

## **Farnham u3a Data Protection Policy**

### **SCOPE OF THE POLICY**

This policy sets out what personal data Farnham u3a requires and how this will be stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by the committee to ensure that the u3a is compliant. This policy should be read in tandem with the Farnham u3a Privacy Policy.

### **WHY WE ASK FOR PERSONAL INFORMATION**

The u3a requests personal information from potential members and members for the purpose of sending communications about their involvement with the u3a. The forms or electronic agreement used to request personal information 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. Members sign the form or click the "I Agree" button on their online application, providing consent for their data to be held. Members can, at any time, remove their consent.

### **USE OF MEMBER INFORMATION**

Member information will be used for communicating with members about u3a events and activities. If they have requested it, members addresses will be added to the direct mailing information for the Third Age Trust magazines. Member information will not be given to third parties without explicit permission. Group convenors will only use member information they have collected for communication about u3a and group related activities, and this information will not be shared with other group members unless all members have agreed.

### **WHAT MEMBER INFORMATION IS HELD**

Only information that is relevant for membership purposes is held. This includes:

- Name.
- Postal address.
- Email address.
- Telephone number.

Where additional information may be required, such as health-related information, this will be obtained with the specific consent of the member who will be informed as to why this information is required and the purpose that it will be used for. There may be occasional instances where a member's data needs to be shared with a third party due to an accident or incident involving statutory authorities. Where it is in the best interests of the member or the u3a in these instances where the u3a has a substantiated concern then consent does not have to be sought from the member.

### **PHOTOGRAPHS**

Photographs are classified as personal data. Where group photographs are taken members should be asked to step out of shot if they don't want to be in the photograph. Otherwise consent will be obtained from members and they will be informed as to where the photographs may be displayed. If at any time members wish to remove their consent and no longer have their photograph on display they should contact the committee.

## ACCURACY OF DATA HELD

We have a responsibility to ensure members' information is kept up to date. Members are asked to let the membership secretary know if any of their personal information changes using the update facility on Farnham u3a website or directly to the membership secretary.

## ACCOUNTABILITY AND GOVERNANCE

The u3a Committee are responsible for ensuring that the u3a remains compliant with data protection requirements and can evidence this. New members will be and existing members have been asked to provide written or electronic consent to the holding of membership data. The u3a Committee will ensure that new members joining the Committee receive an induction into how data protection is managed within the u3a and the reasons for this. Committee Members will also stay up to date with guidance and practice within the u3a movement. The Committee will review data protection and who has access to information on a regular basis as well as reviewing what data is held.

## SECURE PROCESSING

The committee have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong unshared passwords.
- Restricting access of member information to those on the Committee who need to communicate with members on a regular basis.
- Using password protection on laptops and PCs that contain or access personal information.
- Using password protection or secure cloud systems when sharing data between committee members and/or group convenors.
- Having firewall security to be put onto Committee Members' laptops or other devices.

## MEMBERS ACCESS TO THEIR DATA

u3a members are entitled to request access to the information that is held by the 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 within 14 days unless there are exceptional circumstances as to why the request cannot be granted. The 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 by ensuring all committee members are aware that a breach had taken place and how the breach had 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 the u3a shall contact National Office within 24 hours of the breach occurring to notify of the breach. A discussion would 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 u3a members to inform them of the data breach and actions taken to resolve the breach. If a u3a member contacts the u3a to say that they feel that there has been a breach by the u3a,

a committee member will ask the member to provide an outline of their concerns in an email or a letter. The concern 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 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 notified of the outcome.

Revised by Val Atkinson (secretary) and Cynthia Barnett (membership secretary)  
May 2022

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