



Adopted by Harborough Welland Trustees November 2024

Harborough Welland u3a (HWu3a)

Data Protection and Privacy Policy

Introduction

This policy explains how the HWu3a Committee of Trustees (“we” “our” “us”) will comply with the requirements of data protection legislation to protect your personal information. Data (“personal information”) is any information relating to a living person which identifies or could identify that person. The information can be in any form – paper, electronic or photographic.

Purpose

The purpose of this policy is to:

- protect your privacy;
- be open about the personal information we hold about you and who may have access to it;
- explain the legal bases on which we will rely to process your personal information;
- confirm the process and minimise the risk of any data breaches;
- confirm who has responsibility for ensuring compliance with data protection legislation;
- provide information about your data protection rights; and detail the actions we will take in the event of a data breach.

What personal information do we collect?

- your name
- home address
- email address
- telephone number
- emergency contact details

We collect your personal information directly from you when you apply for membership of HWu3a.

Accuracy and up to date personal information

To ensure your personal information is accurate and up to date, you can make any changes to it on the secure central server we use for storing your personal information (“Beacon”) if you have access to it. If you are not able to access Beacon, please notify the Membership Secretary if any of your personal information changes. It is essential that you keep us informed of any changes, as otherwise the information we hold may not be accurate.

Who can access your personal information?

As a general principle, only we and Group Co-Ordinators will have access to personal information. On occasion, we may give access to another member for a legitimate purpose, where we consider it appropriate to do so. In such a case, we will ensure that the member is aware of their obligations under this policy.

Access to your personal information will be on a strictly need to know basis.

How do we use your personal information?

To enable us to manage and administer your membership, we will use the personal information you give us to:

- tell you about our activities
- send you information about Third Age Trust events and activities
- arrange for you to receive the Third Age Matters magazine
- keep a record of your participation in the Gift Aid Scheme (if applicable) and of your membership fee
- help Group Co-Ordinators set up new interest groups
- contact you about arrangements for outings or holidays
- provide support to Group Co-Ordinators
- enable a Group Co-Ordinator to contact you if you belong to an interest group or are interested in joining one
- give you notice of the Annual General Meeting and any Special General Meeting;
- communicate with you about any specific issue that may affect your membership
- send you renewal reminders
- for any other reason relating to your membership.

If we need to use your personal information for any other purpose, we will notify you before we start processing the information. Depending on the purpose, we may either rely on legitimate interest or ask for your consent. We will also explain your right to object. The legal bases for processing personal information

Legitimate interest

The charitable purposes clause in our constitution describes our purpose which is: “The advancement of education and, in particular, the education of older people and those who are retired from full time work by all means, including associated activities conducive to learning and personal development.”

We achieve this purpose by offering membership of HWu3a to anyone who is eligible to join. We have undertaken a legitimate interest assessment and consider that legitimate interest is the correct and sufficient lawful basis upon which to process your personal information.

We also consider that the information we need to collect is the minimum necessary to provide you with access to our various activities and to enable us to administer your membership. Given this, we have concluded that legitimate interest takes into account both our interests and yours and is a reasonable balance between the two.

Disclosing personal information to 3rd parties

We will not disclose your personal information to anyone outside of HWu3a except in the following circumstances:

- you have voluntarily disclosed it in any article printed in our HWu3a Magazine, which is publicly available
- you are a Group Co-Ordinator and have voluntarily provided your contact details for publication in the HWu3a Magazine and on our website
- to arrange for you to receive the Third Age Matters magazine
- we have a statutory duty to disclose it or for legal and/or regulatory reasons
- in a life-or-death situation
- to take legal advice or to issue or defend legal proceedings

In any other case, where we need to share your information outside of HWu3a, we will ask for your written consent (unless there is another appropriate legal basis upon which we may rely) and let you know to whom we will be making the disclosure and the reason why.

Where do we store your personal information?

We store your personal information on Beacon which can only be accessed by us, the Group Co-Ordinators and any other authorised HWu3a member. Beacon enables us to vary the level of access granted to those authorised to use it so that they only ever have access to the minimum amount of personal information they need for their role. The Membership Secretary also stores copies of paper membership applications so there is a record, whilst you are a member, of the information you provided when you completed the application form. These records are kept in a secure place in the Membership Secretary's home.

How we safeguard your personal information

We will provide training to all new trustees and Group Co-Ordinators and any other authorised Beacon user to ensure they understand their responsibilities when handling personal information.

We require anyone with access to your personal information to take all reasonable precautions to protect it. In particular, they must:

- use Beacon for sending emails to members
- never disclose or share their Beacon password
- (If a group co-ordinator) keep secure any personal information you give them
- never share your personal information outside of HWu3a unless you have given consent or it is necessary to comply with a legal or insurance obligation or to save your life
- comply with Beacon's data protection policy
- review your personal information on Beacon from time to time to ensure it is up to date, accurate and still relevant

How long do we keep your personal information?

