

Data Protection Policy

Mathematics Recovery Council UK and Ireland

Last updated	28.01.2021
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Definitions

Charity	means Mathematics Recovery Council UK and Ireland, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Wik Piotrowski
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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; and
- f. processed in 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.”

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity is exempt from registering with the Information Commissioner’s Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity’s systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

General Data Protection Regulation: Register of Systems

Mathematics Recovery Council UK and Ireland

GENERAL DATA PROTECTION REGULATION: REGISTER OF SYSTEMS

Introduction

In accordance with the General Data Protection Regulation which comes into force on 25 May 2018, this document sets out the approach of Mathematics Recovery Council UK and Ireland to the collection, use and management of the personal data of its members under the following headings:

- The data we collect and in what way
- How the data are stored and who has access to them
- Sharing the data
- Purpose for which the data are used
- Data removal and archiving

The data we collect and in what way

On becoming a member of Mathematics Recovery Council UK and Ireland or on applying for a training course or conference individuals are asked to complete an application form and to supply name and email address, a residential address and telephone number.

The data are entered on to an Excel spreadsheet by the Member Secretary and updated either through the annual membership renewal process or as new data are made available throughout the year (e.g. change of email or residential address).

Names and email addresses of accredited Maths Recovery teachers, trainers and consultants are also entered by the Administrator on a contact database in order to facilitate the dispatch/receipt of newsletters, conference information or training updates.

How the data are stored and who has access to them

Only the officers of Mathematics Recovery Council UK and Ireland – i.e. Chair, Treasurer, Administrator and Membership Secretary – have access to the personal data of members of Mathematics Recovery Council UK and Ireland.

The Excel spreadsheet maintained by the Administrator (see above) is shared with the Membership Secretary each time it is updated. Both the spreadsheet held by the Administrator and that by the Membership Secretary are password-protected and regularly backed up.

The Chair has access to the full data set on request to the Administrator and/or membership Secretary. The Chair has direct access to names and email addresses only via the database.

Application forms are passed to the Membership Secretary once data have been entered on to the Excel spreadsheet and contact database by the Administrator and are stored alphabetically in year order.

Online application forms are stored electronically and password protected.

Sharing the data

The complete data set is shared solely between the officers as described above.

The complete data set will not be shared with any third party unless legally obliged to do so.

From time to time it might be necessary to share the personal data of one member of Mathematics Recovery Council UK and Ireland with another in order, for example, to arrange transport to an event of one member by another. This will not, however, be done, without the agreement of the member concerned.

Purpose for which the data are used

The data are processed on the basis of legitimate interest.

The data are used primarily as a vehicle for disseminating information about Mathematics Recovery Council UK and Ireland and its activities.

The membership application form specifically asks members to opt in to receiving information from Mathematics Recovery Council UK and Ireland.

Each electronic newsletter provides the option to unsubscribe.

Data removal and archiving

A member who fails to renew his/her membership is kept on the membership database for one further year and continues to be sent information during that time.

If a member fails to renew his/her membership after this further year, his/her data are removed from the membership database to an archive list for a further two years. The archive list is used solely for the purpose of informing former members from time to time of Mathematics Recovery Council UK and Ireland activities in which they might be interested.

ADOPTED 24 January 2019