Data Protection Policy

1. Introduction

This policy will be made available to any member who requests it and will be on our website.

2. Policy

2.1 Scope of the policy

This policy applies to the work of **Waltham Forest u3a**. The policy sets out the requirements that **Waltham Forest u3a** must collect and process information for membership purposes. The policy details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy will be reviewed by **Waltham Forest u3a** committee members to ensure that **Waltham Forest u3a** remains compliant. This policy should be read in tandem with **Waltham Forest u3a's** Privacy Policy.

2.2 Why this policy exists

This data protection policy ensures **Waltham Forest 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

2.3 General guidelines for committee members 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 **Waltham Forest u3a** members.
- **Waltham Forest u3a** will ensure that committee members and group leaders understand their responsibilities when handling data.
- Committee Members and group leaders should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used, and they should never 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 periodically to ensure accuracy, via the membership renewal process or when this 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 is inaccurate, regarding the purposes for which they are processed, are erased or rectified without delay;
- Principle 5 – Personal data must keep 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 as long 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

Waltham Forest 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 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 contractual relationship 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. **Waltham Forest u3a** members will be informed as to who they need to contact should they wish for their data not to be used for 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 as to when the action has been taken.

2.6 Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and **Waltham Forest u3a** committee will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about **Waltham Forest u3a** 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 theTrust publication u3a Matters. Members will be informed and have a choice as to 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

Waltham Forest u3a 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.

Waltham Forest 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 **Waltham Forest 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

Where additional information may be required such as health-related information or emergency contact 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.

Where **Waltham Forest u3a** 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.

2.8 Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to **step out of shot** 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 to have their photograph removed

then they should contact the Chair or Secretary to advise that they no longer wish their photograph to be displayed.

2.9 Accuracy of data and keeping data up to date

Waltham Forest u3a has a responsibility to ensure members' information is kept up to date. Members will be informed to notify the membership secretary 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 **Waltham Forest u3a** as to any changes in their personal information.

2.10 Accountability and governance

Waltham Forest u3a Committee are responsible for ensuring that the u3a remains compliant with data protection requirements and can evidence that it has. Where consent is
required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely. **Waltham Forest u3a Committee** will ensure that new members joining the Committee understand the requirements of GDPR and the implications for their role. **Waltham Forest u3a** will 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. **Waltham Forest u3a Committee** will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted. When Committee Members and Group Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

2.11 Secure Processing

Waltham Forest u3a Committee have a responsibility to ensure that data is both securely held and processed. This will include:

- 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 personal information
- Using password protection, a membership database or secure cloud systems when sharing data between committee members and/or group leaders.

2.12 Subject Access Request

u3a members are entitled to request access to the information that is held by **Waltham Forest u3a**. The request needs to be received in the form of a written request to the Membership Secretary. On receipt of the request, the request will 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. **Waltham Forest 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

Should a data breach occurs then action will be taken to minimise the harm. This will include ensuring that all **Waltham Forest u3a Committee members** are made aware that a breach has taken place and how the breach occurred. **The Committee** shall then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair or Secretary of **Waltham Forest u3a** will contact National Office as soon as possible to notify them of the breach. A discussion will take place between the Chair or Secretary and National Office as to the seriousness of the breach, what action needs 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.
Where a u3a member feels that there has been a breach by the u3a, a committee member will ask the member to provide an outline of the breach. 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 alleged breach 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.

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ICO Head Office
4th Floor, No. 3 Circle Square,
5 Hawkshaw Street,
Manchester, M1 7BL
0330 12345678

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Version	Description of changes	Date
2	Updated formatting	18/11/2021
3	Updated formatting and change from Sample to Template =	13/06/23
