

The Cardiff U3A Data Protection Policy

Scope of the policy

This policy applies to the work of Cardiff U3A. The policy sets out the requirements that Cardiff 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. The policy is reviewed on an ongoing basis by Cardiff U3A committee members to ensure that we are compliant. This policy should be read in tandem with Cardiff U3A's Privacy Policy. In this document, the term Group Convenor also refers to a Cardiff U3A member acting as secretary to a Group as well as the actual convenor of the Group.

Why this policy exists

This data protection policy ensures Cardiff 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 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 the Cardiff U3A members.
- Cardiff U3A 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 will be used and they should never be shared.
- Data should not be shared outside of the Cardiff 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 support from the Third Age Trust where uncertainties or incidents regarding data protection arise.

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 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 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 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 Processing

Members pay an annual fee to the Cardiff U3A as a consideration for membership and this establishes a contractual relationship between each member and the Cardiff U3A and this contract establishes a lawful basis for the processing of the personal information of those members.

Cardiff U3A requests personal information from potential members and members for membership applications and for sending communications about their involvement with the U3A. The paper forms 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. Where an online form is used, reference is made to the relevant documents also available online.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Cardiff 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 Cardiff U3A events and activities and other related activities and events
- Group convenors communicating with group members about specific group activities and other related activities and events
- The provision of periodic publications automatically provided by the Cardiff U3A (monthly Newsletter by email and termly printed Magazine) and the Third Age Trust (printed magazines *Third Age Matters* including *Sources*)
- 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

Cardiff U3A will ensure that group convenors are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending Cardiff U3A members marketing and/or promotional materials from external service providers other than specific materials related to the group activities thought to be of interest to group members.

Cardiff U3A will ensure that members' information is managed in such a way as to not 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

Right to Opt-out of Receipt of Publications

The Cardiff U3A automatically provides certain publications as a perquisite of membership and on the same basis contracts with the Third Age Trust to provide additional publications.

Members have the right at any time to request that they no longer receive these publications and such a request should be made to the Membership Secretary memsec@cardiffu3a.org.uk or on 07926 533 693.

Provision has also been made for paper copies of the electronic monthly Newsletter to be made available and sent by post to the member.

Adequate, relevant and limited data processing

Members of Cardiff 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 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 Cardiff U3A organises a trip or activity that requires next of kin 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.

Photographs

Photographs containing images of individuals such that those individuals are identifiable 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 data.protection@cardiffu3a.org.uk to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Cardiff U3A has a responsibility to ensure members' information is kept up to date. Members will be requested 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 Cardiff U3A as to any changes in their personal information. Members will also be able to view and edit their personal data online.

Accountability and governance

The Cardiff U3A Committee are responsible for ensuring that the Cardiff 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. The Cardiff U3A Committee will ensure that new members joining the Committee receive an induction into the requirements of the General Data Protection Regulation and the implications for their role. Cardiff U3A will also ensure that group convenors 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 Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Cardiff U3A Committee Members have a responsibility to ensure that data are 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 or secure cloud systems when sharing data between committee members and/or group convenors
- Paying for firewall security to be put onto Committee Members' laptops or other devices.

Subject Access Request

U3A members are entitled to request access to the information that is held by Cardiff U3A about themselves. 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 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. Cardiff 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 Cardiff 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 the Cardiff U3A shall contact National Office within 24 hours of the breach occurring 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, 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 by the Cardiff U3A, 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 Cardiff 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 National Office. The Cardiff 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 Cardiff U3A. Breach matters will be subject to a full investigation, records will be kept and all those involved notified of the outcome.

Policy review date: This policy will be reviewed by the Cardiff U3A Committee annually at their meeting prior to the Annual General Meeting, at such other time as legislation requires or whenever a change of advice from the Third Age Trust necessitates review.