

Witham and District (Essex) u3a Privacy Policy

The General Data Protection Regulations (GDPR) came into effect on 25 May 2018, replacing the Data Protection Act (1998). This policy updates the practices of Witham and District (Essex) u3a with respect to data protection, utilising the guidelines from the Third Age Trust.

The policy incorporates the good practice already adopted by Witham & District (Essex) u3a at the membership level and additionally brings the Group Co-ordinators, who also hold personal data, into line with the GDPR requirements. The policy centres not only on the collection, purpose, use, storage, access and disposal of information but also on how this information is provided to members, complaints from members and how any complaints will be dealt with.

The GDPR requires that the request for information from members must be done on a lawful basis. For u3as, contract is the lawful basis. Our application process and payment of a fee is sufficient to meet this requirement. We must ensure that members give consent with respect to Gift Aid and to pass on their information for Third Age Matters. Members give this consent on our online application form. Members opt in to these issues.

Information we gather

- Name
- Address
- Telephone numbers
- Email
- Gift aid information
- Emergency contact details

1. Personal data must be processed lawfully, fairly and transparently

- a) Our application/renewal form tells our membership what their personal information will be used for. This information is held online using Google Workspace for Nonprofits, which is registered to the Witham & District (Essex) u3a charity, secured professionally by Google Workspace and cannot be accessed by the general public. The completed application/renewal forms and spreadsheets, in Google Workspace, which hold membership data are password protected and the password is only known to the Witham & District (Essex) u3a Membership Officer, Treasurer and Web Manager. The Web Manager is the System Administrator. The completed online application/renewal forms in Google Workspace are kept for six years plus the current year. Completed paper application/renewal forms from 2026 onwards are kept securely on locked premises by the Membership Officer.

- b) Completed paper application/renewal forms *prior* to 2026 are kept securely on locked premises by Margaret Bassett, who was formerly a Membership Officer.
- c) Group Co-ordinators also hold personal information. The register of attendance should be kept separately from the group member details. Both should be kept securely, and password protected if held electronically or on secure premises (i.e. the Group Co-ordinator's home) if held in paper format.
- d) If group members want to share their personal information within the group, the Group Co-ordinator shall ensure that the consent of each member has been obtained
- e) When the Membership Officer or a Group Co-ordinator is sending an email to more than one member then they **MUST** use the BCC facility, even when consent to sharing has been obtained.
- f) Access to the email address used by previous membership officers is now held by the Secretary as it was also on the contact files of some outside organisations. Any general members files will not be accessed by her, but are available to the Membership Officer if needed.
- g) The Committee shall review annually, who needs access to this information and will keep a record of this.

2. Data must be collected for specified, explicit and legitimate purposes

- a) Witham & District (Essex) u3a will only use the information for purposes specified on our application/renewal form. It will get consent for sharing information with specified third parties (i.e. His Majesty's Revenue & Customs for Gift Aid; Third Age Trust for the magazine); and will not use members' data for sending information that could be considered 'marketing'. Information from other u3as may be circulated to the membership (e.g. information about upcoming events).
- b) The Committee will provide training to existing and new Group Co-ordinators as to what is considered appropriate.
- c) Members who feel that they have received inappropriate communications should contact a member of the Committee in the first instance who will pass the matter to the Secretary who will instigate an investigation and report back on the outcome.
- d) The Committee will communicate about GDPR through existing channels - i.e. the website and the newsletter.
- e) The Treasurer may request banking details from those members claiming expenses. This information will be kept securely by the Treasurer.

3. Collection of personal data must be adequate, relevant and limited to what is necessary

- a) Witham & District (Essex) u3a will collect only the information identified in this policy.
- b) The Membership Officer will review this requirement regularly.
- c) The Secretary will keep a record of any complaints about data breaches and how they have been dealt with.

4. Personal data should be accurate and up to date

The Membership Officer is responsible for collecting member's details. The annual renewal procedure ensures that members' details are kept up to date.

5. Personal data is retained only so long as it is needed for its stated purpose

- a) Completed application/renewal forms are retained for six years for gift aid purposes. The records are deleted or shredded annually on rotation.
- b) Other records are kept for two years - i.e. the current and the previous year and shredded on rotation.
- c) The Groups Facilitator shall hold only the records for the current year and will shred or delete record annually.
- d) Group Co-ordinators will shred paper records annually following renewal.
- e) Accident/Incident forms must be retained for three years (for insurance purposes). The Secretary will hold the paper copies.

6. Data must be processed in a way that ensures security of that data

- a) Data is kept online using Google Workspace for Nonprofits, which is registered to the Witham & District (Essex) u3a charity, secured professionally by Google Workspace and cannot be accessed by the general public. The completed application/renewal forms and spreadsheets in Google Workspace, which hold membership data, are password protected and the password is only known to the Witham & District (Essex) u3a Membership Officer, Treasurer and Web Manager.
- b) Data is sent to Third Age Trust on a quarterly basis
- c) Group Co-ordinators who leave must provide a written statement to confirm that they have deleted all information and/or that they have handed over all the information to the new Group Co-ordinator.
- d) Our application/renewal form states that Witham & District (Essex) u3a never

passes data on to outside parties other than those already identified (i.e. His Majesty's Revenue & Customs and the Third Age Trust)

- e) Group Co-ordinators' personal details are not available through the website which is public. There is a contact system for members and non-members to request information about groups which the relevant Group Co-ordinator will respond to.

7. Individual's Rights

Our members have the right

- To be informed
- To access
- To rectification
- To erasure
- To restrict processing
- To data portability
- To object

Members can make a 'subject access request' to view the data that is held about them. This should be in the form of a written request to which they will receive a reply within 14 days.

Witham & District (Essex) u3a will keep their practices under review and report the outcome of the review through the newsletter which is provided to all members.

New members to the Committee will be inducted to ensure ongoing effectiveness of the privacy policy.

8. Data Security and emails

- a) All Committee members must have firewall software on their digital devices.
- b) Where data is kept on a computer hard drive it should be backed up to an external storage device (e.g. external hard drive, memory stick etc) which should be kept separate and secure. Data can also be saved to the Cloud.
- c) If a computer containing large amounts of information is lost or stolen this must be reported to National Office.

9. Accountability

- a) The Committee of the Witham & District (Essex) u3a will assume joint responsibility for how data is processed and managed even when it is not accessed by all committee members.
- b) Data protection will be reviewed every year by the Committee and will be

reported in the minutes.

- c) The privacy policy will be on the website.
- d) New Committee members and Group Co-ordinators will be inducted into the principles and practice of GDPR.
- e) There will be an initial meeting for Group Co-ordinators to introduce the policy; thereafter there will be an annual meeting to ensure ongoing good practice.

10. Breaches

GDPR will require certain types of breaches to be reported to the relevant authority and in some cases to the individual affected. This part of the requirements has not yet been developed, but in the meantime Witham & District (Essex) u3a will investigate the extent of the breach, keep a record of actions taken, discuss the breach with National Office within 72 hours, and inform members of serious breaches.

Privacy Policy Review

Policy signed off	Next Policy review date	Review completed	Signed by Chair
October 2018	n/a	n/a	Terry Slater
	October 2019	1/11/2019	Judith Biddle
	October 2020		
	July 2023	1/09/2023	Ray Hardisty
	July 2024	5/07/2024	Ray Hardisty
	July 2025	6/03/2026	Ray Hardisty
	March 2027		