Data Protection Policy and Register of Processing Activities

Approved	21.07.2026	Next review due	4th meeting 2027

1. Purpose and Scope

This policy sets out how Chaplaincy Derbyshire ensures that personal data is handled lawfully, securely and in line with UK data protection law.

It applies to:

- Trustees
- Staff (if any)
- Volunteers and chaplains (including Sector and Hub Leads)
- Anyone processing personal data on behalf of the charity

This is an internal policy. It complements (but does not replace) the charity's public-facing Privacy Notice.

2. Our Commitment

Chaplaincy Derbyshire is committed to:

- Respecting the privacy and dignity of all individuals
- Processing personal data responsibly and transparently
- Protecting sensitive information, including safeguarding-related data
- Meeting the requirements of:
  - UK GDPR
  - Data Protection Act 2018
  - ICO guidance
  - Charity sector best practice

3. Data Protection Principles

We comply with UK GDPR principles.

Principle	What this means in practice
Lawfulness, fairness and transparency	We have a clear legal reason for processing and are open about how data is used.
Purpose limitation	Data is used only for specific, legitimate purposes
Data minimisation	We only collect what we need
Accuracy	Information is kept up to date where necessary
Storage limitation	Data is not kept longer than needed
Security (integrity and confidentiality)	Data is protected against unauthorised access or loss
Accountability	We can demonstrate compliance

4. Roles and Responsibilities

Role	Responsibilities
Trustees	Overall accountability for data protection compliance
Data Protection Lead	Day-to-day oversight, breach handling, advice and monitoring
Sector & Hub Leads	Responsible use of data within their groups; must not share data without authority
All volunteers and users	Follow this policy, maintain confidentiality, report concerns
Third-party processors	Must comply with contracts and data protection requirements

All individuals with access to personal data must understand and follow this policy.

5. Categories of Personal Data

Chaplaincy Derbyshire processes personal data including:

- Names
- Dates of birth
- Contact details (address, email, phone)
- Church affiliation
- Application and sign-up information
- Volunteer records
- Referee details and references
- Data from the Disclosure and Barring Service (DBS) as part of our initial and ongoing checks

In some cases, we may process *special category data*, such as:

- Religious affiliation (specific church connection, for accountability)
- Safeguarding-related information
- Whether or not you have a disability for which we may need to make reasonable adjustments.

6. Lawful Bases for Processing

We only process personal data where there is a lawful basis:

Purpose	Lawful basis typically used
Enquiries and communication	Legitimate interests
Recruitment and management	Legitimate interests / contract
Safeguarding	Legal obligation / vital interests
Maintaining chaplain networks	Legitimate interests
Email updates	Consent
Administration and records	Legitimate interests

We document lawful bases in an internal Register of Processing Activities. (See appendix below)

7. Special Category Data

Where we process sensitive personal data (e.g. church affiliation or safeguarding information), we:

- Ensure a valid Article 9 condition applies, in particular the not-for-profit condition (Article 9(2)(d)) where we process data relating to members, volunteers or those in regular contact with the charity, as well as safeguarding or other applicable conditions where relevant. Where church affiliation is shared beyond Chaplaincy Derbyshire, this will be anonymised
- Restrict access to those who need it
- Apply additional confidentiality safeguards

8. Recruitment and Volunteer Data

We collect and process data for recruitment and volunteering, including:

- Application forms
- Background information
- References and referee contact details
- Data from the Disclosure and Barring Service (DBS)

We ensure:

- Referees are contacted appropriately
- Information is only used for recruitment purposes
- Unsuccessful applicant data is retained only as long as necessary
- Volunteer records are handled confidentially

9. Safeguarding Information

Safeguarding is a core responsibility of the charity.

Where safeguarding concerns arise:

- Relevant personal data may be shared where *legally required or where necessary to protect individuals*
- Records may be retained for extended periods (up to 75 years, in line with safeguarding guidance)
- Access is strictly limited

10. Data Minimisation and Accuracy

We will:

- Only collect data necessary for defined purposes
- Regularly review what we hold
- Update or correct inaccurate information when identified

Individuals may request corrections at any time. (See section 17, below, for information on Subject Access Requests)

11. Retention and Secure Disposal

We apply clear retention periods:

Data type	Typical retention period
Volunteer and chaplain records	Up to 7 years after last involvement
Safeguarding records	Up to 75 years where required
Trustee minutes	May be retained indefinitely
Routine contact data	Reviewed periodically and deleted when no longer needed

When data is no longer required:

- It is securely deleted or destroyed
- Electronic data is permanently erased
- Paper records are securely shredded

12. Data Security

We implement appropriate technical and organisational measures, including:

- Secure digital systems (including ChurchSuite)
- Password protection and access controls
- Secure storage of paper records
- Data backups and recovery procedures
- Regular software updates
- Ensuring personal data will not be shared outside the charity unless there is a lawful basis and a clear need to do so.

13. Systems and Access Control

ChurchSuite

Chaplaincy Derbyshire uses *ChurchSuite* as its primary data management system.

