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**UPPER BANN U3A**

**DATA PROTECTION POLICY**

***1.Scope of the Policy***

This policy applies to the work of Upper Bann U3A (hereinafter referred to as ‘UBu3a’). The policy sets out the requirements that UBu3a has to follow when it collects and processes information for membership purposes.

The policy details how personal information will be collected, stored and managed in line with data protection principles, the General Data Protection Regulation and UK Law as detailed in The Data Protection Act 2018.

The Policy is reviewed on an ongoing basis by UBu3a committee members to ensure that UBu3a policy remains compliant. This policy should be read in tandem with UBu3a Privacy Policy.

***2. Why this Policy Exists***

This data protection policy ensures UBu3a:

* Complies with data protection law and follows good guidance.
* Protects the rights of members.
* Is open about how it stores and processes members data.
* Protects itself from the risks of a data breach.

***3. General Guidance for Committee Members and Group Convenors***

* The only people able to access data covered by this policy should be those who need to communicate with or provide a service to UBu3a members.
* UBu3a will provide induction training to committee members and group convenors to help them understand their responsibilities when handling data.
* Committee members and group convenors 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 to HMRC, or information provided to the distribution company for the Trust publications.
* Member information should be refreshed periodically to ensure accuracy, for example via the membership renewal process or when policy changes.
* Additional support is available from the Third Age Trust where uncertainties or incidents regarding data protection arise,

***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 specific, 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 it is 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 accordance and 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.

***5. Lawful, Fair and Transparent Data Processing***

UBu3a requests personal information from potential members and members for membership applications and for sending communications regarding members’ involvement with UBu3a. Members will be informed as to why the information is requested and what the information will be used for.

The lawful basis for obtaining member information is due to the legitimate interest relationship UBu3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs. Members will be informed who to contact should they wish that their data should not be used for specific purposes which they had previously consented to. These requests will be dealt with promptly and the member advised that action has been taken.

***6. Processed for Specified, Explicit and Legitimate Purposes***

Members will be informed as to how their information will be used and UBu3a committee will seek to ensure that member information is not used inappropriately*.* Appropriate use of informationprovided by members will include:

* Communicating with UBu3A members about UBu3a events and activities.
* Group Convenors communicating with group members about 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 their membership.

UBu3a will ensure that group convenors are made aware of what should be considered appropriate and inappropriate communication. Inappropriate communication would include sending U3A members marketing and/or promotional materials from external providers.

We will ensure that members’ information is managed in such a way as not to infringe an individual members rights which include:

* The right to be informed.
* The right to access.
* The right to rectification.
* The right to erasure.
* The right to restrict processing.
* The right to data portability.
* The right to object.

***7. Adequate, Relevant and Limited Data Processing***

Members of UBu3a 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

When additional information may be required such as health related information this will be obtained with the consent of the member who will be informed why this is required and the purpose it will be used for,

Where UBu3a organises a trip or activity that requires next of kin information, a legitimate interest assessment will have been completed to request this information. Members will be made aware that the assessment has been completed,

***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 included. Otherwise, consent will be obtained from members in order for photographs to be taken.

UBu3a may use photographs as follows:

* On the Upper Bann U3A website and social media.
* Offline such as leaflets, newsletters.
* For promotional materials, publications, articles and potentially for publicity and marketing purpose

Members can remove their consent for photographs to be removed by contacting the UBu3a Membership Secretary, ubu3a@talktalk.net.

Members should note that while every effort will be made to remove photographs, we have no control of photographs already published and may be unable to recall them.

***9. Accuracy of Data and Keeping Up To Date***

UBu3a 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 UBu3a of any changes in their personal information.

***10. Accountability and Governance***

UBu3a Committee are responsible for ensuring that UBu3a remain compliant with data protection requirements and can evidence that is has.

Where consent is required for specific purposes then evidence of this consent (either electronic or paper) will be obtained and retained securely.

UBu3a Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications their role.

UBu3a will also ensure that group convenors are made aware of their responsibilities in relation to the data they hold and process.

Committee member will stay up to date with guidance and practice within the U3A movement and will seek advice from the Third Age Trust National Office should any uncertainties arise.

UBu3a 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 Committee Members and Group Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

***11. Secure Processing***

UBu3a 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 who need to communicate with members on a regular basis.
* Using password protection on laptops and PCs that contain personal information.
* Using password protection, a membership database, or secure cloud systems when sharing data between committee members and/or group convenors.
* Paying for firewall protection security to be put onto Committee Members’ laptops or other devices if required.

***12. Subject Access Request***

U3A members are entitled to request access to the information that is held by UBu3a. The request needs to be received in the form of a written request to the Membership Secretary of UBu3a ubu3a@talktalk.net

On receipt, 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.

UBu3a 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. Data Breach Notification***

Were a data breach to occur action will be taken to minimise the harm. This will include ensuring all UBu3a 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 Committee Chairman will contact the National Office as soon as possible after the breach occurred 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, when necessary, the Information Commissioner’s Office and the Northern Ireland Charities Commission 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 by UBu3a, a committee member will ask the member to 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 the National Office.

The U3A member should also be informed that they can report their concerns to the National Office if they don’t feel satisfied with the response from UBu3a. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

**Please note that this document has been prepared from information obtained from The Third Age Trust advice and support section for U3A. The recommended Third Age Trust template has been used to develop this policy.**