

# YOUR DATA

Version 5  
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THE HONOURABLE SOCIETY OF  
THE INNER TEMPLE

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## Introduction

1. The Honourable Society of the Inner Temple ("the Inn") needs to collect, process and use information about its members and other contacts to carry out its work. We seek to ensure that all personal information is collected and dealt with appropriately – regardless of the material, media or form it is collected through or stored on. We aim to ensure that this is done with reference to the framework laid out in the Data Protection Act 2018 ('DPA2018') and the General Data Protection Regulation (GDPR) (the legislation). We also aim to ensure that our data policy and the rights of the data subject are transparent and understandable.
2. This policy sets out the basis upon which any personal data that we collect from you, or that you provide to us, will be processed and with whom, if anybody, it may be shared. This document should be read carefully by members, and anyone else whose data might reasonably be expected to be processed by the Inn, to inform them of the Inn's data practices and procedures.
3. For the purposes of the legislation the Data Controller is The Honourable Society of the Inner Temple.
4. This policy informs data subjects of the Inn's procedures in respect of data processing and the rights of those subjects under the legislation. If you have any questions arising from this policy or regarding your rights in connection with the data we hold on you, or the Inn's data processing practices, then please contact our Data Protection Lead at: [jhodgson@innertemple.org.uk](mailto:jhodgson@innertemple.org.uk)
5. The following is a list of definitions of the technical terms that we have used in this policy and is intended to aid understanding. If you have any questions regarding these definitions then please get in touch with the Inn's Data Protection Lead.

**5.1 Data Controller** - 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**5.2 The legislation** - Data Protection Act 2018 ('DPA2018') and the General Data Protection Regulation (GDPR). The current UK data protection laws that outline the responsibilities of those processing personal data.

**5.3 Data Protection Lead** - The person(s) responsible for ensuring that the Inn follows the Data Protection Policy and complies with the DPA2018. This is Jude Hodgson, the Membership Registrar.

**5.4 Data Subject/Service User** - The individual whose personal information is being stored or processed by the Inn. This might be a member, a client, an employee, a supporter or other stakeholders.

**5.5 Consent** - 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**5.6 Information Commissioner** - The UK Information Commissioner responsible for implementing and overseeing the DPA2018.

**5.7 Processing** - "Processing" means any operation or set of operations performed upon personal data, whether by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

**5.8 Personal data** – 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.



**5.9 Sensitive data-** "Sensitive Personal Data" are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and data concerning health or sex life.

## Information processing

6. The Inn collects personal information using diverse methods: paper forms; emails; online forms, etc.

7. The information that we collect will include: your name, date of birth, a postal address, email addresses, your contact telephone number(s), education/employment information, and, where relevant, criminal record information. We will also collect diversity monitoring information for outreach activities, when you apply to join the Inn, apply for a scholarship or become a Bencher, so that we can support the Inn's work on monitoring social mobility and access to the Bar in line with the Inn's equality and diversity policy. We will also collect criminal records information for the purposes of fit and proper person checks at admission to the Inn, Call to the Bar and if disciplinary matters arise while a student member of the Inn.

8. Like most website operators, we collect non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Our purpose in collecting non-personally identifying information is to better understand how our visitors use our websites. From time to time, we may release non-personally-identifying information in the aggregate, e.g. by publishing a report on trends in the usage of our website. We also collect potentially personally-identifying information like Internet Protocol (IP) addresses. We do not use such information to identify our visitors, anonymise wherever possible, and do not disclose such information, other than under the same circumstances that we use and disclose personally-identifying information, as described in the 'When you visit our website' section of this document.

9. The Inn may also use and disclose other information in aggregate for research, marketing, and strategic development purposes. Further, the Inn is required to share some of your data with external bodies, such as equality and diversity information with the Bar Standards Board and information in relation to admission and scholarships with the other Inns.

