

Forth Valley U3A Data Protection Policy and Procedures

Approved by The Board 4th June 2019

Data Protection Policy

This policy describes the administrative procedures of Forth Valley U3A (FVU3A) in compliance with the EU General Data Protection Regulation and the UK Data Protection Act. The policy describes how personal data for membership purposes is gathered, stored and managed. The policy is reviewed by the FVU3A Board on an ongoing basis to ensure continuing compliance. The aim is to ensure that FVU3A:

- complies with data protection law and follows good practice
- protects the rights of members
- is open about how member data is stored and processed
- protects itself from the risks of a data breach.

If you have any questions about protection of your personal data you can contact the FVU3A Data Protection Officer. You have the right to take any complaints to the Scottish Information Commissioner (45 Melville Street, Edinburgh EH3 7HL, Telephone 0303 123 1115, Email scotland@ico.org.uk).

Data Protection Principles

Access to the data covered by this policy is restricted to those who need to communicate with or provide a service to FVU3A members. Data is not shared outside FVU3A and the national U3A office. Member information and consent are refreshed periodically via the membership renewal process. FVU3A Board members and Interest Group Leaders keep all data secure by following good practice such as use of strong passwords and network firewalls.

FVU3A requests personal data from potential and current members for communicating about their involvement in the organisation. The forms used to collect personal data indicate why the information is being requested and how the information will be used. Members are asked to provide consent to this. A record of this consent along with member information is held securely. FVU3A members can, at any time, remove their consent by contacting the FVU3A Membership Secretary.

FVU3A will ensure that member information is used appropriately, including:

- FVU3A communicating with members about general events and activities
- FVU3A providing direct mailing information to the Third Age Trust for information about national events, activities and publications
- FVU3A communicating with members about their membership or specific issues relating to this
- Interest Group Leaders communicating with group members about specific activities.

FVU3A will ensure that member information is managed in such a way as to not infringe an individual member's rights. Were a data breach to occur, action would be taken to minimise the resulting harm and the national U3A office would be contacted promptly. All breaches would be subject to a full and recorded investigation.

Use of Personal Data

FVU3A members are asked to provide only information that is relevant for their membership. This includes name, postal address, email address(es), telephone number(s) and Gift Aid preference. Where additional information is required, this is obtained with the specific consent of the member.

There may be occasional instances where a member's data needs to be shared with an appropriate third party (e.g. due to an accident or incident involving statutory authorities). Where it is in the best interests of the member or FVU3A, specific consent may not be sought for this.

Members must let the Membership Secretary know if any of their personal data changes. In addition, membership renewal forms provide an opportunity for members to resubmit their personal data and to reconfirm their consent for use of personal data.

General Membership Data

The Membership Secretary collects the following information through membership applications and renewals:

- name, postal and email addresses, postal/email preference, telephone number(s)
- Gift Aid details, membership payment record, data consent
- group interests, suggestions, hosting/leading groups, help offered for General Meetings
- new members: source of information about FVU3A, date of joining.

This information is maintained securely by the Membership Secretary; it is available only to the Membership Secretary and to relevant FVU3A Board members. Suggestions and comments about FVU3A may be summarised anonymously by the Membership Secretary and provided to Board members.

Following a request from a member for personal data held about them by FVU3A, the Data Protection Officer will respond after consultation with the Membership Secretary and relevant Interest Group Leaders.

A subset of the above information (name, postal address, Gift Aid details) is provided by the Membership Secretary to the Treasurer so that a Gift Aid claim can be made. Her Majesty's Revenue & Customs (HMRC) requires this information to be kept for 7 years. As a Scottish Charitable Incorporated Organisation (SCIO), FVU3A must keep a member's name and the date on which they ceased to be a member for at least six years.

A subset of the above information (name, postal address) is provided by the Membership Secretary to the U3A centrally (the Third Age Trust and its publishers) so that national publications and information about national events can be communicated to members. Contact details of members (name, email address, telephone number) may appear in FVU3A publications such as the Monthly Update, but this is restricted to members only.

Data and network security for online sites are the responsibility of the hosting organisation (currently Amazon Lightsail for the main web site, Facebook and Twitter for their respective sites).

The Interest Group Coordinator(s) hold a subset of the above information (name, email address, telephone number, postal address) about Interest Group Leaders. This will appear in the Interest Group programme provided to members, but may also be passed to potential or current members who need more details of a group they wish to join.

Group Membership Data

Interest Group Leaders collect a subset of personal data through group sign-up forms. Typically this is name, email address, telephone number and whether these details can be shared with other group members. Where the activities of a group require additional information, this is recorded only with the consent of the members.

The above information is maintained securely by each Interest Group Leader and is available only to this individual. The information collected by each Interest Group Leader is used only for the purposes of their group. Email to a group will normally be by Bcc, i.e. be anonymous. If group members agree to have their email addresses visible to others, then this use is beyond the control of FVU3A.

The Membership Secretary may inform all Interest Group Leaders of those whose membership has lapsed (names only). If a group sign-up form contains unclear or missing information, an Interest Group Leader may request this information from the Membership Secretary provided it is necessary for the operation of their group.

The above information about previous members is kept by Interest Group Leaders for a maximum of 12 months after someone's membership lapses or members indicate that they wish to leave the group.

Online Data

The FVU3A web site itself does not use advertising, analytics or tracking of the kind that commercial sites may employ. However, links to external sites may make use of these capabilities outside the control of FVU3A. Cookies (information stored by a browser from a web server) are used by the FVU3A web site only when accessing a password-protected document. These cookies are anonymous and do not identify the member personally. External sites linked from the FVU3A site may, however, use cookies.

Visits to pages on the FVU3A web site are totalled and are anonymous. Referring web sites (e.g. search engines) are tallied. No personal information (e.g. IP address or location) is recorded. Page statistics are used by the FVU3A Board in order to determine which sources of information are the most relevant.

Photographs and videos may be taken by FVU3A organisers at its major events. These may be used on the FVU3A web site, in its Facebook and Twitter information, and in U3A publications generally. A member who does not wish to appear prominently in such images must make this known to the event organiser. Non-members who might appear in these images will be asked if they may appear in this way. With the exception of image data and what appears in FVU3A publications, personal data will not be used online without the member's consent. Image data may be stored online indefinitely unless there is a written request to the Web Site Maintainer to remove it.