



ST PETER'S CHURCH, CHORLEY
HARPERS LANE, CHORLEY, LANCASHIRE PR6 0HP

St Peter's Chorley Parish Church

in the Church of England Diocese of Blackburn

DATA PROTECTION POLICY & COMPLIANCE FRAMEWORK

Issue 3.0 | June 2026

*Address: Parish Office St Peter's Church, Harpers Lane Chorley,
PR6 0HP Email: chorleystp.office@gmail.com*

ST PETER'S CHURCH, CHORLEY

Diocese of Blackburn — Church of England

DATA PROTECTION POLICY & COMPLIANCE FRAMEWORK

1. Purpose & Legal Context

This Policy defines the operational framework for the lawful, fair, and transparent handling of personal information at St Peter's Church, Chorley. The Parochial Church Council (PCC), Clergy, and Officers acknowledge that proper stewardship of personal data is not merely a legal compliance mandate, but a profound expression of our pastoral care, safeguard protocols, and Christian ministry. This revised document formally brings our previous 2024 policy into absolute alignment with the statutory shift introduced under the United Kingdom's Data (Use and Access) Act 2025 and contemporary 2026 guidelines issued by the Information Commissioner's Office (ICO).

2. Scope & Applicable Jurisdiction

The jurisdiction of this policy applies strictly to all processing of personal data and special category data carried out by or on behalf of the PCC of St Peter's Church, Chorley. This encompasses:

- All living data subjects associated with the parish, including parishioners, electoral roll members, staff, clergy, regular volunteers, donors, contractors, and individuals accessing sacramental ministries (including baptisms, weddings, and funerals).
- All administrative staff, churchwardens, committee members, and external groups or commercial hirers who utilize church IT infrastructure or physical premises to manage personal records.
- Data records relating to recently deceased individuals, handled with appropriate dignity and in structural alignment with local archival, memorial, and safeguarding requirements.

3. Governance, Roles & Operational Responsibilities

The Data Protection framework operates under a distinct hierarchy to guarantee accountability and prompt regulatory action:

Role / entity	Primary statutory responsibility	Designated personnel
The Parochial Church Council (PCC)	Ultimate Data Controller. Legally accountable for policy ratification, strategic alignment, and overall legislative compliance.	The PCC Body of St Peter's Church
Churchwardens & Parish Office	Day-to-day operational enforcement, physical record verification, password policy monitoring, and staff compliance checks.	Church Warden & Parish Administration
Clergy & Ministry Team	Oversight of sensitive pastoral records, sacramental registers, and ensuring strict integration with national safeguarding directives.	Clergy/ Incumbent/ Priest in Charge

4. The Data Protection Principles (UK GDPR & DUAA 2025)

In accordance with core British data law, St Peter's Church ensures that all personal data is:

- **Lawfulness, Fairness & Transparency:** Processed strictly on valid legal grounds, with clear communication via updated Privacy Notices.
- **Purpose Limitation:** Collected for specific, explicit, and legitimate ecclesiastical purposes and never repurposed for incompatible actions (e.g., using baptism contacts for general marketing without explicit opt-in).
- **Data Minimisation:** Limited strictly to what is adequate and necessary for the active purpose (e.g., collecting only essential emergency contacts for volunteers).
- **Accuracy & Currency:** Kept fully accurate and up to date; any identified inaccuracies must be rectified or permanently erased without delay.
- **Storage Limitation:** Retained only for the duration required to satisfy the intended purpose, adhering strictly to the Lambeth Palace / Church of England Record Management schedules.
- **Integrity, Confidentiality & Security:** Protected using modern technical safeguards, including full password encryption on local devices, locked physical filing systems, and secure cloud platforms.
- **Accountability:** The PCC must actively maintain documentation, audit logs, and impact assessments to definitively prove legal compliance.

5. Lawful Bases for Processing & The 'Necessity' Test

Data processing cannot occur without a valid legal framework. St Peter's relies upon the following distinct conditions under British Law:

5.1 Legitimate Interests & The 2025 Statutory Exemptions

The PCC utilizes Legitimate Interest where processing is genuinely necessary for the operational day-to-day administration of the church, provided it does not override individual rights. Under the Data (Use and Access) Act 2025, specific structural updates have been formalised regarding automated self-assessment and recognised legitimate interests. This condition applies to standard parish communication, keeping track of regular service attendance, and volunteer coordinating.

5.2 Public Task & Statutory Obligation

Processing is lawful where required by secular law or the ecclesiastical measures of the Church of England—specifically in the maintaining of the Church Electoral Roll, handling official parish registers (Baptisms, Marriages, Burials), and fulfilling binding financial reporting to HMRC regarding Gift Aid declarations.

5.3 Safeguarding & Substantial Public Interest

Special Category Data (specifically religious beliefs and health disclosures) is processed strictly under Article 9(2)(g) of the UK GDPR, mapped to Schedule 1, Part 2 of the Data Protection Act 2018 (Safeguarding of children and individuals at risk). Vital medical details provided for church trips or Youth Club/ Lego Church are processed under 'Vital Interests' to ensure safety in life-threatening situations where consent cannot be obtained.

