



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



W&P Legitimate Interest Assessment



Last Updated 19th March 2026

Version 1.0



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1. Introduction/Summary:

- 1.1. Data Protection regulations define seven lawful bases for holding and processing personal information. The two main bases used by the Guild are Legitimate Interest and Consent. The Data (Use and Access) Act 2025 introduced a new basis called Recognised Legitimate Interest which can be used when processing data related to safeguarding of a child or vulnerable adult.
- 1.2. Legitimate Interest can be used if the information is necessary for the core administrative functions of the organisation, reasonably expected by the data subject, and not prejudicial to a person's rights or likely to cause harm.
- 1.3. We can use Legitimate Interest without getting consent from the data subjects involved, provided that we can demonstrate three things:
 - 1.3.1. We are using the information for legitimate purposes (the Purpose test)
 - 1.3.2. The information is needed in order for us to achieve these purposes (the Necessity test)
 - 1.3.3. The rights and freedoms of the data subjects are not likely to override our usage of the information (the Balancing test). This test is not required in the case of a Recognised Legitimate Interest, such as Safeguarding.
- 1.4. This document assesses the Guild's legitimate interest in personal data and uses that to determine which of the types of personal data held by the Guild are subject to it, and which require formal consent for their use.



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2. Purpose:

- 2.1. We must identify the legitimate interests. These may include the Guild's own interests and/or the interests of third parties, and which may be commercial interests, individual interests or broader societal benefits.
- 2.2. The Guild is a membership organisation. Its objects include encouraging mutual support among its members, cultivating change ringing and helping to preserve church bells in an efficient condition. It is also part of the wider ringing community.
- 2.3. The Guild processes data in order to perform its functions including:
 - 2.3.1. Managing and administering membership
 - 2.3.2. Providing services (or facilitating the provision of services) to its members
 - 2.3.3. Encouraging the development of young ringers
 - 2.3.4. Providing ringing-related information to its members and to other bellringers visiting the Guild's area.
 - 2.3.5. Facilitating communication between its members and others on ringing related matters
 - 2.3.6. Liaising with the Diocesan Safeguarding teams to ensure that appropriate Safeguarding controls are in place and are operating effectively. This includes forwarding reports and other information (including emails) relating to new or ongoing Safeguarding incidents to the appropriate diocesan team.
 - 2.3.7. Contributing to the well-being of the Guild and the wider ringing community.
- 2.4. The Guild does not perform any kind of data analysis or profiling on the data collected.
- 2.5. No data is shared with commercial or marketing organisations or other third parties, other than the Diocesan Safeguarding Teams.



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3. Necessity:

- 3.1. We must consider whether this processing is necessary and proportionate, and whether we can reasonably achieve the same result in another less intrusive way.
- 3.2. Managing and administering membership requires the Guild to know who its members are, when they joined or re-joined the Guild, when they paid subscriptions and their tower affiliation (if applicable).
- 3.3. Good practice when dealing with members (or others) who are minors, includes appropriate involvement of, and communication with, the minor's parents or guardians. This requires knowing their names and contact details. The Guild requires the young person's date of birth in order to know whether the young person is still a minor and should therefore be treated as such. It also needs to hold details of any relevant medical conditions of minors taking part in Guild-organised events and to record DBS clearance status (but not certificates) for youth leaders.
- 3.4. Providing services to members requires the Guild to be able to inform them about the services (training courses, ringing practices, etc). In some cases, it may also need to communicate directly with them to make specific arrangements. The proven most effective primary way to give members timely, useful information is by direct e-mail. The Guild and its Districts use member mailing lists that go to members (and some other interested parties). For the small number of members without e-mail the Guild and its Districts communicate via the relevant tower correspondent or nominated proxy.



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4. Balance Of Interests:

- 4.1. We must consider whether the data subjects would reasonably expect the Guild or District to use the information as it does, whether its use would cause them unjustified harm and whether their interests are likely to override the Guild or District's legitimate interests.
- 4.2. Members (and others) will reasonably expect that the following will happen:
 - 4.2.1. Their name, information about membership, subscription payment and tower affiliation will be shared between their District and the Guild and used to manage their membership.
 - 4.2.2. The Guild will list the names of ringers affiliated to each tower in its annual report.
 - 4.2.3. Their contact details will be used by the Guild or their District to contact them about Guild or District activities, or other appropriate matters directly related to ringing.
 - 4.2.4. The Guild or their District will not unreasonably disclose their contact details to third parties.
 - 4.2.5. E-mail addresses will be protected as far as technically possible.
- 4.3. Members (and others) will reasonably expect that the following may happen:
 - 4.3.1. Names in the attendance book for an event may be read by anyone looking back over previous events.
 - 4.3.2. If they are present at a meeting then the minutes may record their name.
 - 4.3.3. Meeting minutes and records of other events may be published.
 - 4.3.4. Photos taken at events (e.g. an outing or striking competition) may be published
 - 4.3.5. People in published photos may be identified by name, except minors.
- 4.4. Members who have agreed to become a Guild officer, District officer or a Tower Correspondent will reasonably expect that:
 - 4.4.1. Their contact details may be published to enable them to be contacted.
- 4.5. Young members and their parents will reasonably expect that:
 - 4.5.1. The parents' contact details will be used to inform them about activity involving young ringers.



