

Bedford U3A Data Protection Policy

Scope of the policy

This policy applies to the work of Bedford u3a. The policy sets out the requirements that Bedford U3A has, to collect and process information for membership purposes. The policy details how personal information will be collected, stored, and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis by Bedford u3a Committee Members to ensure that we remain compliant. This policy should be read in tandem with Bedford u3a's Privacy Policy.

Why this policy exists?

This data protection policy ensures Bedford 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 leaders/contacts

- 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 Bedford u3a members.
- Bedford u3a will ensure that Committee Members and Group Leaders are aware of their responsibilities when handling data.
- Committee Members and Group Leaders 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 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 available 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, fair, and transparent data processing

Bedford u3a requests personal information from potential members and members for membership applications and for sending communications about their involvement with the u3a. The lawful basis for obtaining member information is due to the legitimate interest that the u3a has with individual members. In addition, members will be asked to provide consent for specific processing purposes such as the taking of photographs.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Bedford 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 Bedford u3a events and activities
- Group Leaders and contacts communicating with group members about specific group activities
- Member information will be provided to the distribution company that sends out the Trust publication. 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 the course of their membership

Bedford 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

Adequate, relevant, and limited data processing

Members of Bedford u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone numbers
- Gift Aid entitlement, in line with HMRC requirements

Where additional information may be required such as health or age-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.

Accuracy of data and keeping data up to date

Bedford u3a has a responsibility to ensure member's 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 Bedford u3a as to any changes in their personal information.

Accountability and governance

The Bedford u3a Committee is responsible for ensuring that the Bedford 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. Bedford u3a Committee will review data protection requirements on an ongoing basis as well as reviewing who has access to data and how data is stored and deleted. When Committee Members relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Bedford u3a Committee Members have a responsibility to ensure that data is both securely held and processed. All data is currently held on Beacon, the national u3a secure system.

Papers copies of application and renewal forms are also securely stored and shredded when relevant.

Subject Access Request

U3a members are entitled to request access to the information that is held by Bedford u3a. The request needs to be received in the form of a written request to the Membership Secretary of Bedford u3a. On receipt of the request, the request will be formally acknowledged and dealt with expediently unless there are exceptional circumstances as to why the request cannot be granted, in which case the member will be notified as soon as possible. The legislation requires that information should generally be provided within one month, but we would usually expect to respond within 14 days. Bedford 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 Bedford 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 Bedford u3a will contact National Office as soon as possible after the breach has 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, 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 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 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 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.

This policy was adopted on:

Signed: _____ Committee role: _____

Print name: _____

Policy review date: _____ February 2026 _____