6. Strict Protocols on Informed Consent & Fundraising

Where no explicit statutory obligation or direct contractual necessity exists, explicit, affirmative, and unbundled consent must be obtained. The church implements rigid boundaries to protect data privacy:

- **Fundraising and Marketing Separation:** The PCC is structurally prohibited from using administrative or pastoral datasets (such as contact lists from weddings, baptisms, or funeral services) to solicit financial donations or promote social events, unless the data subject has actively checked an unticked, explicit opt-in box on an independent consent form.
- **Electoral Roll Protections:** Data harvested for the statutory compilation of the Church Electoral Roll must exclusively be used for official governance, annual meetings, and formal elections. Direct mailing for unrelated commercial or parish fundraising is strictly forbidden without independent, explicit authorization.
- **Profiling Bans:** The church prohibits the algorithmic profiling, financial scoping, or targeting of individual parishioners for tailored fundraising campaigns based on their historic donation levels or demographic metadata.

7. Modern Data Retention & Secure Physical Erasure

Personal data must be permanently erased or securely shredded immediately when it is no longer required for its designated purpose, when an individual successfully withdraws consent, or when legal grounds expire. Data cannot be retained indefinitely out of historical convenience. Exceptions apply only to legal disputes, mandatory public safeguarding logs, and statutory archival registers kept in the public interest under national Church guidelines.

8. Third-Party Risk Management & Processor Auditing

Whenever personal data is hosted or handled by an external provider—including cloud storage systems, parish management applications, or email hosting software—the PCC must secure formal, legally binding written contracts. These Data Processing Agreements (DPAs) guarantee that the third party implements equivalent security standards to meet UK law, retains data only on our documented instructions, and remains open to compliance reviews.

9. Individual Rights & Enhanced Subject Access Requests (SARs)

Data subjects retain comprehensive rights, including the Right to Be Informed (via transparent Privacy Notices), Access, Rectification, Erasure ('Right to be Forgotten'), Restriction, Portability, and Objecting to processing.

9.1 Operational SAR Standard (2026 Updated)

Upon receipt of a valid Subject Access Request, the PCC will provide a comprehensive copy of all personal records held on the individual, along with necessary transparency disclosures, within the legal limit of one calendar month. Under modern UK regulations, this service is fundamentally free of charge. The historical 2024 practice of levying standard processing fees is entirely abolished. Reasonable fees

may only be applied if a request is determined to be overtly vexatious, unfounded, or structurally excessive, as strictly evaluated under the 2025/2026 ICO statutory frameworks.

10. Data Breach Protocols & Mandatory 72-Hour ICO Notification

A personal data breach refers to any accidental, unauthorized, or unlawful destruction, loss, alteration, or disclosure of personal records. In the event of a breach, the following action plan is triggered automatically from the exact moment of discovery:

1. Immediate Triage: The Churchwardens and Clergy will immediately contain the breach and assess the potential risk of material or emotional harm to the affected individuals.
2. ICO Notification within 72 Hours: If the breach poses an operational risk to the rights and freedoms of individuals (e.g., leaked safeguarding notes or stolen unencrypted devices), the PCC must formally report the event to the Information Commissioner's Office (ICO) within 72 hours.
3. Data Subject Notification: If the breach presents a high risk of identity theft, fraud, or emotional distress, all affected individuals must be notified in plain, direct language without undue delay.
4. Encryption Exemption: If the compromised data was fully secured using industry-standard, un-cracked cryptographic encryption (rendering it entirely unreadable to unauthorized actors), the event does not present a real-world risk and does not require an external regulatory declaration.

11. Physical & Digital Security Measures

To guarantee data integrity, the PCC mandates the following physical and digital baseline controls:

- All local computer workstations, parish laptops, and mobile devices containing parish data must use robust, multi-character password security and full-disk device encryption.
- Physical records—including baptism application cards, signed consent sheets, and accounting printouts—must be kept locked securely inside flame-retardant filing cabinets, secure drawers, or the church safe when not in active use.
- Staff and volunteers are strictly prohibited from sharing user credentials or passwords, leaving active devices unattended, or utilizing unsecured public Wi-Fi networks when modifying parish records.

12. Operational Interdependencies

This Data Protection Policy must not be read in visual isolation. It operates in seamless structural tandem with the St Peter's Church Child & Vulnerable Adult Safeguarding Policy, the National Church of England E-Safety Guidelines, and the Parish Finance & Gift Aid Internal Control Procedures.

13. Emergency Contacts & Incident Response

In the event of an active security threat, physical break-in, or high-risk data theft on church premises, personnel must immediately contact emergency services via 999. Following initial containment, the key contacts must be informed immediately to execute the 72-hour ICO triage protocol:

Role	Name	Contact Details
Priest in Charge / Clergy Oversight	Fr. Neil Kelley	Phone: 01257 266037 / Email: chorleystp.office@gmail.com
Churchwarden / Parish Office	Mr Ronnie Hunter Mr Eric Crompton	Phone: 07986 671390 Phone: 01257 794372 Parish Office: 07709 146070

14. Policy Review, Authorization & Version Governance

This compliance framework remains subject to a strict 12-month statutory evaluation cycle. It will be proactively reviewed and amended ahead of schedule should there be any material change in parish operations, national church guidelines, or subsequent adjustments to British data protection laws.

Formal Ratification & Approval

Signed: *Neil Kelley*

Name: Fr. Neil Kelley
Position: Priest in Charge / Chair of PCC
Date: 11 June 2026

Signed: *Ronnie Hunter*

Name: Ronnie Hunter
Position: Churchwarden
Date: 11 June 2026

Signed: *Eric Crompton*

Name: Eric Crompton
Position: Churchwarden
Date: 11 June 2026

Document Version Control History

Version	Release Date	Author / Originator	Approved By
3.0	05/06/2026	Parish Office	St Peter's PCC