

Data Protection Policy

1. Introduction

This document relates to Stanway u3a in Colchester and covers personal information and financial data.

2. Policy

2.1 Scope of the policy

This policy applies to the work of Stanway u3a. The policy sets out the requirements that Stanway u3a has to collect and process information for membership purposes. The policy details how personal information will be collected, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy also covers how financial data must be kept secure. The policy is reviewed on an ongoing basis by Stanway u3a Executive Committee members to ensure that Stanway u3a remains compliant. This policy must be read in tandem with Stanway u3a's Privacy Policy.

2.2 Why this policy exists

This Data Protection Policy ensures Stanway 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
- Protects Stanway u3a financial data from loss or unauthorised access

2.3 General guidelines for committee members and Group Leaders

- The only people able to access data covered by this policy are those who need to communicate with or provide a service to Stanway u3a members.
- Stanway u3a will provide induction training to committee members and guidance material to Group Leaders to help them understand their responsibilities when handling data.
- Executive Committee Members and Group Leaders must 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 must not be shared outside of Stanway u3a unless with prior consent of the individuals concerned 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.
- Member information must be refreshed periodically to ensure accuracy, via the membership renewal process or when policy is changed.
- Additional support will be available from the Third Age Trust where uncertainties or incidents regarding data protection arise.
- Volunteer official or member personal contact details may only be shared where the volunteer official or member has agreed.

- Hard copy documentation containing personal information or financial data must be secured against loss or unauthorised access.

2.4 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 must 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 the 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 accordance 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.

2.5 Lawful, fair and transparent data processing

Stanway u3a requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with Stanway 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 is due to the legitimate interest relationship that Stanway u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs. Stanway 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.

2.6 Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Executive Committee of Stanway 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 Stanway u3a events and activities
- Group Leaders communicating with group members about specific group activities
- Member information will be provided to the distribution company that sends out the Trust publication – Third Age Matters. Members will be informed and have a choice as to whether or not they wish to receive the publication.
- 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

Stanway u3a will ensure that Group Leaders are made aware via guidance materials of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Stanway u3a members marketing and/or promotional materials from external service providers.

Stanway 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

2.7 Adequate, Relevant and Limited Data Processing

Members of Stanway 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

Where additional information may be required such as health related information or car registration number 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 Stanway 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 made aware that the assessment has been completed.

2.8 Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't wish to be in the photograph. Otherwise, consent will be obtained from members in order for photographs to be taken and 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 stanwaychair@gmail.com to advise that they no longer wish their photograph to be displayed.

2.9 Accuracy of data and keeping data up-to-date

Stanway 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 Stanway u3a as to any changes in their personal information.

2.10 Accountability and governance

Stanway u3a Executive Committee are responsible for ensuring that Stanway 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. Stanway u3a Executive Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Stanway u3a will also ensure that Group Leaders are made aware of their responsibilities in relation to the data they hold and process, via guidance material. Executive Committee members will stay up to date with guidance and practice within the u3a movement and will seek advice from the Third Age Trust should any uncertainties arise. Stanway u3a Executive Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to date and how data is stored and deleted. When Executive Committee members and Group Leaders relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

2.11 Secure Processing

Stanway u3a Executive Committee Members have a responsibility to ensure 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 of sharing 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 or financial data.
- Using password protection, a membership database or secure cloud systems when sharing data between committee members and/or Group Leaders
- Paying for firewall security and antivirus software to be put onto Executive Committee members' laptops or other devices.
- Using separate user accounts if a device used for personal information or financial data is shared with others e.g. Family members.

- Keeping operating systems and relevant software automatically updated on devices used for personal information or financial data.
- Guarding against loss or unauthorised access by being alert to scam calls and phishing attempts.

2.12 Subject Access Request

Stanway u3a members are entitled to request access to the information that is held by Stanway u3a. The request needs to be received in the form of a written request to the Membership Secretary of Stanway 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. Stanway u3a will provide a written response detailing all information held on the member. A record must be kept of the date of the request and the date of the response.

2.13 Data Breach Notification

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring that all Stanway u3a Executive Committee members are made aware 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 Stanway u3a will contact the Third Age Trust as soon as possible after the breach has occurred to notify of the breach. A discussion will take place between the Chair and the Third Age Trust as to the seriousness of the breach, action to be taken and, where necessary, the Information Commissioner's Office would be notified. The Executive Committee shall also contact the relevant Stanway u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a Stanway u3a member feels that there has been a breach by Stanway u3a, an Executive Committee member 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 Stanway 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 Executive Committee needs support or if the breach is serious, they should notify the Third Age Trust. The Stanway u3a member must also be informed that they can report their concerns to the Third Age Trust if they don't feel satisfied with the response from Stanway u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

2.14 Business Continuity

Key documents or systems holding Stanway u3a personal information or financial data must be backed up frequently and securely so that a loss or compromise of the device or system does not mean loss or harm to essential data.

To avoid a situation where a volunteer official in a key role is unable to carry out their responsibilities and data is rendered inaccessible; there must be a designated deputy who is, by arrangement, able to provide business continuity.

Copies of relevant login details and passwords for key roles, password protected documents and any applicable procedural notes relating to the administration of the specific role must be kept securely by local arrangement and accessed only when necessary to provide business continuity cover.

2.15 Enforcement

Failure of a Stanway u3a Executive Committee member or other volunteer official to comply with the Stanway u3a Data Protection Policy and related procedures may result in disciplinary procedures and removal from post. Membership of Stanway u3a may also be suspended or terminated.

2.16 Contact

For queries about this policy please contact the IT and Data Security Officer at dataU3AStanway@gmail.com

2.17 Policy Adoption and Review

This policy will be reviewed in order to ensure it continues to reflect data protection legislation.

Drafted and adopted: 5 March 2024

Review date: 5 March 2029 or sooner in the event of a major legislative change.