

Data Protection Policy

Safety for Religious Guidance



Islamic Centre of England (the Charity)

(Charity number 1058998, Company number 03142456)

Data Protection and Privacy Policy

Approved by	Board of Trustees		
Date of Approval	08/01/2026	Date of Next Review	08/01/2029

1. INTRODUCTION

- 1.1 The purpose of this data protection and privacy policy (the **Policy**) is to set the roles and responsibilities of the Charity with regard to the Processing of Personal Data and has been prepared to help the Charity comply with its obligations under the EU General Data Protection Regulation (EU 2016/679) as incorporated into the laws of the United Kingdom (**UK GDPR**) and the Data Protection Act 2018 (**DPA 2018**).
- 1.2 This Policy applies to all Personal Data Processed by the Charity, including hard copy and any electronic records.
- 1.3 This Policy applies to all individuals engaged in the Charity, including consultants, professional advisers, contractors, trustees and members of the Charity's community when processing personal data in the course of the Charity's activities (referred to together in this Policy as **Personnel**) and all those receiving funds from the Charity.
- 1.4 All Personnel must comply with this Policy.
- 1.5 All those to whom this Policy applies are referred to as **you** and **your** in this Policy and references to **we**, **us** or **our** refers to the Charity.
- 1.6 We Process Personal Data about former employees of the Charity, contractors, individuals and professional advisers such as legal advisers, as well as our trustees.
- 1.7 The Charity is responsible for ensuring compliance with the UK GDPR and the DPA 2018. Protecting the confidentiality and integrity of Personal Data is a responsibility that we take seriously at all times. A description of the data protection principles to help safeguard Personal Data under the UK GDPR and DPA 2018 are set out in paragraph 3 below.
- 1.8 It is important for you to familiarise yourself with and comply with this Policy, to help ensure that all processing of Personal Data by the Charity is carried out in accordance with the UK GDPR and the DPA 2018.
- 1.9 This Policy may be amended by the trustees at any time.
- 1.10 It is important that you take responsibility for ensuring that you act in accordance with this Policy. Any breach of this Policy by you will be taken seriously and, in the case of Personnel, may result in consequences for the Charity and also, in some cases, sanctions for Personnel. It may also result in us breaching the UK GDPR or other legal requirements.

- 1.11 We are responsible for ensuring all Personnel comply with this Policy and need to implement appropriate practices, processes, and controls to ensure such compliance.

2. DEFINITIONS

- 2.1 In this Policy, the following words have the meanings set out below:

Controller – means the person or organisation that determines when, why and how to Process Personal Data. It is responsible for establishing practices and policies in line with the UK GDPR and the DPA 2018. For example, the Charity will be the Controller of the Personal Data it holds about its trustees and consultants.

Data Subject – means a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

Personal Data – means any information about an individual which directly or indirectly identifies them. A person does not need to be named in a document for the document to include Personal Data. If it is obvious from the document who the information relates to, this will likely be enough to constitute Personal Data. Similarly, if it is obvious who the document is about when it is used in conjunction with other information held, this will also likely be enough to constitute Personal Data. Personal Data might include: a name; e-mail address; date of birth; an ID number; location data; an online identifier; or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, or an opinion about an individual.

Personal Data Breach – means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

Processor – means an organisation that Processes Personal Data on behalf of a Controller in accordance with the Controller's instructions. In some circumstances, the Charity may use a Processor to Process Personal Data on its behalf.

Process/Processed/Processing – means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special Categories of Personal Data – as defined in the DPA 2018 and means Personal Data revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

3. DATA PROTECTION PRINCIPLES

- 3.1 Anyone using Personal Data must do so in accordance with the principles set out in the UK GDPR. Those principles state that Personal Data must be:
- 3.1.1 processed fairly, lawfully and transparently;
 - 3.1.2 collected for specified, explicit and legitimate purposes and not used in a manner which is incompatible with those purposes;
 - 3.1.3 adequate, relevant and not excessive;
 - 3.1.4 accurate and, where necessary, up to date;
 - 3.1.5 kept for no longer than is necessary; and

3.1.6 used in a way which ensures they are kept secure.

