

# Watford Park U3A Data Protection Policy

Updated: April 2020

## 1.0 Scope of the policy

This policy applies to the work of Watford Park U3A. The policy sets out the requirements that Watford Park 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 (GDPR). The policy will be reviewed annually by Watford Park U3A Executive Committee. This policy should be read in tandem with Watford Park U3A's Privacy Policy.

## 2.0 Why this policy exists

This data protection policy enables Watford Park U3A to:

- Comply with data protection law and follow good practice
- Protect the rights of members
- Be open about how it stores and processes members data
- Protect itself from the risks of a data breach

## 3.0 General guidelines for committee members and group conveners

- 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 Watford Park U3A members.
- Watford Park U3A will provide induction training to committee members and Study Group Leaders (SGLs) to help them understand their responsibilities when handling data.
- Executive Committee Members and SGLs 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 Third Age Trust publications.
- Member information should be refreshed periodically to establish the accuracy of the data, via the membership renewal form, directly into the Simple Membership (SM) system on-line or when policy is changed.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.

## 4.0 Data protection principles

The General Data Protection Regulations identify key data protection principles:

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

Principle 2 - Personal data must only 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 provides 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.

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

Watford Park U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with the 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 and storing members data is “Consent” and all members will be required to tick a box on the application form to signify that they agree to Watford Park U3A storing their personal data. SGLs will also store a limited amount of information about the members of their group, sufficient to enable them to communicate with their group members. The lawful basis for SGLs is “Legitimate Interest” since the group could not operate if it was not able to communicate with members. The data stored by SGLs will be the minimum required to operate the study group. 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 to delete the data has been taken.

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

Members will be informed on the membership form as to how their information will be used and the Executive Committee of Watford Park U3A will seek to make sure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Watford Park U3A events and activities
- SGLs communicating with group members about specific group activities
- Sending details to the direct mailing system 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
- Submission of data to HMRC for Gift Aid purposes

- Communicating with members about specific issues that may have arisen during the course of their membership

Watford Park U3A will document the responsibilities of SGLs in a guide so they 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.

Watford Park U3A will make sure 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

### **7.0 Adequate, relevant and limited data processing**

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

- Full name
- Postal address
- Email address
- Telephone numbers
- Gift Aid entitlement

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 for which it is used.

Where Watford Park 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. A template for a legitimate interest assessment is available on the Watford Park U3A website.

### **8.0 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. Alternatively, consent will be obtained from all members (and others) in the photograph in order for photographs to be taken. 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 a member of the Executive Committee to advise that they no longer wish their photograph to be displayed. SGLs and U3A members submitting photographs for publication must include written confirmation that permission to publish has been given by the participants.

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

Watford Park 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 Watford Park U3A of any changes in their personal information.

## 10.0 Accountability and governance

The Watford Park U3A Executive Committee are responsible for making sure 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. The U3A Committee will ensure that new members joining the Executive Committee receive an induction into the requirements of GDPR and the implications for their role. Watford Park U3A will also ensure that SGLs are made aware of their responsibilities in relation to the data they hold and process. Executive 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 Executive Committee will review data protection and who has access to information annually, as well as reviewing what data is held. When Executive Committee Members and SGLs relinquish their roles, they will be asked to either pass on data to those who need it and/or delete the data.

## 11.0 Secure Processing

Watford Park Executive Committee has a responsibility to make sure that data is both securely held and processed. This will include:

- Executive Committee members using strong passwords
- Executive Committee members not sharing passwords
- Restricting access to member information to those on the Executive 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 or secure cloud systems when sharing data between Executive Committee members and/or SGLs
- Paying for firewall security to be put onto Executive Committee Members' laptops or other devices if deemed necessary.

## 12.0 Subject Access Request

U3A members are entitled to request access to the information about them that is held by Watford Park U3A. The request needs to be received in the form of a written request to the Membership Secretary of the U3A. On receipt of the request, the request will be formally acknowledged and dealt with expediently within 30 days unless there are exceptional circumstances as to why the request cannot be granted. Watford Park 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.

## 13.0 Data Breach Notification

If a data breach occurs, action shall be taken to minimise the harm. This will include informing all Executive Committee Members that a breach has taken place and how the breach occurred. The Executive Committee shall then seek to rectify the cause of the breach as soon as possible to

prevent any further breaches. The Chair of the U3A shall contact National Office within 24 hours of the breach being discovered to notify 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 will be notified. The Executive Committee shall also contact the relevant U3A members to inform them of the data breach and the actions taken to resolve the breach.

Where a U3A member feels that there has been a breach by the U3A, a member of the Executive Committee will ask the member to provide an outline of the breach. If the initial contact is by telephone, the Executive 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 Executive 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 do not 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.