Dorset County Association of Church Bell Ringers

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Dorset County Association of Church Bell Ringers
Bell Restoration Fund is a registered charity. Charity number 294239

Data Protection Policy

Version History

Version	Approved by	Date Approved	Minute Ref	Latest Review By	Review Date	Minute Ref
1.0	DCA Committee	23/08/26	8	DCA Committee	23/08/26	8
1.1	DCA Committee	26/11/26	OpaVote	DCA Committee	26/11/26	OpaVote

Next Review Due by September 2029.

1. Purpose

The Dorset County Association of Church Bell Ringers is committed to protecting the privacy and personal data of its members, volunteers, officers, donors, website users and anyone else whose personal data it processes.

This Policy explains how the Association collects, uses, stores, shares, retains and protects personal data. It demonstrates the Association's commitment to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

The Association's policy is to collect and process only the personal data necessary to administer membership, communicate with members, organise ringing, training and other Association activities, manage its governance and finances, and meet its legal and charitable responsibilities. The Association is committed to collecting only the minimum personal data necessary for these purposes.

Further information about the categories of personal data processed by the Association is provided in Appendix A – Privacy Notice.

The Committee maintains separate Data Protection Procedures which explain how this Policy is put into practice by Committee members, officers and authorised volunteers who process personal data on behalf of the Association.

2. Scope

This Policy applies to all Committee members, officers, volunteers and any other person who processes personal data on behalf of the Association in connection with its charitable, educational and administrative activities.

It covers all personal data and other Association information created, received or maintained in the course of Association business. Such information is held on behalf of the Association and is not the personal property of any individual Committee member, officer or volunteer.

This Policy also provides members and the public with a clear statement of the Association's commitment to protecting personal data and respecting individuals' rights under data protection legislation.

3. How We Use Personal Data

The Association processes personal data solely for legitimate purposes connected with the administration and governance of the Association and in furtherance of its charitable and educational objectives. Personal data may be used to administer membership, communicate with members, distribute newsletters and official announcements, organise meetings, events and training activities, administer volunteers and officers, conduct elections and ballots, and manage the Association's financial affairs. It may also be processed to administer the Association's constitutional and governance arrangements, including the operation of its Rules and Standing Orders.

The Association also processes personal data where necessary to comply with legal and regulatory obligations, including financial reporting, charity administration, safeguarding responsibilities and other statutory requirements applicable to its activities.

The Association will process personal data only for the purposes for which it was collected, or for other compatible purposes permitted by law, and will not use personal data for unrelated purposes without a lawful basis for doing so.

The lawful bases on which the Association processes personal data are described in more detail in Appendix A – Privacy Notice.

4. How We Communicate

The Association is committed to communicating effectively with its members while protecting the privacy of their personal data. Official communications, including newsletters, notices, meeting papers and other Association information, are distributed using managed communication systems that are designed to support the secure handling of personal data.

Where appropriate, authorised officers may prepare and issue official communications without having access to the underlying membership lists or the personal data of the recipients. The Association seeks to use systems and processes that separate the administration of communications from the management of personal data wherever this is practical and appropriate.

Access to personal data used for communications is granted only to those authorised officers and volunteers who require it to carry out their specific responsibilities on behalf of the Association. Personal data is not made available more widely than is necessary and is processed in accordance with the principles of data minimisation and least privilege.

The Association reviews its communication systems periodically to ensure they continue to provide an effective, secure and proportionate means of communicating with members while protecting their personal data.

5. Elections and Voting

The Association uses membership information to administer elections, ballots and other votes conducted in accordance with its Rules and Standing Orders. Personal data is used only to establish an individual's eligibility to vote, to issue voting instructions where appropriate, and to ensure that voting processes are conducted fairly, accurately and securely.

Where electronic voting or balloting systems are used, the Association may engage approved third-party service providers to administer the voting process on its behalf. Only the minimum personal data necessary to identify eligible voters and facilitate the administration of the ballot will be provided to such service providers.

