

UK IBM Club Operating Guidelines

Version: Number 18 Final

Owner: UK IBM Club Oversight Manager

OBJECTIVE

This document details key operational elements that are agreed and in place between IBM UK and the IBM UK Clubs and are in line with the requirements in the Global IBM Club Operating Guidelines unless a deviation has been agreed.

This document should be read in conjunction with the IBM Local and Retiree Club Constitutions.

Revision History

Revision Number	Revision Date	Summary of Changes	Changes marked
01	14 th Jan 2013	1 st draft – work in progress	
02	8 th July 2013	2 nd draft – for review by FC & LB	N
03	29 th July 2013	Draft updated with comments from FC & LB	N
04	12 th August 2013	Draft updated with additional comments from LB and input from YJ	N
05	19 th Aug 2013	Draft updated with additional comment from LB regarding Quarterly I&Es being by event and submitting meeting minutes	Y
06	30 th Sept 2013	Draft updated to include reference to payment of subscriptions, amendment to Liability section and additional section added covering Dissolution of an IBM Cub. Added reference to retaining receipts for PayPal transactions and Records Retention section Awaiting data privacy section	Y
07.1	8 th Oct 2013	Draft updated with data privacy section as well as Fiona and Laura's comments added. Final changes and amendments made	Y
08	9 th Oct 2013	Final Draft	N
09	15 th Oct 2013	Comments added regarding free tickets, accounting package, club activities and communications	Y
10	13 th Nov 2013	Comments from individual Club calls included	Y
11	19 th Nov 2013	Changes to events	Y
12	19 th Nov 2013	Final review	N
13	26 th Nov 2014	Changes post Audit 2014 – clarification on review of annual accounts, gambling activities and charitable donations	N
14	18 th Mar 2015	Updates suggested by FSC to provide greater clarity to clubs on UK Club Admin, Banking & Account Management, Bank & Event Reconciliations, Overnight Stays	Y
15	3 rd Aug 2016	Change to Banking & Account Management, Club Activities & Events and Communications	Y

Revision Number	Revision Date	Summary of Changes	Changes marked
16	Sept 2017	Amendments/Additions to the following: Financial Accounting & Controls – Tickets Financial Accounting & Controls – Admin Penalty Process Club Activities & Events – Inventory Reports Club Activities & Events – Recommended Group Sizes Club Activities & Events – Excluded Activities – Overnight Stays Club Activities & Events – Tickets & Vouchers for Events Club Activities & Events – Unused Tickets Communications – IBM and IBM Club Logo Communications – External Communications	N
17	Sep 2019	Removal of references to National Committee and updates to role of Finance Steering Committee. Removal of Admin Penalty Process. Amendments / Additions to the following: Public Liability Insurance Financial Accounting & Controls – External audit Communications Data Privacy (GDPR) Records Retention	Y
18	Jan 2021	Duplication with IBM Club Constitution removed. Sections on funding, financial controls and Club activities edited to remove duplication and re-ordered to increase clarity. Eligibility for subsidy clarified in Club Activities	Y

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UK Club Mission

The mission of the IBM Club is to strengthen IBM's values by creating a robust community where all employees have the opportunity to connect and interact with each other through a variety of recreational, social and cultural activities outside the workplace.

In addition, the IBM UK Club enables IBM retirees (subject to eligibility) to enjoy the membership benefits provided by the IBM Club and maintain their IBM network after they have left IBM.

UK Club Legal Status

UK Clubs are classified as unincorporated associations. As unincorporated associations, the UK Clubs are separate from IBM UK in terms of control. Club officers can be personally liable to claims made against their association.

UK Club Structure

IBM UK Company

IBM UK provides an annual grant directly to each Club, paid in February and July each year. The amount is at the discretion of the Company and is intended for the benefit of the Club members.

IBM Trustee

The Trustee is appointed by the IBM UK Director of Human Resources as their representative. The Trustee acts as final reviewer and signatory on behalf of IBM UK and/or the IBM Corporation for UK Club constitutional changes and as final approver in the decision to open a new UK Club or close an existing Club. The Trustee also acts as final decision maker as required by the Oversight Manager.