A Data Sharing Protocol is in place between the independent data controllers; the Bar Standards Board (BSB), the Council of the Inns of Court (COIC) and each of the four Inns of Court: Inner Temple, Middle Temple, Gray's Inn and Lincoln's Inn. This document ('the Protocol') provides a framework for the collection, sharing, retention and destruction of information. This is to support the BSB in the administration of its regulatory functions and to provide quality assurance that obligations administered by the Inns of Court and COIC are done so effectively. Members of the Inner Temple should make themselves aware of the protocol in order to better understand how their data may be shared. A copy of the protocol can be found [here](#).

10. The Inn may also ask you to complete surveys (both electronic and paper-based) used for research purposes. Information given in these surveys will be completely confidential and analysed anonymously. You are not obliged to complete the surveys; data from research will be destroyed once it has been analysed and published.

11. The Inn may have cause to contact you by letter, telephone, email, or otherwise in relation to the purposes specified in this policy. It is therefore of fundamental importance that you ensure that your contact details are kept up to date. This can be done online or by informing the Membership Registrar: [jhodgson@innertemple.org.uk](mailto:jhodgson@innertemple.org.uk)

12. When processing your personal data, the Inn will ensure that it does so with a lawful basis for the processing or the explicit consent of the data subject in accordance with this policy and the DPA2018. The Inn will keep a register of processing activities, the lawful basis we rely on for that

processing and, where legitimate interest is relied upon, a legitimate interest assessment to ensure this interest does not outweigh the personal rights and freedoms of the data subject.

### **Informed consent**

13. Informed consent is:-

*13.1. any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.*

14. The Inn will ensure that data is collected within the boundaries defined in this policy. Regardless of whether that data is collected in person or by completing a paper based or electronic form.

15. When collecting data, the Inn will ensure there is a clear explanation of:

*15.1. Why the personal information is needed;*

*15.2. What it will be used for and what the consequences are should the Data Subject decide not give consent to processing;*

*15.3. The lawful basis relied upon for processing that data;*

*15.4. Where consent is relied upon, that consent is freely given by somebody competent to do so and without duress.*

### **Use of personal information**

16. The Inn believes treating personal data with respect and full regard to the principles in the DPA2018 and GDPR to be vital in maintaining trust and good relations with all our members and contacts.

17. The Inn intends to ensure that personal information is treated lawfully and correctly.

18. The Inn will, through appropriate management and adoption of data protection by default and by design:

*18.1. Observe fully the conditions regarding the fair collection and use of personal information;*

*18.2. Meet its legal obligations to specify the purposes for which personal information is used;*

*18.3. Collect and process appropriate personal information and only to the extent that it is needed to fulfil its operational needs or to comply with any legal requirements;*

*18.4. Ensure as far as it is able the quality of personal information that is used - it is incumbent upon the individual to ensure that the personal data that the Inn holds on them is kept up-to-date and accurate;*

*18.5. Ensure that the rights of Data Subjects about whom personal information is held, can be fully exercised under the DPA2018 and GDPR . These include:*

*18.5.1. The right to be informed that processing is being undertaken;*

*18.5.2. The right of access to a Data Subject's own personal information;*

*18.5.3. The right to prevent processing in certain circumstances;*

*18.5.4. The right to correct, rectify, block, or erase information that is regarded as incorrect information; and*

*18.5.5 The right to data portability.*

- 18.6. *Take appropriate technical and organisational security measures to safeguard personal information;*
- 18.7. *Ensure that personal information is not transferred abroad without suitable safeguards;*
- 18.8. *Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation, or ethnicity when dealing with requests for personal information; and*
- 18.9. *Set out clear procedures for responding to requests for personal information.*

19. The Inn will use the personal information provided by you (or that is appropriately obtained from third-parties, which includes persons duly authorised by you to provide such information on your behalf) for the following purposes: -

**19.1 Membership** - We will use the information you provide us with, or which we have appropriately obtained from a third party:

