

Hollywood District u3a

Policy Documents

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Safeguarding information and overview

1. What is safeguarding?

“Safeguarding” refers to measures designed to protect the health, wellbeing and human rights of individuals.

- All u3a members have a responsibility to report any safeguarding concerns to their committee.
- All u3a committee members have an obligation to follow their safeguarding policy and procedure if they suspect that a member is at risk of abuse.

2. What are some examples of where safeguarding procedures may be activated?

- A member controlling the finances of a visually impaired member.
- A member arriving at an outdoor-based group without appropriate clothing and seemingly confused.
- A member making advances towards another member with dementia.

3. What is the responsibility of members in safeguarding?

Safeguarding is everyone’s responsibility, and members must bring any safeguarding concerns they have to their committee (this can be via their group leader). Members should follow their code of conduct and not keep any concerns they have to themselves.

4. What is the responsibility of the committee in safeguarding?

All trustees must take reasonable steps to protect anyone who comes in contact with u3a from harm. Every trustee should have clear oversight of how safeguarding and protecting people from harm are managed within the u3a. Trustees must report all safeguarding concerns to the relevant safeguarding authorities promptly. Trustees should support those involved in safeguarding incidents but should not lead safeguarding investigations- this must be left to the authority it is referred to (e.g., social services).

Once a safeguarding concern has been raised , it should be referred onto the appropriate authority. Usually, this would be the HSC Trust in Northern Ireland. In cases where the individuals involved are in immediate danger you should call 999.

Additionally, **Hourglass** (previously Action on Elder Abuse)

<https://www.wearehourglass.org> is a confidential support and advice for older people who have been abused or people who know an older person who may be suffering abuse. Available weekdays 9am - 5pm on freephone 0808 808 8141.

5. What are the signs and indicators of abuse and neglect?

Abuse may be inflicted by anyone that the member comes into contact with. There are many signs and indicators that may suggest abuse or neglect including:

- Unexplained bruises or injuries – or lack of medical attention for an injury
- Non attendance at interest groups without reason and no response to reminders from group leaders or other members.
- Significant loss or gain of weight and/or an unkempt appearance.

- A change in the behaviour or confidence of a member, where they become quiet and withdrawn, or lash out in anger.
- A member showing fear of a particular group or individual.
- A member who sends unwanted sexually explicit text messages to a vulnerable member
- Threats of physical harm and bullying, or intentional striking of another member.

Additionally, a member may report they are being abused – i.e., a disclosure.

6. How do you deal with a disclosed safeguarding concern?

If someone discloses a safeguarding concern to you:

Do:

- Stay calm and try not to show shock or disbelief.
- Listen carefully to what they are saying.
- Be sympathetic (“I’m sorry that this has happened to you”).
- Be aware of the possibility that medical evidence might be needed.
- Tell the person that:
 - They did the right thing to tell you.
 - You are treating the information seriously. It was not their fault.
 - You are going to inform the appropriate person.
 - You/ will take steps to protect and support them.
- Record and report the disclosure in line with your safeguarding policy and procedure.

Do not:

- Press the person for more details if they are not comfortable sharing.
- Stop someone who is freely recalling significant events (Don’t say ‘hold on, we’ll come back to that later’; they may not tell you or anybody else again).
- Promise to keep secrets; you have a duty of care to raise safeguarding concerns.
- Make promises you cannot keep such as “this will never happen to you again”.
- Contact the alleged abuser unless they are also a u3a member and it is necessary to do so to safeguard other members.
- Be judgemental.
- Pass on the information other than to those with a legitimate ‘need-to-know’ under your safeguarding policy and procedure.

7. How should you record a safeguarding concern?

- Note what people actually said, using their own words and phrases.
- Describe the circumstances in which the disclosure came about.
- Note the setting and anyone else who was there at the time of the disclosure.
- Separate factual information from your own and others’ opinions.
- Use pen or biro with black ink so that the report can be photocopied if needed.
- Be aware that your report may be required later as part of a legal action or disciplinary procedure.

8. Key Definitions

Adult at risk

Any person aged 18+ who has need for care and support, is experiencing, or is at risk of abuse or neglect, and as a result of those needs is unable to protect themselves against the abuse or neglect, or risk of it.

Abuse

is the “violation of a person’s human and civil rights by any other person(s). It may be a single or repeated act(s), physical verbal, psychological, sexual, institutional, discriminatory, or financial, an act of neglect or failure to act”.

Types of abuse

- **Physical abuse** e.g. assault, hitting, slapping, pushing.
- **Domestic violence** e.g. psychological, physical, sexual, financial, emotional.
- **Sexual abuse** – including inappropriate looking or touching, indecent exposure and sexual harassment.
- **Psychological abuse** e.g., threats of harm, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation.
- **Financial or material abuse** e.g., theft, fraud, internet scamming, coercion in an adult’s financial affairs/arrangements, including with wills, property, inheritance or finances, or the misuse/misappropriation of property, possessions or benefits.
- **Modern slavery** encompasses slavery, human trafficking, forced labour and domestic servitude.
- **Discriminatory abuse** including harassment, slurs, or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Organisational abuse** – including neglect in relation to care provided at home. This may be a one off incident or on-going ill-treatment, through neglect or poor professional practice.
- **Neglect and acts of omission** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, withholding of medication, adequate nutrition and heating.
- **Self-neglect** – this covers a wide range of behaviour neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding.

