



Swanton Morley  
Bell Ringers

# Privacy Notice

GDPR and Data Protection

Version No.2.0

Adopted: June 2023

Policy Area: Tower Operation

Review: Annually

This policy was adopted at the Annual General Meeting held on

|  |           |      |
|--|-----------|------|
| Signed on behalf of the<br>All Saints Church<br>Swanton Morley Bell<br>Ringers | Signature | Date |
|  | Name      | Role |
| Signed on behalf of the<br>All Saints Church<br>Swanton Morley PCC             | Signature | Date |
|  | Name      | Role |

A review of this policy is to be conducted **Annually**

|                         |         |         |         |         |         |
|-------------------------|---------|---------|---------|---------|---------|
| Dates of Policy Reviews | Date    | Date    | Date    | Date    | Date    |
|                         | Initial | Initial | Initial | Initial | Initial |

## Summary of Changes

This policy has been revised to take into account changes in the law, guidance or via a proposed amendment put forward by one of the tower membership and approved by a majority voted at an Annual General Meeting.

| Version | Date | Page | Section | Amendment | Author |
|---------|------|------|---------|-----------|--------|
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |
|         |      |      |         |           |        |

# Privacy Notice

## 1. Who are we?

- 1.1. The All Saints Swanton Morley Bell Ringers are the bell ringers of All Saints Church, Swanton Morley, Norfolk, which is part of the Dereham and District Team Ministry. In this Privacy Notice, the terms “we”, “us”, “the bell ringers”, “Swanton Morley Ringers” or “tower” all have this meaning.
- 1.2. There is a legal duty on all organisations to handle Personal Data appropriately. The Swanton Morley Ringers process small amounts of Personal Data in pursuit of its objects and for these purposes we adhere to the General Data Protection Regulation (referred to below as the “GDPR”), which came into force on 28 May 2018.

## 2. Your Personal Data

- 2.1. Personal Data is information which concerns (or is about) a living individual who can be identified directly or indirectly. This can be by the information alone or by referring to other available data which, when used in conjunction with the information, identifies the individual.
- 2.2. This Privacy Notice sets out what Personal Data we record, how we use it and whether it is shared. It also sets out the procedures we have established to enable you to exercise control over the way we manage any Personal Data which relates to you.

## 3. Why we use Personal Data

- 3.1. We use Personal Data in pursuit of our objectives to secure the future of ringing at All Saints Church through the teaching, training and development of ringers in the art of change ringing. This includes maintaining membership lists, providing help and support to those seeking information or advice about bell ringing and associated matters, providing publications and services related too bell ringing, maintaining information relating to past and potential donations.
- 3.2. Where necessary, we also use Personal Data to meet our statutory obligations.

## 4. What information is collected, how it is use and who is it shared with

### 4.1. If you are a Swanton Morley Bell Ringer Member

- 4.1.1. We will **record**: your full name; contact details (including email address, postal address, landline telephone number, mobile number); membership type and status; photographs and videos; an emergency contact (including full name, contact number). As part of the safer recruitment of ringers, in addition to the above information we will record: your date of birth; any previous names you have gone by; and other relevant information related to safeguarding which you fill in at time of registration. With your expressed consent, we may record “special categories” of data (as defined int the GDPR) including details of allergies and special health or access needs relevant to your attendance. We may also record any communication between us.

- 4.1.2. We **use** this data on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations). This includes: maintaining a database of current membership; record attendance to ringing events; to communicate to members (including requests for ringers, practice night updates, education and training opportunities, distribution of newsletters and minutes and any other information related to the operation of the tower; and publish photos, videos and live streaming on our social media and website.
- 4.1.3. We may **share** this information with other tower officers who are involved in the operation and organisation of the tower and its ringers. With your expressed consent, share photos, videos and live streaming shared on our social media accounts and website.

