

## Scope of the policy

This policy applies to the work of Formby U3A. The policy sets out the requirements that Formby U3A has to gather 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 Formby U3A Committee Members to ensure that we are compliant. This policy should be read in tandem with Formby U3A's Privacy Policy.

This data protection policy ensures Formby 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, Committee Attendees 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 Formby U3A members.
- Formby U3A will provide induction training to Committee Members, Committee Attendees and Group Leaders to help them understand their responsibilities when handling data.
- Committee Members, Committee Attendees and Group Leaders should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords must be used.
- If data files are being sent between committee approved persons by whatever means, then encrypted files must only be used
- Data should not be shared outside of Formby U3A unless with prior consent and/or for specific and agreed reasons.
- Member information should be refreshed periodically to ensure accuracy or when the policy is changed.
- Additional support will be obtained 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 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 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 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**

Formby U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with Formby 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 lawful basis for obtaining member information is due to the contractual relationship that Formby U3A has with individual members. In addition, members may be asked to provide consent for specific processing purposes. Formby 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 previously 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.

### **Processed for specified, explicit and legitimate purposes**

Members will be informed as to how their information will be used and the Committee of Formby 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 Formby U3A events and activities
- Group Leaders communicating with group members about specific group activities
- Consent may 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
- Sending the Formby U3A Newsletter by email
- Posting Committee and Group Leader contact details on the website
- Giving a list of groups and the contact details of group leaders to new members and existing members on request
- Publishing Committee contact details and new members names in the Newsletter

- Sending details of specific officers to the Third Age Trust

Formby 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.

Formby 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**

Members of Formby U3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number

Where additional information may be required such as health related information 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 Formby U3A organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

### **Photographs**

Photographs are classified as personal data. Where group photographs are being taken for the Newsletter and website members will be asked to step out of shot if they don't wish to be in the photograph. Consent would be required if the photograph was of a named individual. Should a member wish at any time to have their photograph removed then they should contact the Membership Secretary to advise that they no longer wish their photograph to be displayed.

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

Formby 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. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Formby U3A as to any changes in their personal information.

## **Accountability and governance**

Formby U3A Committee is 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. Formby U3A Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Formby U3A will also ensure that Group Leaders are made aware of their responsibilities in relation to the data they hold and process. 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. When Committee Members, Committee Attendees and Group Leaders relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

## **Secure Processing**

Formby U3A Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee Members and Committee Attendees using strong 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 and encryption of appropriate data files
- Using password protection/encryption of files when sharing data between Committee Members, Committee Attendees and/or Group Leaders.
- Formby U3A uses local printers for membership cards, new member welcome packs and any special correspondence. Where this involves the use of personal data the committee will scrutinise the Terms and Conditions of each supplier and ensure that they are GDPR compliant

## **Subject Access Request**

U3A members are entitled to request access to the information that is held by Formby U3A. The request needs to be received in the form of a written request to the Membership Secretary of Formby U3A. On receipt of the request, the request will be formally acknowledged and dealt with expediently normally within one month unless there are exceptional circumstances as to why the request cannot be granted. Formby 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.

## **Data Breach Notification**

Were a data breach to occur, action shall be taken to minimise the harm. This will include ensuring that all Formby 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 Chairman of Formby U3A shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion will take place between the Chairman 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.

Where a U3A member feels that there has been a breach by Formby 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 Formby U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

### **Further Information**

The General Data Protection Regulation (GDPR) is a new, Europe-wide law that replaces the Data Protection Act 1998 in the UK. More information can be found the Information Commissioner's website:

<https://ico.org.uk/for-organisations/charity/>

### **Availability and Changes to the Policy**

This policy is available on the Formby U3A website or by request to the Secretary. This policy may change from time to time. If we make any material changes we will make members aware of this via the newsletter, the Formby U3A website and the monthly members' meetings.

### **Contact**

If you have any queries about this policy, need it in an alternative format, or have any complaints about our privacy practices, please contact the Secretary Keith Jacques:

Email: [secretary@formbyu3a.org.uk](mailto:secretary@formbyu3a.org.uk)

Telephone: 01704 870906

Address: **Secretary, Formby U3A, PO Box 216, Liverpool L37 1XQ**

Policy Review date: May 2021