- 19.1.1. To inform you about developments within or pertaining to the profession, particularly those relating to the Inn's regulatory functions;*
- 19.1.2. To inform you about developments within the Inn, particularly membership;*
- 19.1.3. For the administration and management of membership records;*
- 19.1.4. For the provision and administration of education and training services and events;*
- 19.1.5. For the management and support of the Inn's standing committees (including access to papers and other information for committee members);*
- 19.1.6. To administer dinners and Inn's events;*
- 19.1.7. In any other respect that we may reasonably require to carry out the work of an Inn of Court.*

The legal basis we rely on for processing this data is Article 6 (1) (b) of the GDPR - contract. It is appropriate to the Inn's relationship with its members and its regulatory functions. Where we use your data to direct market the Inn's social events we will rely on the basis of consent. The Inn may share data with other agencies such as a local authority, HMRC, funding bodies, and other agencies connected with the Bar, such as the other Inns, Bar Standards Board, the Bar Council, the Circuits, and Specialist Bar Associations to be able to keep records up-to-date and to administer your relationship with them. We will also share your data with the Inn's data base provider Access thankQ, their privacy policy can be found [here](#). We will also share data with Mailchimp in order to facilitate the Inn's Communications, this will necessitate your data leaving the EEA. Personal data will only be sent to countries where an 'adequacy decision' has been made under Article 45(3) of the GDPR, or, in the case of a partial adequacy decision, where data processors have signed up to the EU-US Privacy shield framework. Mail Chimp's privacy statement is [here](#).

*19.1.8. To monitor trends in membership relating to access of minorities to the profession and to ensure equality and diversity at the Bar.*

To monitor the equality of access to the Bar and social mobility trends in the profession we will process Special Category Data. The legal bases we rely on to process the information is Article 6 (1) (e) a Public task and Article 9 (2) (g) reasons of substantial public interest under member state law, for the purposes of ethnicity and diversity monitoring under the Equality Act 2010.

We will retain your data indefinitely, as appropriate, as a historic record of the Inn's membership.

**19.2 For the investigation of complaints and conduct issues and to carry out Fit and Proper Person checks on admission and Call** – The Inn may process criminal conviction

data to fulfil the above purpose. We will rely on the basis of Article 6(1) (e) - a public task and official capacity under Article 10 of the GDPR – that authority being delegated to the Inns by the BSB under the Legal Services Act.

**19.3 Education, Training and Outreach activities** – We will use your information for the provision of education and outreach services and events. We will rely on the legal basis provided in Article 6 (1) (f) of the GDPR – legitimate interest. To aid the placement of Pegasus Access and Support Scheme (PASS), and to place PASS students with chambers, we will share your details with the set of chambers. Students should check the privacy statement of the set with which they are placed. For those individuals who progress to membership we will keep their data indefinitely, per membership above. For those that do not progress, we will retain their data for five years after their participation in the event or scheme. To monitor the equality of access to the Bar and social mobility trends in the profession we will process Special Category Data, the legal bases we rely on to process the information is Article 6 (1) (e) a Public task and Article 9 (2) (g) - reasons of substantial public interest under member state law, for the purposes of ethnicity and diversity monitoring under the Equality Act 2010.

**19.4 Financial transactions and accounts** – The Inn will use personal data for the processing of financial transactions and maintaining accounts. We will rely on the legal basis provided in Article 6 (1) (b) of the GDPR – contract. The Inn will keep details of transactions and accounts for six years plus the current year. The Inn uses Sagepay to take payments through its website, their privacy policy can be found [here](#) .

**19.5 Car park administration** – We will use personal data to administer the Inn’s car park. We will rely on the legal basis provided in Article 6 (1) (f) of the GDPR – legitimate interest. We will keep your data for 10 years.

