

# Welwyn-Hatfield U3A Data Protection Policy

## Scope of the policy

This policy applies to the work of Welwyn-Hatfield U3A. The policy sets out the requirements that Welwyn-Hatfield U3A has to comply with when gathering information for membership purposes. The policy details how personal information should be gathered, stored and managed to be in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by Welwyn-Hatfield U3A committee members to ensure that we are compliant. This policy should be read in tandem with Welwyn Hatfield U3A's Privacy Policy.

## Why this policy exists

This data protection policy ensures that Welwyn-Hatfield 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

## General guidelines for committee members and group conveners

- The only people able to access data covered by this policy should be those who need it to communicate with or provide a service to the Welwyn-Hatfield U3A members.
- Welwyn-Hatfield U3A will provide induction training to committee members and group conveners to help them understand their responsibilities when handling data.
- Committee Members and group conveners should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords should be used to secure personal data and they should not normally be shared.
- Data should not be shared with people or organisations outside Welwyn-Hatfield 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 periodically to ensure accuracy.
- Additional support will be sought from the Third Age Trust where uncertainties or incidents regarding data protection arise.

## 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 stored personal data that is not accurate is erased or corrected without delay;

Principle 5 – Personal data should 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 was originally obtained. ; However, personal data may be stored for longer periods if 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.

### Lawful, fair and transparent data processing

Welwyn-Hatfield U3A requests personal information from potential members and members, for membership applications and for sending & gathering information that is relevant to their membership of the U3A. The forms used to request personal information should 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. This lawful basis for obtaining member information is due to the contractual relationship that the U3A has with individual members. In addition members will be asked to provide consent for specific purposes. U3A members will be informed as to whom they need to contact should they NOT wish for their data to be used for specific purposes for which they have previously provided consent. When these requests are received they will be acted upon promptly and the member will be told 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 the Committee of Welwyn-Hatfield 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 Welwyn-Hatfield U3A events and activities
- Group conveners communicating with group members about specific group activities
- Consent will be sought in order to add 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

Welwyn-Hatfield U3A will ensure that group conveners 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.

Welwyn-Hatfield U3A will ensure that members' information is managed in such a way as not to infringe an individual member's 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 Welwyn-Hatfield U3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number(s)
- Gift Aid entitlement

Where additional information may be required such as health-related information, or next of kin (for example, for a trip or activity) 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. However, the individual member should carry information of next of kin, if required, because if U3A have this information we need consent from the U3A member's next of kin as we are holding their personal details.

### Photographs

Photographs are classified as personal data. Where group photographs are being taken members should be asked to step out of shot if they don't wish to be in the photograph. Otherwise consent will be assumed from members for photographs to be taken and possibly printed in U3A publications. Should a member wish at any time to revoke their consent and to have their photograph removed then they should contact the taker of the photograph to advise that they no longer wish their likeness to be displayed.

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

Welwyn-Hatfield U3A has a responsibility to ensure that members' information is kept up to date. Members should be advised to let the membership secretary know if any of their personal information changes.

### Accountability and governance

The U3A Committee and members are responsible for ensuring that the U3A remains compliant with data protection requirements. Where consent is required for specific purposes then evidence of this consent (either electronic or paper) should be obtained and retained securely. The U3A Committee should ensure that new members joining the Committee are made aware of the requirements of GDPR and the implications for their roles. Welwyn-Hatfield U3A should also ensure that group conveners are made aware of their responsibilities in relation to the data they hold and process. Committee Members should endeavour to stay up to date with guidance and practice within the U3A movement and should seek additional input from the Third Age Trust National Office should any uncertainties arise. The Committee should review data protection and who has access to information on a regular basis, as well as reviewing what data is held. When Committee Members and Group Conveners relinquish their roles, they should be asked to either pass on data to those who need it and/or delete data.

### Secure Processing

Welwyn-Hatfield U3A Committee Members have a responsibility to ensure that data is both securely held and processed. This can include:

- Committee members using strong passwords
- Committee members not sharing passwords (unless really necessary)
- 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 personal information
- Using password protection or secure cloud systems when sharing data between committee members and/or group conveners

### Subject Access Request

U3A members are entitled to request access to the information that is held by Welwyn-Hatfield U3A. The request needs to be received in the form of a written request to the Membership Secretary of the U3A. On receipt of the request, the request should be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. Welwyn-Hatfield U3A should provide a written response detailing all personal information held on the member. A record should be kept of the date of the request and the date of the response.

### Data Breach Notification

Were a data breach to occur action should be taken to minimise the harm. This should include ensuring that all Welwyn-Hatfield U3A Committee Members are made aware that a breach has taken place and how the breach occurred. The Committee should 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 give notification of the breach. A discussion should take place between the Chair and National Office as to the seriousness of the breach, any action to be taken and, where necessary, the Information Commissioner's Office should be notified. The Committee should also contact the relevant U3A members to inform them of the data breach and actions taken to resolve the breach.

Where a U3A member feels that there has been a breach by the U3A, a committee member should ask the member to provide an outline of the breach. If the initial contact is by telephone, the committee member should ask the U3A member to follow this up with an email or a letter detailing their concern. The alleged breach should 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 their U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Version dated 5/1/2019, R Swaine

*Policy review date: XX/XXXX*