

Scope:

This policy applies to the work of Frinton Walton and District (FWD) u3a and it sets out the requirements that FWDu3a must follow when collecting and processing information for membership purposes. The policy details how personal information will be collected, stored and managed in line with the principles of the General Data Protection Regulation (2018) and should be read in tandem with the u3a's Privacy Policy

Background:

This policy exists to ensure:

- Compliance with Data Protection legislation
- Good Practice is integral to data management
- Members rights are protected
- Openness in the way that membership data is processed and stored
- Protection from risks of potential data breach

General Data Protection Regulation (GDPR) Principles:

Everyone responsible for using personal data must follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage.

Fair, lawful and transparent:

FWDu3a requests personal information from potential members and members for membership applications and for sending communications regarding members' participation 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 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 such as the taking of photographs. FWDu3a members will be informed as to who they need to contact should they subsequently wish for their data not to be used for the specific purposes for which they have provided

consent. Where these requests are received, they will be acted upon promptly and the member will be informed when the action has been taken.

Specified, explicit purposes:

Members will be informed how their information will be used and the Committee of FWDu3a will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about FWDu3a events and activities
- Group Leaders communicating with group members about specific group activities
- Member information will be provided to the distribution company that sends out the Trust publication e.g. Third Age Matters. Members will be informed and have a choice of whether 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 their membership.

FWDu3a will ensure that Group Leaders are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending u3a members marketing and/or promotional materials from external service providers. FWD 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

Adequate, Relevant and Limited Data Processing:

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. 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 members and potential members why the information is being requested and what it will be used for.

Data should not be shared without the member's permission. Members of FWDu3a 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

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

Where FWDu3a organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed to request this information. Members will be made aware that the assessment has been completed.

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step aside if they don't wish to be in the photograph. Otherwise, consent will be obtained from members for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and have their photograph removed then they should contact a FWDu3a Committee Member to say that they no longer wish their photograph to be displayed.

Accurate and up-to-date data information:

FWDu3a has a responsibility to ensure members' information is accurate and 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 process will provide an opportunity for members to inform FWDu3a of any changes in their personal information including gift aid eligibility. All reasonable steps will be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Retention of Records:

Records should only be kept where appropriate and will normally be deleted after 2 years or at the specific request of a member, whichever is sooner. The exceptions to this are:

- instances where there may be legal or insurance circumstances that require information to be held for longer whilst this is investigated or resolved
- records pertaining to Gift Aid and other tax purposes which are required to be kept for 7 years

Secure Processing, Accountability and Governance:

FWDu3a Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Using password protection on laptops and PCs that contain personal information
- Using password protection, a membership database or secure cloud systems when sharing data between Committee Members and/or Group Leaders
- The use of strong passwords
- Not sharing passwords
- Restricting access to personal member information on a need-to-know basis.
- Ensuring firewall security is put onto laptops or other devices used by Committee Members

FWDu3a Committee is responsible for ensuring that the u3a remains compliant with data protection requirements and can provide evidence of same. Where consent is required for specific purposes then evidence of the same (either electronic or paper) will be obtained and retained securely.

FWDu3a Committee will ensure that new Committee Members and Group Leaders receive an induction into all aspects of GDPR and the implications for their role. FWDu3a will also ensure that Group Leaders are made aware of their responsibilities in relation to the data they hold and process. Committee Members will stay up to date with guidance and practice within the u3a movement and will seek advice from the Third Age Trust National Office should any uncertainties arise. FWDu3a Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how it is stored and edited. When Committee Members and Group Leaders relinquish their roles, they will be asked to either delete the data they hold or pass it on to an appropriate successor.

Access Request:

u3a members are entitled to request access to the information that is held about them. The request needs to be received in the form of a written request to the Membership Secretary of FWDu3a. The request will be formally acknowledged on receipt and responded to within one month unless there are exceptional circumstances as to why the request cannot be granted. FWDu3a will provide a written response detailing all information requested by the member. A record shall be kept of the date of the request and the date of the response.

Data Breach Notification:

When a u3a member feels that there has been a data breach by FWDu3a, it should be reported to a Committee Member. The committee member will ask the member to give a detailed account of the breach. If the initial contact is made verbally, the u3a member will be asked to record their concerns in an email or letter and send it to the relevant Committee member as soon as possible. Where the member is not able to do this for any reason, a committee member can undertake this on their behalf.

Prompt action will be taken to minimise harm and all Committee Members will be made aware that a breach has taken place. There will be a full investigation by Committee Members who are not implicated in the infraction in any way. Detailed records will be kept. The Committee will seek to rectify the cause of the breach as soon as possible and ensure further such events are prevented.

Concurrently with the investigation, the Chair of FWDu3a will contact u3a National Office as soon as possible, to notify them of the breach. A discussion will take place between them both to determine how serious the breach is and what action might need to be taken. Where necessary, the Information Commissioner's Office will be notified.

FWDu3a Committee will also contact the relevant u3a member(s) to inform them about the data breach and the actions being taken to resolve it. They will also be advised that they can report their concerns to National Office if they are not satisfied with the response.

Approval & Updates	By	Date
First version	Committee	July 2023