**19.6 Crime prevention** – The Inn is monitored by CCTV cameras. We will use this data for the prevention of crime in the Inner Temple, using the legitimate interest basis in Article 6(1)(f). The data is deleted after 28 days. We may share the data with Middle Temple, chambers in the Inn and the police for the purpose of crime prevention in the Inner Temple.

**19.7 Administering tenant relationships** – The Inn will use personal data to administer its relationship with the Inn’s residential tenants. We will rely on the legal basis provided in Article 6 (1) (b) of the GDPR – contract. We may share your details with the Inn’s provider of cleaning services and for the purposes of maintenance to the property. Details of residents will be kept indefinitely as an archival record of the Inn’s tenants.

**19.8 Administration of a scholarships scheme** - The legal basis we rely on for processing this data is Article 6 (1) (f) of the GDPR - legitimate interest. For those individuals who progress to membership we will keep their data indefinitely, per membership above. For those that do not, we will keep the data for five years. We will share the names of scholarships winners with the Times newspaper.

**19.9 Managing of administrative functions for the Temple Church –**

19.9.1. We will use the information you provide to manage donations to the Temple Church relying on the basis provided in Article 6 (1) (b) of the GDPR – contract; details will be kept indefinitely.

19.9.2. We will use information provided to us by you to manage the permissions for those requesting marriage in the Temple Church, relying on the basis provided in Article 6 (1) (b) of the GDPR – contract. Details will be kept indefinitely to provide a historic record of those marrying in the

Church. Details will be shared with the Temple Church Administration Office.

## 19.10 When you visit our website

19.10.1. We use 'cookies' on our websites. A 'cookie' is a small piece of information that is sent by a web server to a web browser that enables the server to collect information from the browser. This small piece of information will be revealed to us when you visit the Inn's websites. You can find out more information about the use of 'cookies' at: <http://www.allaboutcookies.org>

19.10.2. The Inn uses 'cookies' to identify you when you visit our websites and to monitor your use of those sites. Other than as stated in this policy, the Inn does not use 'cookies' to collect any other information about you.

19.10.3. With a change in the law about 'cookies' in May 2011, all websites must now obtain your explicit agreement before they set a 'cookie' on your computer or other internet enabled device. You should be aware that most web browsers allow you to turn off 'cookies' or to receive a warning before a 'cookie' is stored on your device. Please refer to your browser instructions or help screen to learn more about how to do this. However, please note that if you disable any 'cookies' that the Inn's websites place on your device, you may not be able to use certain services or facilities on our websites.

19.10.4. As part of the collection of website visitor information, we use Google Analytics. You can find out more information about Google Analytics at: <https://support.google.com/analytics/answer/6004245?hl=en> and read Google's Privacy Policy at: <https://www.google.com/policies/privacy/>

19.10.5. You can opt out of Google Analytics cookies at: <https://tools.google.com/dlpage/gaoptout>

## 19.11 Photography and video

19.11.1 The Inn may take photographs or record video footage of attendees at its events for the purpose of:

- a. *Use on the Inn's Website or social media;*
- b. *Use in the Inn's publications, including, but not limited to: the Yearbook, newsletter and Careers Guide;*
- c. *Use in the Inn's promotional materials and publicity and marketing materials;*
- d. *Photos and video footage may be shared with media and press to publicise the Inn's events.*

The legal basis we rely on for processing this data is Article 6 (1) (f) of the GDPR - legitimate interest, or, where applicable, Article 6 (1) (a) - consent.

19.11.2 Photos and video will be stored in the Inn's media library for a maximum of five years, unless they are of historical or archival interests, such as a Royal visit or an Inn's anniversary.



19.11.3 If you object to the use of video footage or a photograph in which you appear, you can request that it be withdrawn at any time by emailing [events@innertemple.org.uk](mailto:events@innertemple.org.uk). This does not apply to material already published. The Inner Temple cannot control or recall already published material.

19.11.4 Where subjects are under 16 years of age, consent to use photographs or video will be sought from the relevant responsible adult, e.g. parent, guardian, carer.