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- 4.5.2. The young person's date of birth will be used to determine whether he/she should be treated as a minor.
- 4.6. Possible harm from the use of contact details could include:
- 4.6.1. The combination of land-line phone number and postal address can be used by thieves to target a home.
- 4.6.2. A stolen e-mail address can be used as a target for spam.
- 4.7. Protective measures are in place to guard against the risks listed in 4.6:
- 4.7.1. Private e-mail addresses are not published on the Guild or District websites and are not published in the Guild report without the subject's consent. A 'click to contact' web form is provided to allow emails to be sent to Guild Officers, District Officers and Tower Correspondents. The addresses used by Guild Officers are generic addresses such as:
- hon.secretary@wpbells.org
 - safeguarding@wpbells.org
- 4.7.2. Guild and District mailing lists hide recipients' addresses from the sender, and from other recipients. Personal addresses are only accessible to the system administrators.
- 4.8. Information (including emails) relating to new or ongoing Safeguarding incidents is stored by the Diocesan Safeguarding teams, following their policies. This is covered by the Recognised Legitimate Interest lawful basis, so no balancing test is required



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5. Opting Out:

- 5.1. Where information is used for core functions like membership administration, there can be no opt out. For example, a member cannot decline to allow the Guild to record his or her name as a member.
- 5.2. Members (and others) are not required to join Guild or District email lists and can opt out at any time.
- 5.3. Members who accept a role within the Guild that requires them to be contactable, consent to their contact details being used for that purpose, however these members can decide what contact details are made available in Guild publications.

6. Conclusion:

- 6.1. Given the above reasonable expectations, and the measures in place to protect the related personal information, the Guild can claim legitimate interest as the lawful basis for holding and using the personal information listed above.



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APPENDIX:

The following table shows what data the Guild uses consent for:

Data Subject	Location and type of Personal Data	Lawful basis	Retention period
Guild Member or former Member	Data held by Guild or District Officers: • Name • Tower • Date of election • Offices held	Legitimate Interest	Indefinite
	Names published in the annual report	Consent	Indefinite
	Names held in attendance registers for Guild / District meetings and other events	Legitimate Interest (including safeguarding)	Indefinite
	Names of ringers included in peal records and published in the annual report.	Legitimate Interest	Indefinite
	Contact information held by organisers of Guild or District events	Legitimate Interest	Until the ending of the event.



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	Member email addresses added to Guild or District email servers	Consent	Until removed by the member
	Emails sent to Guild /District Officers, about subjects other than safeguarding	Legitimate Interest	Indefinite, but can be deleted upon request.
	Emails sent to Guild /District Officers, concerning safeguarding	Recognised Legitimate Interest	Emails are processed and sent to the appropriate Diocesan safeguarding team(s). A record of emails that have been forwarded (without their content) is retained indefinitely.
Members under 18 taking part in Guild-organised youth events and their parents/guardians	The Guild retains consent forms, including contact details along with details of any relevant medical conditions	Recognised Legitimate Interest	For the time that the young member is under 18 and involved in these events.
Members involved in organising Youth Ringing Events	DBS Certification Status (but not the actual certificates) is retained by the Guild Safeguarding Officer	Recognised Legitimate Interest	For the time that the member remains as an organiser of these events.
Tower contact (might not be a Guild member)	• Name • Tower	Legitimate Interest	For the duration that the subject is the tower contact



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	Contact details		
	Names published in the annual report and on the Guild Website	Legitimate Interest	For the duration that the subject is the tower contact
	Email addresses held by the email forwarding mechanism that doesn't reveal the true email address	Legitimate Interest	For the duration that the subject is the tower contact
	Home addresses and/or phone numbers published in the Guild Report and/or Guild website	Consent	For the duration that the subject is the tower contact
Guild and District Officers	Publishing officer names in the annual report and on the Guild Website	Legitimate Interest	For the duration that the subject is in post
Incumbents	Publishing names in the annual report	Legitimate Interest	For the duration that the subject is in post

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