



Managing data in Contact Lists and the Register of Membership

Guidance for Quaker area meetings and charities

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Contact details

If you have questions related to any of the material in this guidance please contact Quakers in Britain, supportmeetings@quaker.org.uk.

Background

The Religious Society of Friends (Quakers) is a membership organisation that has a decentralised membership model. Membership is held by area meetings or regional Quaker bodies on behalf of the national church; these bodies can vary in their size and characteristics. Quaker communities hold information about people to enable participation in the life of the Society. Not all Quakers choose to become members, which means that the basis for holding personal and contact information can vary.

This guidance is to help with understanding the data we hold and the lawful basis that it is held. It is specifically looking at the data held in the register of members and the contact lists that we use to communicate with members, attenders and supporters.

This guidance is **advisory and sets out best practice**, rather than providing legal advice. It interprets the [requirements of UK GDPR](#), the [Data Protection Act 2018](#) and the [Data \(Use and Access\) Act 2025](#), alongside [Information Commissioner's Office](#) (ICO) guidance, to support good governance and proportionate risk management.

UK data-protection law is **principles-based**, requiring organisations to exercise judgement in applying it to their specific circumstances.

The difference between Contact Lists and the Register of Membership

Contact Lists

This refers to the list of all members and attenders of local Quaker communities who have given permission for their details to be included in an address book. The contact list is circulated to other members and attenders in an agreed upon area such as area meeting, a regional meeting or a collection of Quaker communities within a single charity body.

- Personal data within the Contact List is collected and processed under [Consent \(Article 6\(1\)\(a\) UKGDPR\)](#). This reflects an individual's choice to consent to an organisation holding their data and choosing what can be shared with the agreed community.
- The Contact List can include anyone who has given consent to the organisation for their contact details to be held.

Register of Membership

The Register of Membership contains personal data such as names and contact details. However, it is distinct in its purpose and status due to the formal membership relationship.

The Register of Members is a permanent record of the Area Meeting and should be preserved for eventual transfer to the associated archive service.

- Personal data within the Register of Members is collected and processed under [Legitimate Interest \(Article 6\(1\)\(f\) UK GDPR\)](#). This reflects the organisation's need to maintain an accurate record of its members for governance purposes. [A Legitimate Interest Assessment \(LIA\)](#) should be in place to confirm that members' rights and freedoms are not overridden.
- The Register applies only to individuals who have a current or past membership relationship with the organisation. It should not include non-members, supporters, or contacts without a defined membership status.

See the simple table to help decide about whether to use [Legitimate Interest or Consent, which are explored in more detail](#) later in the document.

	Consent	Legitimate Interest
Contact Lists Details circulated in order that members and attenders can contact each other	✓	
Membership Registers Formal register of details of those in membership of the Religious Society of Friends		✓

Members vs Contacts

It is good practice to distinguish clearly between:

- Members – individuals with a formal governance relationship
- Attenders with a relationship akin to membership – individuals without a formal governance relationship but involved in the life of the community (often role holders)
- Attenders/Contacts/Supporters – individuals receiving information without membership relationship

This distinction should be reflected consistently in privacy notices, consent wording, lawful basis decisions, and retention policies.

The principles of responsible and secure storage apply to all personal data held

Access should be restricted to authorised individuals, records should be kept securely (whether electronic or paper), and appropriate technical and organisational measures must be in place to prevent unauthorised access, loss, or disclosure.

[Members have the right to rectification](#) under UK GDPR, meaning they can request that inaccurate or incomplete personal data held in the Register be corrected without undue delay. Procedures should be in place to consider and respond to such requests.

How data may be held

Organisations may hold personal data in:

- Paper lists (e.g. sign-in sheets, printed mailing lists)
- Digital lists (e.g. spreadsheets, databases, email systems)

Both formats present risks and must be managed appropriately.

Managing risk

Common risks

- Loss, theft, or unauthorised access
- Use beyond the original purpose
- Inaccurate or outdated information
- Uncontrolled duplication of lists

Reducing Risk When Compiling and Using Lists

- Collect only the minimum data necessary
- Be clear about the purpose before collecting information
- Avoid “just in case” data collection
- Review and update lists regularly
- Securely dispose of data when no longer needed

Paper Lists

- Do not leave lists unattended or publicly visible
- Store securely when not in use
- Shred securely when no longer required

Digital Lists

- Use approved, access-controlled systems
- Limit access to those with a genuine need
- Avoid copying lists to personal devices
- Use password protection and encryption where possible
- Manage version control to prevent duplication

Generic Email Addresses

Use generic addresses (e.g. info@, clerk@, treasurer@) wherever possible to:

- Reduce reliance on named individuals
- Minimise exposure of personal contact details

- Improve continuity and accountability

Access to generic inboxes should be limited and reviewed regularly.

Lawful Basis: Consent vs Legitimate Interest

A clear [lawful basis](#) must be identified for holding and using data in any kind of list.

Consent

May be appropriate where:

- Communications are optional or promotional
- Individuals would not reasonably expect contact
- Data collection is not necessary for core functions

Consent must be freely given, specific, informed, and unambiguous, and should not be relied upon where refusal would disadvantage the individual.

