## **South Wales Caving Club – Data Audit September 2025**

## Reviewed and updated 10 September 2025 (new/amended entries inserted re BCA data) Adopted at Committee Meeting of 13 October 2025.

Role	Data Held	How held?	Purpose	How Collected and Updated?	Legal Basis	Retention
Membership Secretary	Membership class Name Address Email Telephone Date of Joining BCA No. and/or other route Date of Birth Sensitive Medical Information	Hard Copy (Original Application Forms)	Application administration, including BCA.	Original Application Forms  – not updated.	Legitimate Interest.	Full Member – indefinite. Provisional – indefinite Temporary – current calendar year plus two previous years.
	Membership class Name Address Email Telephone Date of Joining BCA No. and/or other route Year of Birth Payment status (no bank details) Relevant notes	Electronic – password protected spreadsheet.	Membership administration and renewals, including BCA.	Originally from application forms, thereafter in response to Member-advised changes.	Legitimate Interest.	Current calendar year plus two previous years. Names, dates, Membership class and BCA number retained indefinitely.
	Lapsed Member details as above, plus date of lapsing	Electronic – password protected spreadsheet.	To facilitate re-joining and calculation of fee due.	Internal transfer, moved to separate spreadsheet sheet, not updated.	Legitimate Interest.	Current calendar year plus two previous years. Names, dates, Membership class and BCA number retained indefinitely.

Role	Data Held	How held?	Purpose	How Collected and Updated?	Legal Basis	Retention
	Membership class Name Address Email Telephone Date of Joining	Electronic – password protected spreadsheet.	For roles which require it: Chairman Secretary Treasurer Communications	Subset cut down from current main Membership details spreadsheet. Update sent out as required by email after each Committee Meeting.	Legitimate Interest.	Last three retained by Assistant Sec. Deleted by role holders on receipt of updated version.
	BCA return: Name Address Email Year of Birth BCA No. and Membership class	Electronic – password protected spreadsheet.	Annual return and updates of Member information to BCA.	Data input directly to online BCA membership database	Legitimate Interest. (Email and Year of Birth - Consent)	Live database - not maintained or retained by SWCC
	Members' Address List: Name Address Email Telephone	Electronic – password protected spreadsheet.	Available on Members' side of website. Distributed to Members on request by email or post.	Subset cut down from current main Membership details spreadsheet.	Consent.	Current only.
Secretary	Membership class Name Address Email Telephone Date of Joining	Electronic – password protected spreadsheet.	General administration and correspondence.	Subset cut down from current main Membership details spreadsheet. Update sent out by Membership Secretary by email as required.	Legitimate Interest.	Deleted on receipt of updated version.
	Minutes (Committee and General Meetings) – may contain information on Members	Hard copy and electronic.	Administration and record purposes. Published on website after acceptance at subsequent meeting.	At meeting, from notes and speech recordings (currently via Zoom).	Legitimate Interest.	Indefinite as formally accepted Minutes. Speech recordings deleted after the Minutes of the relevant meeting are ratified.
Chairman	Membership class Name Address Email Telephone Date of Joining	Electronic – password protected spreadsheet.	General administration and correspondence.	Subset cut down from current main Membership details spreadsheet. Update sent out by Membership Secretary by email as required.	Legitimate Interest.	Deleted on receipt of updated version.

Role	Data Held	How held?	Purpose	How Collected and Updated?	Legal Basis	Retention
Treasurer	Membership class Name Address Email Telephone Date of Joining	Electronic – password protected spreadsheet.	Debtor and creditor management.	Subset cut down from current main Membership details spreadsheet. Update sent out by Membership Secretary by email as required.	Legitimate Interest.	Deleted on receipt of updated version.
	Hut Sheets: Name Date Fees paid/due Payment method (no bank or card details other than last four digits on card)	Hard copy and/or Electronic – access controlled web-based (Google) spreadsheet.	Accounting and audit. Debtor and creditor management. Anonymised bed night summaries.	Hard copy collected from HQ by Treasurer or sent by post by the Duty Officer. Electronic data are user- entered.	Legitimate Interest.	Current financial year plus previous two years.
	Accounts, PayPal, SumUp and Bank Statements (includes details from Hut Sheets).	Electronic – password protected spreadsheet. Statements may be held as hard copy.	Club financial management and audit purposes.	Transferred from hut sheets, invoices and similar sources.	Legitimate Interest.	Current financial year plus previous seven years.
Communications Manager	Membership class Name Address Email Telephone Date of Joining	Electronic – password protected spreadsheet.	Website and enews administration and maintenance. Welcoming new Members via enews. Blog control. Facewall control. eMailing lists.	Subset cut down from current main Membership details spreadsheet. Update sent out by Secretary by email as required.	Legitimate Interest.	Deleted on receipt of updated version.
Editor	Contributor contact details.	For Members – electronic password-protected spreadsheet. Non-Members – usually electronic, often as email address list.	Communication in respect of potential and submitted articles.	Members - Subset cut down from current main Membership details spreadsheet. Update provided by Secretary as required. Non-Members - from contributors directly.	Consent – all contributors are voluntary.	Members – deleted on receipt of updated version. Non-Members – deleted after relevant publication(s) have been issued.
	Member name and postal address details.	Electronically or as hard copy labels.	Distribution of Newsletter to Members.	From Membership Secretary on ad hoc basis.	Legitimate Interest.	Deleted after Newsletter has been distributed.