#### 4.2. If you are one of our office-holders or a Bell Handling Instructor

- 4.2.1. We will **record** your full name and contact details; details of the office you hold; details of any courses or trainings complete in relation to your role; and any communication between us. the office you hold. We will record if you have a current DBS certificate for Persons in charge of ringing and Ringing Instructors (see Appendix A Handling and Safekeeping of DBS Certificate Information)
- 4.2.2. We **use** this data on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations) and solely in accordance with the operation and distribution of responsibility within the tower.
- 4.2.3. We may **share** your Personal Data with All Saints' Swanton Morley's Parochial Church Council in order for them to maintain their records on the operation and governance of the tower on the basis of legitimate interest (and where necessary to meet their statutory duties on the basis of legal obligations). We may share you name, email address, mobile number of officer role with the membership for the purpose of contacting officers in relation to tower business.

#### 4.3. If you are to receive payment to reimburse expenses from us

- 4.3.1. We will **record**: your full name; contact details (including email address, postal address; mobile number); bank details (including Name of Account Holder; Account Number; Sort Code); details of the expenses; total funds transferred to the account; reasons for expense.
- 4.3.2. We **use** this data on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations). This includes: bank details for the reimbursement of expenses (with details securely held in the banking system used by the ringers).
- 4.3.3. We may **share** this information with other tower officers who are involved in the operation and organisation of the tower and its ringers. Bank Account details will be shared with our bank to facilitate the transfer of funds.

#### 4.4. If you sponsor for the bells to be rung or make a donation to us

- 4.4.1. We may **record** your full name and contact details; details of the dedication, details of your donation. We may also record any communication between us.
- 4.4.2. We **use** this data on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations) to maintain our accounts and acknowledge your donation and ring the dedication. We may also contact you by email to keep you updated with news from the ringers.
- 4.4.3. We will **not share** your Personal Data for any other purpose without your express consent.

#### 4.5. If you have requested to /organised for a visiting band to ring at All Saints Swanton Morley

- 4.5.1. As visit lead, we will **record** your full name; contact details (including email address and contact number); the name of the tower, society or group you are organising the visit on behalf of; and other relevant information such as the type of ringing, its duration as well as the date and time of the visit. If there are ringers under the 18 we will record if you have the necessary safeguarding documentation and procedures in place as set out in our Safeguarding Policy. We may also record any communication between us.
- 4.5.2. We **use** this data on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations) and solely in relation to arranging your visit to All Saints.
- 4.5.3. We may **share** your name and who you are organising the visit on behalf of with All Saints' Swanton Morley's Parochial Church Council in order to arrange for the visit to take place. We may also share your name and contact details with either the officers or a designated key holder so they can contact you in case of a problem arising preventing your visit taking place.

#### 4.6. If you contacted us about learning to ring or to be kept informed of news from the ringers

- 4.6.1. We may **record** your full name; contact details together with any correspondence between us. We may also record your date of birth (if under 18) and other relevant information which you entered at time of contact.
- 4.6.2. We **use** this data on the basis of consent to send you newsletters and other information related to our work.
- 4.6.3. We may with your expressed consent, **share** your name and contact details with other local towers who can support your interest in ringing.

#### 4.7. If you have visited our website

- 4.7.1. We may record pseudonymised data relating to your activity for our own statistical purposes and, with your consent we will set cookies on your machine in accordance with our Cookie Policy (see Section 8 Our use of cookies).
- 4.7.2. We use this data on the basis of Legitimate Interest to ensure that your experience, and those of others visiting our website is as straightforward as possible
- 4.7.3. We will not share your Personal Data for any other purpose without your express consent.

#### 4.8. If you have participated in conversations on social media websites which we administer

- 4.8.1. We may record your name and contact details together with your social media posts
- 4.8.2. We use this data on the basis of Legitimate Interest (and where necessary to meet our statutory duties on the basis of Legal Obligation) in accordance with that website's terms of use.
- 4.8.3. We may share publicly your email address and contact details alongside any social media posts which you have made in accordance with the website's terms of use.

