

HANDBELL RINGERS OF GREAT BRITAIN



**For HRGB incl. all HRGB Events, HRGB Sales, William Hartley Memorial Fund,
Vaughan Evans Fund and HRGB Promotions Ltd.**

GDPR Compliance Instructions

These instructions relate to what is required for compliance with the new data protection regulations which came into force on 25th May 2018.

HRGB has a Data Protection Policy including a data retention schedule which is available on the website. There is also a Privacy Notice on the website which gives a full account of how HRGB handles members' personal information.

These documents cover all personal information processed at National and Regional levels and by all teams where all team members are members of HRGB. *Please note that teams which have members who are not members of HRGB should have their own Data Protection Policy and Privacy Notice in respect of these non HRGB members' personal information.* It may be possible for teams who have non HRGB members and who are a recognised church organisation or recognised community organisation, to be covered by that organisation's policy but the team would need to check this out and may require to give explicit consent for the processing of all information if this is the organisation's data protection policy.

It is not necessary to obtain explicit consent to store and process basic personal data such as name, address, phone number and email address in an organisation such as HRGB where all ordinary members have registered their membership, pay an annual fee and have access to and should have read the Privacy Notice. The same applies to Honorary Members and Life Members who have accepted the honour of this type of membership.

Certain types of information do require explicit consent to have been obtained for storage and processing of these kinds of data but this is very limited within HRGB.

It is necessary to have signed consent for the treasurer to retain bank details of NEC members to enable bank transfer payments of travel and other expenses incurred in fulfilling their roles within the NEC. This consent is also required if regional treasurers retain bank details of regional members for bank transfer payment of expenses etc.

Some teams retain a summary of health issues affecting their members in case of a medical emergency at a practice or event. Explicit signed consent is essential for this and the information must be kept under lock and key or in a secure (e.g. password protected) digital form. Sharing of health information, though useful in a medical emergency, even if requested by the team is not obligatory. To justify processing medical information for this use the information would require to be

available at the events chosen by the team e.g. practice, concert or team event, in a secure protected form.

Where information is passed to a third party for bona fide HRGB business (e.g. within the working of HRGB Sales) it is necessary to provide the Data Processor, Laura Buist with a copy of the contract with that organisation and its Privacy Policy. If the third party is outside the EU then please supply its full Data Protection Policy to ensure that it complies with the GDPR Regulations.

The 6 principles of data protection are fully laid out in the Data Protection Policy and to comply with these the data collected and processed must be only for specific purposes eg membership, to enable mailings, to register for HRGB events etc. The data must be accurate and kept up to date. It must be limited to what is necessary for the purpose and must be destroyed when that purpose has ended. Destroying electronic information requires not just deleting it from the e-mail list but also deleting it from the “recycling”/”trash” bin. It must also be stored and processed securely.

Membership

Membership details of name, address, phone number and email address or as many of these as are provided by the members are stored on a database and information from this data base is only provided to bona fide office holders at National and Regional levels for appropriate HRGB business. (National office holders can access the whole database but Regional office holders can only access full information from their region, however Regional Secretaries will have access to the contact details of team correspondents from other regions.) An individual member can request to see their own entry at any time.

Mailing

Mailing of Reverberations and Regional newsletters is often contracted to a mailing company for sending out the publication either by post or digitally. *If your region uses such a service you must provide the HRGB Data Controller, Laura Buist, with a copy of the contract with the mailing company indicating that it complies with all the GDPR regulations.*

Since Reverberations may be read by people who are not members of HRGB the office holders and other members of the NEC whose contact details are printed in the publication must give explicit consent for their personal information to be published. If Regional newsletters have a readership outside HRGB then the same applies and explicit consent must be obtained from the members identified. The consents must be recorded on forms which will be retained by the editor of the newsletter or the Regional Chairman and be available for inspection by the Information Commissioners Office if requested. Please inform the HRGB Data Controller that the consent has been obtained and who has the signed forms. For Reverberations the editor will keep the signed consent forms and inform the Data Controller that they are all in order.

Events

The HRGB Data Protection Policy and Privacy Notice allow organisers of HRGB events at National and Regional levels to collect, store and process personal information in the form of name, address, email address and telephone number(s) obtained during the process of registration for the event. This will be stored securely for the period from registration for the event through till and during the event but must be destroyed immediately the event is over.

It may be necessary to request dietary information from participants which will need to be given to a third party (catering services). If possible this should be done by numbers and not identifying individuals but if identification is required then the contract with the caterer must be stored with the documents relating to the event and must contain evidence that the third party fully adheres to GDPR Regulations.

It may be deemed desirable to request health and medical information and contact details of a next of kin from participants to be used in case of a medical or other emergency. If this information is obtained there must be signed evidence of explicit consent from the member and the information must be stored under lock and key at all times or in a secure digital fashion and must only be accessed in the case of an emergency. It must be destroyed immediately the event has finished.

Reports of events retained for the future must not contain addresses, or other contact details and should only be accessible to HRGB members.

Archived Material

Material placed in the HRGB National Archive or Regional Archives after 25th May 2018 should be examined to ensure that identifying personal information is not being stored unless prior explicit consent has been obtained e.g. Reveberations with contact details. It may not be possible to completely remove all personal information so access should be limited to HRGB members. If there is a need for a document archived since the introduction of the GDPR Regulations to be shown to a third party then the Archivist must redact any personal information from the document before it or a copy leaves the Archive.

E-mail Communications

The Data Protection Regulations state that when e-mailing a group of people the “blank copy” facility must be used. However this hinders effective communication amongst committee members; so in the interest of effective communication if all the members of a committee at regional or national level are in agreement for their e-mail addresses to be seen by the other members of that committee then it is acceptable (and beneficial) to use the conventional system of allowing each member to know who else is on the e-mail circulation. This also allows members of the committee to see responses from other members if all use the “reply to all” facility. Agreement of the members of the committee for this “non-blind copying” should be recorded in the minutes of the committee

and any persons not present at that meeting should be consulted and asked to sign a form giving their consent to this.