We will keep your personal information for so long as you are a member of Wu3a. If you leave HWu3a or fail to renew your membership, we will normally delete your membership information from Beacon within 12 months of your leaving or your membership lapsing, if you have not signed up to the Gift Aid Scheme. If you have signed up to the Gift Aid Scheme, we will retain your personal information for seven years from the date your membership ceases. After that we will delete it.

Group Co-Ordinators will have access to your personal information on Beacon for as long as you remain a member of their group. Please tell your group co-ordinator if you are leaving the group, so they can remove your details from their group record as soon as they reasonably can.

We may also need to retain your personal information for legal or insurance purposes to enable any issue outstanding at the date your membership ceases to be investigated or resolved. Once we no longer need this information, we will delete it.

Photographs

Photographs, that clearly identify members, are classed as personal information. Where photographs of members are taken, we may publish these in the Magazine, on our website, on an electronic notice board at general meetings, in promotional material, such as leaflets and on social media. There is no obligation to participate in photographs if you do not wish to do so.

The photographer is responsible for ensuring that they only include in the photograph those members who wish to be in it and should ask any member, who does not wish to be included, to step out of shot.

You may at any time withdraw your consent to any photograph being displayed that clearly identifies you. Please notify the Compliance Officer who will arrange for the photograph to be removed.

Your Right to be informed

You are entitled to know why we ask for your personal information, what we will do with it, where it will be stored and the period for which we will keep it.

Right of access

You are entitled to request a copy of any of your personal information we are holding. This is known as a subject access request. We will also tell you about the personal information we are processing, the reasons why and who has access to it.

Right to erasure

You can ask us to delete your personal information at any time. Where we need the personal information to comply with a legal obligation or to establish, exercise or defend a legal claim, we can refuse your request.

Right to object

You can object to the processing of your personal information where we rely on legitimate interest to process the information. You will need to provide specific reasons for your objection.

Right to rectification

This will apply if you believe we are holding inaccurate personal information or it is incomplete.

Right to restrict processing

This is likely to apply if you are exercising your right to object or to have your personal information rectified. In these cases, you can also ask us to restrict the processing of your personal information. You might exercise this right if you need us to keep your personal information to establish, exercise or defend a legal claim, even though we no longer require it because, for example, your membership has ceased.

Making a request

If you wish to make a subject access request or to exercise your rights to object, have your personal information rectified or the processing restricted, please contact the Compliance Officer/Secretary either verbally or in writing. The Compliance Officer/Secretary will acknowledge receipt of your request and give you our full written response within one month of the date we receive it. If we have a reason not to comply with your request, we will explain our decision and inform you of your right to make a complaint to the Information Commissioner's Office.

Accountability and Governance

We are responsible for ensuring that HWu3a complies with the data protection legislation and can provide evidence to show we have done so. We will ensure that new trustees, group coordinators and any other newly authorised members are aware of the importance of data protection.

We will keep up to date with the current guidance and practice within the U3A movement and will seek advice from the Third Age Trust National Office in the case of any uncertainty.

Data Breach Notification

Should a data breach occur, we will take immediate action to minimise the risk of harm to any member affected by the breach.

Data breaches can be accidental as well as deliberate and include:

- sending an email containing personal information to the wrong person
- deleting personal information which should have been retained
- mobile phones/tablets/laptops and other electronic devices containing personal information being lost or stolen

All HWu3a members authorised to access your personal information must contact the Chair chair@hwu3a.org.uk or Secretary secretary@hwu3a.org.uk as soon as they possibly can after becoming aware that there has been a data breach. This is essential to enable us to assess the risk and seriousness of the breach.

We will seek to rectify the cause of the breach as soon as possible to prevent any further breaches. The Chair or the Vice Chair will contact The Third Age Trust within 24 hours of the breach occurring to discuss the seriousness of the breach, whether it is necessary to notify the Information Commissioner's Office and the action that needs to be taken.

The Chair or the Vice Chair will contact any members affected by the breach to advise them what has occurred and the actions we have taken to remedy the breach.

If you consider there has been a data breach, we will ask you to provide an outline of the alleged breach. If you reported this by telephone, we will ask you to confirm details of the alleged breach in an email or letter.

Two committee members (with no connection to the alleged breach) will conduct a full investigation into the alleged breach and will keep records of the investigation, all those involved, any evidence provided by the member in support of the alleged breach and the outcome.

Once the investigation has been completed, we will review the findings and take appropriate action if required. We will advise you of the outcome and your right to report your concerns directly to the Third Age Trust, if you are not satisfied with the action we have taken.

Policy Review Date November 2028