Oversight Manager

The Oversight Manager is appointed by the IBM UK Director of Human Resources to act as the primary interface between the IBM Company and the UK Clubs. The Oversight Manager is responsible for interpreting requirements, communicating decisions and key information to the Clubs and ensuring compliance with Corporate requirements, key financial controls and UK business controls. They act as a central point of contact on behalf of HR and are a decision maker on UK Club or member appeals. The Oversight Manager reserves the right to defer to the IBM Trustee as the final decision maker.

Finance Steering Committee (FSC) - Local (Employee) & Retiree Clubs

The FSC is a committee in place to address financial aspects relating to the Local (Employee) Clubs & Retiree Clubs. Its responsibilities include preparation

of the grant distribution, and sign-off of all Local & Retiree Club annual accounts, addressing any financial issues at a Local & Retiree Club level, supporting Local & Retiree Club treasurers where needed and putting forward proposals on other financial aspects of the Clubs to the Oversight Manager for their consideration.

Club Officers

As set out in the Constitution, every UK Club should have a committee that includes a minimum of Chairman, Treasurer and Secretary with the defined roles.

Contact details for all the above can be found at:

*IBM Global Club Publisher Page: (IBM Internal)
<https://w3.ibm.com/w3publisher/globalibmclub>*

*IBM UK Club Website: (IBM External)
<http://www.ibmclub.org.uk/contacts/contacts.shtml>*

Dispute Resolution

If a dispute arises between members, a Club-related issue requires resolution, or when a potential conflict of interest emerges, follow these steps:

Disputes should be resolved by the Club Committee in the first instance. If the member is dissatisfied with the outcome, then the matter may be referred to the Oversight Manager for resolution.

In the event an issue concerns IBM policy or impacts the IBM Company, the Oversight Manager will liaise with the Trustee who will make any policy decision on behalf of the Company. The Oversight Manager will communicate their decision which will be final.

Insurance – Public Liability

Employee members of the IBM Club are covered by the global IBM [public liability] policy, both when acting as event organisers and when attending events, with cover up to a maximum of \$5m. Retiree and family members of all Clubs (except Hursley Local Club) are covered by a separate public liability insurance policy, both when acting as event organisers and when attending events, with cover up to a maximum of £5m. Details of this cover and a copy of the insurance certificate can be seen on the Liability Insurance page under Running Events on the IBM Club website at: <http://www.ibmclub.org.uk> In the event of an incident, the affected Club is responsible for handling and reporting the incident to the relevant policy provider. The IBM Club Oversight Manager should also be notified.

Funding Approach

All funds of the IBM Club must be used to further the mission of the Club and its members. The Club is not intended to generate a profit, nor should expenditures be made for the benefit of an individual member or to support other organisations, including charities. The sources of funding are:

IBM Grant

The IBM grant is distributed by the UK Oversight Manager based on a recommendation from the Finance Steering Committee. The Finance Steering Committee can adjust the grant for Clubs according to their financial and administrative performance. An initial grant payment is made in February, and the residual balance payment made in July.

Membership Subscriptions – *Subscription rates are set by the Trustee. Sub-sections may charge a membership subscription. Retirees that left IBM on or after 1 April, 2018, who are eligible, will be charged a membership subscription should they wish to join a local Club, however Retiree Clubs remain free of charge to join*

Members contributions to event and activities – *An appropriate subsidy level for each event and activity should be decided by club committees and minuted.*

To spread the Club benefit across as many events and members as possible, the suggested maximum overall annual subsidy level as shown on the year end accounts summary is 50%. However individual events may be subsidised to a higher level, even 100%, at the discretion of the committee.

Banking and Account Management

Each Club owns and is responsible for managing its own Club bank account, which includes budgeting for and paying any bank charges. It is strongly advised that Clubs have an online banking facility, to both make and receive payments. The use of personal bank accounts for managing Club funds is not allowed. Bank accounts should be in the name of IBM Club XXX where XXX is the name of the location. Sub sections are discouraged from operating their own bank account but may do so with approval of their local Club committee. For all bank accounts, the list of signatories (the bank mandate) should be held by the Club Treasurer and Secretary with a copy sent to UK Club Oversight Manager.

All deposits and payments should be made promptly and with minimal delays. All vendors should be paid by the invoice due date and records kept of every payment made.

