

Data Protection Policy

Scope of the policy

This policy applies to the work of Thatcham u3a. The policy sets out the requirements that Thatcham 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, the Data Protection Act (2018) and UK GDPR (2021). The policy is reviewed on an ongoing basis by Thatcham u3a committee members to ensure that we are compliant. This policy should be read together with Thatcham u3a's Privacy Policy.

Why this policy exists

This Data Protection Policy ensures Thatcham 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 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 Thatcham u3a members.
- Thatcham u3a will provide induction training to Committee Members and Group Convenors to help them understand their responsibilities when handling data.
- Committee Members and Group Convenors 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, where appropriate.
- Member information should be refreshed periodically to ensure accuracy, via the membership renewal process 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 Data Protection Act (2018) and UK GDPR (2021) identify 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.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary.

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date.

Principle 5 – Personal data must be kept in a form which permits identification of data subjects for no longer than is necessary.

Principle 6 - Personal data must be processed in a manner that ensures appropriate security of that data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

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 Data Protection Act (2018) and UK GDPR (2021) in order to safeguard the rights and freedoms of individuals.

Lawful, fair and transparent data processing

Thatcham u3a requests personal information from potential members and current members for membership applications and for sending communications about their involvement with the u3a. The Membership forms used to request personal information will contain a privacy statement containing 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 the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes. Thatcham 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. The contact for this is the Membership Secretary.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Thatcham 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 Thatcham u3a events and activities
- Group Convenors communicating with group members about specific group activities
- Consent for data being shared with the company that oversees distribution of the Trust magazine, where appropriate.
- 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.

Thatcham u3a will ensure that Group Convenors are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include

anything political or offensive, any personal opinion or viewpoint, and must not harm or damage the reputation of Thatcham u3a and its members.

Thatcham u3a will ensure that members' information is managed in such a way as to not 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 or stop processing
- The right to data portability
- The right to object in certain circumstances

Adequate, relevant and limited data processing

Members of Thatcham 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
- Emergency Contact name and 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 Thatcham u3a organises a trip or activity that requires emergency contact information to be provided, a Legitimate Interest Assessment will have been completed in order to request this information. Members will be advised of this.

Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to advise the photographer if they do not wish to be included. Otherwise consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs may 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 using the contact form on the Thatcham u3a web site to advise that they no longer wish their

photograph to be displayed. A Committee member can accept the request in writing or by email to forward to the Chair.

Accuracy of data and keeping data up-to-date

Thatcham u3a has a responsibility to ensure members information is kept up to date. To ensure the information we hold is accurate and up to date, members need to inform the u3a as to any changes to their personal information. This can be done by contacting the membership secretary at membership@thatchamu3a.org.uk

In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Thatcham u3a as to any changes in their personal information.

Accountability and governance

The Thatcham u3a Committee are responsible for ensuring that this 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. The Thatcham Committee will ensure that new members joining the Committee receive advice and information into the requirements of Data Protection and the implications for their role. Thatcham u3a will also ensure that group Convenors 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 and Group Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Thatcham u3a Committee Members 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, PCs and other electronic devices that contain personal information
- Using password protection or secure cloud systems when sharing data between Committee Members and/or Group Convenors

Subject Access Request

Thatcham u3a members are entitled to request access to the information that is held by Thatcham u3a. The request needs to be received in the form of a written request to the Membership Secretary of Thatcham u3a. 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. Thatcham 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 Thatcham 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 of Thatcham u3a will contact National Office within 48 hours of being notified of the breach. A discussion will 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 members to inform them of the data breach and actions taken to resolve the breach.

Where a Thatcham u3a member feels that there has been a breach by this 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 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 member should also be informed that they can report their concerns to National Office if they don't feel satisfied with the response from Thatcham u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy review dates – June 2022

April 2024