



Cheadle (Staffs) U3A

DATA PROTECTION POLICY

Scope of the Policy

This policy applies to the work of Cheadle (Staffs) U3A (hereafter 'the U3A'). The policy sets out the requirements that the U3A has to gather personal information for membership purposes. 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 is compliant. This policy should be read in tandem with the U3A's Privacy Statement.

Principles of the Data Protection Regulations

Article 5 of the GDPR requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) 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;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) 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;
- e) 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 periods 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 the individuals; and
- f) processed in a manner that ensure 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.

Article 5(2) requires that:

“the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

This Policy Exists to ensure that Cheadle (Staffs) 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 itself from the risks of a data breach

Lawful, fair and transparent data processing

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 members and members as to why the information is being requested and what the information will be used for. The Committee of the 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 the U3A's events and activities
- Group Leaders communicating with their group members about specific group activities.
- Adding members details to the direct mailing information for the Third Age Trust magazines – Third Age Matters and Sources.
- 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.

Inappropriate communication would include sending U3A members marketing and/or promotional materials from external service providers.

The U3A will ensure that members' information is managed in such a way as to not infringe an individual members' rights.

Members of the 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.

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

There may be occasional instances where a members' data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the U3A in these instances where the U3A has a substantiated concern then consent does not have to be sought from the member.

Accuracy of Data and Keeping Data up to Date

The U3A has a responsibility to ensure members' information is kept up to date. Members will be informed to let the membership secretary know if any of their personal information changes.

Accountability and Governance

The U3A Committee are responsible for ensuring that the U3A remains compliant with data protection requirements and can evidence that it has. The U3A Committee shall ensure that new members joining the Committee receive an induction into how data protection is managed within the U3A and the reasons for this. Committee Members shall 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 Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

Secure Processing

The committee members of the U3A have a responsibility to ensure that data is both securely held and processed. This includes:

- Committee members using strong passwords.
- Committee members not sharing passwords.
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between committee members and/or group convenors.
- Ensuring firewall security is put onto Committee Members' laptops or other devices.
- The Membership Secretary holds the database on a dedicated laptop and it is backed up regularly. The back up being held under lock and key

The U3A has contracted for services from with the following 3rd party data processors:

- The Third Age Trust
- Canprint
- HMRC

The committee has scrutinised the Terms and Conditions of each supplier and judge that they are GDPR compliant.

Cheadle (Staffs) U3A will provide a method for members to record their 'In Case of Emergency' (ICE) details, but this information will not be held on any central data base.

Data Breach Notification

Were a data breach to occur action shall be taken to minimise the harm by ensuring all committee members are aware that a breach had taken place and how the breach had 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 being made aware of the breach occurring to notify of the breach. A discussion would take place between the Chair and National Office as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The committee shall also contact the relevant U3A members to inform them of the data breach and actions taken to resolve the breach.

If a U3A member contacts the U3A to say that they feel that there has been a breach by the U3A, a committee member will ask the member to provide an outline of their concerns. If the initial contact

is by telephone, the committee member will ask the U3A 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 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.

Privacy

The U3A treats your privacy rights seriously. This privacy statement sets out how we will deal with your 'personal information', that is, information that could identify, or is related to the identity of, an individual.

All the information collected is obtained directly from you. This is usually at the point of your initial registration. The information will be collected via membership forms. At the point that you provide your personal information for membership purposes, we will also request that you provide consent for us to store and use your data.

Disclosure

We may disclose information about you, including your personal information:

- Internally - to committee members and group leaders as required to facilitate your participation in our U3A activities.
- Externally – where we use products or services such as direct mailing for the Trust magazines (*Third Age Matters* and *Sources*) our bi-annual Newsletter and for Gift Aid, the committee has scrutinised the Terms and Conditions of each supplier and judged that their digital and physical systems and procedures are secure and entered into a contract.
- If we have a statutory duty to disclose it for other legal and regulatory reasons. Where we need to share your information outside of the U3A we will seek your permission and inform you as to who the information will be shared with and for what purpose.

We need to keep your information so that we can provide our services to you. In most instances information about your membership will be stored for 6 years. 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. Where this is the case then the member/s will be informed as to how long the information will be held for and when it is deleted.

To ensure the information we hold is accurate and up to date, members need to inform the U3A as to any changes to their personal information. You can do this by contacting the membership secretary at any time:

Email: vegertonmem@outlook.com

Telephone: 01538 753248

On an annual basis you will have the opportunity to update your information, as required, via the membership renewal form. Should you wish to view the information that the U3A holds on you, you can make this request by contacting the membership secretary – as detailed above. There may be certain circumstances where we are not able to comply with this request. This would include where the information may contain references to another individual or for legal, investigative or security reasons. Otherwise we will usually respond within 7 days of the request being made.

Storage

Your membership information is held on a database and accessed by committee members and group leaders – as appropriate.

This policy is available on the website. This policy may change from time to time. If we make any material changes we will make members aware of this via e news or the newsletter.

If you have any queries about this policy please contact the Chairman.