Bank accounts may not be overdrawn. Any impending cash flow problem must be highlighted promptly to UK Club Oversight Manager.

Separation of Duties

There is a control requirement that there are 3 different Club members involved in any vendor/expense payment. These are usually the requestor, raiser of the payment and the approver. Clubs must maintain, and provide when requested, evidence of the separation of duties. Should the raiser of the payment be the same person as the requestor, the payment will require 2 different people to approve the payment in order to retain the 3 different people involved in the payment process.

Clubs operating internet banking must have in place a dual payment/approval facility with separation between the person who raises the payment and the person who approves the payment.

Clubs that are unable to establish a dual payment/approval facility must scan a copy of the vendor invoice to an authorised approver requesting approval to pay using online banking. Two cheque signatories are required on all cheque payments.

Selected vendors cannot be related to any Club Officer or Administrator and must not be an IBM employee.

Making Payments to 3rd Parties

Given that the Clubs are separate legal entities, Club Officers are authorised to sign contracts for the Clubs and there is no requirement to go through the IBM Procurement vendor selection process, although Clubs should document reasoning for selecting particular vendors in their committee minutes.

Making Payments To Club Officers And Volunteers

Where an event organiser pays directly for an event, reimbursement should be against proof of booking/payment.

Expenses incurred by a Club member should be reasonable and necessary and in line with the IBM UK Expense and Reimbursement policy (available on request from the UK Club Oversight Manager).

Receiving Payments

Clubs may receive payment in the form of online internet banking, cheque, money order and debit/credit card only. Cash-based activities are discouraged, online banking is encouraged. Any Clubs that do handle cash must have a documented cash management process.

Insufficient fund cheques must be handled promptly. The Club may be charged a fee by their bank, which should be recovered from the Club member along with the original amount of the cheque.

Financial Accounting and Controls

Whilst all Club funds are deemed to be assets of the IBM Club, as the primary grant provider, IBM requires some controls to be in place to ensure funds are spent appropriately. IBM requires all Clubs to maintain financial records, prepare quarterly and annual financial reports that summarise club activities and this includes reports for sub-subsections that handle funds or have their own sub-section bank account. The required reports are as follows:

Monthly Bank Reconciliations

Monthly bank reconciliations, along with supporting bank statements, should be submitted to IBM by every UK Club, including Retiree Clubs (except where agreed otherwise by the Oversight Manager) within three weeks of month end. Club subsections with their own bank accounts are required to submit quarterly bank reconciliations (rather than monthly) along with supporting bank statements for review within three weeks of quarter end.

Quarterly Income and Expenditure

All Clubs are required to prepare and submit a summary of quarterly Income and Expenditure by event, every quarter, within three weeks of quarter end.

Annual Accounts

All Clubs are required to prepare annual accounts which will include a summary of income and expenditure by event, an end of year bank position and a list of any assets. Any VAT registered Local Club accounts should be audited by external accountants unless agreed otherwise by the Oversight Manager. All Club accounts should be submitted to IBM and will go through the FSC annual accounts review and approval process. All Club annual accounts should be submitted to IBM by the end of March of the following year. They should also be accepted as true at each Club's Annual General Meeting and documented in the meeting minutes accordingly.

Meeting Minutes

Every local Club is required to keep committee and general meeting minutes that show a record of their decisions. Minutes of Annual General Meetings should be submitted routinely to the UK Club Oversight Manager, ideally by the end of the month following the Annual General Meeting. All other meeting minutes should be submitted only upon request. Approval of annual budget/event planning should also be minuted.

Event Reconciliations

All clubs are required to complete an event reconciliation for every event held. The purpose of this is to ensure the financial details relating to a specific event can be tracked back. The event reconciliation should include basic information about costs, subsidies and the number of members/non-members attending the event, as well as the relevant cheque number/banking reference for payments made to suppliers. The completed event reconciliation should match the Club accounts. These event reconciliations are to be kept by the Club and available for review by an auditor, or the Oversight Manager, if requested.

Tickets

No event places should be confirmed or tickets issued until monies have been received. This should avoid the need to chase late receipts. If for any reason a receipt is late, it should be chased by the treasurer then chairman. If not received within 3 months of the event, it should be written off and shown as negative income if reversing a cashbook entry. The Oversight Manager should be informed of all write offs as and when made.