3.2 We are responsible for ensuring that we comply with the principles set out above and we must be able to demonstrate the steps that we have taken to comply. This is known as the accountability principle under the UK GDPR.

3.3 We describe how you can help us satisfy these principles by setting out some practical examples in paragraphs 4 to 9 below.

4. FAIR AND LAWFUL PROCESSING

4.1 Personal Data must be Processed fairly, lawfully and in a transparent manner in relation to the Data Subject.

4.2 You may only Process Personal Data on the basis of one or more of the lawful bases set out in the UK GDPR and the DPA 2018. The list below identifies the lawful bases which are most likely to apply to the Charity:

4.2.1 the Data Subject has given **consent**;

4.2.2 the Processing is necessary for the **performance of a contract** with the Data Subject or in order to take steps at the request of the Data Subject prior to entering into a contract;

4.2.3 the Processing is necessary to meet our **legal obligations**;

4.2.4 the Processing is necessary to protect the **vital interests** of the Data Subject or another individual; or

4.2.5 the Processing is necessary for the purposes of **legitimate interests** pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subjects which require protection of personal Data, in particular where the Data subject is a child.

4.3 Special Categories of Personal Data and any information relating to criminal convictions and offences must be treated more carefully by us so, where you wish to Process such Personal Data, you must comply with additional conditions set out in the UK GDPR and the DPA 2018. In addition to the lawful basis for Processing Personal Data described at paragraph 4.2 above, you must also satisfy one of the following conditions, in relation to Special Categories of Personal Data:

4.3.1 the Data Subject has given **explicit consent**;

4.3.2 the Processing is necessary for the purpose of carrying out the obligations or exercising our **legal rights in the field of employment**;

4.3.3 to protect the **vital interests** of an individual where the subject of the Personal Data is physically or legally incapable of giving consent (this is intended to cover matters of life and death);

4.3.4 Personal Data is **manifestly made public** by the data subject;

4.3.5 the Processing is necessary for the establishment, **exercise or defence of legal claims**; or

4.3.6 the Processing is **necessary for the purposes of preventative or occupational medicine**, for the assessment of the working capacity of an employee and medical diagnosis. This legal basis will only apply if the Processing is carried out by, or under the responsibility, of a person subject to a legal or professional duty of confidence (for example, a doctor).

- 4.4 Personnel must identify the lawful basis (and, if applicable, additional conditions) being relied on for each Processing activity. If you are in any doubt about which lawful basis (and, if applicable, additional conditions) applies to the Processing, please contact the Charity's IT Manager, Mr Saeed Massumi, for further guidance and advice.
- 4.5 The UK GDPR requires Controllers to provide detailed, specific information to Data Subjects. Such information must be provided through appropriate privacy notices and policies, which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a Data Subject can easily understand them.
- 4.6 The conditions on which the Charity relies to Process Personal Data for trustees is set out at APPENDIX 1.
- 4.7 The conditions on which the Charity relies to Process Personal Data for other Personnel is set out at APPENDIX 2.
- 4.8 The conditions on which the Charity relies to Process Personal Data for third parties and other visitors to the Charity and those who submit personal data to us, is set out at APPENDIX 3.
- 4.9 You should check that the way you are using Personal Data is covered by the purpose detailed. If it is not, you should refer the matter to the Charity's IT Manager, who will refer to the Trustees for advice as required.

5. SPECIFIED PURPOSE

- 5.1 Personal Data must be collected only for specified, explicit and legitimate purposes. It must not be further Processed in any manner incompatible with those purposes.
- 5.2 You should not use Personal Data for new, different or incompatible purposes from those purposes disclosed when it was first obtained. If it becomes necessary for us to use or disclose the Personal Data for any purpose that is additional to or different from the originally specified purpose (i.e. to change the purpose for which the Personal Data is Processed), the Data Subject may need to be informed of the new purpose before any new processing occurs. Consent may also need to be obtained from the Data Subject to the proposed new use of their Personal Data.

6. DATA MINIMISATION

- 6.1 Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed. Processing should not be excessive therefore.
- 6.2 Personal Data should only be collected to the extent that it is required for the specific purpose(s) notified to the Data Subject. Any Personal Data which is not necessary for that purpose should not be collected by Personnel in the first place.
- 6.3 You should only Process Personal Data if and when the performance of your job duties requires it. You should not Process Personal Data for any reason unrelated to your job or your duties.

