



Data Protection and Records Keeping Policy

1. Introduction

WorkCare West Midlands (WWM) is a charity providing workplace chaplaincy in the West Midlands and Warwickshire.

WWM uses personal information to carry out its mission. WWM collects personal data required for or incidental to the discharge of its functions. WWM will endeavour to use personal information in line with the expectations and interests of those to whom it relates, for the benefit of WWM and in compliance with Data Protection legislation.

The Trustees have overall responsibility for ensuring that WWM works in line with the General Data Protection Regulations and that trustees, staff and chaplains are aware of their responsibilities.

The Lead Officer will advise on day-to-day data protection matters. The Data Protection Office may be consulted on any matters relating to data protection.

The Data Protection Officer is identified on the WWM website (www.workcarewm.org.uk).

2. Definitions

Personal data - Personal data is information that relates to a living individual (the "Data Subject") who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by The General Data Protection Regulation 2016/679 (the "GDPR").

Data Subjects - The Data Subject is the living person to whom the data relates. They may request a copy of all of data about them held by WWM. WWM is likely to keep data on its chaplains, staff, trustees, recipients of chaplaincy services, friends and supporters, business contacts, visitors and contractors.

Data Controller - WWM is a Data Controller: WWM decides what data to process and for what purposes. WWM is a Registered Charity (No 1208119). WWM may be contacted at John Cadbury House, 190 Corporation Street, Birmingham, B4 6QD.

Data Processing - Data processing is the handling of any data: this includes storing, sharing, viewing, deleting, changing, manipulating that data. Trustees, chaplains (paid or voluntary) and staff with WWM may be processing data for WWM purposes and for which WWM is the nominated Data Controller.

Special Category Data - Data that relates to certain characteristics – like faith, race, political opinions, medical information – requires specific conditions for processing.

Data for personal use - Data that is processed for personal, social use does not fall under the scope of the GDPR.



Data Processing officer - the data protection officer for WWM is identified on the charity website www.workcarewm.org.uk.

3. Objectives

Data protection legalisation gives you specific rights regarding your personal data:

1. The right to be informed
2. The right to access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object.

Your rights are set out in the Privacy Statement annexed to this Policy.

4. Scope

The WWM Trustees, staff and volunteer chaplains, and any others who process personal information on behalf of WWM must comply with the principles of GDPR.

It is a responsibility of volunteers and staff to ensure that:

- i. They process personal information in ways that follow good data protection practice in collecting, securely storing, using and sharing data.
- ii. Anyone they allow to access the data adheres to these guidelines.
- iii. Any personal information they choose to give to WWM colleagues is accurate and deserves to be communicated.
- iv. They understand that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.

The WWM Lead Officer, assisted by the Data Protection Officer is responsible for ensuring that:

- i. Everyone processing personal information is appropriately trained to do so and appropriately supervised.
- ii. WWM responds within legal timeframes to any enquiries about handling personal information, any Subject Access Requests, or any requests to restrict processing



iii. WWM describes clearly how it handles personal information, in its privacy statement.

WWM's trustees are responsible for this policy. The Trustees Board will assess adherence to this policy at regular intervals ^b It will review (and update as necessary) the policy against best practice and any changes or amendments made to the General Data Protection Regulations, or other laws and guidance.

5. Conclusion

The WWM Trustees have overall responsibility for ensuring that WWM works in line with the General Data Protection Regulations (GDPR) and that volunteers are aware of their responsibilities.

Further information is set out in the Privacy Notice annexed to this policy.

Approved by: WorkCare West Midlands Trustees 20th November 2024

Next Review Date: on or before 1 July 2025



Annex 1: Privacy Notice

1. Introduction

WWM is committed to protecting and respecting your personal data.

This Privacy Notice explains how we collect, use, and safeguard your personal data which either you provide to us, or we obtain and hold about you. It tells you about your privacy rights and how the law protects you. It applies to information we collect about:

- Visitors to our website
- Individuals who engage with our services
- Donors and supporters
- Volunteers and staff

2. Information We Collect

We may collect and process the following (but not limited to) types of personal information:

- **Personal Identification Information:** Name, address, email address, phone number, date of birth, marital status/title.
- **Image data** – photographs of you
- **Financial Information:** Bank details, credit/debit card details (necessary for processing donations or paying invoices).
- **Demographic Information:** Age, gender, interests, preferences.
- **Usage Data:** Information about how you use our website and services.

3. How We collect and Use Your Information

You may choose to provide personal information to us direct e.g. by speaking to us, by filling in forms or by corresponding with us by post, phone, email or otherwise.

We will keep personal data as up to date as possible and take steps to rectify any personal data we find to be incorrect. Data will be processed lawfully, fairly and in a transparent manner for specified, explicit and legitimate purposes and not processed in a manner which is incompatible with those purposes.

We use (process) your personal information for the following purposes:

- **To Provide and Improve Our Services:** Including managing donations, providing information or services you request, and improving our offerings.
- **Communication:** To contact you with information about our activities, events, and fundraising campaigns, provided you have given consent.



- **Compliance:** To fulfil our legal obligations, such as financial record-keeping and reporting to regulatory authorities.
- **Website Management:** To administer our website, including troubleshooting, data analysis, testing, research, and statistical purposes.

4. Legal Basis for Processing

We rely on the following legal grounds to process your personal information:

- **Consent:** Where you have given us explicit consent to process your information for specific purposes.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract with you.
- **Legal Obligation:** Where we need to comply with a legal obligation.
- **Legitimate Interests:** Where it is in our legitimate interests and not overridden by your rights.

5. Data Sharing and Disclosure

We treat all personal data as strictly confidential, except where consent has been provided for it to appear in publications available to general members of the public.

Personal data will not be shared with third parties, other than those listed below unless **we** are legally obliged to do so or:

- with your explicit consent;
- it is necessary for law enforcement purposes; or
- it is necessary to protect our rights, property or safety of our members, ministers, volunteers or staff.

We may share your personal data with:

- **Service Providers:** Third-party service providers who assist us in operating our website, conducting our business, or serving our users, so long as those parties agree to keep this information confidential.
- **Legal Requirements:** Where we are required by law to disclose your information.
- **Protection of Rights:** To protect the rights, property, or safety of WWM, our users, or others.

6. Data Security

We have implemented appropriate technical and organizational measures to protect your personal information from unauthorised access, use, disclosure, alteration, or destruction. These measures include encryption, access controls, and secure storage.



7. Data Retention

We will retain your personal information only for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements. When personal data is no longer required, we will securely delete or anonymise it.

8. Your Rights

Unless personal data is subject to an exemption under UK GDPR, such as it is subject to the prevention, investigation, detection or prosecution of a criminal offence, you have the following rights with regards to your personal data:

- **Access:** The right to request a copy of the information we hold about you.
- **Correction:** The right to request correction of any inaccurate or incomplete information.
- **Deletion:** The right to request deletion of your personal information, under certain conditions.
- **Restriction:** The right to request restriction of processing your personal information.
- **Objection:** The right to object to the processing of your personal information.
- **Portability:** The right to request transfer of your personal information to another organisation.

If you wish to exercise any of these rights, please contact us.

9. Changes to This Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We will notify you of any significant changes by posting the new statement on our website and, where appropriate, by other means.

10. Contact Us

If you have any questions about this Privacy Statement or our data practices, please contact us at: teamwmm@workcarewm.org.uk