

Data management processes

This document describes how the Branch collects, stores and uses personal information.

Collection

Membership information is collected initially via the new member form, completed by each new member. Subsequent updates may be made by the member's tower correspondent in the update form sent annually to each tower. Members may also update or provide additional information at any time.

Storage & protection

The Branch stores information in three main ways:

- Master lists are held by the secretary. The subset of that information used in the annual membership/subscription update is held by the Treasurer. Subsets of the information – notably contact details – are held by the Chairman and other officers. The Youth Officer holds extra information relating to young members. Information is stored on a combination of paper and personal computers held within the relevant officer's house and subject to normal domestic security.
- Some information is shared with the Guild, notably membership information (for Guild membership records and for the Guild report) and contact details (of Branch officers and Tower Correspondents).
- Members e-mail addresses (and those of some non-members who participate in Branch activities) are held in the mailing lists on the Guild server. This information is password protected, with access limited to the Branch Postmaster (and Guild server managers). Details of mailing lists, their purpose and use are available at: odg.org.uk/sdb/services/email.html. The Branch also provides individual towers who want one with their own mailing list, which is managed independently.

Use, retention & consent

Personal information is used primarily to manage membership and communicate with members. Names and photos may also appear as part of the Branch's historic record in reports, minutes, articles, newsletters or on the website.

Most information is used on the basis of the Branch's legitimate interest¹ so formal consent does not apply. Where consent does apply it is often implied, for example: When a tower correspondent provides his/her contact details it implies consent to be contacted using it. When a member takes part in a team photograph it implies consent to it being taken and used in Branch records and/or publicity. When a ringer supplies an e-mail address for the members' mailing list it implies consent to receive mail via the list.

For more detail see the data status table. ***Separate document – may be combined***

Information is retained as long as it is needed. Some information (membership and records of participation) are held indefinitely as part of the historic record. Contact information is normally deleted when a member leaves (unless he/she wishes to remain in contact with the Branch).

Transparency

- The Data Protection Policy and related document are available on the Branch website, see: odg.org.uk/sdb/documents/. ****not there yet but will be after documents are approved****
- New members will be informed of the policy when they join, and given the link above.
- Meetings will include a reminder that the names of contributors may be recorded.
- If a photo is intended to be used other than for the obvious purpose (eg for publicity outside the ringing community rather than for internal record and publicity) then permission will be sought.

¹ See accompanying document on Legitimate Interest Assessment

Transition

The one-off actions below are needed as part of the transition between the previous informal system and the more formal system following GDPR.

Information sharing – Where the Branch provides the Guild with e-mail addresses of officers and tower correspondents (notably for the Guild Report) these will be the generic addresses of the post and not personal e-mail addresses as in the past.

Retention – Some contact information of members other than officers and tower correspondents is held, which has accumulated over the years. The January 2019 annual membership/subscription update from towers will be accompanied by a request to confirm the relevant member's permission to retain it. Any such surplus contact information for which permission is not received will be deleted.

Addresses on the members' mailing list remain until either the recipient asks for removal (usually having moved away or given up ringing) or an officer requests removal (eg when a member dies). If any former members still receive e-mail from the Branch it might be that they like to remain in touch, or they might be tolerating it as low level spam (it seems reasonable to assume that anyone unhappy about it would have complained and asked for removal) but the Branch has no way of knowing.

The following one-off process will be used to rationalise the situation:

- A message will be sent via the members' list, explaining that the Branch is having a 'data clear out' and asking anyone who is no longer a member to say whether or not he/she wishes to be removed from the list or to continue to receive communication.
- The Branch Postmaster will reconcile addresses held on the list against those of the current membership and know third parties who are interested in Branch activities.
- Any addresses not accounted for by the above will be contacted individually to see whether the recipient wishes to remain on the list.
- After reasonable time for response, any remaining unaccounted addresses will be removed.