The Association seeks to ensure that all voting systems used provide appropriate safeguards to protect personal data and maintain the integrity and confidentiality of the voting process. Personal data used for elections and voting is retained only for as long as is necessary to administer the ballot, verify the results where appropriate, and comply with any legal or governance requirements.

6. Sharing Personal Data

The Association treats personal data as confidential and will share it only where there is a legitimate and lawful reason to do so. Personal data is disclosed only to the extent necessary for the administration of the Association, the delivery of its charitable and educational activities, or to comply with legal or regulatory obligations.

Where the Association uses third-party service providers to support its activities, such as membership administration, electronic communications, document management, online meetings or electronic voting, only the minimum personal data necessary for the service being provided will be shared. The Association seeks to ensure that all third-party service providers maintain appropriate standards of information security and data protection and process personal data only on the Association's behalf.

The Association may also share personal data where required or permitted by law, including to comply with legal obligations, support safeguarding responsibilities, prevent or investigate fraud or other unlawful activity, or respond to lawful requests from regulatory or law enforcement authorities.

The Association does not sell personal data and does not share personal data with other organisations for marketing purposes. Personal data is never disclosed for commercial gain.

Appendix A – Privacy Notice explains the circumstances in which personal data may be shared and the categories of organisations with whom it may be shared.

7. Information Security

The Association is committed to protecting the confidentiality, integrity and availability of the personal data and other Association information that it holds.

Access to personal data is granted solely on the basis of operational need. Holding office within the Association, including membership of the Committee, does not automatically entitle an individual to access personal data. Access is provided only where it is necessary for an authorised Committee member, officer or volunteer to carry out their specific responsibilities on behalf of the Association, and is limited to the minimum personal data required for that purpose.

Association information, including personal data, membership records, correspondence, documents, mailing lists, passwords, access credentials and other digital resources created, received or maintained in the course of Association business, is held on behalf of the Association and is not the personal property of any individual Committee member, officer or volunteer. Such information shall be used only for authorised Association purposes and handled responsibly, securely and in accordance with this Policy.

Where practical, the Association uses systems and processes that enable authorised officers and volunteers to carry out their duties without providing access to the underlying personal data. Personal data is therefore restricted to the smallest number of authorised individuals consistent with the effective administration of the Association.

The Association uses secure systems and reputable service providers to support the administration of its activities. Appropriate organisational and technical measures are implemented to safeguard personal data against unauthorised access, accidental loss, alteration, disclosure or destruction.

When an individual ceases to hold office or no longer requires access to Association information, they shall promptly return or transfer all Association records, documents, passwords, access credentials and other Association assets to their successor or to the Committee, as appropriate. They shall not retain, use or disclose Association personal data or other confidential Association information after leaving office except where required by law or with the explicit authority of the Committee.

The Association's information security arrangements are reviewed periodically to ensure they remain appropriate, effective and proportionate to the nature of the personal data being processed and to reflect changes in legislation, technology and the Association's operational requirements.

8. Individual Rights

The Association is committed to respecting the rights of individuals in relation to their personal data and will deal promptly and fairly with any request made under the UK General Data Protection Regulation (UK GDPR).

Individuals have the right to request access to the personal data the Association holds about them, to request that inaccurate or incomplete information is corrected, and, where permitted by law, to request that personal data is erased or that its processing is restricted. Individuals may also object to the processing of their personal data in circumstances provided for by the UK GDPR.

The right to erasure is not absolute. The Association may retain personal data where continued retention is permitted or required by law, including where it is necessary to preserve permanent historical records, comply with legal obligations or protect the Association's legitimate interests.

The Association will consider each request on its individual merits and will respond within the timescales required by law. Where a request cannot be fulfilled, the Association will explain the reasons for its decision and advise the individual of any further rights that may be available.

Anyone who has concerns about the way the Association has processed their personal data should contact the Association's Data Protection Lead in the first instance. If the matter cannot be resolved satisfactorily, individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Guidance on exercising these rights is provided in Appendix A – Privacy Notice.

