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

The Chorley Parish Church of St Peter

in the Church of England Diocese of Blackburn

WhatsApp Communication & Data Protection Policy

Covering Volunteer, Ministry, Committee, Teams, and Church Group WhatsApp Communication

Document owner	Incumbent, in consultation with the Parish Safeguarding Officer (PSO)
Applies to	All clergy, PCC members, churchwardens, staff, volunteers, group leaders and members of parish WhatsApp groups
Legal framework	UK GDPR, Data Protection Act 2018, Safeguarding and Clergy Discipline Measure 2016, Church of England Safeguarding Policy, Diocese of Blackburn safeguarding and data protection guidance
Approved by	The Parochial Church Council (PCC)
Date approved	Click or tap to enter a date
Next review date	Annually, or sooner following a data protection or safeguarding update
Version	1.0

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1. Introduction

WhatsApp, and similar instant messaging platforms, are widely used within parish life to help volunteers, committees and ministry teams to communicate quickly and simply. Used well, they can strengthen fellowship, improve coordination and reduce the burden of formal communication. Used carelessly, however, they can create safeguarding risks and breach data protection law.

This Policy sets out how St Peter's Church, Chorley, will establish, administer and close WhatsApp groups used for church business, and the standards expected of everyone who takes part in them. It has been prepared with reference to the Church of England's national safeguarding and social media guidance, the Diocese of Blackburn's safeguarding and data protection requirements, and UK data protection law.

This Policy should be read alongside the Parish Safeguarding Policy, the Parish Privacy Notice, and the Diocese of Blackburn's data protection guidance. Where there is any conflict between this Policy and diocesan or national safeguarding requirements, the diocesan or national requirements take precedence.

2. Scope

This Policy applies to all WhatsApp groups created for, or used in connection with, the business, ministry or social life of the parish, including but not limited to:

- Groups set up by the Incumbent or churchwardens on behalf of the PCC;
- Groups used by staff teams, volunteer rotas, committees and sub-committees;
- Groups used by ministry teams (for example, pastoral visiting, prayer ministry, music and worship);
- Groups used by church-based clubs and activities, including groups involving children and young people (for example, a youth club).

It applies to the Incumbent, churchwardens, PCC members, staff, licensed and authorised ministers, volunteers, and all other members who join a parish WhatsApp group. It does not govern purely personal or social WhatsApp groups that have no connection to church business, although members are always encouraged to conduct themselves online in a manner consistent with Christian values.

3. Legal and Regulatory Framework

This Policy has been developed with reference to the following legislation, national guidance and diocesan policy:

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which govern how personal data (including mobile numbers, names and photographs) may be collected, used, stored and shared;
- The Safeguarding and Clergy Discipline Measure 2016, under which the Incumbent, churchwardens and PCC are "relevant persons" who must have due regard to House of Bishops safeguarding guidance;
- The Church of England's national safeguarding policy and practice guidance, published on the Safeguarding e-manual, and the Church's Social Media Community Guidelines;
- The Diocese of Blackburn's safeguarding guidance and Diocesan Data Privacy Notice, and the parish's obligations under the Parish Safeguarding Dashboard service agreement;
- The Information Commissioner's Office (ICO) guidance on the use of instant messaging and personal mobile devices to process personal data for organisational purposes.

4. Governance — Setting Up and Managing Groups

4.1 Who may create a group

Parish WhatsApp groups will normally be established by the Incumbent or a churchwarden, or by a team leader with the Incumbent's or churchwarden's authorisation. No parish WhatsApp group should be created without the knowledge of the Incumbent or a churchwarden, so that the PCC retains oversight of how parish data is being used.

4.2 Group administration

Every group must have at least one, and ideally two, named administrators. Administrators are responsible for:

- adding and removing members, and keeping the membership list current and appropriate;
- setting the group name, description and (where used) group icon clearly, so its purpose is obvious;
- applying WhatsApp's in-app privacy and group settings appropriately (for example, restricting who can be added, and who can edit group information) — the mechanics vary by device and app version, so administrators should check the current settings within the app;
- monitoring the group for content that does not meet the standards set out in this Policy;
- removing a member promptly if they leave a role, team or activity, or if requested to do so by the Incumbent, a churchwarden or the individual concerned.

4.3 A register of groups

The Incumbent or churchwarden will keep a simple register of all parish WhatsApp groups in existence, recording the group name, its purpose, its administrator(s) and the date it was created. This supports the PCC's oversight duties and makes it easier to close groups that are no longer needed.

5. Types of Parish WhatsApp Groups

Groups will typically fall into one of the following categories. Each group should be limited to those who genuinely need to be part of it, in line with the data minimisation principle described in Section 6.