Safeguarding Policy

Policy

Purpose

This policy and procedure is written to enable the committee to address issues where there are safeguarding concerns. Safeguarding includes incidents between members, concerns regarding abuse or neglect that a u3a member may be experiencing outside of the u3a, health related issues or previous or pending criminal convictions.

The purpose of this policy is to demonstrate the commitment of Holywood District u3a to safeguarding their members and to ensure that everyone involved in Holywood District u3a is aware of:

- The legislation, policy and procedures for safeguarding adults.
- Their role and responsibility for safeguarding adults.
- What to do or who to speak to if they have a concern relating to the welfare or wellbeing of an adult within Holywood District u3a.

Scope

This safeguarding policy and procedure apply to all individuals involved in Holywood District u3a, including the committee, group leaders and members, and to all concerns about the safety and wellbeing of members taking part in u3a activities and in the wider community.

Safeguarding Commitments

In order to implement this policy, Holywood District u3a will ensure that all members will be aware of the safeguarding procedures and know who to contact if they have a concern relating to the welfare or wellbeing of an adult.

Holywood District u3a committee has a duty of care to its members, is committed to upholding this safeguarding policy in order to protect its members.

Holywood District u3a recognises that some people are potentially at risk of abuse and neglect. Where abuse or neglect is suspected Holywood District u3a will aim to respond in a prompt and efficient manner to any situation where there is a risk of or perceived risk of harm.

Holywood District u3a does not hold any statutory authority. Matters of concern will be reported to the relevant safeguarding authorities and charity regulatory authorities, as appropriate. This may include the local authority, the local multi-agency safeguarding hub (MASH), or the police in an emergency.

Where there are concerns for a member's wellbeing or safety, Holywood District u3a committee will complete a safeguarding risk assessment, seek advice and support from the Trust where necessary, and will contact the relevant statutory authorities as needed. It is not appropriate for Holywood District u3a to take the lead role in any Safeguarding Enquiry according to the Northern Ireland Charity Commission guidelines)

Holywood District u3a recognises that there are various forms of abuse which can be perpetrated by volunteers, members, relatives, friends, and neighbours. Holywood District u3a will not condone nor tolerate any form of abuse or neglect and believes that all people should be able and, where necessary, enabled to live in an environment which is safe and free from harm.

Holywood District u3a will put the well-being of those at risk of harm first, and they will be actively supported to communicate their views and the outcomes they want to achieve. Those views and wishes will be respected and supported unless there are overriding reasons not to. Any actions taken will respect the rights and dignity of all those involved and be proportionate to the risk of harm.

A list of the types of safeguarding risks and harm can be found on the [England and Wales Charity Commission website](#), which is applicable generally.

Holywood District u3a will monitor the implementation of this policy and procedure annually through its committee.

When following the safeguarding procedure Holywood District u3a will strive to uphold the principles that those involved in incidents are entitled to:

- privacy
- be treated with dignity and respect
- lead an independent life and to be enabled to do so
- choose how they live their lives
- the protection of the law
- have their human and civil rights upheld regardless of ethnic origin, gender, sexuality, impairment or disability, age, religious or cultural background.

Holywood District u3a will also follow the principles enshrined according to the Northern Ireland Charity Commission guidelines.

- **Principle 1 – Empowerment** – whereby the approach is focused on the individual making their own decision and gaining informed consent, where possible.
- **Principle 2 – Prevention** – seeking to take steps to prevent issues from arising or escalating.
- **Principle 3 – Proportionality** – responding in a proportionate way to the issue/s being presented.
- **Principle 4 – Protection** – seeking to keep the membership safe and protection for those deemed to be at risk.
- **Principle 5 – Partnership** – reporting incidents to the relevant statutory bodies and liaising with the Trust.
- **Principle 6 – Accountability** – accurate recording of incidents. Reporting incidents, as required, to the Trust and to relevant regulatory authorities.

Procedure

Introduction

Holywood District u3a has a responsibility to ensure that its committee members and group leaders understand their safeguarding responsibilities.

Depending on the nature of the allegation and the identified risk, Holywood District u3a will support the alleged victims and the alleged perpetrators of any abuse as well as any volunteer who becomes aware of an allegation in so far as this does not compromise any safeguarding enquiry or investigation into the allegation or place other adults at risk.

