

Legitimate Interest Assessment (Issue 1.0)



The Surrey Association of Church Bell Ringers

1. Who are we?

The Surrey Association of Church Bell Ringers ('The Surrey Association') is a non profit voluntary organisation with approximately 600 members working to the benefit of the bellringing community in the geographical area specified in our constitution (www.surreybellringers.org.uk). Our rules and privacy policy are available on our website.

The Association operates a Belfry Repair Fund which is a registered charity (number 260561) and is affiliated to the Central Council of Church Bell Ringers (www.cccbr.org.uk)

2. Legitimate Interest – what is it?

Legitimate interest is one of the six lawful bases for processing personal data. Data Protection laws require us to have a lawful basis in order to process personal data in line with the 'lawfulness, fairness and transparency' principle [GDPR Article 6(1)]

A legitimate interest is only lawful if it applies to processing which the organisation could reasonably be expected to undertake, is necessary for the purpose of the interest and does not override the interests and freedoms of the individual.

Guidance from the UK Data Protection Regulator, the ICO, sets out a three-stage test that organisations can apply to help them decide whether a legitimate interest is lawful, which covers the purpose of the activity, whether it is necessary and how this is balanced against an individual's rights.

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>

3. What personal details do we hold and how do we process it?

We aim only to collect and hold the information which is necessary for the purpose of running of the Association and achieving our objectives. This will include name, home address, phone number and email address together with the tower you ring at. This information is generally collected directly from the data subject.

We use personal data for the following purposes:

- To enable us to provide voluntary services for the benefit of the bellringing community in the geographical area specified in our constitution;
- To administer membership records and maintain our own accounts and records;
- To fund raise and promote the interests of the Belfry Repair Fund charity;
- To publish directories of officers, members and local tower contacts online and in our annual report;
- To inform you of news, events, activities and services provided by us;
- To organise and conduct training events.
- To analyse visitors to our website.

4. Our Legitimate Interest

We use the personal information of our members and other people who contact us purely for the purposes on which the organisation was founded in relation to training ringers, raising funds for our Belfry Repair Fund and fostering fellowship both amongst ringers and with the general public. This is our legitimate interest.

Our data processing is very limited, conducted on a small scale and all processing is consistent with the reasonable and expected activities of a territorial bell ringing society. This includes:

- When a person joins the Surrey Association we will keep information about them that allows us to administer their membership and process subscriptions. For this purpose we only hold names and addresses and undertake processing which is necessary for our membership administration.
- We may publish members name in the attendance books and minutes of meetings. The purpose of this is administrative and with the aim of keeping a record of the Associations activities and business meetings.
- Members names may appear in news articles or records of performances and in our directory of members published annually in our report. The purpose of this is to promote the Association and inform our members to achieve our aim of fostering fellowship amongst bellringers.
- Membership of our numbers club is optional and we will publish names of prize winners to further our aim of promoting the club and raising money for the Belfry Repair fund.
- Joining our email distribution lists is optional but if you decide to join we will send you information about activities, events and news relevant to the Association and the exercise of Bell Ringing. Our email groups are the primary channel for communication with our members.
- Attending a training event is optional but if you sign up to a course you will be assigned to a group and your information shared with the group leader and other members of the group.

5. How we balance our interest with an individual's rights

Our determination is that the impact on an individual of our data processing activities is negligible. We make this determination on the basis of the following factors:

- There is no expectation of privacy when joining our Association. Bell ringing is an inherently social and public activity in which the value of working together as a fellowship of like minded people with common aims is widely recognised and understood.
- We only process data for purposes that would be reasonable to expect of our Association and the nature of our data processing is limited and proportionate to our purpose;
- We only process information the individual has freely chosen to provide to us and are up front and transparent about the way we use this data;
- We recognise an individual's rights to their own data and members have the choice to opt out of all communications and to request that their information is kept private.

We undertake to keep this assessment under review and revise it whenever any additional information or guidance becomes available.