

Oban u3a Privacy and Data Protection

Further Guidance

1. Introduction and scope

Our privacy policy and guidance have the following goals:

- a) to ensure that there is a sound legal basis for our storage and use of personal information that we hold about members
- b) to document our diligence in pursuit of our obligations
- c) to explain what information is held
- d) to reassure members that data held are stored and used appropriately, with the requisite confidentiality and security
- e) to give guidance on precautions necessary to avoid breach of the policy

a and **b** above are covered by our formal Privacy Policy, which is a legal document based on a template provided by the Third Age Trust. Here we provide guidance within our u3a. The Privacy Policy should be regarded as definitive in the event of any discrepancy between the two documents.

This document takes cognisance of the advice on data protection provided by the Third Age Trust on their web site¹.

Our membership data are managed within the *Beacon* system. Beacon is run on behalf of the Third Age Trust, and gives individual u3as a means of managing their day-to-day business functions.

¹ <https://www.u3a.org.uk/edocman-downloads/data-protection> (despite its title, this is advice, not a template)

Beacon policies are included in the system documentation² and cover the privacy safeguards within the system.

All data are managed within a GDPR³ compliant framework.

2. Definitions

the u3a	Oban u3a (us, we, our)
Member	This is used in a broad sense to mean a person who <i>is, has been or has expressed interest in becoming</i> a member of Oban u3a. It is equivalent to “data subject” in GDPR terminology.
Convenor	The primary contact for an interest group. (Detailed arrangements may vary as to how the tasks of running a group are shared among members, but each group must have one primary contact.)
Deputy Convenor	In running some groups there may be designated Deputy Convenors whose duties require administrative privileges similar to those of Convenors.
Authorised Users	Members of Oban u3a who, in discharging their duties, have the right to access member information relevant to those duties. These include office bearers and committee members, Group Convenors and Deputy Convenors.

3. The data held

For individual members we hold:

- Name
- Postal address

² <https://www.u3a.org.uk/beacon/beacon-team-data-protection-policy>

<https://www.u3a.org.uk/beacon/beacon-team-privacy-policy>

<https://beacon.u3a.org.uk/terms/>

³ European General Data Protection Regulation as implemented by the UK Data Protection Act 2018

- Phone number(s)
- eMail address
- Names of groups which the member has joined or asked to join
- Date of joining⁴
- Subscription payment information
- Whether they have subscribed to the u3a magazine.

Additionally, Oban members are given the option of indicating that they have mobility limitations⁵, but no detail of their nature is requested. Convenors are made aware of group participants indicating limitations and may make contact to discuss the suitability of meeting venues.

In rare circumstances, for example in the event of an accident, there may be a requirement to ask for further information. This is covered in the Beacon Policies⁶.

4. How your information can be verified, updated or corrected

Members should inform the u3a of changes to their personal information. They can make changes themselves by logging in to the Beacon Members' portal or can contact the Membership Secretary:
Email: obanu3amemsec@gmail.com

On annual membership renewal you will be asked to reaffirm and update your information as required. You can view the information that we hold on you directly in the Beacon system or by contacting the Membership Secretary. We will usually respond within 28 days of the request being made.

5. How long do we keep your personal information?

Your record will be removed from Beacon three months after expiration of your subscription.

⁴ Prior to the May 2024 installation in Beacon this information was not recorded.

⁵ The wording of this section may change to reflect an updated membership form.

⁶ <https://www.u3a.org.uk/beacon/beacon-team-data-protection-policy>

Names of individual members may appear in minutes and other records but full personal information (as outlined above) will not be retained. There may be legal or insurance circumstances that require some information to be held for longer.

6. How do we use your personal information?

This information can be accessed by committee members, group convenors and deputy convenors (*authorised users*) who will use it:

- for administration, planning and management of our u3a.
- to communicate with you about u3a activities.

Under this policy, only *authorised users* will have access to these data.

Personal data will not be used for anything other than u3a business.

Sometimes, often at the suggestion of members, potential content which does not *directly* relate to u3a business comes to the attention of the editor of our Newsletter. After consulting with members it was agreed that the editor may include such information occasionally, judging that it:

- is likely to be of interest to a majority of members
- will not offend, for example for political or religious reasons
- cannot be construed as lobbying or marketing
- is comparatively modest in quantity

7. Data Sharing outwith Oban u3a

If you have chosen to subscribe to the u3a Trust magazines (*u3a Matters* and *Sources*) you will have consented to share mailing information for that purpose.

8. Guidance to Authorised Users

Authorised users must not disclose members' personal information to others. Note that this forbids disclosure even to other members of our u3a.

8.1. Composing and forwarding and reusing messages and text

Clearly, without agreement, personal information should not be revealed in any form of communication (for example, email and WhatsApp). Particular care should be taken to check that text which is forwarded in messages or reused in any other way does not contain personal data inappropriate for the recipients.

8.2. Communications with multiple recipients

When messages are sent to multiple individuals, many systems such as email and WhatsApp, by default, make the entire recipient list visible to all recipients. This could breach the privacy policy.

Whatever medium is used, recipient lists should not be revealed unless permission has been granted (see 8.3 below).

When using email “bcc” (Blind Carbon Copy) should be used to keep recipient lists confidential.

8.3. Guidance to Convenors and group members on sharing

Many groups make a collective agreement to share contact details. This can facilitate joint discussions, transport and sundry practical arrangements. For email, such agreements can include using “to” and “cc” rather than “bcc.” When a group agrees to use email this way members should be aware that their email address is shared with all members of the group. Members must not forward such messages outside of the group, even to other Oban u3a members. In agreeing to communicate this way group members rely on the discipline of all the other members not to reveal their personal information outside of the group.

Where collective recipient lists are used it must be noted that adding an outsider to a visible recipient list (for example a visiting speaker or another Oban u3a member) would also breach the guidance, meaning that it would be necessary to revert to a mechanism such as bcc.

When using WhatsApp only group members can see the names and mobile phone numbers of the rest of the group. Forwarding messages sent within the group to outsiders does not risk revealing contact details. However care should be still be taken that the body of the message also contains no personal information.

9. Photographs

Obanu3a uses images in the newsletter, on our website and in other documents and materials. These images will often include members, and will only be used with members' permission. Permission will be sought before taking photographs. At events where photography is anticipated, participants should be told at the start, and advised to move out of shot if they not wish to be included.

If a member prefers, for whatever reason, not to be seen in any of our images it would be helpful if they informed the secretary.

Any metadata which include personal details or private location information should be removed from images. (These data are typically invisible and much software, such as MS-Word washes off such information by default.) Photographers should be credited for their photographs and any copyright information that they attach should be retained.

10. Contact

If you have any queries about this guidance (including suggestions for improvement), need it in an alternative format, or have any complaints about our privacy practices, please contact us:

Email: obanu3a@gmail.com

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