Holywood District u3a will make every effort to respect the confidentiality of any information that is disclosed under this policy and procedure, however due to the seriousness of allegations confidentiality is not absolute. Information will be recorded and stored securely in accordance with Data Protection Act 2018 but information may have to be shared with relevant authorities on a 'need-to-know' basis only, to prevent:

- Danger to a person's life
- Danger to a person's health
- Danger to others
- Danger to the community
- To facilitate the investigation of a serious crime

Courses of action

- Holywood District u3a's approach to safeguarding will include members who exhibit health concerns that could put themselves or others at risk, convictions (previous or pending) that include offences of a sexual or violent nature, inappropriate behaviour exhibited by a member including sexual advances, bullying, aggression or violent behaviour, harassment and/or discrimination. This can include behaviour exhibited face to face as well as electronic communications or via social media platforms.
- Where the committee becomes aware of a safeguarding concern, steps will be taken, as needed, to ensure the safety of adult/s at risk is secured as a priority. The steps to take to address this will be discussed and agreed between the Executive Officers of the committee in the first instance. No committee member will act in isolation when dealing with a safeguarding concern. The steps taken should be documented and stored securely in accordance with the Data Protection Act 2018.
- Where Holywood District u3a committee becomes aware of a safeguarding concern, the first step will be to gather as much information as possible to assist with the decision as to the next steps. A risk assessment will be developed and recorded as soon as possible after the concern comes to the attention of the committee.

- Where it is deemed that the risk is high and immediate action needs to be taken, the committee will contact the relevant authorities and the Trust for advice and support. The Ards & North Down Council Designated Safeguarding Officer can be reached at 0300 013 3333, OR Adult Protection Gateway Service (South Eastern Health & Social Care Trust): Phone (Office Hours): 028 9250 1227
- As far as possible, the adult at risk's wishes will be respected as to whether or not to refer any concerns to the local authority as a Safeguarding Enquiry according to the Northern Ireland Charity Commission guidelines. However, it may be necessary to override their wishes in the best interests of other adults at risk.
- In developing the risk assessment, the committee will consider the level of risk and the action that needs to be taken accordingly. Assessment of risk will include:
 - Risk to the individual member
 - Risk to other members within the u3a
 - Reputational risk for the individual u3a and the u3a movement as a whole
- Where the risk is not deemed to be high but support is needed, Holywood District u3a will contact the Trust to discuss the concerns and seek additional assistance in developing the risk assessment. Assistance will always be sought before moving to exclude any member from the u3a on the basis of a safeguarding risk assessment.
- Once the risk assessment is completed, the committee will decide as to the most appropriate course of action. This could include excluding members from certain groups i.e., groups held in people's homes, requesting that a member attends the u3a with a carer or excluding a member from a group run by a particular group leader.
- Depending on the nature of the allegation it may be necessary to pursue the incident following Holywood District u3a's complaints or disciplinary procedure. Where it is decided that this is the best course of action the matter will not be investigated by any party that was privy to the initial reporting of the incident.
- All actions taken will be recorded. Any records will remain confidential to the committee unless a prior decision has been taken to share the record with the relevant statutory bodies.

Equality, Diversity and Inclusivity Policy

Statement

Holywood District u3a is a learning co-operative and membership charity which enables members in their third age to share educational, creative and leisure activities. Members of each u3a draw upon their knowledge, skills and experience to teach and learn from each other (peer to peer learning). Holywood District u3a recognise that some people are particularly likely to experience discrimination and harassment and are committed to making sure that the u3a is as inclusive and welcoming as possible.

Aims of this policy

Charities in Northern Ireland are regulated by the Charity Commission for Northern Ireland, in accordance with the Charities Act (Northern Ireland) 2008. Although there is no single Equality Act for NI, other legislation requires charities (and other organisations) not to discriminate on certain grounds (eg religion or political views) when they provide services to the public.

There are several major pieces of legislation which apply in Northern Ireland and protect individuals from discrimination on the basis of the following characteristics:

- Disability: Disability Discrimination Act 1995 as amended
- Sex (including pregnancy/maternity, gender reassignment and marital/civil partnership status): Sex Discrimination (NI) Order 1976 as amended
- Race: Race Relations (NI) Order 1997 as amended
- Religious belief and political opinion: Fair Employment & Treatment (NI) Order 1998 as amended
- Sexual orientation: Employment Equality (Sexual orientation) Regulations (NI) 2003 and the Equality Act (Sexual orientation) Regulations (NI) 2006.

Holywood District u3a will strive to ensure that members do not experience discrimination on the basis of their characteristics. This will include ensuring equal access to groups, and behaviour between members, and by Holywood District u3a Committee Members and group leaders. The legislation in Northern Ireland highlights that organisations have a duty to make reasonable adjustments for a person with a disability in order to ensure they can enjoy the u3a in the same, or as close a way as possible to members without a disability. Holywood District u3a Committee will review the reasonable adjustments needed for all members and individual members with particular needs related to their disability, on an ongoing basis as required.

It should be noted that the u3a movement is resolutely non-political and non-religious. It is not intended that Holywood District u3a will monitor members on the basis of religion or political opinion. Nor is it intended that we collect information on any of the characteristics except insofar as it may be necessary for the welfare of the individual member.