Group category	Example	Typical membership
Staff / Admin team	Parish office coordination, rota queries, urgent operational matters	Employed staff, key volunteers, wardens
Volunteer teams	Welcome team, stewards, car park team	Registered volunteers only
Hospitality team	Refreshments, catering for events	Hospitality volunteers
Ministry teams	Pastoral visiting, prayer ministry, home communion	Licensed/commissioned ministers and named team members, DBS-checked where required
PCC / Committees	PCC business, standing committee, fabric committee	PCC/committee members only
Church-based groups	Youth club, toddler group, choir	See special provisions below for groups involving children (Section 7)

Groups must not be used as a substitute for formal PCC decision-making, official record-keeping, or as the sole means of reporting a safeguarding concern (see Section 13).

6. Data Protection Principles Applied to WhatsApp

A mobile number is personal data. When a person is added to a WhatsApp group, their number, name (if saved), profile photograph and "last seen"/status information may become visible to every other member of that group. The following UK GDPR principles apply:

6.1 Lawful basis

The lawful basis for processing contact details for church volunteers, team members, committee members and activity groups is ordinarily legitimate interest (running the activities of the church) or, for some groups, consent. Where a group involves children or young people, explicit parental consent must be obtained before a parent's number is added (see Section 7).

6.2 Data minimisation

Only add people who genuinely need to be in a group, and only for as long as they need to be. Do not create sprawling "whole church" groups where a notice board, newsletter or email list would do the job with less exposure of personal numbers.

6.3 Transparency

Before adding someone to a group, tell them the group's purpose, who will be able to see their number, and how long they can expect to remain in it. Point them to the Parish Privacy Notice.

6.4 Security

Members should keep their phones secured (passcode or biometric lock), should not screenshot or forward group content outside the group without good reason, and administrators should use WhatsApp's privacy settings to limit who can see group membership and who can be added by others.

6.5 Retention and closure

Groups that are time-limited (for example, an event planning group) should be closed and deleted once their purpose has ended. Standing groups (for example, a ministry team) should be reviewed at least annually, and anyone who has left the role or team should be removed promptly.

6.6 Rights of individuals

Anyone may ask to leave a group at any time without giving a reason, and may ask what personal data the parish holds about them. Requests of this kind should be directed to the Incumbent or the parish's data protection contact and handled in line with the Diocese of Blackburn's data privacy guidance.

7. Safeguarding: The Youth Group WhatsApp Group

Where a WhatsApp group is used to support a church-based group for children or young people, such as a youth club, additional safeguarding rules apply, reflecting national and diocesan guidance that adults should avoid one-to-one online contact with children and should not hold children's personal contact details on personal devices.

> *The youth club WhatsApp group exists solely to help parents and carers stay informed about sessions, trips and any changes at short notice, and to allow parents to contact leaders quickly. Only the mobile numbers of parents and carers*

> *will be added to the group — children and young people's own mobile numbers will never be added, and children will not be members of the group themselves. Leaders will not contact a parent or child one-to-one via WhatsApp outside the group; any individual concern will instead be raised by telephone, in person, or through the parish office. At least two authorised, DBS-checked leaders will be administrators of the group at all times, so that no single adult communicates unsupervised, and all messages remain visible to both leaders. Parents will be asked to give their consent when their child first joins the youth club, and may withdraw from the group at any time. Any safeguarding concern arising from the group must be reported immediately to the Parish Safeguarding Officer in line with the Parish Safeguarding Policy.*

8. Roles and Responsibilities

Role	Responsibility
Incumbent / Churchwardens	Overall oversight of parish WhatsApp use; authorise new groups; ensure this Policy is followed; act as first point of contact for concerns.
Parish Safeguarding Officer (PSO)	Advise on and review arrangements for any group involving children, young people or adults at risk; receive and act on safeguarding concerns.
Group administrators	Day-to-day management of membership and content, as set out in Section 4.2.
Group members	Follow this Policy and the Participant Agreement (Appendix A); treat other members with respect; report concerns promptly.
Parents/carers (youth groups)	Provide consent, keep contact details up to date, and pass on relevant information from the group to their child.

9. Purpose

Parish WhatsApp groups exist to help volunteers, committees, ministry teams, and church-based activity groups to communicate quickly, simply and safely about legitimate church business, in a way that respects everyone's privacy and complies with data protection law, Church of England safeguarding requirements and Diocese of Blackburn guidance.

10. Prohibited Uses

Parish WhatsApp groups must not be used to:

- share personal, sensitive or safeguarding information about a third party without a clear lawful basis and need to know;
- raise or discuss a safeguarding concern instead of reporting it through the proper safeguarding channels;
- send unsolicited one-to-one messages to a child or young person, or to any adult who has not consented to being contacted this way;
- share images or videos of children or vulnerable adults without the necessary consent;
- conduct official PCC or church decision-making, voting, or record-keeping in place of minuted meetings;
- post anything defamatory, discriminatory, bullying, sexually explicit, or otherwise inconsistent with Christian values;
- forward chain messages, unverified claims or spam;
- add a person to a group without first telling them why, or without the required consent where a child is involved;

- use the group for private commercial activity, political campaigning, or fundraising unconnected with church business.

