North Midlands LGBT+ Older Peoples Group
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Information Governance Policy Updated August 2026

1. Purpose

The North Midlands LGBT+ Older Peoples Group collects and uses information to manage its membership, communicate with people, organise activities and run the charity effectively.

This policy explains how we will manage information lawfully, fairly, securely and proportionately.

It replaces the previous Data Protection Policy.

2. Scope

This policy applies to trustees, volunteers and anyone handling information on behalf of the Group.

It covers personal information held on paper or electronically, including information held in emails, online forms, mailing lists, messaging services, Group systems and personal devices used for Group business.

3. Our Responsibilities

The Group will comply with relevant data protection and privacy law.

We will:

- collect and use personal information only for clear and lawful purposes;
- collect only the information we reasonably need;
- take reasonable steps to keep information accurate;
- keep information secure;
- retain information only for as long as it is needed;
- respect people's legal rights;
- be able to explain how and why we use personal information.

We recognise that membership of, attendance at or communication with an LGBT+ organisation may reveal or suggest sensitive personal information. Such information will be treated with particular care.

4. How We Use Information

The Group may collect and use information for purposes including:

- administering membership and prospective membership;
- communicating about meetings, activities and Group business;
- managing attendance and event bookings;
- checking eligibility for activities;
- producing statistical reports;
- managing photographs and publications;
- dealing with complaints, safeguarding concerns, accidents and other incidents;
- meeting legal, regulatory, funding and governance requirements.

The Group will identify an appropriate lawful basis for using personal information.

5. Privacy and Transparency

The Group will provide clear and accessible privacy information wherever personal information is collected.

This will explain, in broad terms:

- what information is collected;
- why it is used;
- who it may be shared with;
- how long it is retained;
- the rights available to individuals;
- how to contact the Group or make a complaint.

The Group will also provide appropriate information about cookies, email tracking and similar technologies and obtain consent where required by law.

Privacy information will be reviewed when the Group changes how it collects or uses information.

6. Security and Confidentiality

The Group will take reasonable and proportionate steps to protect information from loss, misuse, unauthorised access or disclosure.

Access will be limited to people who need the information for an authorised purpose.

Electronic communications and electronic storage will use approved Group accounts wherever practicable. Personal devices and accounts may be used where necessary, provided information is kept secure and important Group records remain accessible to the charity.

Particularly sensitive information, including safeguarding and complaint records, will be subject to additional restrictions.

7. Sharing and External Services

Personal information will be shared only where there is a lawful and legitimate reason.

The Group may use external services to manage email, mailing lists, online forms, documents, website functions and communications. Reasonable steps will be taken to ensure that these services provide appropriate protection.

Information will not be sold.

Wherever possible, statistical information provided to funders or partners will not identify individuals.

8. Retention and Disposal

Personal information will be kept only for as long as it is reasonably needed.

The Group will maintain proportionate retention arrangements for its main types of records.

Information retained for statistical purposes will be anonymised where names or other identifying details are no longer required.

Paper and electronic records will be securely destroyed or deleted when they are no longer needed.

9. Individual Rights and Complaints

The Group will respect people's legal rights in relation to their personal information.

Requests to access, correct, restrict or delete information, or to object to its use, will be handled within the legally required timescale.

People may raise concerns with the Group and may also complain to the Information Commissioner's Office.

10. Information Breaches

Any loss, unauthorised disclosure or other suspected breach of personal information must be reported promptly to the Chair or another trustee.

The Group will:

- take steps to limit any harm;
- establish what happened;
- keep an appropriate record;
- notify the Information Commissioner's Office or affected individuals where legally required.

11. Responsibilities

The Board of Trustees is collectively responsible for ensuring that the Group complies with this policy.

All trustees and volunteers handling information must:

- follow this policy;
- maintain confidentiality;
- use information only for authorised purposes;
- report concerns or breaches promptly;
- return, transfer or securely delete Group information when their role ends.

12. Related Documents

How we process and manage membership records is set out in our **Membership Procedures**.

Other policies that affect how we handle information include:

- Confidentiality Policy;
- Safeguarding Policy;
- Complaints Policy.

We publish the following on our website:

- Privacy Notice;
- Cookie Policy.

13. Review

The Board of Trustees will periodically review how the Group collects, uses, stores, shares and disposes of personal information and will take reasonable steps to address any areas that do not comply with this policy.

The Board of Trustees will review this policy at least every three years, or sooner if:

- the law or official guidance changes;
- the Group significantly changes how it handles information;
- an information incident identifies a need for review.

---------- End of policy ----------

Version History

05/08/2026	Created as a new policy to replace the Data Protection Policy