Best practice includes:

- Only collect data that is genuinely needed; optional fields must be clearly marked.
- Individuals must be able to withdraw consent easily at any time.
- Requests to withdraw consent or update information should be acted on promptly.
- Best practice is to refresh consent approximately every two years, particularly for mailing lists or ongoing communications.
- Maintain records of when and how consent was obtained and refreshed.

Legitimate Interest

May be appropriate where:

- There is an existing relationship (e.g. members or volunteers)
- Communications relate to the organisation's core purpose
- Contact would be reasonably expected
- Individuals' rights are not overridden

Best practice includes:

- Completing and documenting a Legitimate Interest Assessment (LIA)
- Limiting communications to what is relevant and proportionate
- Providing a clear opt-out

Compliance and Legal

Compliance and Reputational Risk

Area meeting trustees, working in partnership with Friends from the Quaker communities they serve are collectively responsible for ensuring that the organisation:

- Complies with UK GDPR and the Data Protection Act 2018
- Demonstrates accountability for data-handling decisions
- Respects individuals' rights and reasonable expectations

Trustees should be aware that data-protection failures present both **regulatory and reputational risks**, including:

- ICO complaints or enforcement action
- Loss of trust among members, donors, or partners
- Reputational damage even where no formal breach occurs

Good data-protection practice is therefore a matter of **governance and trust**, not just legal compliance. ICO advises that a proportionate approach should be taken.

Legal Definition of “Membership” and Data Protection Implications

There is no single statutory definition of “membership” in UK data-protection law. Membership status depends on the organisation’s governing documents, policies, and actual practices.

For data-protection purposes, membership generally exists where an individual:

- Has formally joined under the organisation’s constitution or rules
- Has ongoing rights or obligations (e.g. voting rights, subscriptions)
- Would reasonably expect communications relating to governance and core activities

How membership is defined affects:

- The appropriate lawful basis for processing data
- What communications are reasonable and expected
- Retention periods and data-review practices

Organisations should ensure that how data is handled matches how membership is described. Treating contacts or subscribers as members (or vice versa) increases compliance and reputational risk.

Appendix I – Passages from Quaker faith & practice

Quaker faith & practice chapter 4

Records

[4.39](#) Area and general meetings should appoint a Friend to act as a custodian of their records, or else appoint a committee for the purpose. Area meetings should take responsibility for the records of their constituent meetings, ensuring their timely transfer to the custodian of records. They are advised in particular to ensure that the records of any local meeting which has been laid down are collected together. The Library of the Society of Friends publishes guidance for clerks and custodians on the creation, care and custody of records ([4.43](#)), and see the BYM website (new window).

[4.40](#) It is advised that the following be preserved in Friends' ownership or custodianship:

- minute books of yearly, general, area and local meetings;
- minute books of elders and overseers and of standing committees of meetings for church affairs;
- official registers of members ([11.37](#)), printed lists of members and attenders ([11.39](#)), marriage registers ([16.62](#)), registers of burials ([17.12](#)), burial ground plans ([14.31](#)), registers of properties and trusts ([15.18](#));
- such other documents as it is reasonable to expect may be needed for future reference.

Data protection and confidentiality

[4.45](#) Meetings storing information about their members and attenders on computers or other electronic devices or in manually processed paper files should be sensitive to the need to protect such information from unauthorised use and must comply with all legal requirements for data protection. Basic factual information on members such as addresses can be kept by the area meeting on the official register of members ([11.37](#)) without notification of those concerned. Such information may be passed to the yearly meeting database, except that members may then request that information other than their names be withheld.

Quaker faith & practice chapter 11

Becoming a member

[11.04](#) An individual, of any age, becomes a member of their area meeting, and through it of Britain Yearly Meeting, by a simple process agreed and adopted by the area meeting. Variety and flexibility in procedures are needed to reflect individual and local circumstances. Each area meeting will develop one or more of such procedures.

Guidance on current procedures used by various area meetings can be obtained from the Recording Clerk.

Records of membership

Official register of members

[11.37](#) Each area meeting shall maintain an official register of members and shall appoint a suitable Friend to have care of it. (See [4.45](#) about data protection.) No alteration shall be made to the register save in accordance with decisions minuted by the area meeting. The official register of members shall be examined annually and checked with the area meeting minutes by the Friends appointed to prepare or check the tabular statement. The official register may be maintained in loose-leaf form provided that proper precautions are

taken. Superseded official registers of members shall be preserved by area meetings among their records ([4.40](#)).

Lists of attenders and children not in membership

[11.38](#) Each area meeting shall maintain a list of attenders and of children not in membership associated with its several meetings for worship or shall arrange that such lists shall be kept by overseers. An attender is one who, not being a member, frequently attends a specific meeting for worship.

Printed lists of members, attenders and children not in membership

[11.39](#) It is recommended that in the published lists of members, attenders and children not in membership, the date of birth should not be printed.

Respecting the essentially private nature of such lists, meetings should exercise care to limit their availability and guard against the risk that they be put to undesirable use