

Scope of the policy

This policy applies to the work of Wolverhampton u3a. The policy sets out the requirements that Wolverhampton 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 is reviewed on an ongoing basis by the Committee of Wolverhampton u3a to ensure that we are compliant. This policy should be read in tandem with Wolverhampton u3a's Privacy Policy.

Why this policy exists

This data protection policy ensures Wolverhampton 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 coordinators

- 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 Wolverhampton u3a members.
- Wolverhampton u3a will provide induction training to Committee members, Group Coordinators and other authorised members to help them understand their responsibilities when handling data.
- Committee members, Group Coordinators and other authorised members 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 Wolverhampton 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.
- Guidance from the Third Age Trust will be followed where uncertainties or incidents regarding data protection arise.

Data protection principles

The General Data Protection Regulation identifies key data protection principles:

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| 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 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 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.

Lawful, fair and transparent data processing

Wolverhampton u3a requests personal information from members and potential members in order to manage membership, applications and the sending of communications about their involvement with the u3a. The lawful basis for obtaining member information is due to the contractual relationship that Wolverhampton u3a has with its individual members. In addition, members will be asked to provide consent for specific processing purposes. Wolverhampton u3a members will be informed as to who they need to contact should they wish that 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.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Wolverhampton 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 Wolverhampton u3a events and activities
- Group Coordinators 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.
- In addition, consent will be sought in order to notify members' details to the Third Age Trust to direct mailing of their magazines, such as Third Age Matters and Sources

Wolverhampton u3a will ensure that Group Coordinators and other authorised members 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. Wolverhampton u3a will ensure that members' information is managed in such a way as not to 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 processing
- The right to data portability
- The right to object

Adequate, relevant and limited data processing

Members of Wolverhampton u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number(s)
- Membership preferences
- 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 will be used. Where Wolverhampton u3a organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed before requesting this information. Members will be made aware that the assessment has been completed.

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. Members who submit photographs for publication in Wolverhampton u3a or Third Age Trust publications, including electronic publications, must have obtained the consent of the individuals featured in the photographs. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the Membership Secretary to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data current

Whilst Wolverhampton u3a has a responsibility to ensure members' information is kept up to date, members also have a responsibility to keep their personal information up to date by using the on-line membership system or, if that is not possible, by informing the Membership Secretary of their changed personal information. In addition, on an annual basis, the membership renewal process will provide an opportunity for members to inform Wolverhampton u3a as to any changes in their personal information.

Accountability and governance

The Committee of Wolverhampton u3a are responsible for ensuring that Wolverhampton u3a remains compliant with data protection requirements and for evidencing 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 Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Wolverhampton u3a will also ensure that Group Coordinators and other authorised members 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 Coordinators relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure processing

Wolverhampton 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 and other authorised members 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 Committee members and/or Group
 - Coordinators and authorised members
- Paying for firewall security to be put onto Committee members' laptops or other devices

Subject access request

Members of Wolverhampton u3a are entitled to request access to the information it holds that relates to them. The request needs to be received in the form of a written request to the Membership Secretary of Wolverhampton u3a. On receipt of the request, 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. Wolverhampton 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 Wolverhampton 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. Within 24 hours of being notified of the breach, the Chairperson of Wolverhampton u3a shall contact u3a National Office to notify them of the breach. A discussion will take place between the Chairperson 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 Wolverhampton u3a members to inform them of the data breach and actions taken to resolve the breach.

Where a Wolverhampton u3a member feels that there has been a breach by the u3a, they should notify 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 alleged 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 don't 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 will be notified of the outcome.

Availability and changes to this policy

This policy will initially be sent to all current members of Wolverhampton u3a by email or by post if the member's email address does not appear on our membership system. After the initial distribution this policy will be available for download from our website (<https://u3asites.org.uk/wolverhampton/home>). This policy may change from time to time. If we make any material changes, we will make members aware of this via our website, the monthly Newsletter and at an appropriate monthly meeting.

Contact

If you have any queries about this policy, need it in an alternative format, or have any complaints about our data protection practices, please contact the Membership Secretary.

This policy was approved by the Committee of Wolverhampton u3a on 23rd May 2024.