Practical approaches to inclusion

Holywood District u3a will make sure all new members are aware of our policies and procedures in relation to equality, diversity and inclusion and accessibility as well as the Member Code of Conduct. Holywood District u3a will make reasonable adjustments

and take practical steps to ensure a wide range of people can participate in our activities and meetings. This may include:

- Consideration given to the time of day of meetings and their location.
- Consideration of venues for meetings including:
 - Accessible to wheelchair users
 - Access to PA system
 - Parking and disabled parking available where possible
 - Disabled toilet facilities available
 - Using a variety of methods and platforms to communicate externally and raise the profile of the U3A.
 - Make communications available to those who don't have access to the internet
 - Encouraging members who are representative of the groups who may be under represented within the u3a, i.e. men or younger members, to assist with the recruitment process.
 - Managing growth so that we ensure that new members can be accommodated.
 - Holywood District u3a committee will review the membership on an ongoing basis and will seek to ensure that the u3a remains attractive and accessible to all.

Tasks and Roles:

- Ensure a range of people get their voices heard by encouraging more members to take on roles such as leading groups.
- The u3a will ensure that both new and existing members can access the members meetings and groups that they would like to join and consider what reasonable adjustments may be needed to ensure this.
- The Groups Coordinator will ensure that new Group Leaders are made aware of issues in relation to accessibility and what steps they may need to take in meeting access requirements. Each group will be reviewed on an individual basis as certain groups may require a certain level of fitness or mobility and members need to be made aware of this in advance.

Dealing with discrimination and harassment

Where Holywood District u3a Committee become aware of any discriminatory practice or harassment, the committee will seek to address this through consultation with all parties concerned and, where necessary, through invoking formal procedures.

If any member of Holywood District u3a feels they have experienced or witnessed discriminatory behaviour or harassment, this should be reported to the Committee. Any matters of concern will be reviewed by the Committee and a decision will be made, in line with the u3a's constitution and formal procedures, as to what steps will be taken to address the issue.

Definitions

Equality is about ensuring that every individual has an equal opportunity to make the most of their lives and talents, and believing that no one should have poorer life

chances because of where, when or whom they were born, or because of other characteristics. Promoting equality is about behaving in a way that tackles inequalities, aiming to ensure that all members are treated fairly, and do not experience discrimination.

Promoting diversity is about recognising that everyone is different and creating an environment that values members and ensuring that the u3a Movement is as accessible as possible to different groups within the community.

Inclusion is about positively striving to meet the needs of different people and taking practical steps to ensure members feel respected.

Direct Discrimination is when a person is treated less favourably because of their ethnic origin, nationality (or statelessness) or race, age, disability, religion or belief (including the absence of belief), marital or civil partnership status, sexual orientation, pregnancy, gender reassignment, political belief.

Indirect Discrimination occurs when a condition or requirement is applied equally to all groups of people but has a disproportionately adverse effect on one particular group.

Harassment is unwanted conduct related to ‘protected characteristics’ that has the purpose or effect of violating a member’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment is also unwanted conduct of a sexual nature which has that same purpose or effect.

Victimisation occurs when a member is treated less favourably than others in the same circumstances because he or she has made a complaint or an allegation of discrimination, harassment or bullying or given information regarding such a complaint or allegation.

Health and Safety Policy

Purpose

Health and safety is about minimising or removing the risk of accidents and injuries.

The [Health and Safety at Work Act 1974](#) only applies to paid workers, although volunteers must still be protected from risks. Holywood District u3a should ensure that reasonable care has been taken to avoid harming others and that participants are aware of the risks.

Policy

Holywood District u3a aims to provide and maintain safe and healthy conditions and environments for all members including during the meeting of u3a groups, monthly meetings and at events.

Insurance

Holywood District u3a is covered by the insurance provided by The Third Age Trust. Further details about the insurance cover can be accessed on the u3a website www.u3a.org.uk/advice. If any activities are being considered that Holywood District u3a is unsure if they are covered, they will contact the u3a Office for further advice. The Third Age Trust provides third party liability insurance; however extreme sports and high hazard activities may not be covered. Please check before running an activity.

Risk Assessments

Holywood District u3a will ensure the Committee, Group Leaders or those responsible for a meeting or event complete a risk assessment(s). These will be used to identify any risks and explore how they could be mitigated. Holywood District u3a is aware that some venues used for meetings/events may already have their own risk assessment, these should be reviewed and where mitigations identified, ensure they are actioned. E.g. a venue may state that nothing be placed in the way of fire escapes. Where relevant, clear instructions and guidance should be provided to anyone who requires it. Further information, guidance and templates about risk assessments can be downloaded from the u3a website: www.u3a.org.uk/advice

Responding to accidents/incidents and dealing with emergencies

In the event of an incident/accident the Chair or another Committee member of Holywood District u3a should be informed as soon as appropriate. Where a u3a member is involved in an accident or incident whilst taking part in a u3a event, Holywood District u3a will ensure those who witnessed the event and were involved complete an incident report (template available to download from website). This must be completed and shared with those who need to have access to it, including the Committee Chair, and kept on file. It will also need to be shared with the insurers in the event of an insurance claim.