9. Contact Details

The Association’s Secretary acts as its Data Protection Lead to oversee compliance with this policy and with applicable data protection legislation.

Any individual who has questions about the way the Association processes personal data, wishes to exercise their rights under the UK General Data Protection Regulation (UK GDPR), or wishes to raise a data protection concern should contact the Association's Secretary in the first instance.

The Secretary's current contact details are published in **Appendix A – Privacy Notice**, together with information about the rights of individuals and how concerns relating to the processing of personal data may be raised.

10. Policy Review

This Policy shall be reviewed by the Committee at least once every three years to ensure that it remains effective, proportionate and consistent with the Association's Rules, Standing Orders and governance arrangements.

The Committee may undertake an earlier review where it considers this necessary, including where there are significant changes to:

- the Association's Rules or Standing Orders;
- legislation or regulatory requirements;
- the Central Council of Church Bell Ringers' Code for Ringing or other guidance adopted by the Association;
- recognised good governance practice;
- the Association's information systems, data protection practices or the introduction of new technologies used to process personal data; or
- the practical operation of this Policy, where experience indicates that amendments would improve its effectiveness.

Where appropriate, any review of this Policy shall include a corresponding review of the Association's Data Protection Procedures to ensure that the two documents remain consistent.

As part of each review, the Committee shall also ensure that the Privacy Notice and Website Cookie Statement reproduced in the appendices remain consistent with the versions published on the Association's website.

Unless otherwise specified by the Committee, amendments approved under this Policy shall take effect from the date of approval, except where the Association's Rules or another governing document requires approval by a General Meeting.

11. Published Documents

The documents contained in the following appendices of this policy are published separately on the Association's website to provide information to members, website users and other individuals whose personal data may be processed by the Association. They are reproduced within this policy for completeness, version control and to ensure that the Committee maintains a single authoritative record of the information made publicly available.

Appendix A – Privacy Notice explains how the Association collects, uses, stores, shares, retains and protects personal data, together with the rights of individuals under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Appendix B – Website Cookie Statement explains how cookies may be used to support the secure and reliable delivery of the Association’s website, and how visitors can manage cookies through their web browser.

Appendix A – Privacy Notice

A.1 Introduction

This Privacy Notice forms **Appendix A** of the Dorset County Association of Church Bell Ringers Data Protection Policy.

It explains how the Dorset County Association of Church Bell Ringers ("the Association") collects, uses, stores and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Notice applies to members, volunteers, officers, donors, participants in Association activities and others whose personal data is processed by the Association.

A.2 Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data, either on its own or together with other information. The processing of personal data is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

A.3 Who are we?

The Dorset County Association of Church Bell Ringers (DCA) is the Data Controller. This means that the Association decides how your personal data is processed and for what purposes.

A.4 How do we process your personal data?

The Association complies with its obligations under the UK GDPR by:

- keeping personal data accurate and, where necessary, up to date;
- storing personal data securely and protecting it from unauthorised access or disclosure;
- collecting and retaining only the personal data necessary for the Association's legitimate activities;
- ensuring appropriate organisational and technical measures are in place to safeguard personal data; and
- deleting or anonymising personal data when it is no longer required.

We use your personal data to:

- administer membership records;
- organise ringing activities, meetings, training and events;
- communicate with members about Association news and activities;
- manage volunteers and officers;
- administer the Association's finances, including Gift Aid where applicable; and
- further the charitable and educational objectives of the Association as set out in its Rules.

A.5 What is the legal basis for processing your personal data?

The Association processes personal data using one or more of the following lawful bases under the UK GDPR:

- **Legitimate interests** – to administer the Association, manage membership, organise activities, communicate with members and further the charitable and educational objectives of the Association.
- **Legal obligation** – where processing is necessary to comply with legal requirements, including financial record keeping and Gift Aid administration.
- **Consent** – where consent is required for specific activities, such as publishing personal data or photographs where appropriate. Consent may be withdrawn at any time.
- **Contractual necessity** – where processing is necessary to administer membership or provide services requested by members.

