness of the breach and the action to be taken. Where necessary, the Information Commissioner's Office would be notified. **The Chair** will also contact the relevant u3a members to inform them that their personal data has been shared inappropriately and actions taken to resolve the breach.

Where a u3a member feels that their personal information has been shared without permission, the **Chair** will ask them to provide an outline of the circumstances. If the initial contact is by telephone the member will be asked to follow this up with an email or a letter detailing their concern. The alleged breach will then be investigated by independent **Trustees**.

Where the committee needs support or if the breach is considered to be serious, they should seek advice from the National Office.

If the member is not satisfied by the response, they can report their concerns to National Office.



u3a	Doc u3a KMS-POL-002 Data Protection Policy Sample	The Third Age Trust
Version	Description of changes	Date
2.0	Updated formatting	18/11/2021
3.0	Chinnor & District u3a	July 2023
4.0	Updated formatting – changing to Group Leaders	November 2024