

# U3A Oliva Data Protection Policy (Draft)

## Aims of this Policy

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

This policy covers Members, Committee Members Administrators & Group Leaders.

## Objectives

U3A Oliva needs to keep certain information on its members to carry out its day to day operations, meet its objectives and comply with legal obligations.

The organisation is committed to ensuring personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

U3A Oliva will ensure that personal data will:

- Be obtained fairly and lawfully.
- Be processed for a specific and lawful purpose
- Be adequate, relevant but not excessive
- Be accurate and kept up to date
- Not be held longer than necessary
- Be subject to appropriate security measures
- Not to be transferred outside the European Economic Area (EEA)

The definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The Personal Data Guardianship Code suggests five key principles of good data governance on which best practice is based. The organisation will seek to abide by this code in relation to all the personal data it processes, i.e.

- **Accountability:** those handling personal data follow publicised data principles to help gain public trust and safeguard personal data.
- **Visibility:** Data subjects should have access to the information about themselves that an organisation holds. This includes the right to have incorrect personal data corrected and to know who has had access to this data.
- **Consent:** The collection and use of personal data must be fair and lawful. Before personal data is to be shared with a third party, the data subject's consent should be explicitly obtained.
- **Access:** Everyone should have the right to know the roles and groups of people within an organisation who have access to their personal data.
- **Stewardship:** Those collecting personal data have a duty of care to protect this data throughout the data life span.

## Type of information processed.

Personal information is kept in the following forms: Members Contact Information and invoices and payments.

Groups of people within the organisation who will process personal information are: Committee Members, Administrators & Group Leaders.

## **Responsibilities**

Under the Data Protection Guardianship Code, overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of U3A Oliva, this is the Committee.

The governing body delegates tasks to the Webmaster. The Webmaster is responsible for:

- understanding and communicating obligations under the Act
- identifying potential problem areas or risks
- producing clear and effective procedures

All web site administrators who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

Breach of this policy will result in the member being excluded from U3A Oliva Membership.

## **Policy Implementation**

To meet our responsibilities administrators will:

- Ensure any personal data is collected in a fair and lawful way;
- Ensure that only the minimum amount of information needed is collected and used;
- Ensure the information used is up to date and accurate;
- Review the length of time information is held;
- Ensure it is kept safely;
- Ensure the rights people have in relation to their personal data can be exercised

## **We will ensure that:**

- Everyone managing and handling personal information is trained to do so.
- Anyone wanting to make enquiries about handling personal information follows this policy.
- Any disclosure of personal data will be in line with our procedures.
- Queries about handling personal information will be dealt with swiftly and politely.

## **Training**

Training and awareness raising about the Data Protection and how it is followed in this organisation will take the following forms:

On induction: Administrators will be given copies of this document plus the email policy.

Training will be given on the use of the WA Content Management Software and they will have to demonstrate competence.

## **Data Security**

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

WA carries out daily backup of data base. Membership secretary keeps an excel spreadsheet of all members on data base.

Any unauthorised disclosure of personal data to a third party by a member may result in legal action, plus expulsion from the U3A Oliva.

## **Subject Access Requests**

Anyone whose personal information we process has the right to know:

- What information we hold and process on them
- How to gain access to this information
- How to keep it up to date
- What we are doing to comply with the Data Protection Policy

They also have the right to prevent processing of their personal data in some circumstances.

They can correct, information regarded as wrong by logging into their personnel profiles.

Individuals have a right to access personal financial transaction records. Any person wishing to exercise this right should apply in writing to the Treasurer. Email: treasurer@u3a-oliva.org

We may make a charge on each occasion access is requested.

We may also require proof of identity before access is granted.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible.

## **Review**

This policy will be reviewed at intervals of 2 years to ensure it remains up to date and compliant with current law.

## **Declaration**

I confirm I have read and understood the U3A Oliva's Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a

- Member
- Group Leader
- Management committee member

Signature:

Print name:

Date:

Please return this form to Webmaster.