## 5. How we process Personal Data

- 5.1. In all cases we process the minimum amount of Personal Data necessary for the purpose described above.
- 5.2. Your Personal Data will be processed by our volunteer officers. It may be processed by suppliers providing services (such as printing, specific promotional campaigns and cloud-based computing services).
- 5.3. Some of the cloud-based storage services are based outside of the UK. As a result, to fulfil the purposes set out above we may need to transfer some Personal Data who are based outside of the UK and European Union. We will ensure that any such transfer are either organisations or countries offering adequate level of protection, or that transfers are subject to appropriate safeguards (as defined by the GDPR).

## 6. How is your data stored

- 6.1. Our aim is to minimise unnecessary retention of data.
- 6.2. We keep all accounting records for 7 years, in line with audit and HMRC guidelines with all other data being deleted when it is no longer required.

## 7. How long do we keep Personal Data

- 7.1. Our aim is to minimise unnecessary retention of data.
- 7.2. We keep all accounting records for 7 years, in line with audit and HMRC guidelines with all other data being deleted when it is no longer required.
- 7.3. The table below sets out the retention period of specific Personal Data which we store on the basis of legitimate interest (and where necessary to meet our statutory duties on the basis of Legal Obligations).

| Data Type  | Retention Period  | Final Action                                    |
|--|---|---|
| Member's Name  | Historical Record   | Permanently retained in tower/church/parish     |
| Ringers Membership Form / Renewal Form                                       | Maintain and deleted when membership ceases (as set out in the band's Constitution) | Destroyed                                       |
| Member's Bank Details  | Deleted after a year of non-regular use   | Destroyed and removed from bank's online system |
| Tower Operation and Administration   |   |   |
| Performance Data (Peals, Quarter Peals, Dedicated Ringing and visitors book) | Historical Record   | Permanently retained in tower/church/parish     |

| Data Type  | Retention Period                           | Final Action                                |
|--|--|---|
| Accounting Records                                       | 7 years                                    | Destroyed                                   |
| Minutes from meetings                                    | Last action + 5 years                      | Permanent                                   |
| Visiting Ringers Requests                                | Historical Record                          | Permanently retained in tower/church/parish |
| Volunteer Bell Ringer Safer Recruitment Application Form | 50 years after ringer has left             | Destroyed                                   |
| Accident reporting sheets (adult)                        | Date of accident + 20years                 | Destroy                                     |
| Accident reporting sheets (under 18)                     | The date of when a child turns 18 +20years | Destroy                                     |

## 8. Your rights and your Personal Data

8.1. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- 8.1.1. The **right to request** a copy of your personal data we hold on you;
- 8.1.2. The **right to request that we correct** any personal data if it is found to be inaccurate or out of date;
- 8.1.3. The **right to request your personal data is erased** where it is no longer necessary for us to retain such data;
- 8.1.4. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to **request a restriction is place on further processing**;
- 8.1.5. The **right to object to the processing** of personal data (where applicable); and
- 8.1.6. The **right to lodge a complaint** with the Information Commissioner Office.

8.2. Where you need to exercise one of the rights shown above, please email or write to us at the address in *Section 10 How to contact us* below.

8.3. You also have a right "to be forgotten" and have your Personal Data removed. Please be aware however that if you exercise this right it may affect our ability to provide services to you, to receive donations from you or to inform you of events or news of interest. If you act as one of our members or officers it may only be possible for you to exercise this right over Personal Data:

- 8.3.1. Which is no longer needed for the purpose for which it was originally recorded; and
- 8.3.2. Which we are not legally required to retain

8.4. Where you wish to exercise the right to be forgotten, please email or write to us at the address in *Section 10 How to contact us* below. We will contact those other individuals or organisations with whom we have specifically shared your Personal Data (see *Section 4 What information we collect* above), instruct them to remove your Personal Data from their records and request from them

confirmation that this has happened. To the extent that the law allows, we will ensure your Personal Data is no longer shared with any other person or organisation, although we may not be able to contact the media, the public or third parties who have in the past viewed or copied your Personal Data by virtue of their access to our websites or other publicity materials.