11. Content Standards

Everyone taking part in a parish WhatsApp group is asked to:

- be safe — remember that children, young people and vulnerable adults may be discussed, and treat all personal information with care;
- be respectful — disagree well, and avoid language that is hostile, inflammatory or disrespectful;
- be kind — treat others as you would wish to be treated, assuming the best in people;
- be honest and clear — do not mislead others about who you are or what you are sharing;
- keep it relevant — restrict messages to the group's stated purpose, and use quiet hours where a group is time-sensitive (for example, avoid late-night messages to a rota group);
- remember it is not private — anything shared in a group can be screenshotted or forwarded, and should be written as though it might be seen more widely.

12. Suspension and Termination

A group administrator, churchwarden or the Incumbent may:

- remove any message or content that breaches this Policy;
- suspend or remove an individual member who repeatedly or seriously breaches this Policy, having where possible first spoken to them about the concern;
- close and delete a group entirely once its purpose has ended, or where continuing it is no longer appropriate.

Where a breach also raises a safeguarding concern, it must additionally be reported and handled under the Parish Safeguarding Policy, and may be referred to the Diocesan Safeguarding Team. Decisions to remove a member should be recorded in the group register described in Section 4.3.

13. Reporting Concerns and Breaches

Any concern about the content of a group, the conduct of a member, or a possible data protection breach (for example, a phone being lost or a group being infiltrated by someone outside the parish) should be reported as soon as possible to the Incumbent or a churchwarden, and, where it involves a child, young person or adult at risk, to the Parish Safeguarding Officer without delay. Safeguarding concerns must always follow the Parish Safeguarding Policy and, where appropriate, be escalated to the Diocese of Blackburn Safeguarding Team.

14. Review of this Policy

This Policy will be reviewed by the PCC at least annually, or sooner following any significant change in the law, national or diocesan guidance, a data protection breach, or a safeguarding concern arising from the use of WhatsApp.

15. Approval by the Parochial Church Council

This Policy was considered and formally approved by the Parochial Church Council at its meeting on the date shown below, and takes effect from that date.

Name	**Role**	**Signature / Date**
Canon Neil Kelley	Priest in Charge	*Fr Neil Kelley* – 27.8.2026
Ronnie Hunter	Churchwarden	
Eric Crompton	Churchwarden	*Eric Crompton* – 27.8.2026
Geoff Parkinson	PCC Secretary (on behalf of the PCC)	*Geoff Parkinson* – 27.8.2026

Date approved by PCC resolution: 27.8.2026

Appendix A — WhatsApp Group Participant Agreement

Please read this short agreement before you join a parish WhatsApp group. It explains what to expect and what is expected of you.

What you are agreeing to

1. I understand that my mobile number, and any name or photograph attached to it, will be visible to other members of this group.
2. I will use this group only for the purpose it was set up for, and in line with the Church's WhatsApp Communication Policy.
3. I will treat other members with respect and kindness, and will not share content that is offensive, discriminatory, bullying or inappropriate.
4. I will not share personal or sensitive information about another person without good reason and their agreement.
5. I understand that this group must not be used to raise a safeguarding concern — any such concern will be reported directly to the Parish Safeguarding Officer or Incumbent.
6. I understand that a group administrator, churchwarden or the Incumbent may remove content, or remove me from the group, if this agreement is not followed.
7. I may leave this group at any time, and may ask to have my number removed and to know what information the parish holds about me.
8. Where this group relates to a children's or young people's activity, I confirm (as a parent or carer) that only my own number will be used, and that my child will not be added to the group.

Participant details

Name	
Role / Group	
Mobile number to be added	
Signature	
Date	

> *A signed or verbally confirmed copy of this agreement should be kept by the group administrator or in the parish safeguarding file, alongside the relevant consent record where the group involves a child or young person's activity.*

References and Further Guidance

- Church of England, Safeguarding e-manual and Policy and Practice Guidance — churchofengland.org/safeguarding
- Church of England, Social Media Community Guidelines — churchofengland.org/help/social-media-guidelines
- Church of England, "Creating a social media policy for your church" and "Advice for using social media to reach young people" — churchofengland.org/resources/digital-labs
- Diocese of Blackburn, Safeguarding pages and Diocesan Data Privacy Notice — blackburn.anglican.org
- Information Commissioner's Office (ICO) — UK GDPR guidance — ico.org.uk
- Safeguarding and Clergy Discipline Measure 2016