Refunds of receipts from members should be shown as negative income and repayment should only be approved with evidence of the original receipt. Uncashed expense cheques should be cancelled after six months and shown as negative expense. Operating this way will show the correct subsidy % per event.

Accounting Package

To enable effective financial reporting as well as execute receipts and disbursements, UK Clubs must use an accounting package, such as Quicken or Sage, although use of the Cashbook in Excel may be appropriate for smaller clubs.

Separation of Duties Matrix

All Clubs are required to maintain a current Separation of Duties (SOD) Matrix which details the roles and responsibilities within each Club. The Oversight Manager also holds a copy. Every year all Clubs will be asked to re-affirm that their current SOD Matrix is correct and any changes must be submitted in a revised SOD Matrix to the Oversight Manager.

Club Contacts Validation

Each Club should ensure that the UK Clubs Oversight Manager has an up to date list of the Club's Chairman, Treasurer and Secretary along with their contact email addresses.

Tax Compliance

Every Club must fulfil UK tax obligations including filing annual tax returns where required. Tax filing is the responsibility of the Clubs.

Audit

Corporate Audit will periodically select IBM Clubs for audit, which includes reviewing business controls, confirming compliance with financial management processes and verifying the accuracy of Club financial records.

Club Activities and Events

Clubs must not receive any gifts from vendors or third parties for any Club events.

Volunteer Recognition, Gifts, Awards, Prizes and Inventory Management

Do not exceed £50GBP per individual, per year to acknowledge efforts of IBM Club Officers, volunteers or others who support Club activities. Gift cards and gift certificates are prohibited as they are considered cash equivalents.

Do not exceed £50GBP per prize for gifts/awards/prizes given out during activities/events. The participant can win more than once and is eligible for another prize. Vouchers are only acceptable in a prize scenario that is linked to an event, for example, a Club holds a golf competition and offer golf vouchers as a prize linked to that event.

Clubs may hold raffles and can offer participation tickets at a cost of no more than \$25 USD. Each participant must not win more than £50 GBP worth of prizes in a year. Each participant can win more than once.

An inventory report must be maintained of purchased assets/gifts/awards/prizes to track purchase, quantity and amount provided to employees/retirees with signing sheets in place, balance quantity, custodian and where it is stored under lock when not in use. Club Chairman must review inventory report every quarter and approve reconciled report.

Event Approval and Sign-Off

All Clubs are responsible for determining and organising what they consider to be appropriate Club events and activities. As a recommendation, we suggest that Clubs use the below minimum as a guide to what constitutes a "Group" event.

Clubs with less than 100 members – 6 tickets

Clubs with 100 members or more – 10 tickets

All Club events proposed for the following year should be reviewed and approved at Club committee level and documented in the meeting minutes accordingly.

There is no requirement for the Oversight Manager to approve Club events.

However, no events should be arranged that fall under the list of excluded activities (below), or with a vendor who is listed in the "[Denied Parties List](#)". In exceptional circumstances, the Oversight Manager reserves the right to request

a Club does not engage in a particular activity which they consider to be inappropriate.

Excluded Activities

Under Corporate requirements, Club members must not be an active participant in any form of racing activities including racing of motorised vehicles/boats etc. of any kind as well as stunt car racing. Attending a racing event as a spectator is allowed.

Given the level of risk, Club members should not participate in bungee jumping, parachuting, flying in micro-lite aircrafts and hot air balloons, jet skiing/biking, kite surfing, sub-aqua diving, mountaineering/pot holing/abseiling/rock climbing and motor biking.

Clubs may not sponsor gambling activities such as casino nights or bingo, regardless of whether the games are played for merchandise, cash or charitable purposes and regardless of how such events are funded.

Events must not promote religious or political positions or be affiliated with external interest groups such as political action groups.

Whilst Clubs may organise appropriate events that result in a donation being made to a registered charity (for example, a speaker attending an AGM), such an event must be approved by the Committee and an appropriate receipt obtained to evidence that the event took place as approved.

The IBM grant may be used to subsidise events for employees that include overnight stays but the accommodation portion of the event must NOT be subsidised.

