

# Privacy Policy

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This Privacy Policy applies to all activities of Police Chaplaincy UK Registered charity no. 1190186. By engaging with us, you are agreeing to the processing of your personal information in accordance with this privacy policy. Engaging with us includes but is not limited to

- Becoming a member of Police Chaplaincy UK by registering on our website
- Attending a training conference or Induction Course
- Attending events or acts of worship that we may put on e.g. welcome services, memorial services

## OUR DATA PRIVACY PRINCIPLES:

- 1.1 We will respect your personal data.
- 1.2 We will store it securely.
- 1.3 We will process the minimum data about you in order to:
  - i. support you appropriately in your connection with Police Chaplaincy UK (PCUK).
  - ii. Enable us to work with you in providing a voluntary service as specified in our charitable constitution.
  - iii. Inform you of relevant news, events, training or services run by us or other similar organisations.
  - iv. Create and maintain anonymised numbers and stories of our work for learning, monitoring, promotion and fundraising that may be shared via a website and social media.
  - v. Use your image, name and stories about you in publicity and reports, if you give your consent.
- 1.4 We will only share your data with other people or organisations where:  
This is needed to prevent harm to yourself or others (e.g. the Police, Social Services, NHS services)
- 1.5 We will delete/rectify/restrict processing it when you ask us to, unless we need to retain information for safeguarding/legal purposes
- 1.6 You can request us to stop processing your data at any time but there are some circumstances when this will not be possible (i.e. for safeguarding/legal reasons). A request to be removed from the Police Chaplaincy UK website or internal mailings will be treated as a request to cease membership of Police Chaplaincy UK.

## WHAT DATA DO WE PROCESS, SHARE, HOW AND WHY?

- 1.7 We will mainly process the data of our members (Active chaplains or chaplaincy coordinators / admins in UK policing who have registered with Police Chaplaincy UK via the website). We may also on occasion process data of:
  - i. Participants or attendees at services and events we run
  - ii. Speakers and participants at our conferences
  - iii. Prospective new chaplains who attend our training courses

- iv. Enquirers who come through the 'contact us' page on our website

1.8 We may process the following data about you:

- i. Your name and contact details (address, phone, email etc.)
- ii. Your job title, role or position within an organisation
- iii. Your faith affiliation, if applicable
- iv. Your photograph and photographs, videos, recordings including you with your permission
- v. Health issues you declare to us
- vi. Your DBS / Vetting status, if required in your role, and any results following a DBS / Vetting check
- vii. Emergency contact
- viii. Minutes of meetings, phone calls and email conversations involving you
- ix. Pastoral notes about your situation
- x. Training records
- xi. Donation records and information for Gift Aid claims
- xii. Information PCUK is required to provide by law for an employee or a trustee

1.9 We may obtain your information through indirect collection:

- i. Your information may be shared with us by fundraising sites like online giving platforms (e.g. JustGiving), or by event organisers (e.g. Eventbrite). These independent third parties will only do this when you have specified that you wish to support PCUK or attend a PCUK event, and with your clear consent. You should check their privacy policy when you provide your information to understand how they will process your data
- ii. your information may be shared with us via referrals from your Force, chaplains, trustees, volunteers or staff
- iii. Your personal details may be available from public sources of personal information. (e.g. local faith leader listed on public website)

1.10 We will keep personal data up to date; store and destroy it securely; protect personal data from loss, misuse, unauthorised access and disclosure, and ensure that appropriate technical measures are in place to protect personal data. We will not collect or retain excessive amounts of data.

1.11 We will carefully process personal data in order to:

- i. Enable us to provide a service as specified in our charitable constitution
- ii. Support people appropriately in their work,
- iii. Administer records, organise events, meetings and training
- iv. iv. fundraise and promote the interests of the charity
- v. manage our staff and volunteers
- vi. Maintain financial records and provide insurance
- covers
- vii. Inform individuals about news, events, activities and services
- viii. Create and maintain numbers and stories of our work for learning, monitoring, promotion and fundraising that may be shared via a website, email, newsletters, publications and social media. Personal data is used for publicity purposes. (e.g. a personal story in a newsletter, or a photo used on website). If your details are to be used for this specific purpose, your consent will be obtained prior to use.

