Commented [JG1]: Jac: questions whether the policy should mention that we keep medical information about members. Should this be included in the policy? Jo

Privacy Statement and Data Protection Policy

Statement of Policy

This policy applies to the work of Burnham-on-Crouch u3a. It sets out how personal information will be collected, stored and managed, to ensure that the organisation:

- 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

It is reviewed on an ongoing basis by the Committee to ensure that Burnham-on-Crouch u3a remains compliant.

Burnham-on-Crouch u3a processes information provided by members so that we can keep them informed about events, groups and activities, and help to keep them safe, as part of their membership.

Where you provide information about people who are your emergency contacts, we ask you to inform them that you are providing us with their information, which will be used only for emergency contact purposes. When you choose to provide information about any medical conditions which you want us to know about, it will be used only in case of medical emergency.

In processing your information, Burnham-on-Crouch u3a will store it securely, use it to communicate with you as a u3a member, share your information with Interest Group leaders of groups that you are a member of, and send you general information about the Third Age Trust.

The lawful basis for collecting this information is 'legitimate interest'.

Personal data which we collect and process

Members' names, postal addresses, phone numbers, email addresses, Gift Aid information, emergency contact names and phone numbers, significant medical conditions (should a member choose to provide this), photographs, interests.

How this personal data is held, and why

- The Membership Secretary keeps information provided on membership application forms (and renewal forms) in a secure database, to establish and maintain membership records. When a member leaves, their details are removed from the membership database after no more than 12 months unless any legal or statutory requirement (eg Gift Aid) means that details must be kept for a longer period.
- Members' email and postal addresses are used to send the magazine to members, and to send membership-wide notices including AGM details and information about activities.
- Interest Group leaders' contact details are used to keep in touch about any matters affecting Interest Groups.
- The Group Co-ordinator keeps details provided by members in order to put members in touch with Interest Group leaders.
- The Treasurer uses details provided by taxpaying members to claim Gift Aid on behalf of the organisation.
- Photographs of members are used in the magazine or at events such as Open Days. Any member who does not wish to appear in a photograph is welcome to move out of shot, or to request that a photograph is not published.
- Interest Group leaders keep members' contact information (including, where necessary, emergency contact information and information about signficant medical conditions) to organise their groups and help to keep members safe in case of medical emergency. When an Interest Group leader steps down, the Group Co-ordinator will remind them to pass any contact information to their successor and to delete their own records.
- Committee members' contact information is used to enable communication among the Committee.

How the Committee monitors data protection

- The Committee keeps the use of members' personal data under review. If any member wishes to check what information is held, they can contact the Membership Secretary.
- Committee members, Interest Group leaders and any others who need to access personal data will receive annual reminders about their responsibilities. This process will be combined with the annual review of this policy.
- The Committee will periodically review this policy and its operation.
- If there is a breach of these policies, the Chair will be informed immediately so that the details can be investigated and recorded, and if necessary reported to the Third Age Trust. If a device holding personal

data is lost or stolen, the Membership Secretary will immediately inform the Third Age Trust.

This Statement and Policy will be made available to members by posting a copy on our website. It will be made available (eg as part of the Group Leaders' information booklet), alongside other policies, to all Group Leaders. Group Leaders will be reminded of their role under this (and all other) policies, at least annually.

Legitimate Interest Assessment: Membership

Burnham-on-Crouch u3a requests personal data in order to be able to register individuals for membership of the organisation. The personal data provided is also used to communicate with members about the activities of the u3a, to keep members informed about any groups or activities that they are interested in and/or involved with, and to claim Gift Aid on members' subscriptions where appropriate.

The information requested from members is limited to what is needed for effective record-keeping and communication. The reasons for collecting information are explained to members upon joining. Membership information is held securely and access is limited to those who need to process data for membership purposes. Membership is renewed every twelve months, at which point members have the option whether or not to renew, as well as the opportunity to update their personal information.

Membership data will not be processed for any purpose other than in connection with an individual's membership. Communications sent will be relevant and targeted to individuals' relevant activities and interests.

All those who process membership information for the u3a will receive an induction into the requirements of data protection, the restrictions around data processing and the need to keep data secure and restricted to those who need access to it.

Based on this assessment, Burnham-on-Crouch u3a considers that it has a legitimate interest in collecting, holding and processing membership information.

Legitimate Interest Assessment: Emergency Contact Details

Burnham-on-Crouch u3a, which has a duty of care to its members, requests details for members' emergency contacts so that Interest Group or activity leaders know who to contact in the event of an emergency; and requests information about any significant medical conditions so that Interest Group or

activity leaders can act on, or pass on, that information in case of a medical emergency involving a member.

We invite members to provide information about any significant medical conditions so that, in the event of a medical emergency, the appropriate steps can be taken and the appropriate information given to the emergency services.

We request only basic information about emergency contacts, including their name(s), phone numbers and an indication of their relationship to the member. This information is held securely and will be accessed only by those who need to see it.

We ask members to inform the person(s) identified as their emergency contacts that their details have been provided, for this purpose, to the u3a. For certain trips or activities we may need to provide these details to a third party; if so, members will be informed.

The emergency contact information provided by members would be used only in the event of an incident/accident, to contact someone who may need to collect the member, support the member, or liaise on the member's behalf with a third party such as a medical professional. The information will not be processed for any other purposes.

Based on this assessment, Burnham-on-Crouch u3a considers that it has a legitimate interest in collecting, holding and processing emergency contact information.

AGREED: Committee Meeting, August 2024
AGREED: Committee Meeting August 2025
AGREED: Committee Meeting September 2026

Review Date: August 2027