Clubs may not subsidise purchases made by individual members for their own benefit e.g. sports event tickets, annual memberships of clubs and associations. Finally, Clubs should not sponsor a community event or activity with another organisation or company without the approval of the Oversight Manager.

Sample Club Activities

IBM Club activities can include recreational, social and cultural activities outside the workplace. IBM Clubs should provide a variety of events and activities throughout the year that appeal to a broad section of members and promote the Club mission.

The following is a sample list of activities considered appropriate for UK Clubs. Should a Club wish to organise a new event outside of this list, they should contact their public liability insurance provider to check they are prepared to insure participant at the chosen venue (i.e. does that venue have appropriate accreditation).

Biking	Cricket
Bridge	Curling
Dance	Rowing
Dinner Clubs	Football
Fitness	Fly Fishing
Arts & Crafts	Golf
Hiking	Hockey
Martial Arts	Bowling
Musical Bands	Badminton
Photography	Paintball
Running	Archery
Toastmasters/speechmakers	Softball
Flying	Table Tennis
Skiing	Tennis
Surfing	Ultimate Frisbee
Horseback riding	Volleyball
Sailing	Exhibitions/Shows
Windsurfing	Netball
Day trips	Theatre trips

National Tournaments

The National Tournaments programme is a key vehicle for IBM employee engagement and enables both current employees and retirees to participate in a range of sporting and other events that promote teaming across different geographical locations. National Tournaments is a sub-section of the Clubs with its own budget, provided by the Oversight Manager, for specific approved National Tournament events.

Participation in UK Club Activities

All members of the IBM UK Club may attend events at any IBM UK Club - Local or Retiree – and may also obtain access for family members (or one guest in place of a spouse or partner) at the relevant advertised price.

Different event prices and subsection subscription rates may be applied to members from other IBM UK Clubs, provided the justification is recorded by the Club Committee. Any cross-funding issues shall be resolved between the individual Clubs involved.

Clubs may prioritise access to events with limited places to allocate first to those requested by members of their own club, then to members of other clubs and finally to non-members.

Non-members can attend events provided that they do not benefit from any portion of the Company grant.

Ticket Sales and Payment

Clubs must adhere to the following guidelines regarding ticket sales:

Tickets should not be issued until payment has been received

Tickets cannot be purchased by individuals for the purpose of reselling.

Ticket sales should include a disclaimer that states that neither IBM nor the IBM Club is responsible for tickets lost through the mail.

Tickets must be kept securely to prevent theft. If tickets are lost or stolen from an IBM location, the Club should report this promptly to IBM Security. Where lost/stolen tickets cannot be replaced, the financial loss must be reflected in the financial records.

It is acceptable for the benefits of bulk purchasing power to be passed on to non-members if the club wishes to do so e.g. tickets at group rates or bulk purchase discounts.

Tickets for Events

Events should appeal to a broad selection of members and promote the Club mission. Clubs may offer tickets at a discounted, or subsidised, price to members but only where the tickets are for a specific event/service on a specific date. Tickets/Vouchers purchased from IBM Rewards Gateway cannot be additionally discounted by Clubs. Ticket inventories (where held) should be reconciled on a quarterly basis with the financial statement and be available for Oversight Manager review/audit if required.

Unused Tickets

Unused tickets cannot be used for free by Club Officers and Coordinators unless the cost is provided for by member's payments. In other words, should an unused ticket be offered, then the member's price should be raised to cover the cost of the additional ticket. Unused tickets under £50 can be used as a prize to members for an IBM event.

Use of IBM Facilities

IBM facility and location access will be given on a case by case basis in agreement with the Oversight Manager.

Dissolution of an IBM Club

The Club may be dissolved at a general meeting of the Club by a resolution supported by 75% of those present, or by the Trustee at their sole discretion.

The last Club Committee members in situ at the time of closure are jointly responsible for winding up all affairs of the Club and ensuring any outstanding debts are paid. In the event there are insufficient monies in the Club account to cover the debt, the Club Officers' Public Liability insurance cover should be

triggered in order to cover the loss. If there is no insurance in place, the Committee Members may be personally liable for the debt. In the event of monies left in the Club bank account after all debts have been paid, the IBM Oversight Manager will allocate the money across all remaining UK Clubs.