## 9. Our use of cookies

- 9.1. Many websites use cookies in order to improve your browsing experience. Cookies are pieces of information that a website transfers to the cookie file on your computer's hard disk. Cookies enable the website to remember you, either for the duration of your visit (using a session cookie) or for repeat visits (using a persistent cookie).
- 9.2. We use traffic analytics cookies to identify which pages are being used on our website. This helps us analyse data about web page traffic and improve our website in order to tailor it to users' needs. We only use this information for statistical analysis purposes, your IP address is anonymised so that individuals cannot be identified. The statistical data is retained for a minimal period only.
- 9.3. Session cookies are set to remember you when you log into password protected areas of the website. These are retained on your computer for approximately 2 weeks to save you having to re-enter a password during that period when revisiting the site.
- 9.4. If you wish to restrict cookies then you can do this through your browser settings or by using additional browser software such as Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout>). For information on how to control cookies on your mobile device please refer to your handset manual.
- 9.5. Further information about Cookies, their use and how to disable them can be found at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in this case certain functions of our websites may not work.

## 10. Changes to our privacy policy

- 10.1. We keep our privacy policies under regular review and we may make updates to this Privacy Notice accordingly.
- 10.2. In the unlikely event that we wish to share or use your Personal Data for purposes outside those set out in this Privacy Notice, we will provide you with a new Privacy Notice explaining this new use prior to commencing any processing. We will set out the relevant purposes and processing conditions. Where necessary, we will seek your prior consent to the new processing.



## 11. How to contact us

- 11.1. If you have a concern or query relating to our use of your Personal Data or this Privacy Notice, please in the first instance contact our Secretary, whose contact details may be found on our website at [www.swantonmorleybellringers.co.uk](http://www.swantonmorleybellringers.co.uk)
- 11.2. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can contact the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk), or you can contact the Information Commissioners Office on 0303 123 1113 or via email [ico.org.uk/global/contact-us/email/](mailto:ico.org.uk/global/contact-us/email/) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

# Appendix A

## Procedure for the Handling and Safekeeping of DBS Certificate Information

### 1. Purpose

- 1.1. The Swanton Morley Bell Ringers complies fully with the obligations of the Data Protection Act 1998 and the DBS Code of Practice regarding the safe handling, use, storage, retention and disposal of Certificate and personal information of volunteers and paid employees.

### 2. Procedure

#### 2.1. Storage and Access:

- 2.1.1. DBS checks are conducted by the PCC. The ringers only record that a check has been conducted, recording the date completed. This will form part of the ringers' Safeguarding Records. Any certificates and update screen prints will be retained by the PCC and stored as outline in their GDPR Policy, with access strictly limited to those who are entitled to see it as part of their duties.

#### 2.2. Handling

- 2.2.1. Disclosure information is only passed to those who are authorised to receive it in the course of their duties. All Saints PCC maintains a record of all those to whom disclosure information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

#### 2.3. Usage

- 2.3.1. Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's consent has been given.

#### 2.4. Retention

- 2.4.1. Paper update enquiry results, permissions to check and any other information shall be retained by All Saints' PCC. Any information following a complaint will be retained by the Safeguarding Officer for up to 5 years following completion of any investigation. Any information on a disclosure will be retained by the Safeguarding Officer for up to 6 months to allow for the consideration and resolution of any disputes or complaints. Declaration forms will also be retained for 5 years

#### 2.5. Disposal

- 2.5.1. The Swanton Morley Bell Ringers will ensure that any paper-based information is destroyed by secure means, i.e. by shredding, pulping or burning.