

| <b>Data held or processed</b>   | <b>How long is the data retained?</b>  | <b>Who/where is it held/recorded</b>   | <b>Use of data</b>  | <b>Basis for holding it</b>   |
|---|--|--|---|---|
| <b>Section A – Resident Members</b>   |  |  |   |   |
| Name and tower of member  | Throughout the course of resident membership   | Membership and district secretary  | Maintaining a membership database   | To fulfil the contract of the membership  |
|   |  | Published in the Annual Report in the directory of members                               | The Annual Report is provided to all resident members and available for sale  | Names will only be published with the explicit consent of the individual            |
| Postal address, email address and/or telephone number of the member               | Throughout the course of resident membership. In the event of membership lapsing, the data will be destroyed, unless it is required to be retained under a subsequent section. | Membership Secretary and other Guild/District Officers when necessary <sup>1</sup>       | For communication by / via Officers   | Only held and used according to any explicit consent received from the individual   |
| Records of payments made to or by the Guild or Bell Fund                          | 6 years following the end of the relevant tax year, potentially longer in the event of an active tax audit   | Guild and District treasurers, and, for peal fees only, Peal Secretary                   | To prepare financial records for the Guild and Bell Fund. To present to HM Revenue and Customs or the Charity Commission in the event of an audit | Legal requirement   |
| <b>Section B – tower contacts</b>   |  |  |   |   |
| Name, tower and at least one of postal address, email address or telephone number | Throughout the course of being a contact   | General Secretary, Membership Secretary and other Guild/District Officers when necessary | To enable the Guild and Bell Fund to communicate with their members   | Explicit consent from the individual is required; it is noted that without consent, |

<sup>1</sup> Email distribution lists will be available for use only by the District and Guild Officers; the addresses on the lists will only be visible by the secretaries. This will prevent multiple officers having their own version of the list for which tracking and maintaining consent will be more difficult.

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|  |   |   |   | the individual cannot be a tower contact.   |
|  |   | Published in the Annual Report  | The Annual Report is provided to all resident members and available for sale  | Explicit consent from the individual is required; it is noted that without consent, the individual cannot be a tower contact.   |
|  |   | Published on the Guild's website or mobile apps maintained by the Guild | Visible to anyone who browses the Guild's website or uses the app to enable contact to be made to the tower. Any email address displayed will be "protected" through a script to prevent spam-harvesting (see also note (a) concerning the availability of an anonymised email address) | Explicit consent from the individual is required; it is noted that without consent, the individual cannot be a tower contact.   |
|  |   |   |   |   |
| <b>Section C – Officers</b>  |   |   |   |   |
| Name, office and at least one of postal address, email address or telephone number | Throughout the course of being an Officer | Guild and District Officers   | For internal communication within and between the Guild and District committees   | Explicit consent from the individual is required; it is noted that for certain offices, contact details available publicly are a prerequisite to fulfilling the duties of that particular office. |
|  |   | Published in the Annual Report  | The Annual Report is provided to all resident members and available for sale  | Explicit consent from the individual is required; it is noted that for certain offices, contact details available publicly are a prerequisite to fulfilling the duties of that particular office. |

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|  |  | Published on the Guild's website or mobile apps maintained by the Guild | Visible to anyone who browses the Guild's website or uses the app to enable contact to be made to the tower. Any email address displayed will be "protected" through a script to prevent spam-harvesting (see also note (a) concerning the availability of an anonymised email address) | Explicit consent from the individual is required; it is noted that for certain offices, contact details available publicly are a prerequisite to fulfilling the duties of that particular office. |
| Name and contact details of the General Secretary and Central Council Representatives                            | Throughout the course of holding the posts | General Secretary   | Shared with the Central Council of Church Bell Ringers. The contact details of the General Secretary will be published in the Ringing World diary which is available for purchase by any individual.  | Explicit consent from the individual is required.   |
| <b>Section D – Former members and non-resident life members</b>  |  |   |   |   |
| Name, tower and offices held of a previous member or a resident member who transfers to non-resident life member | Indefinitely                               | Membership Secretary  | For the purposes of the maintenance of an archive of the Guild.<br><br>To ensure a membership fee is not levied in the event of ringing a future peal for the Guild.  | Permitted to maintain for historic research purposes<br><br>Legitimate purpose of the Guild   |
| Names of non-resident life members   | Indefinitely                               | Membership Secretary  | For the purposes of the maintenance of an archive of the Guild.<br><br>To ensure a membership fee is not levied in the event of ringing a future peal   | Permitted to maintain for historic research purposes<br><br>Legitimate purpose of the Guild   |