19.11.5. When attending events, if you do not wish for photographs or videos of you to be taken, you should speak to the event manager, who may ask you to wear a sticker on your clothing so that you can be easily identified by the event photographer/videographer.

### Use of sensitive personal data

20. The Inn is committed to ensuring that access to the Bar should be equally open to all, regardless of ethnicity, gender, disability, marital status, sexual orientation, religion/belief, or socio-economic background. To aid in the achievement of that goal, the Inn needs to monitor data trends of those individuals entering the profession, so that we can better understand how people from a diverse range of backgrounds succeed in fulfilling their aim of a career at the Bar.

The Inn will continue to hold diversity information against your membership record. There is no obligation on an individual to provide this information and your professional relationship with the Inn will not be prejudiced in any way if you do not. However, to help with our monitoring work, the Inn strongly encourages you to provide this information together with your application to join the Inn and to update it as circumstances change.

21. The Inn will use the sensitive personal data provided by you for the purposes of diversity monitoring and other legal requirements. Such information will: -

*21.1. Be treated as confidential information and all measures will be taken to ensure that it can only be accessed by those whose job roles mean they have a justifiable reason for accessing the data.*

*21.2. Be destroyed if you do not commence the Bar Professional Training Course within five years of admission, or complete it within 10, or within the statutory/regulatory time period stipulated from time to time by the Bar Standards Board or its successors; are disbarred at your own request; or you request that such personal information is destroyed/erased; and*

*21.3. The sensitive personal data will not be released in a form that will identify an individual. Anonymised analyses may be published by the Inn in any format and on any medium. Anonymised data will also be shared with the industry regulator, the Bar Standards Board, and with the other Inns of Court for the purpose of statistical comparison and data trend analysis.*

22. If the Inn changes any of these purposes then you will be notified as soon as possible. If, after receipt of the details of the new or additional processing, you wish the Inn to destroy/erase your sensitive personal data then this will be carried out and confirmed to you.

23. If you require any information as to why the Inn gathers and processes diversity information from you, please contact the Inn at: [membership@innertemple.org.uk](mailto:membership@innertemple.org.uk)

### Social Media

24. When engaging with the Inn's social media channels, an individual uses the services of a third-party provider. The individual will therefore be subject to the data protection policies of those organisations in addition to those of the Inn. Such third-party providers are outside of our control and are not covered by this policy.

### **Other websites**

25. The Inn's websites and social media channels may contain links to third-party sites that are outside our control and are not covered by this policy. If you access other websites and social media channels using the links that are provided, the operators of these websites/channels may collect information from you that will be used by them in accordance with their own data protection policies. These may be different from those of the Inn. Therefore, if you use any of these links to leave our websites and social media channels and visit those that are provided by third-parties, the Inn cannot be responsible for the protection and privacy of any information that you provide whilst visiting those websites. Please check the appropriate policies before you submit your personal data to such websites and social media channels.

### **Data storage and security**

26. The Inn will take all necessary steps to ensure that your data is stored and processed securely in accordance with this policy and the principles of the DPA2018. All the Inn's employees are personally responsible for maintaining personal information confidentially and to ensure that such information is processed only for the specified purposes for which it is collected. The Inn provides continuing education and training to its staff about their obligations under this policy, the GDPR and the DPA2018. Additionally, staff members will only have access to information relevant to their work roles.

27. Personal information will be stored only if it is needed or required and will be disposed of appropriately.

28. All information that you provide to the Inn is stored on secure servers, both at the Inn and at our approved third-party locations, consistent with the Inn's IT management and business continuity plans.

29. All payment transactions carried out electronically with the Inn will be encrypted using SSL technologies. Card details will not be retained following the completion of online transactions, but account details will be held to manage and administer any continuing financial relationship with the Inn that the individual has consented to. Payments made via the Inn's website will be processed by a third-party payment processor on behalf of the Inn.

