

## **Purbeck U3A Data Protection Policy**

### **SCOPE OF THE POLICY**

This policy applies to the activities of Purbeck PU3A ("PU3A"). The policy sets out the requirements that the PU3A 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 subject to review on an ongoing basis by the PU3A committee members to ensure that PU3A is compliant. This policy should be read in conjunction with PU3A's Privacy Policy.

### **WHY THIS POLICY EXISTS**

This data protection policy is intended to ensure that PU3A:

- Complies with data protection law and follows good practice.
- Protects the rights of members, past and present.
- Outlines how it stores and processes members data.
- is protected from the risks of a data breach.

### **GENERAL GUIDELINES FOR COMMITTEE MEMBERS AND GROUP CONVENORS**

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to the members of PU3A.
- Data may not be shared outside of PU3A other than in accordance with our Privacy Policy
- PU3A will provide guidance to committee members and group leaders to help them understand their responsibilities when handling personal data.
- Committee Members and group leaders should keep all data secure, by taking sensible precautions and following the guidelines below.
- Strong passwords should be used to access external membership data and not shared.
- Personal data is not to be shared outside of PU3A unless with prior consent and/or for specific and agreed reasons.
- Member information should be reviewed periodically via the membership renewal process or when policy is changed.
- PU3A shall request help from National Office if they are unsure about any aspect of data protection.

### **DATA PROTECTION PRINCIPLES**

The General Data Protection Regulation identifies 8 data protection principles.

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

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 are erased or rectified without delay.

Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 - Personal data must be processed in accordance with the individuals' rights.

Principle 7 - 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.

Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

### **Lawful, fair and transparent data processing**

PU3A requests personal information from potential members and members for the purpose of sending communications about their involvement with PU3A. 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. Members will be asked to provide consent for their data to be held and a record of this consent along with member information will be securely held. PU3A members will be informed that they may, at any time, remove their consent and will be informed as to whom to contact should they wish to do so. Once a PU3A member requests not to receive certain communications this will be acted upon promptly and if appropriate, a confirmatory acknowledgement will be provided.

### **Processed for Specified, Explicit and Legitimate Purposes**

Members will be informed as to how their information will be used and the Committee of PU3A will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about PU3A's events and activities
- Group leaders communicating with their group members about specific group and social activities.
- Adding members details to the direct mailing information for the Third Age Trust magazines – Third Age Matters and Sources.
- Sending members information about local matters that may be of interest and information from other Third Age Trust U3A bodies.
- 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.

PU3A will ensure that group leaders are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending PU3A members marketing and/or promotional materials from external service providers.

PU3A 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 PU3A will only be asked to provide information that is relevant for membership purposes. This will include:

- Name.
- Title / Gender
- Postal address and members residing there.
- Email address(es).
- Telephone number(s).
- Gift Aid entitlement.

Where additional information may be 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 that it will be used for.

Where PU3A organises a trip that requires next of kin information to be provided, PU3A will require the member to gain consent from the identified next of kin. The consent will provide permission for the information to be held for the purpose of supporting and safeguarding the member in question. Were this information to be needed as a one off for a particular trip or event then the information will be deleted once that event or trip has taken place unless it was to be required – with agreement – for a longer purpose. The same would apply to carers who may attend either a one-off event or on an ongoing basis to support a PU3A member with the agreement of PU3A.

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 of PU3A or where PU3A has a substantiated concern then in these instances consent does not have to be sought from the member.

#### **Accuracy of Data and Keeping Data up to Date**

PU3A has a responsibility to ensure members' information is kept up to date. Members will be requested to let the membership secretary know of changes to their personal information. In addition, members will be reminded from time to time of the personal details held

#### **Accountability and Governance**

PU3A Committee is responsible for ensuring that PU3A remains compliant with data protection requirements and can evidence that it has. For this purpose, those from whom data is required will be asked to provide written consent. The evidence of this consent will then be securely held as evidence of compliance. PU3A Committee shall ensure that new members joining the Committee will be given information about how data protection is managed within PU3A. Committee Members 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 PU3A 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 or access personal information.
- Using password protection or secure cloud systems when sharing data between committee members and/or group convenors.
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

**Subject Access Request**

PU3A members are entitled to request access to the information that is held by PU3A. The request needs to be received in the form of a written request to the Treasurer of PU3A. On receipt of the request, the request will be formally acknowledged and dealt with within 14 days unless there are exceptional circumstances as to why the request cannot be granted. PU3A 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**

In the event of a data breach 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 PU3A shall contact National Office within 24 hours 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 PU3A members to inform them of the data breach and actions taken to resolve the breach.

If a PU3A member contacts PU3A to say that they feel that there has been a breach by PU3A, 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 PU3A 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. PU3A member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from PU3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.