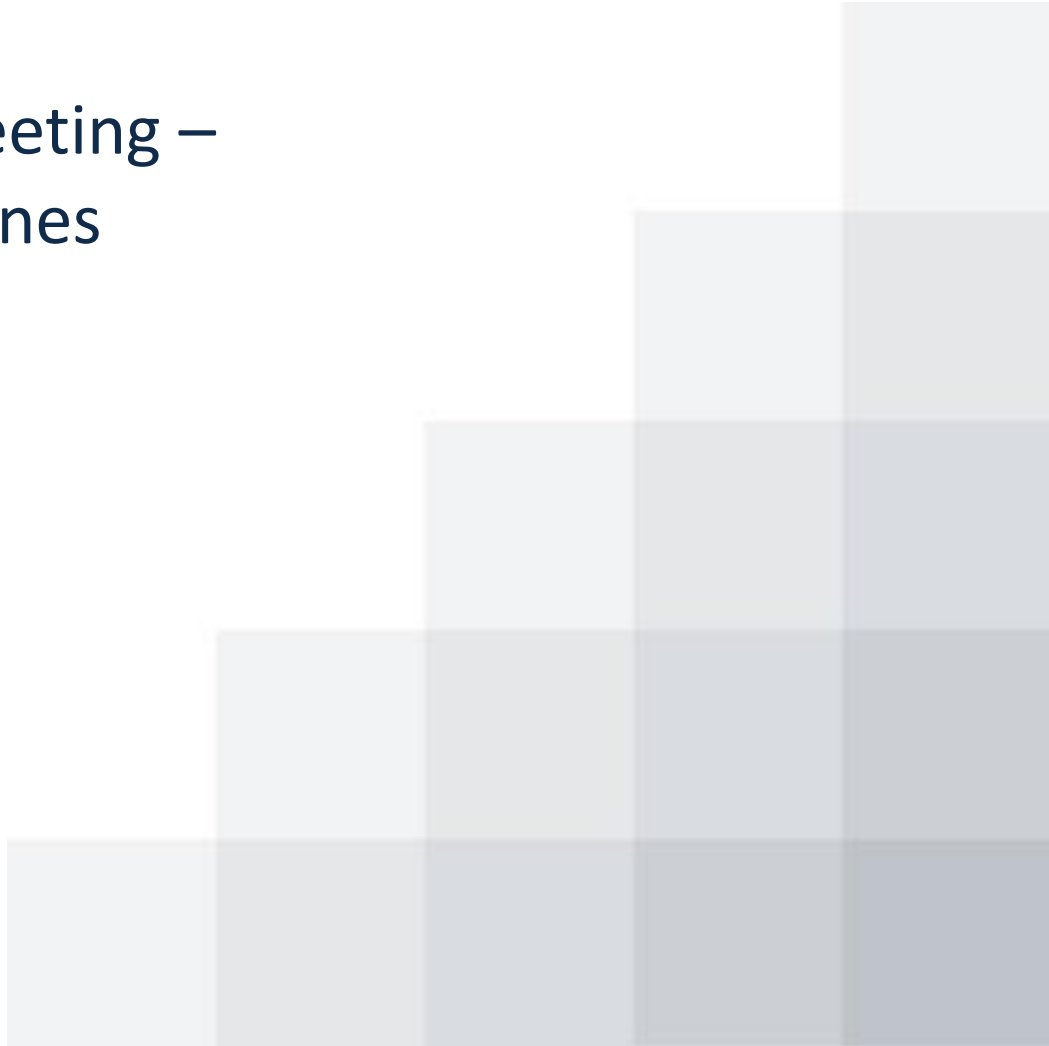




Group Coordinators Meeting – Data Protection Guidelines

June 2018
Rev. 01





What We Will Cover

1. What is 'GDPR'?
2. iU3A Privacy Policy
3. How Do We Comply?
4. What does it mean for our Members?
5. What does it mean for Group Coordinators?
6. In Summary



1. What is GDPR?

- General Data Protection Regulation (GDPR)
- It's a new regulation, in force from 25th May 2018. But it largely updates & replaces previous Data Regulations
- It's something (protecting member's personal data) we should be doing anyway
- One of the principles of GDPR is to 'limit' and 'minimise' the use and storage of personal data, and all such use & storage must be covered by one of a number of legal basis specified in GDPR