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|   |  | Published in the Annual Report as either a new or transferring member in the year in which the individual becomes a non-resident life member. | The Annual Report is provided to all resident members and available for sale  | Names will only be published with the explicit consent of the individual  |
| <b>Section E – Safeguarding</b>   |  |   |   |   |
| Information provided to the Safeguarding Officer by individuals about themselves (for example, though not limited to, concerning DBS checks and Safeguarding Training completed). | Indefinite   | Safeguarding Officer  | In line with the Guild’s Safeguarding procedures  | Explicit consent from the individual is required<br><br>The important consideration here is that the Guild may need to demonstrate that it complied with Safeguarding legislation many years after the event    |
| Information shared with the Safeguarding Officer by members or other agencies.  | Indefinite, unless advised to the contrary by the Diocesan Safeguarding Officer or relevant agency in question | Safeguarding Officer  | Any data held will be in a password protected document.<br><br>Able to be shared with the Diocese Safeguarding Officer and any relevant local or law enforcement authority in accordance with the Guild’s Safeguarding Policy | There is a specific exemption within the Data Protection Act 2018 for the processing of such data without the consent of the affected individual and for the disclosure of such data to the affected individual |
| <b>Section F – other</b>  |  |   |   |   |
| Information provided upon Gift Aid declaration forms  | 6 years following the end of the relevant tax year, potentially longer in the event of an active tax audit     | Bell Fund and District treasurers   | To prepare financial records for the Bell Fund.<br>To present to HM Revenue and Customs or the Charity Commission in the event of an audit  | Legal requirement   |
| Peals rung for the Guild  | Indefinitely   | Peal Secretary and within the Guild Library   | To maintain a record of the activities of the Guild   | Legitimate purpose of the Guild   |

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|   |  | Published in the Annual Report  | The Annual Report is provided to all resident members and available for sale  | Legitimate purpose of the Guild  |
| Attendance registers at Guild Events                                  | Indefinitely   | Initially by District or Guild secretaries and then archived within the Guild Library.  | (1) As part of the Guild's Safeguarding procedures;<br>(2) To maintain the Guild's insurance cover; and<br>(3) To maintain a history of activities of the Guild                               | Legitimate purpose of the Guild  |
| Name and contact details of any insured person                        | 10 years post holding requisite post or carrying out Guild insured labour                                  | Officers Insurance:<br>Membership Secretary<br>Guild Insured Labour: Bell Advice Co-ordinator   | For use in the event of a claim   | Legitimate purpose of the Guild  |
| Minutes of meetings, including a list of members present              | Indefinitely   | General Secretary (Guild)<br>Secretary to the Bell Fund (Bell Fund). The minutes are shared with members and archived within the Guild Library. | The minute book is available to auditors and examiners, trustees, officers on request   | Legitimate purpose of the Guild  |
| Photographs   | As long as valid consent is held   | For use on the Guild website<br><br>Published within newsletters or Annual Report   | To provide a public face of the Guild<br><br>The Annual Report is provided to all resident members and available for sale. Newsletters may be published on the website and be sent to members | Explicit consent from the individual is required<br><br>Explicit consent from the individual is required |
| Names and contact details of members of the 100 Club or any successor | 6 years following the end of the relevant tax year, potentially longer in the event of an active tax audit | Within a spreadsheet maintained by the 100 Club Co-ordinator  | To run the 100 Club   | To fulfil a contract of membership of the 100 Club   |

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| Bank account details for members of the 100 Club who pay by standing order | From receipt until Standing Order set-up having been confirmed by the bank | Within a paper file held by the 100 Club Co-ordinator | To run the 100 Club | To fulfil a contract of membership of the 100 Club |

Notes:

- a) A forwarding email address or a POP3 mailbox is made available to any officer or tower contact. This allows personal email addresses to be kept private from all other than the Webmaster (who will need the address to arrange the set-up). The personal email address will be shared with the Guild's and Bell Fund's current email provider. The Webmaster will ensure that the email provider has a suitable GDPR policy ahead of the Guild entering into the contract for the provision of services.
- b) For members aged under 13, consent should be provided by the individual's parent or guardian.
- c) "Guild Events" encompasses any practice, training session or other event organised, and advertised as such, by a member of or a person acting on the direction of either the Guild Committee or a District Committee.
- d) The Guild moderates groups on Facebook which are available to join by members of the Guild and non-members alike. By joining Facebook, a user has accepted the terms and conditions of Facebook, including the associated DP policies. Posts made by officers of the Guild (including officers of Districts) or their delegates, acting on behalf of the Guild shall be subject to the same criteria and policies as publishing data on the Guild website. Whilst it is acknowledged that the Guild cannot control all postings made to these groups, it will endeavour to remove offensive, irrelevant or other inappropriate content within a reasonable timeframe, and take action against any offending user including, though not limited to, a warning or removal from the group. For avoidance of doubt, posting of personal data without an appropriate basis under the DP Act is considered inappropriate content.
- e) Details of peals rung for the Guild may be submitted by the conductor or other person on behalf of the band to publications including, though not limited to, the *Ringling World* and *Bellboard*. The Guild is not responsible for any data held by those publications, nor the use made of the data, which may include photographs, by these publications.