

Data Protection Policy for Great Glen u3a

1. Statement

Great Glen u3a is a learning co-operative and membership charity which enables members in their third age to share educational, creative and leisure activities. Members of each u3a draw upon their knowledge, skills and experience to teach and learn from each other (peer to peer learning). This data protection policy ensures Great Glen 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. Scope of the policy

This policy applies to the work of Great Glen u3a. The policy sets out the requirement that Great Glen 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 Great Glen u3a Committee to ensure that we are compliant. This policy should be read in tandem with Great Glen u3a's Privacy Policy.

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 Great Glen u3a members.
- Great Glen u3a will provide guidelines/training to Committee Members and Group Leaders to help them 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 must 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 Third Age Trust publications.
 - Member information should be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
 - Additional support will be sought from the Third Age Trust where uncertainties or incidents regarding data protection arise.

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 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.

5. Lawful fair and transparent data processing

Great Glen u3a requests personal information from potential members and members for membership applications and for sending communications about their 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 arises from the legitimate interest that the u3a has in individual members. In addition, members may be asked to provide consent for specific processing purposes for example taking photographs. Members will be informed whom they need to contact should they wish 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 when the action has been taken.

6. Processed for specific, explicit and legitimate purposes

Members will be informed how their information will be used and the Committee of Great Glen u3a will seek to ensure that member information is not used inappropriately.

Appropriate use of information provided by members will include:

1. Communicating with members about Great Glen u3a events and activities.
2. Group Leaders communicating with group members about specific group activities.
3. Adding, subject to their consent, members' details to the direct mailing information for the Third Age Trust magazines: Third Age Matters and Sources
4. Sending members information about Third Age Trust events and activities.
5. Communicating with members about their membership and/or renewal of their membership.
6. Communicating with members about specific issues that may have arisen during the course of their membership.
7. Communicating between members and the group leader within specific group activities.

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

Great Glen 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.

7. Adequate, Relevant and Limited Data Processing

Members of Great Glen u3a will be asked to provide information that is relevant for membership purposes only. This will include but is not limited to:

- Name
- Postal Address
- Email Address
- Telephone Number (s)
- Gift Aid Status

Where additional information may be required, such as emergency contact information, this will be obtained with the consent of the member who will be informed why this information is required and of the purpose for it will be used.

When Great Glen u3a organises a trip or activity that requires next of kin or emergency contact details to be provided, a legitimate interest assessment will have been completed in order to request the details. Members will be made aware that this assessment has been completed.

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 do not wish to be in the photograph. Otherwise consent will be obtained from members to be photographed and members will be informed where the photographs will be displayed. Should members wish at any time to remove their consent and to have their photographs removed, they should contact the Group Leader to advise that they no longer wish their photographs to be displayed.

9. Accuracy of Data and Keeping Data up to Date

Great Glen u3a has a responsibility to ensure members' information is kept up to date. Members will be asked to advise the Membership Secretary (membership@greatglenu3a.co.uk) 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 Great Glen u3a of any changes in their personal information.

10. Accountability and Governance

- Great Glen u3a Committee is responsible for ensuring that the u3a remains compliant with data protection requirements and can evidence this.
- Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely.
- Great Glen u3a Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role.
- Great Glen 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 shall seek additional input from the Third Age Trust National Office should any uncertainties arise.
- The Committee will review data protection requirements and who has access to information on a regular basis as well as reviewing what data is-stored and deleted.
- When Committee Members and Group Leaders relinquish their roles, they will be asked to pass on data to those who need them and/or delete data.

11. Secure Processing

Great Glen u3a Committee Members have a responsibility to ensure that data are securely held and processed. This will include:

- Committee Members and Group Leaders using strong passwords/biometrics for accessing systems
- Committee Members and Group Leaders not sharing passwords/biometrics
- Restricting access to member information or the sharing of member information to those members of the Committee or Group Leaders who need to communicate with members on a regular basis
- Using password protection or other security forms on laptops and PCs that contain personal information
- Using password protection and secure cloud systems when sharing data between Committee Members and/or Group Leaders

12. Subject Access Request

u3a members are entitled to request access to the information that is held about them by Great Glen u3a. Requests need to be made in writing to the Membership Secretary of Great Glen u3a. The request will be formally acknowledged on receipt and dealt with expediently (the legislation requires that information should generally be provided within one month), unless there are exceptional circumstances why the request cannot be granted. Great Glen u3a will provide a written response detailing all information held on the member. A record will be kept of the date of the request and the date of the response.

13. Action to be Taken in the event of a Data Breach

If a data breach occurs action will be taken as follows to minimise the harm. This will include ensuring that all Great Glen u3a Committee Members are made aware that a breach has taken place and how the breach occurred. The Committee will then seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair of Great Glen u3a will notify National Office within 24 hours of being made aware of a breach. The Chair and National Office will discuss the seriousness of the breach and action to be taken. Where necessary, the Information Commissioner's Office will be notified. The Committee will contact the relevant u3a members to inform them of the data breach and actions taken to resolve the breach. Secure records will be kept of investigations of breaches and their outcomes.

u3a members believing that there has been a breach by the u3a will be asked to provide an outline of the breach in writing. Members of the Committee who are not in any way implicated in the breach will investigate it. u3a members reporting an alleged breach should be informed that they may report their concerns to National Office if they are not satisfied with the response from the u3a.

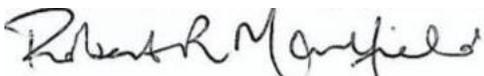
14. Availability of this Policy and subsequent Changes

This policy is available on the Great Glen u3a website. This policy may change from time to time and is reviewed annually. If the Committee makes any material changes, members will be informed through the newsletter.

15. Contact

If you have any queries about this policy, please contact us at chairman@greatglenu3a.co.uk.

This policy was adopted on: 1 December 2020

Signed: 

Committee Role: CHAIRMAN

Print Name: ROBERT MANSFIELD

Policy Review Date: October 2021