

# Ilkeston u3a Data Protection Policy

## 1. Policy

### 1.1 Scope of the policy

This policy applies to the work of Ilkeston u3a. The policy sets out the requirements that Ilkeston u3a has to collect and process information for membership and other 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 is reviewed on an ongoing basis by Ilkeston u3a committee members to ensure that Ilkeston u3a remains compliant. This policy should be read in tandem with Ilkeston u3a's Privacy Policy.

### 1.2 Why this policy exists

This data protection policy ensures Ilkeston 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

### 1.3 General guidelines for Committee Members, Groups Co-ordinator/s 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 Ilkeston u3a members.
- Ilkeston u3a will provide induction training to Committee Members, Groups Co-ordinator/s and Group Leaders to help them understand their responsibilities when handling data.
- Committee Members, Groups Co-ordinator/s and Group Leaders 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.
- Member information should 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.



## 1.4 Data protection principles

The General Data Protection Regulation identifies key data protection principles listed below. Further information about each Principle follows.

- 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 is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Principle 5 Personal data must 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.

## 1.5 Principle 1 - Lawful, fair and transparent data processing

Ilkeston u3a requests personal information from members and potential members for membership applications and for sending communications regarding their involvement with the u3a. The forms used to request personal information will contain a privacy statement informing members and potential members 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 contractual relationship that the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes

such as the taking of photographs. Ilkeston 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.

### **1.6 Principle 2 - Processed for specified, explicit and legitimate purposes**

Members will be informed as to how their information will be used and Ilkeston u3a Committee will seek to ensure that member information is not used inappropriately. Appropriate use of information provided by members will include:

- Communicating with members about Ilkeston u3a events and activities
- Group Leaders communicating with group members about specific group 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
- Sending members information about Third Age Trust events and activities
- Member information may 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.

Ilkeston u3a will ensure that Group Leaders 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.

Ilkeston 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

### **1.7 Principle 3 - Adequate, Relevant and Limited Data Processing**

Members of Ilkeston 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 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.

Ilkeston u3a members are expected to complete the reverse of their membership badge and carry it with them at all times they are participating in an Ilkeston u3a activity. The reverse of the badge holds emergency contact information should it be required, but remains in the possession of the member at all times, without disclosure to Ilkeston u3a.

### **1.8 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 included 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 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 Business Secretary to advise that they no longer wish their photograph to be displayed.

### **1.9 Principle 4 - Accuracy of data and keeping data up-to-date**

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

### **1.10 Principle 5 - Accountability and governance**

Ilkeston u3a Committee are responsible for ensuring 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. Ilkeston u3a Committee will ensure that new members joining the Committee receive an induction into their legal responsibilities including the requirements of GDPR and the implications for their role. 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. Ilkeston u3a Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted.

Ilkeston u3a will also ensure that Groups Co-ordinator/s, Group Leaders and Acting Group Leaders are made aware of their responsibilities in relation to the data they hold and



process. When Committee Members, Groups Co-ordinators, and Group Leaders relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data. Some data will need to be stored securely for a longer period, in order to meet legal or statutory requirements and in line with Ilkeston u3a document retention policy.

### 1.11 Principle 6 - Secure Processing

Ilkeston Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Conducting mini data audits to review and reinforce appropriate data storage and processing with every authorised user
- Restricting access of sharing member information to those on the Committee or other authorised users who need to communicate with members on a regular basis
- Data held on paper should be stored in a locked cupboard, or a secure location only accessible to the authorised user

Electronic data storage should be secured by:

- Using strong passwords
- Not sharing passwords
- Using the Blind Carbon Copy feature (bcc) when sending emails to multiple recipients, unless prior consent has been obtained to share personal information
- Using password protection on laptops, PCs, or other devices used that contain personal information and recommending frequent changes of passwords
- Using password protection, a membership database, or secure cloud systems for data storage and when sharing data between Committee Members and others who need it
- Encouraging the use of inbuilt firewall security on operating systems, and encryption on storage or transfer devices

### 1.12 Access Request to one's personal information

u3a members are entitled to request access to the information that is held by Ilkeston u3a. The request needs to be received in writing to the Membership Secretary of Ilkeston u3a. On receipt, the request will be formally acknowledged and dealt with expediently (normally within one month) unless there are exceptional circumstances as to why the request cannot be granted. Ilkeston 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.

### 1.13 Data Breach Notification

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring that all Ilkeston 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



Ilkeston u3a will contact 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 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 Committee shall also contact the relevant u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a u3a member feels that there has been a breach of personal information, they should contact a Committee Member and provide an outline of the breach. If the initial contact is by telephone, the 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 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 Third Age Trust. The u3a member should also be informed that they can report their concerns to Third Age Trust if they are unsatisfied with the response from Ilkeston u3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

<b>u3a</b>	<b>Ilkeston u3a Data Protection Policy</b>		
<b>Version</b>	<b>Description of changes</b>	<b>Date</b>	<b>Review Date</b>
Issue 1	Creation of policy & approval by Committee	Adopted 17 September 2018	
Issue 2	Policy reviewed, updated for content, & formatting changed (to be approved by Committee)	October 2023	September 2025