Lone volunteering

There may be occasions where u3a members may be carrying out activities for Holywood District u3a on their own. For example, opening a venue for a meeting, setting up for a meeting etc. Where this occurs the u3a member should ensure someone else knows where they are and when they should be expected back. The u3a member should also know who to contact in the event of an incident or accident and ensure they have, for example, their mobile phone with them and avoid activities at height e.g. using a ladder.

Manual handling

All u3a members should think about manual handling in advance to avoid injury to themselves and others. Members should not carry out any manual handling tasks if they are not able to manage them and should ask for help from other u3a members.

Venues

Where Holywood District u3a uses external venues who have their own policies and procedures and risk assessments Holywood District u3a will ensure these are followed. This will include making sure all u3a members in attendance are aware of what to do in the event of a fire alarm/evacuation. If Holywood District u3a is hosting an open day this will also include ensuring those who are not u3a members are also informed.

In General

Holywood District will ensure this policy is kept up to date and reviewed annually. Members of the Committee are responsible for monitoring and overseeing the implementation of the policy. The Committee has the ultimate responsibility for ensuring that members adhere to this policy and to keep up to date with any new legal requirements as they come into force.

It is equally the duty of every member, to exercise responsibility and to take care of their own health and safety and that of any other person who may be affected by their actions or omissions. Members are expected to do everything possible to prevent hazards and injury to themselves and others when engaged in u3a activities. Group leaders have an important role to play in this regard. All leaders should review what information your members need. This should include procedures for using special materials or equipment, as well as more general reminders about the location of fire exits, for example. “Common sense” is the key phrase.

Related documentation

The following documents are available on the u3a website www.u3a.org.uk/advice.

- Risk assessment templates
- Risk Management guidance
- Insurance Cover Note 2025
- Insurance FAQs
- Insurance Overview

Data Protection Policy

Scope of the policy

This policy applies to the work of Holywood District u3a. The policy sets out the requirements that Holywood District 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 Holywood District u3a committee members to ensure that Holywood District u3a remains compliant.

Why this policy exists

This data protection policy ensures Holywood District 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 convenors

- The only people able to access data covered by this policy should be those who need to communicate with or provide a service to Holywood District u3a members.
- Holywood District u3a will provide induction training to committee members and group convenors to help them understand their responsibilities when handling data.
- Committee Members and group convenors should keep all data secure, by taking sensible precautions and following the guidelines below.
- Committee Members should ensure that any personal information is at all times treated as confidential.
- 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 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 accordance 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

Holywood District u3a requests personal information from potential members and members for membership applications and for sending communications regarding members' involvement with the u3a. Members will be informed as to why the information is being requested and what the information will be used for. The lawful basis for obtaining member information is due to the legitimate interest relationship 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. Holywood District u3a members will be informed as to who they need to contact should they wish for their data not to be used for specific purposes for which they have provided consent. Where these requests are received, they will be acted upon promptly and the member will be informed as to when the action has been taken.

Processed for specified, explicit and legitimate purposes

Members will be informed as to how their information will be used and the Committee of Holywood District 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 Holywood District u3a events and activities
- Group convenors communicating with group members about specific group activities

- Member information will be provided to the distribution company that sends out the Trust publication – u3a Matters. 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

Holywood District u3a will ensure that group convenors are made aware of what would be considered appropriate and inappropriate communication. Inappropriate communication would include sending u3a members marketing and/or promotional materials from external service providers.

Holywood District u3a will ensure that members' information is managed in such a way as to not infringe an individual members 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 Holywood District u3a will only be asked to provide information that is relevant for membership purposes. This will include:

- Name
- Postal address
- Email address
- Telephone number
- Gift Aid entitlement

Where additional information may be required such as health 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.

If Holywood District u3a organises a trip or activity that requires next of kin information to be provided, a legitimate interest assessment will have been completed in order to request this information. Members will be made aware that the assessment has been completed.

Photographs

Photographs are classified as personal data. Where group photographs are being taken members will be asked to step out of shot if they don't wish to be in the photograph. Otherwise consent will be obtained from members in order for photographs to be taken and members will be informed as to where photographs will be displayed. Should a member wish at any time to remove their consent and to have their photograph removed then they should contact the group leader or a Committee member to advise that they no longer wish their photograph to be displayed.

Accuracy of data and keeping data up-to-date

Holywood District u3a has a responsibility to ensure members' 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 Holywood District u3a as to any changes in their personal information.

Accountability and governance

Holywood District u3a Committee are responsible for ensuring that the 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. Holywood District u3a Committee will ensure that new members joining the Committee receive an induction into the requirements of GDPR and the implications for their role. Holywood District u3a will also ensure that group convenors are made aware of their responsibilities in relation to the data they hold and process. Committee Members will stay up to date with guidance and practice within the u3a movement and will seek advice from the Third Age Trust National Office should any uncertainties arise. Holywood District 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 and Group Convenors relinquish their roles, they will be asked to either pass on data to those who need it and/or delete data.