The IBM Oversight Manager will be responsible for overseeing Club closure activities.

Communications

IBM and IBM Club Wordmark

A UK Club can brand its communications and collateral with the 3 approved specific Club Wordmarks or the general IBM Club Wordmarks as supplied in the Box file. ([Link](#)). Additionally, a Club can create Club merchandise such as T-shirts and caps. If there is a request for use of the IBM Name and 8 bar Logo, or IBM Club Name Wordmark, please contact the Oversight Manager who will work with the Club to obtain usage approval from IBM Brand and Legal

All merchandise should be coordinated with the Global Logo Merchandise Team. If Clubs are planning on using the IBM logo or IBM Club Wordmark at an event, please submit an application to IBM Logo Permission at [Create New Logo Merchandise Request](#).

An approved IBM Logo Merchandise supplier must be used to produce merchandise with the IBM 8 bar logo or IBM Club logo.

Approved suppliers can be viewed here: [Logo Merchandise Supplier](#)

IBM Communications

These are the task IDs that should be used by all Clubs to contact IBM, via the Oversight Manager.

UK Club Oversight Manager/UK/IBM (internal communications)
UKClubOM@uk.ibm.com (external communications)

All Club activities should be communicated through the IBM Club website/Slack. Use of country flags are not permitted for communication or to be published on Club Communities/websites

Authorised users can use the website to publish information about their clubs as well as events, activities and announcements. All pages should be kept up to date and all information displayed on them should be relevant and useful. In addition, information about particular Club events can be posted in a designated place at an IBM location.

External Communications

UK Clubs should not communicate or send any newsletters related to IBM HR programs. Club communication must be restricted to approved Club activities.

A UK Club can create a group on a social / professional networking site such as Facebook or Slack. Group membership should be closed, which means group

members join by invitation or submit a request to join the group approved by the group owner

Websites can be used for the advertising of IBM Clubs however, they must not use the 8 bar IBM Logo and must follow the “Fair use guidelines for use and reference of IBM Trademarks”, (Link)

Annual revalidation of Club communities, BOX, team rooms, websites and social media are to be conducted by the IBM Clubs to determine that only current Club Members are accessing.

The statement “This site is intended for IBM Employees and Retirees only” should be placed on all social/networking sites.

Local IBM Clubs can advertise local discounts on their pre-approved Club Slack pages. New discounts should be reviewed by the IBM Club Committee prior to posting. The vendor of the applicable discounts must not be an IBM employee. Local IBM Club Administrators should check whether the discount is already offered by IBM Reward Gateway, (national discounts).

Publishing a discounted promotion code, without proper contract, on external social media is not permitted.

All Clubs must ensure there is no disclosure or use of IBM Confidential or proprietary information or that of any other person or company in any online social computing platform.

Any press enquiries about the IBM Club should be directed to the Oversight Manager in the first instance who will liaise with Corporate Media Relations and/or the Global IBM Club Program Manager as required.

Data Privacy, (GDPR)

The GDPR places obligations on any organisation that stores Personal and Sensitive Personal information about people. The Regulation covers the principles of fair and lawful use, limiting data to that required for purpose, accuracy, retention, and restriction of access. (See links below to ICO web pages for more detail).

The UK IBM Club collects and stores data about its members in a way that is commensurate with the requirements to know who its members are, communicate with them and organise events on their behalf. At a UK level membership data is extracted from IBM's HR Workday Application.

At a Club level data is collected detailing booking requests and payment for events. Minutes of meetings with attendee information may also be recorded.

All IBM Provided PI, (Personal information), (i.e., Name, Serial Number, Address, Phone Number, email address etc.), should only be stored on an IBM approved internal application or on Box.