2. iU3A Privacy Policy

- GDPR requires that every 'organisation' have a Privacy Policy
- Hence we now have one. It's been issued to all members & is available on our 'About' webpage
- The Policy aims to re-assure our members that we will protect their personal data (name, image, email address, phone number, next of kin/ health info)
- The Policy defines how we will comply with the law and the basis or bases on which personal data will be used & stored. The bases available are Consent, Contract, Legitimate Interest and Legal Requirement. Each has different implications.
- We now need to comply with our Privacy Policy



3. How Do We Comply?

LEGAL BASIS

- Generally membership of iU3A involves a 'contract' between iU3A and the member (based on the membership subscription) and to comply with this contract we need personal data. This covers most of our data processing requirement
- There are specific circumstances where we may need to ask for 'consent'. These would include for example: photographs, health data, purchase of the TAT magazine
- There are also specific issues where we rely on 'legitimate interest' (LI) and hence need to have conducted an LI Assessment. These include for example next of kin or gift aid data.

PHOTOGRAPHS

- For group photographs you must ask if it's ok to take a photo that will be visible to others (for example through our website, at monthly meetings and the open day or other promotional purposes); & if anyone objects they need to step out of the photo
- For individual images (for example for new group coordinators) consent will be requested and registered (we don't have to go backwards historically)



4. What does it mean for our Members?

RIGHT OF ACCESS

- A member can ask to see their data wherever it is held in iU3A. Therefore we must know all the data and all locations where it's stored
- Access means digitally & physically
- We are creating a Data Inventory Register so we can track all data

RIGHT OF CORRECTION OR DELETION

- A member can ask for their data to be corrected. They can do this themselves directly in Beacon
- A member can ask for their data to be destroyed/ deleted. If they wanted all their data deleted then they would have to end their membership
- After a member leaves iU3A their data must be deleted within 12 months of their departure. This is data in all locations. There are some legal exceptions to this (for example for accounting, insurance or gift aid requirements)

HEALTH DATA & THE MAGAZINE

- Specific measures will be taken where required



5. What does it mean for Group Coordinators?

EMAILING GROUP MEMBERS

- The data in Beacon is covered by the 'contract' basis. Therefore if you are using Beacon to contact your group members then you don't need to do anything. You are already in compliance.
- If you are emailing group members directly – exposing their personal email address to others in the group - you have to have their consent. This consent needs to be positive and explicit, ie it needs to be registered & stored. If however you are sending emails to group members under blind copy (ie by bcc) then you don't need their consent – Coordinators use of personal data is covered by the 'contract' basis.
- However we should be 'limiting' our data storage. If you are emailing members this way (ie not through Beacon) you are increasing our use (& storage) of personal data

LISTS

- Keeping lists relating to group activities (eg attendance records) which have the members name &/or email addresses, is acceptable (covered by our 'contract' basis). But these are subject to all the above, ie they need to be registered, minimised, and access provided if requested
- Best to minimise these lists and delete them as soon as practical



5. What does it mean for Group Coordinators?

OUTINGS/ VISITS/ EVENTS (using a 3rd party)

- If you are to share our member's data – even a list of names - with a third party you must have specific positive consent from all those members concerned
- You should check that the 3rd party is GDPR compliant (and ask for a copy of their Privacy Policy)

GENERAL

- To minimise data storage it is best if Beacon is used – then many Coordinators can use the same data. If a member is in several groups & each of these Group Coordinators is keeping that member's data separately that multiplies our risk of a breach.
- Any data breach (eg if you lose a laptop or smartphone that has iU3A personal data on it) has to be reported to the EC and we have to report it to the National Office .
- If you stop being a Group Coordinator please ensure you delete/ destroy all member's personal data.
- Use of Google Forms / Sheets (for sign ups etc): can continue to use these but should follow the above, ie minimise and delete old versions



6. In Summary

- GDPR is common sense & good practice.
- Don't let it put you off being a Coordinator!!!
- But as we move into more of a digital world we need to give 'personal data' more attention and respect our member's rights
- You might not have to do anything differently from what you are currently doing, but bear it in mind.