A.6 Sharing your personal data

Your personal data will be treated as confidential and will only be shared where necessary for the administration of the Association, where required by law, or where you have given your consent.

The Association may use third-party service providers to support its activities, including systems used for membership administration, communications, document storage, online meetings, elections and member consultations. Such providers process personal data on behalf of the Association and are required to maintain appropriate data protection and security standards.

Personal data may be shared with statutory agencies, safeguarding authorities, law enforcement agencies or other relevant organisations where the Association considers this necessary to protect children or adults at risk, comply with safeguarding obligations, investigate concerns, or fulfil a legal duty.

Where personal data is processed by service providers outside the United Kingdom, the Association will ensure that appropriate safeguards are in place in accordance with UK GDPR requirements.

The Association does not sell personal data and does not routinely share members' personal data with other organisations for marketing purposes.

A.7 How long do we keep your personal data?

Membership records are retained for as long as an individual remains a member of the Association and for an appropriate period afterwards where necessary to administer the Association, comply with legal obligations or resolve disputes.

The Association also maintains a limited permanent historical archive which may include the names of Life Members, together with limited information such as the year of joining, offices held and declared home tower at the time the record was created. Such information is retained on the basis of the Association's legitimate interests in preserving its history and governance and will not normally be erased following the end of membership.

Financial records, including Gift Aid declarations and supporting documentation, are retained for up to seven years after the relevant financial year in accordance with HM Revenue & Customs requirements.

Personal data is reviewed periodically and deleted or anonymised when it is no longer required for the purposes for which it was collected.

A.8 Your rights

Unless subject to an exemption under the UK GDPR, you have the following rights:

- to request access to the personal data the Association holds about you;
- to request correction of inaccurate or incomplete personal data;
- to request erasure of your personal data where there is no lawful reason for continued processing;
- to withdraw consent where processing is based on consent;
- to request restriction of processing in certain circumstances;
- to object to processing where applicable;
- to request data portability where applicable; and
- to lodge a complaint with the Information Commissioner's Office (ICO).

A.9 Changes to this Privacy Notice

If the Association wishes to process personal data for a purpose not covered by this Privacy Notice, a revised Privacy Notice will be published explaining the new purpose and the lawful basis for the processing before it takes place.

The current version of this Privacy Notice is published on the Association's website and forms Appendix A of the Association's Data Protection Policy.

A.10 Contact details

To exercise your rights or raise any questions about this Privacy Notice, please contact the Association's Data Protection Lead:

Email: dcacbr@gmail.com

Telephone: 0844 357 7533

If you are dissatisfied with the way the Association has handled your personal data, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Appendix B – Website Cookie Statement

B.1 Introduction

This Website Cookie Statement forms **Appendix B** of the Dorset County Association of Church Bell Ringers Data Protection Policy.

The Association's website may use a small number of cookies to help it function securely and reliably. Cookies are small data files stored on your device.

This statement explains how cookies may be used on the website and the purposes they serve.

B.2 Cookies Used by the Website

The website does not currently provide user logins or accept comments, and the Association does not use cookies for analytics, advertising or personalised content.

From time to time, the hosting platform may set strictly necessary cookies to help deliver or secure the website. These cookies are set by the platform, not by the Association. Their use may depend on the platform's security and technical requirements.

B.3 Why Cookies May Be Used

Any cookies set by the hosting platform are intended to support the secure and reliable delivery of the website. The Association does not use cookies for analytics, advertising or personalised content.

B.4 Managing Cookies

You can manage or disable cookies through your browser settings. Disabling strictly necessary cookies may affect the secure or reliable delivery of parts of the website.

B.5 Changes to this Cookie Statement

This Cookie Statement may be updated from time to time to reflect changes to the Association's website or to applicable legal or regulatory requirements.

The current version is published on the Association's website and forms Appendix B of the Association's Data Protection Policy.