### **Marketing communications**

30. From time to time the Inn will send you marketing communications about its events, services or other offers the Inn thinks are relevant or of interest to its membership. You have a right to ask the Inn not to process your personal data for marketing purposes and can exercise your right to prevent such processing by using the 'unsubscribe' link at the bottom of marketing communications that you receive from the Inn. Alternatively, you can opt-out of all such marketing communications by informing the Inn at: [membership@innertemple.org.uk](mailto:membership@innertemple.org.uk)

We will not send direct marketing by email unless we have your specific consent to do so, we may still send direct marketing by post if we believe it is in our legitimate interest to do so.

31. Should you decide to opt-out of receiving marketing communications from the Inn, you will be foregoing the opportunity to find out about future member related events, special offers or opportunities.

## **Your rights**

### **Access to your information**

32. The DPA2018 and the GDPR afford you the right of access to the personal information that the Inn holds about you. If you wish to exercise this right, you should submit a 'Subject Access Request' to the Inn's Data Protection Lead using the contact details shown below. There is no charge for making such a request.

### **Object to processing**

33. Where the Inner Temple is relying on legitimate interest to process the data, you may object to your information being processed if you believe your personal circumstances warrant an objection to processing on the specified grounds. You also have the right to object if your data is used for direct marketing without specific consent.

### **Restriction of processing**

34. You may ask the Inn to suspend the processing of your data, for example, if you wish to ascertain the accuracy of the data or the basis for the processing before any processing takes place.

### **The right to correction**

35. The data the Inner Temple holds on you should be accurate and current. You have the right to request that any data be corrected or completed. It makes our task much easier if you inform us of any changes. Please keep us informed of any relevant changes to your details which may occur.

### **Data portability**

36. You have the right to receive the personal data concerning you, which you have provided to the Inner Temple, in a structured, commonly used and machine-readable format and have the right to ask the Inn to transmit that data to another controller without hindrance from the Inner Temple. This is most likely appropriate in the case of the transfer of membership data.

### **Data deletion and destruction**

37. The Inn will retain your personal data for no longer than is required for its processing. The Inn has devised a retention schedule that give guidance to the Inn's staff on the length of time that certain data must be retained before it is deleted and destroyed. Different data processing activities require different retention schedules.

38. Once you have been called to the Bar, your membership of the Inn is for life, unless you apply to resign your membership or are disbarred from professional practice.

39. Student members who do not commence the BPTC within five years of admission, or do not complete it within 10 years of admission, will be removed from the Inn's roll of students. The Inn will delete all data it holds, save for data which would be pertinent to any future application for readmission to the Inn.

40. The Inn will also retain some personal data permanently for historical purposes, such as your name, date of admission and date of Call to the Bar.

## Data protection management

41. This policy will be reviewed periodically and updated as necessary to reflect best practice in data management, security and control, and to ensure compliance with any changes or amendments made to the DPA2018, GDPR or any associated legislation or regulations. Should there be substantial or material updates, we will publish the new policy and changes on our website. We may also notify you in other ways about changes in the processing of your personal data.

42. In case of any queries or questions in relation to this policy please contact the Inn's Data Protection Lead:

Jude Hodgson  
Membership Registrar  
The Honourable Society of the Inner Temple  
Inner Temple Treasury  
Crown Office Row  
Temple  
London  
EC4Y 7HL

Tel: 020 7797 8206

Email: [jhodgson@innertemple.org.uk](mailto:jhodgson@innertemple.org.uk)

43. The Inner Temple has formally informed the Data Commissioner of its data processing; the details are publicly available from the Commissioner's office at: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (Tel: 01625 545745. Fax: 01625 524510). Our registration number is Z7122120.

Complaints about the way the Inn has handled your data can be made to the Information Commissioners Office at the above address or via their website.

Alternatively, see the Commissioner's web site ([www.ico.gov.uk](http://www.ico.gov.uk)).