Secure Processing

Holywood District u3a Committee Members have a responsibility to ensure that data is both securely held and processed. This will include:

- Committee members using strong passwords
- Committee members not sharing passwords
- Restricting access of sharing member information to those on the Committee who need to communicate with members on a regular basis
- Using password protection on laptops and PCs that contain personal information
- Using password protection, a membership database or secure cloud systems when sharing data between committee members and/or group conveners
- Paying for firewall security to be put onto Committee Members' laptops or other devices.
- **Subject Access Request**
- u3a members are entitled to request access to the information that is held by Holywood District u3a. The request needs to be received in the form of a written request to the Secretary of Holywood District u3a. On receipt of the request, the request will be formally acknowledged and dealt with expediently (the legislation requires that information should generally be provided within one month) unless there are exceptional circumstances as to why the request cannot be granted. Holywood District 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 will be taken to minimise the harm. This will include ensuring that all Holywood District 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 Holywood District 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.

Complaints Policy

Complaints procedure: this may include complaints from members about an issue that has arisen or complaints from an external organisation or individual. Depending on the nature and source of the complaint, the committee will make a decision as to how best to approach reaching a resolution.

u3a Complaints – responsibilities of the committee

In any organisation, complaints will occur from time to time and it is important that members know where to turn for help, advice and support so that, whatever the issue, it can be dealt with quickly, objectively and appropriately. In the first instance, complaints should be directed towards the committee of the u3a. This may include complaints from members about an issue that has arisen or complaints from an external organisation or individual. Depending on the nature and source of the complaint, the committee will make a decision as to how best to approach reaching a resolution.

In dealing with complaints, the u3a committee will ensure:

- All actions will be documented.
- Complaints will be dealt with quickly and fairly.
- The u3a committee will try to de-escalate the situation and settle issues without having to resort to formal action, where possible.
- Confidentiality will be maintained. For more serious complaints, the committee may need to liaise with and share information with the Third Age Trust. This will not constitute a data breach due to the u3a's membership of and affiliation to the Trust.
- Decisions made will be based on the facts and evidence gathered.

Informal process

In most cases, it is hoped that complaints can be dealt with informally as detailed below:

- Depending on what the issue is, a decision should be taken as to who the best person is to lead on attempting to resolve the situation informally. If an issue has arisen between two members in a group then the Group Leader may be the best person supported by the Groups' Coordinator, if felt appropriate. For issues involving committee members it will be best for another committee member to attempt to mediate and try to find a solution. The initial stage requires checking with the party raising the concern as to whether they are willing to accept an informal outcome as opposed to going through a formal process.
- The person(s) identified to lead on the informal stage will hold an informal discussion with all relevant parties. The purpose of this would be to understand the problem and hear each party's views. The parties may decide to put their concerns or complaints in writing, and for the sake of clarity, this is often helpful.

- If there are several people involved with the complaint – it may be deemed appropriate to speak with others mentioned so that as full a picture as possible is obtained.
- The purpose of the informal meetings will be to seek to summarise the situation with both parties, attempting to reach a mutually satisfactory outcome, agree any changes required to ensure that the situation does not happen again and clear the air.
- If it is felt that there is a case to answer but that nevertheless it is a minor issue, and all parties are willing to accept the agreed outcome, then it should be made clear that there should be no repeat of the actions/behaviour and that no further action is necessary.
- If, however, it is felt by the person(s) leading on the informal stage, that the situation warrants a more formal approach or a specific course of action e.g. exclusion from an interest group; or if the person raising the complaint wishes to lodge a formal complaint, the matter should be referred, in writing, to the Chair of the u3a Committee stating that this is a formal complaint. This will include a summary of the complaint, any steps already taken to deal with the issue and any action that the parties involved consider necessary to resolve it.

Formal process

Where someone wishes to raise a formal complaint, they will be asked to put the complaint in writing providing as much information as is relevant and giving specific dates and times – where possible. The complainant should also be asked as to what outcome they are hoping to achieve by making the complaint, for example, whether they would be prepared to accept an apology. Explain to the complainant that whilst their desired outcome forms part of their complaint, they need to be aware that there are no guarantees as to what the likely outcome will be.

The committee will appoint a Trustee who acts as the designated Trustee for managing complaints. The committee may also contact the Third Age Trust and request support from the Regional Trustee, a Trust volunteer and/or u3a Office staff. The committee will inform the complainant that additional support has been requested and the reasons why.

A letter or email will be sent to the complainant confirming receipt of the complaint and

- if the complaint is deemed to be a disciplinary then the disciplinary procedure will be followed.
- if the complaint is deemed to not involve a disciplinary matter then the following process will be undertaken.

The Chair will appoint either one or two people to lead on the investigation. This will include gathering information and conducting interviews related to the complaint. The person(s) against whom the complaint has been made will be informed about the basis of the complaint. This will include the letter of complaint and any supporting documentation or other member statements. The result of these investigations must not be disclosed to any other Trustees at this stage, in order to not bias any appeal.

The Chair will appoint a subcommittee of three committee members to hear the complaint.