Controls include:

- Role-based access (users only see what they need)
- Account permissions managed centrally
- User agreements before access is granted

Access Rules

- Access is limited to those with a legitimate need
- Sector and Hub Leads must not share data beyond authorised use
- Data must only be used for Chaplaincy Derbyshire purposes

14. Third-Party Processors

Where we use third-party services (e.g. ChurchSuite, email providers), we ensure:

- A written Data Processing Agreement is in place
- Providers offer appropriate security assurances
- Data is only processed on our instructions

15. International Data Transfers

It is not our current practice to transfer data our of the UK. However, if data is transferred outside the UK:

- We ensure appropriate safeguards (e.g. adequacy decisions or standard contractual clauses)
- Transfers are limited and assessed for risk

ChurchSuite has their own policies and procedures regarding this. For more information, see their website. (https://www.churchsuite.com/privacy-notice/)

16. Confidentiality

All trustees, volunteers and leaders must:

- Treat personal data as confidential
- Not disclose information without authority
- Use data only for approved purposes

A breach of confidentiality may result in removal from role.

17. Individual Rights

Individuals have the right to:

- Access their data (Subject Access Request)
- Rectify inaccurate data
- Request deletion (where applicable)
- Restrict or object to processing
- Withdraw consent
- Complain to the ICO

When handling Subject Access Requests

- Requests should be responded to within **one month**
- Identity must be verified before disclosure
- Requests should be logged and managed centrally

18. Data Breach Management

A data breach includes loss, unauthorised access, or disclosure of personal data.

All staff and volunteers must:

- Report any suspected or actual breach **immediately** to the Data Protection Lead (or to the Trustees, who collectively retain oversight and responsibility)

The charity will:

1. Assess the risk to individuals
2. Take immediate containment steps
3. Notify the ICO within 72 hours if required
4. Inform affected individuals where risk is high
5. Record all breaches and actions taken

19. Training and Awareness
Chaplaincy Derbyshire will ensure:

- Trustees and relevant volunteers receive appropriate data protection awareness
- Sector and Hub Leads understand their responsibilities
- New users of systems (e.g. ChurchSuite) are properly briefed

20. Accountability and Governance
We demonstrate compliance by:

- Maintaining a Register of Processing Activities
- Keeping records of decisions and lawful bases
- Reviewing systems and risks regularly
- Ensuring ICO registration is maintained

21. Policy Review
This policy will be reviewed annually, or sooner if required, updated to reflect changes in law and practice, and approved by Trustees.

22. Key Principles for Practice (Summary)
All who handle data should follow these simple rules:

- Only collect what you need
- Keep it secure
- Do not share without permission
- Keep it accurate
- Delete when no longer needed
- Report concerns immediately

Appendix A
Register of Processing Activities

This appendix is a working document. It may be updated from time to time without requiring full re-approval of the main policy, provided that any changes made are consistent with the policy framework.

Processing Activity	Purpose	Categories of Data	Lawful Basis	Special Category Condition	Data Subjects	Recipients	Retention	System / Location
Enquiries and general contact	Respond to enquiries and engage with individuals	Name, email, message content	Legitimate interests	N/A	Members of public	None unless necessary	Up to 2 years after last contact	Email system / ChurchSuite
Volunteer & chaplain recruitment	Assess suitability for roles	Name, contact details, DOB, application data	Legitimate interests / steps prior to contract	Religious belief (where relevant) – Art 9(2)(d) not-for-profit condition	Applicants	Referees	1 year after decision (unless retained longer with consent)	ChurchSuite / secure files
Volunteer & chaplain management	Maintain records and coordinate activities	Name, contact details, church affiliation, role information	Legitimate interests	Religious belief – Art 9(2)(d)	Volunteers / Chaplains	Sector & Hub Leads (restricted access)	Up to 7 years after role ends	ChurchSuite
Referee information & references	Assess suitability of applicants	Referee name, contact details, reference content	Legitimate interests	May include inferred special category data	Referees	Internal only	Retained with volunteer file (see above)	Secure files
Safeguarding records, including data from DBS checks	Protect individuals and fulfil safeguarding duties	Incident details, personal data, sensitive information	Legal obligation / vital interests / legitimate interests	Art 9(2)(g) substantial public interest (safeguarding)	Individuals involved in safeguarding concerns	Safeguarding authorities where required	Up to 75 years	Secure restricted records
Communications (email updates)	Send updates and news	Name, email	Consent	N/A	Subscribers	Email provider	Until consent withdrawn or reviewed periodically	Email system / ChurchSuite

Processing Activity	Purpose	Categories of Data	Lawful Basis	Special Category Condition	Data Subjects	Recipients	Retention	System / Location
Trustee governance	Manage charity governance	Names, contact details, meeting records	Legal obligation / legitimate interests	N/A	Trustees	Regulators if required	Minutes retained indefinitely	Secure storage
Donations and supporter engagement	Administer donations and relationships	Name, contact details, donation details	Legitimate interests / legal obligation	N/A	Donors	Payment providers	6–7 years for financial records	Finance systems
Website usage data	Improve website performance	IP address, browser data, cookies	Legitimate interests / consent (for optional cookies)	N/A	Website users	Analytics providers	As per cookie policy	Website / analytics tools