1.12 We will treat personal data as strictly confidential. We will only share personal data with other chaplaincy organisations and Forces with your consent. We will share data when there is a perceived need to prevent serious harm to yourself or others, with other agencies – e.g. police, health practitioners, social services etc.

1.13 We will retain data for no longer than necessary. In normal circumstances, most data will be safely destroyed two years after last contact with a data subject. In the case of an employee or former volunteer, most data will be destroyed seven years after last engagement with that individual. If there has been a safeguarding concern or enquiry about an individual, we may be required to keep relevant data for longer. Notes of committee meetings may be archived indefinitely for future reference.

1.14 We may process data in this way on the following legal grounds, all data processing will take place under the UK GDPR and data protection act 2018.

- i. By consent – where we use your information for a purpose based on consent, you have the right to withdraw consent for any future use of your information for this purpose at any time.

- ii. In the case of employees acting on behalf of ourselves, processing of certain data is necessary for the performance of a contract
- iii. In order to respond to requests from relevant authorities (eg. Police, Safeguarding, Insurance), processing is necessary for compliance with a legal obligation
- iv. In responding to enquiries or in providing pastoral support for members of the public, processing is necessary for the legitimate interests of our purposes (except where such interests are overridden by your interests, rights or freedoms).
- v. There is no disclosure to a third party without consent, unless a legal requirement to do so.

## YOUR RIGHTS

### **1.15 Right to access your personal data**

You have a right to see the data we hold for you. You can request this by a 'Data Subject Access Request'. We will respond to your request within 30 calendar days. There will be no charge to you for this.

### **1.16 Right to rectification**

You have the right for inaccurate or incomplete data to be corrected within one month, although this can be extended to two months if the request is extremely complicated. If the data has been shared with third parties, we will inform them of the rectification.

### **1.17 Right to withdraw consent to process data**

**3.4** You are able to request a withdrawal of consent to process your data at any time. To do this, please contact us in writing via email – [comms@policechaplaincy.uk](mailto:comms@policechaplaincy.uk) , Please note we do not have a physical address for postal requests. A request to be removed from the Police Chaplaincy UK website or internal mailings will be treated as a request to cease membership of Police Chaplaincy UK. Since we may process some data on legal grounds other than consent (e.g. safeguarding, charity membership), we may continue to process such data under these grounds.

### **1.18 The right to request your personal data is erased where it is no longer necessary for us retain such data**

You can ask us to erase your data when it is no longer necessary for us to retain it. Our retention policy for data is also controlled by other legal obligations – such as employment, financial, charity laws and safeguarding guidance.

### **3.5 The right to restrict processing**

You can ask us to do no further processing of your data, where there is a dispute in relation to the accuracy or processing of your personal data. If processing is restricted, we can still store the data but cannot otherwise use the data.

**3.6 The right to object to the processing of personal data**

Where we use your data to contact you to promote events, etc or when we take legitimate pastoral notes of our encounters with you in furtherance of our charitable objectives, you can ask us to stop doing so.

**3.7** To exercise your rights above, please contact the Chair who also acts as our data protection officer via our website [www.policechaplaincy.uk](http://www.policechaplaincy.uk) or via email [Chair@policechaplaincy.uk](mailto:Chair@policechaplaincy.uk). Please note we do not have a physical address for postal requests.

**3.8 You also have the right to lodge a complaint with the Information Commissioners Office**

If you have already made a complaint to us and you are not satisfied with the response: You can contact the Information Commissioners Office at Information Commissioner's Office,  
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF (0303 123 1113;  
[www.ico.org.uk](http://www.ico.org.uk))