The timetable for the date of the meeting to hear the complaint will be short, within 14 days. The subcommittee will then consider the matter, taking into account any mitigating circumstances and agree what action to take. This could include, for example, a change of procedures, a change of venue for monthly meetings or whatever outcome is deemed the most appropriate as a solution.

Decision

The subcommittee decision will be communicated in writing to both the member or Trustee who raised the complaint and the member or Trustee against whom the complaint has been made. Both parties will be informed as to the outcome of the investigation in respect of whether the complaint has been upheld or not upheld. If the complaint has been upheld, the letter will also specify what action will be taken as a result.

Right of appeal

A right of appeal should be offered providing it is lodged within a 7 day period from the date of the subcommittee decision being provided to the complainant and the member or Trustee against whom the complaint has been made. The appeal needs to be lodged in the form of a written representation for the committee to consider. An appeal can be lodged either by the person who made the complaint or by the person against whom the complaint has been made.

The appeal can include a request for a right of reply as well as written representations. For the appeal, the Chair will convene a meeting of three Trustees (including themselves). This should not include those who were involved in the initial investigation.

The person raising the appeal will be offered a verbal right of reply, if they wish to take this up then they will be asked to attend a meeting with the appeal panel. Where the verbal right of reply involves the member or Trustee against whom the complaint has been made, they will be offered the option to attend with a companion who may also speak in a personal capacity.

The whole issue will be summarised and the person making the appeal will be given the opportunity to speak. The appeal panel will review the decision based only on the facts included in the original hearing, taking into account any mitigating circumstances, and then make a final decision, which must be communicated in writing to both parties.

Disciplinary Policy

Disciplinaries – responsibilities of the committee

This procedure sets out how Holywood District u3a will approach problems related to a breach or suspected breach of the agreed Code of Conduct by a member or Trustee. This procedure is intended to ensure any issues are dealt with promptly, fairly and consistently. All parties are encouraged to take a problem-solving approach to achieve resolution.

In the event of a report of any member or Trustee allegedly breaching the Code of Conduct or if a breach becomes apparent, the Chair will be notified immediately.

In carrying out this procedure, Holywood District u3a will ensure the following:

- Every action will be documented.
- Disciplinary matters (including the appeals procedure) will be dealt with quickly and fairly.
- Holywood District u3a will strive to de-escalate any situation and to settle the issue without having to resort to formal disciplinary action.
- Holywood District u3a will seek additional support from Trust staff, the Regional Trustee and Trust volunteers, as required. All requests for support will go via the u3a Office.
- Confidentiality will be maintained at all times. For more serious issues Holywood District u3a will liaise with the Third Age Trust to seek advice and guidance about procedural issues. Sharing of information with the Trust will not constitute a breach of confidentiality due to the affiliation with the Trust. Members involved in the disciplinary procedure will be informed of the Trust's involvement.
- Decisions will be based on facts and evidence.

The disciplinary procedure will be implemented once all steps that have been taken to resolve matters informally have been unsuccessful and/or where a matter is deemed by the u3a committee to be so serious that the only relevant course of action is to follow the disciplinary procedure.

1 Confidentiality

All procedures and documents relating to a disciplinary must be kept confidential at all times. Information will only be shared with those who have a genuine need to receive it and this will include Trust staff and volunteers, as required. All situations should be dealt with discreetly and by showing respect for the parties and views involved.

2 Informal procedure

It is very important to try and resolve disputes amicably and informally. This is more likely to lead to a better relationship between the parties in the longer term. The Chair will use his/her best endeavours to resolve the problem amicably and quickly, through an informal discussion with the member or Trustee in question or using the established mediation process. The Trustee or member will be informed that if any areas of activity

that could potentially be of a **disciplinary** nature are found, they will be requested to attend a meeting with an initial Hearing Committee.

The informal discussion will be clear and all parties should understand their obligations at the end of the meeting. A confidential written record of the outcome of the informal discussion should be kept by the Chair.

3 Formal procedure

However, if the initial process is not effective in reaching a solution or if it is felt that the alleged breach is serious enough to require formal disciplinary action, the Chair will appoint two investigating trustees (who are not involved or connected to any party in the alleged breach) to investigate it. The Chair will appoint a subcommittee of a minimum 2/3 committee members (where possible) to hear the alleged breach.

The result of these investigations must not be disclosed to any other Trustees, at this stage, in order to not bias any appeal. The timetable for the date of the meeting to hear the breach of code of conduct will be short, preferably within 14 days from the date that the Chair is first advised.

A letter will be sent to the member/Trustee who is alleged to have breached the Code of Conduct for the purpose of:

- Advising they are subject to a formal disciplinary procedure.
- Advising them of what constitutes the alleged breach of Code of Conduct.
- Asking for their response to the breach in writing.
- Advising them of the date of the breach hearing.
- Advising that they can also attend the subcommittee meeting to state their response in addition to their written response.
- Advising them they may choose to bring a companion, if they wish, who will also be bound by confidentiality.

If the member/Trustee advises that there are witnesses to the incident(s) who are willing to give representations, they will ask those witnesses to contact the subcommittee to agree to giving a statement relating to the specific incident(s) that they have witnessed. It is important that any statements taken are a factual representation of what the witness says. The statement should not be an interpretation or opinion of what he/she says.