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Meets and New Members Co-ordinator	Member, Provisional Member and Temporary Member contact and experience details. May include sensitive medical information.	Hard copy or electronic, as completed Application Forms and tabulated summaries.	Organisation of Provisional Member weekends.	Provided by those participating.	Legitimate Interest.	Hard copies forwarded to Membership Secretary. Electronic copies forwarded and then deleted.
	Member names and contact details.	Usually electronic, often as email lists.	Organisation of Club meets.	From Members expressing an interest in the meet.	Consent – participation in Club meets is voluntary.	Data deleted after the event is over.
Social Events Co-ordinator	Member names and contact details.	Usually electronic, often as email lists.	Organisation of Club events.	From Members expressing an interest in the event.	Consent – participation in Club events is voluntary.	Data deleted after the event is over.
Training Officer	Member names, contact details and details of training provided or requested.	Electronic – held in Trello.	Training management and equitable provision of training.	From Members who request training and from training attendance.	Legitimate Interest and/or Consent – training is voluntary.	For the duration of Membership.
Training Officer	Relevant medical, fitness and experience information	Electronic – Google spreadsheet on club Googledrive	To enable training to be delivered safely	From Members who request training and from training attendance.	Consent – participation is voluntary.	Deleted 6 months after completion of training.
Other Committee Members	Committee Member names and contact details.	Usually electronic, often as email lists.	Committee email discussion.	From the Secretary or Communications Officer.	Legitimate Interest and/or Consent – all are volunteers.	Data deleted when Members leave the Committee.
Roof Fund donation co-ordinator	Name of donor and amount donated or pledged.	Electronic – USB locked in safe.	Ad hoc requirement - anonymisation of donations.	From donation forms. Time limited so no update required.	Consent – all donations and pledges are voluntary.	To be retained until roof replaced and monies collected, then deleted/destroyed.
Bookings Secretary	Names and contact details for Clubs booking to stay at the HQ.	Electronic – password protected email account.	Bedspace management.	Provided by booking Club contacts on an ad hoc basis.	Legitimate Interest.	Indefinite
Merchandise Officer	Names, email and postal addresses.	Hard copy and electronic  – email account	Postal merchandise sales	Provided by purchasers on an ad hoc basis.	Legitimate Interest	Deleted on completion of the purchase.

Role	Data Held	How held?	Purpose	How Collected and Updated?	Legal Basis	Retention
Advisory Group Chairmen	Group member names and contact details.	Usually electronic, often as email lists. Working Group membership (names only) is published on the website.	Group co-ordination.	From group members or the Membership Secretary.	Legitimate Interest and/or Consent – all are volunteers.	Data deleted when group members leave or the group is wound up.
Advisory Group members	Group member names and contact details.	Usually electronic, often as email lists.	Group email discussion.	From the group Chairman.	Legitimate Interest and/or Consent – all are volunteers.	Data deleted when group members leave or the group is wound up.
Various administrative working lists, archives and other documents	Name, other information relevant to the purpose.	Hard copy or electronic.	Ad hoc administration. Examples include HQ key control, Library or Tackle loans, organisation of Club events. Safeguarding reports, Club photo archive.	Names recorded by the relevant administrator. Information updated at appropriate intervals.	Legitimate Interest.	No set period. Deleted when no longer required.
SWCC Permit Secretary	Names and contact details of applicants for OFD, Pant Mawr and other SWCC permits	Electronic – password protected email account.	Access Permit administration.	Provided by Permit applicants on an ad hoc basis.	Legitimate Interest.	Current calendar year plus two previous years.
	Names and contact details of caving trip leaders and trip members	Hard copy and/or Electronic – access controlled web-based (Google) spreadsheet.	Cave key control and cave usage monitoring	Data are user-entered in both cases. Hard copy data collected from HQ by Permit Secretary or a nominee.	Legitimate Interest.	Current calendar year plus previous year
	Leader contact details, party member names and cave route details	Electronic - entry on 'Digital Destination Board' app. Stored encrypted in Microsoft Azure. Hard copy 'Trip Tickets' are no longer retained.	Cave Rescue call-out	Data are user-entered.	Legitimate Interest and/or Consent – use of DDB is voluntary	Retained throughout the duration of the Leader's registration on the DDB app, then deleted.