



**THE WINCHESTER &
PORTSMOUTH DIOCESAN GUILD
OF CHURCH BELL RINGERS**



W&P Guild Privacy Policy



November 2025

Version 2.0



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1. Introduction/Summary:

- 1.1. Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the UK General Data Protection Regulation (the "GDPR") and the Data Protection Act 2018.
- 1.2. The Winchester and Portsmouth Diocesan Guild of Church Bell Ringers (the Guild) understands the importance of the GDPR for protecting the rights of its members, officers and other individuals with whom the Guild has contact. The Guild takes these obligations seriously and has developed this policy governing how and why we may collect, store, process and publish personal data.

2. This Policy Has Been Developed To Ensure:

- 2.1. Guild members and other individuals interacting with the Guild have a clear understanding of how the Guild may collect and use their personal information.
- 2.2. All Guild officers are aware of their responsibilities with respect to collection, storage and usage of personal data.
- 2.3. The Guild has good governance processes in place to monitor our compliance with the GDPR.
- 2.4. This policy has been developed using guidance published by several sources. These include the Central Council of Church Bell Ringers (CCCBR), the Church of England (CofE) and the Information Commissioners Office (ICO)



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3. What Is Our Lawful Basis For Processing Personal Data:

- 3.1. Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.
- 3.2. The lawful basis we rely on may affect your data protection rights which are set out in brief in the next section. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website.
- 3.3. Much of the information held by the Guild is held and processed on the basis of ‘legitimate interest’, and this does not require formal consent.
- 3.4. For some categories of data we require the Consent of each person (Data Subject), for example email addresses to be used so that the Guild can keep members informed about news, events, activities and services.
- 3.5. In this policy the term Data Subject is used to refer both to Guild members and to non-members, e.g. Tower Correspondents, who come into contact with the Guild.



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4. Your Rights & Your Personal Data:

- 4.1. Under GDPR, you have the following rights with respect to your personal data held by the Guild:
 - 4.1.1. **The right to be informed:** Data subjects must be told what personal data is being held, what it is being used for and why.
 - 4.1.2. **The right of access:** Data subjects have the right to ask us for copies of their personal information. They can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
 - 4.1.3. **The right to rectification:** Data subjects have the right to ask us to correct or delete personal information they think is inaccurate or incomplete.
 - 4.1.4. **The right to request erasure:** Data subjects have the right to ask us to delete their personal information.
 - 4.1.5. **The right to restriction of processing:** Data subjects have the right to ask us not to process their personal information. The Guild can store the information, but is not allowed to process it.
 - 4.1.6. **The right to object to processing:** If a data subject does not like the way their data is being used, they can request that that use is stopped.
 - 4.1.7. **The right to withdraw consent:** When we use consent as our lawful basis you have the right to withdraw your consent at any time.
- 4.2. To make a data protection rights request, please contact us using the contact details at the end of this privacy notice. If you make a request to the Guild, we must respond to you without undue delay and in any event within one calendar month.



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5. How Do We Process Personal Information:

- 5.1. As a membership-based organisation the Guild collects and maintains basic information on all our members. This data may include the member's name, address, email, phone number, subscription payment and category of membership. It also maintains attendance registers and bell ringing history information. In addition, the Guild maintains information needed to safeguard its youth ringers. This includes contact details for their responsible adults, medical details for those with relevant conditions and DBS clearance status (but not certificates) for youth leaders.
- 5.2. This information is used to communicate with members, prepare the annual report, and otherwise meet any other operational requirements of the Guild (such as maintaining insurance policies and maintaining peal records). It also allows the Guild to maintain a historical record of membership.
- 5.3. Upon becoming a member of the Guild, members should be made aware of the reasons why we collect this information and their rights as detailed above.
- 5.4. Data is not held or processed by the Guild outside the United Kingdom.

6. Publishing Personal Information:

- 6.1. The Guild will never publish contact information (such as in the annual report and on the website) of members without the written consent of those members.
- 6.2. However, it should be noted that it is convention for the Guild to publish all members' names and individual Guild peal records in the annual report (both printed and electronic forms) and that the Guild will continue to do this unless explicitly asked not to do so by any individual member.
- 6.3. Members should also be aware that their names may appear in meeting minutes and other reports or news items published by the Guild..
- 6.4. Officers of the Guild and tower correspondents will need to have contact details published in order to carry out their duties effectually. Upon appointment they must be asked for, and provide, written consent as to which contact details they wish to have published in the annual report, Guild website and other relevant media.



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7. Sharing Personal Data

- 7.1. Personal data, other than that which is published on the Guild website or in its Annual Reports, will be treated as strictly confidential and will only be shared with Guild and District Officers and Committee members in order to communicate and provide services in line with the Guild's objects. The Guild will never disclose or sell membership personal data to third parties, unless as required to meet its statutory obligations.
- 7.2. Emails or other communications sent to Guild officers regarding Safeguarding incidents (either ongoing or new allegations) are shared with the Safeguarding teams of the Diocese of Winchester and/or the Diocese of Portsmouth and are securely stored by them.

8. How Long Do We Keep Personal Data:

- 8.1. Membership records will be retained in order to support the custom of recognising long service to the Guild. Performance data is traditionally retained indefinitely in order to preserve complete performance records for historical purposes.
- 8.2. If the Guild wish to use any member's personal data for a new purpose, not covered by this Privacy Policy, then the Guild will provide a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, the Guild will obtain prior consent to the new processing.
- 8.3. Information (including emails) relating to new or ongoing Safeguarding incidents is stored by the Diocesan Safeguarding teams mentioned in 6, following their policies, It is not retained by the Guild.

9. Data Protection Officer

- 9.1. Consistent with ICO guidance, the nature of the Guild's activities means that it does not need to appoint a Data Protection Officer. Instead, the Honorary General Secretary will:
- 9.2. Have a "watching brief" to ensure that the Guild and its officers are made aware of and encouraged to observe good data collection, management and usage practices (as laid out in this Policy).
- 9.3. Be informed in the event of any suspected data breaches within the Guild.
- 9.4. Be the first point of contact in the case of any statutory or subject access requests.



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10. Guild Email Accounts

- 10.1. The Guild owns and operates several email accounts in the *wpbells.org* email domain that are associated with Guild officers. Emails sent to and from these accounts, other than those related to potential or ongoing Safeguarding cases, may be shared with other Guild officers. When there is a change of officer, historical emails may be transferred to the new office holder.

11. How to complain

- 11.1. If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details given below.
- 11.2. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the Information Commissioner's Office.

12. Contact Details

- 12.1. To exercise all relevant rights, queries or complaints please in the first instance contact the Guild Secretary using hon.secretary@wpbells.org
- 12.2. Members can also contact the Information Commissioner's Office on 0303 123 1113 or via email <https://www.ico.org.uk/make-a-complaint> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.
- 12.3. The data controller for the Winchester Diocese is the Winchester Diocesan Board of Finance. For contact details see <https://winchester.anglican.org/privacy-notice/>
- 12.4. The data controller for the Portsmouth Diocese is the Portsmouth Diocesan Board of Finance. For contact details see <https://www.portsmouth.anglican.org/documents/diocesan-data-privacy-notice/>

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