4 The Hearing Committee

The Hearing Committee will be the members of the committee appointed by the Chair. The initial Hearing Committee will examine the matter, considering any written statements submitted, verbal statements and any mitigating circumstances. From this the Hearing Committee will agree whether any disciplinary action has taken place.

The full committee may be told that a disciplinary procedure has been initiated and is being dealt with, but not given any of the detail. This is necessary in order not to bias any appeal that they may be required to hear at a later date.

Note: If the Chair of the committee is suspected to have breached the Code of Conduct, then the Vice Chair will replace the Chair in the procedure. In this case, and in the event of an appeal, the Vice Chair may choose to ask committee members from a

neighbouring u3a or seek advice or request attendance from Third Age Trust staff or Trustees.

The initial Hearing Committee may decide there is no breach of conduct in which case they will advise the member or Trustee of this outcome. If they do feel that the Code of Conduct has been breached they can consider any of the following possible forms of disciplinary action. Levels 4 and 5 will only be invoked in the case of significant breaches of the code or a persistent repetition of behaviour about which the member or Trustee has previously been warned, such as not complying with the terms of the constitution.

5 Levels of action

5.1 Level 1

No case to answer. No further action necessary.

5.2 Level 2

A verbal warning which makes clear the nature of the unacceptable behaviour and includes a warning about future conduct and the consequences of non-compliance. The Chair should give the warning on behalf of the initial Hearing Committee. Details of the warning should be recorded, dated and kept on file.

5.3 Level 3

A written warning from the Chair, on behalf of and agreed by the sub-committee, itemising the unacceptable behaviour, stating the improvement required with immediate effect and the consequences of continued non-compliance.

5.4 Level 4

A final written warning as above, which states that if the behaviour is repeated the member or Trustee will be asked to leave the u3a or committee, with immediate effect.

5.5 Level 5

The Trustee or member is asked to leave either the committee or the u3a.

6 Gross misconduct

If there is a case to answer, for most problems the process will start at Level 1. However, in the case of an extremely serious proven misdemeanour, for example:

- Sexual/racial abuse, discrimination, harassment, bullying.
- Dangerous or violent behaviour.
- Falsification of expense claims.
- Theft.
- Malicious damage
- Conduct which brings the u3a into disrepute or is prejudicial to the u3a or the running of the u3a.

The committee has the right to move immediately to Levels 4 or 5, including asking the Trustee or member to leave.

7 Decision

The decision should be communicated in writing to the member or Trustee advising them if the breach of the Code of Conduct has been upheld or not upheld. If the breach has been upheld, they will be informed:

- Of the action that will be taken as a result;
- That they have the right of appeal;
- That the right of appeal can only relate to the original breach;
- That the appeal request must be lodged with the Chair within 14 days from the date the decision is communicated.

8 Right of appeal

The Trustee or member who is alleged to have breached the Code of Conduct must be informed of their right of appeal at the end of the initial hearing. The appeal must be lodged within a 7 day period, from the date of the appeal request and must take the form of written representation with the opportunity to attend an appeal meeting for a right of reply. The Trustee or member must be advised of their right to attend with a companion. The written appeal request must be sent to the person chairing the initial hearing. The Chair should be informed of the intention to appeal by the person chairing the initial hearing. The Chair will then convene a further sub-panel of Trustees who did not hear the original disciplinary, to hear the appeal.

The appeal panel will then hold an appeal hearing to consider any written response and representations in order to make their decision on whether to uphold the appeal or not. This will be independent of the initial hearing and trustees should not discuss this outside of the appeal sub-panel.

If the member or Trustee concerned requests a right of reply to the appeal panel the member or Trustee can be accompanied by a companion who may also speak in a personal capacity, if they wish.

The Chair of the appeal panel will summarise the issues involved in the disciplinary hearing and the information provided and then the member or Trustee will be given the opportunity to speak, along with their companion if the companion wishes to speak.

The appeal panel will review its decision, considering any mitigating circumstances, and then make a final decision which must be communicated in writing within 7 days of the appeal meeting.

The committee's decision following any appeal is final and absolute confidentiality must be maintained.

MEMBER CODE OF CONDUCT

Purpose

The Member Code of Conduct clarifies the standard of behaviour expected from each u3a member.

Scope

Relevant to all u3a members.

Member Code of Conduct

- Members are expected to know, follow and promote the Principles of the u3a Movement at every opportunity.
- Members must always act in the best interests of Holywood District u3a and the u3a Movement, strive to uphold its reputation and never do anything which could bring their own, another u3a or the u3a Movement into disrepute or expose it to undue risk.
- Members are expected to use Holywood District u3a's resources responsibly and only to further its stated charitable objects/purposes.
- Members are expected to reflect the current organisational policy of Holywood District u3a, regardless of whether it conflicts with their personal views.
- Members are expected to abide by Holywood District u3a's procedures and practices.
- Members are expected to treat each other with dignity and respect at all times.