Any additional PI/Sensitive Personal Information given by Club members to the Club Committee is the responsibility of the IBM Club to handle/store

The detailed IBM Club Data Privacy statement can be found [here](http://www.ibmclub.org.uk/data/data.shtml):
<http://www.ibmclub.org.uk/data/data.shtml>

Membership lists

All data relating to Club members will be held by IBM by the UK Club Oversight Manager. This membership data will be made available to the individual Club Secretary to whom the members belong. The data that is extracted into the membership lists is as follows:

- IBM personnel number
- Local club affiliation
- First name
- Surname
- E-mail address (IBM e-mail for employees, personal e-mail (where provided) for retirees)
- Title (Retirees only)
- Address (Retirees only)
- Post code (Retirees only)
- County (Retirees only)
- Country (Retirees only)
- Telephone number (Retirees only - where provided)

At an individual Club level, each monthly list should be superseded by the next, and so only the current list is retained. As the Data Processors (once in receipt of the membership lists), it is the responsibility of the Club Officers to ensure that obsolete membership lists are deleted in electronic form, and that hard copies are destroyed, and that they only retain the latest list. If a Retiree ceases to be a member, or changes their details, the information should be passed to the Oversight Manager who will update the Master Membership List

General points

- Each Club committee are the 'Data Processors for the Club Membership Lists they handle and as such it is their responsibility to ensure data is only used for Club activities and is never passed to any party not involved in running the Club.
- No photographs should be published / used unless in receipt of permission.
- When bulk emailing members, the Blind Copy option should be used so as not to share email addresses.
- A DSAR (Data Subject Access Request) is the process whereby an individual may contact the Club directly requesting to see what information regarding them is held by the Club (or the DSAR request may come in to IBM HR requesting that they see the data IBM Clubs hold regarding them). All Club Officers should be aware of DSARs and that if a request comes to them,

there is a formal process around this, (as specified in the Act), with strict documented turnaround times. Please ensure that at least 2 members of each Club have access to the Club PI data to cover for holidays etc.

- *Club Officers should be aware of what and how to report a Data Privacy incident. All Club members should be advised to immediately report the incident to their Club Committee and Oversight Manager.*
- *Storage - each Club committee is responsible for ensuring the information they hold on Club members is kept securely and appropriately, to ensure no unauthorised access, loss or disclosure of the data. Data held online may only be held in IBM Box. Data held on personal computers must be in password protected files on encrypted storage devices.*

Useful Information

Organisations Guide to Data Protection

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

Search for "[Regulation \(EU\) 2016/679: GDPR](#)" online.

Records Retention

All IBM Local Club records including vendor selection, financial, tax returns, meeting minutes and supporting documents are to be retained in restricted Club Databases or BOX in accordance with the IBM Corporate Guidance.

For Retiree Clubs, Box is the approved application for file storing and sharing. Box allows owner to invite retirees who have Club Board responsibilities to perform their role.

Club management must prohibit data transfer to all removable portable storage devices example, USB, SD card, flash drive

These are the IBM Club reference records which need to be retained per IBM World Wide Records Management:

IBM Code	Title	Duration	Owner
HR050	IBM Clubs Management <ul style="list-style-type: none"> - Event Reconciliations - Completed Separation of Duties, SOD Documents - Payments received - Payments made with approvals - Club bank account statements and reconciliations - Taxes, if applicable - IBM Club Bylaws, if applicable - Club Minutes 	2 years 9 years 9 years 9 years 9 years 9 years 9 years	Club Secretary & Treasurer

IBM Code	Title	Duration	Owner
HR050	IBM Clubs Oversight Manager <ul style="list-style-type: none"> - IBM Club Constitution and Operating Guidelines - Completed Separation of Duties (SOD) Documents - Membership subscription - IBM grant / budget provided to the Club - Club bank account statements and bank reconciliations 	9 years 9 years 9 years 9 years 9 years	Oversight Manager

Note 1: IBM Club records that are not Essential (such as the record codes above) are reference records. They should only be retained if required for the specific business purpose for which they were created.

Note 2: Although the above is the IBM Club Policy, if there is a local law which mandates shorter or longer retention, then apply the local law. Make a note of the law to justify the different retention period in the event of an audit.

Note 3: Essential records should be disposed of at the end of their retention period above, unless subject to a Legal document retention order.

Note 4: Owners of Box who are leaving IBM or their Club Committee role are to transfer the ownership to new owner for accessibility of the data because once owners leave IBM, the co-owners will not have access to the data).

Reference:

Corporate Instruction CIO122, "IBM World Wide Records Management". The web address is at [CIO 122 IBM World Wide Records Management](#)

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