7. ACCURACY

- 7.1 Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.
- 7.2 You will ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it. You must check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards.
- 7.3 Where Personal Data is duplicated and held separately at different departments, locations or on different systems, please ensure that all updates or amendments to Personal Data are

communicated to all parties and departments holding copies of the Personal Data and all systems holding the Personal Data are updated.

8. KEPT FOR NO LONGER THAN IS NECESSARY

- 8.1 Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the Personal Data is Processed. The length of time we hold your information for will vary according to what that information is and the purpose for which it is Processed.
- 8.2 We will keep personal information for as long as is necessary for the purposes for which we collect it. The precise period will depend on the purpose for which we hold your information.
- 8.3 This means the Charity must not keep Personal Data in a form which permits the identification of the Data Subject for longer than needed for the legitimate business purpose or purposes for which it was originally collected, including for the purpose of satisfying any legal, accounting or reporting requirements.
- 8.4 We will generally keep your personal information for a period of 6 years after our collection of the personal data, but in some cases we may keep the information longer if we have a need to retain it. For example, we retain safeguarding data for so long as may be needed to fulfil our obligations in this regard and in relation to any potential legal claim. The Charity will also have regard to its insurance requirements in relation to data retention. For more information, please refer to our Data Retention Schedule set out at APPENDIX 4.

9. SECURITY

- 9.1 Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction, damage, access, use or disclosure.
- 9.2 We will develop, implement and maintain safeguards appropriate to our size, scope and activities, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data.
- 9.3 Personnel are responsible for protecting the Personal Data we hold. You must follow the procedures we set out to protect the Personal Data we hold from unlawful or unauthorised Processing and against the accidental loss of, destruction or damage to that Personal Data. You are required to exercise particular care in protecting Special Categories of Personal Data and information relating to criminal convictions and offences from unauthorised or unlawful Processing against accidental loss, destruction, damage, access, use or disclosure.
- 9.4 Personnel must maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:
 - 9.4.1 confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it;
 - 9.4.2 integrity means that Personal Data is accurate and suitable for the purpose for which it is Processed; and
 - 9.4.3 availability means that authorised users are able to access the Personal Data when they need it for authorised purposes.
- 9.5 You should not attempt to circumvent the administrative, physical and technical safeguards we implement and maintain to protect Personal Data.

9.6 You may only transfer to or allow access to Personal Data by third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place. These should be documented in writing. Please see section 15 for further details.

9.7 All Personnel who Process Personal Data must attend appropriate data protection training.

10. PERSONAL DATA BREACHES

10.1 The UK GDPR requires Controllers to notify certain Personal Data Breaches to the applicable regulator, the Information Commissioner, and, in certain instances, the Data Subject. We may also be required to inform the Charity Commission.

10.2 Personnel must notify the Charity's IT Manager immediately if they become aware of or suspect that a Personal Data Breach has occurred so that the Charity can comply with any reporting obligations.

11. TRANSFER OF PERSONAL DATA OUTSIDE OF THE UK

11.1 The UK GDPR restricts transfers of Personal Data to countries outside the United Kingdom (UK) in order to ensure that the level of protection afforded to individuals by the UK GDPR is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that Personal Data in or to a different country. Please be careful in this regard as sharing things online or through email, could result in data moving between territories.

11.2 Personal Data should not be transferred outside of the UK, including being accessed outside of the UK, unless this has first been discussed with the Charity's IT Manager so that appropriate procedures and measures can be implemented if required.

12. RIGHTS OF DATA SUBJECTS

12.1 You have certain rights with respect to your personal information. The rights may only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights. You can exercise these rights by contacting the Charity's IT Manager.

	Summary of your rights
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.
Right to erasure of your personal information:	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.
Right to restrict the use of your	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the

	Summary of your rights
personal information	accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is, in the case of the Charity, the Information Commissioner's Office (ICO), where you think we have not used your personal information in accordance with data protection law. The contact details for the ICO are: https://ico.org.uk/ or 0303 123 1113.

- 12.2 Personnel must immediately forward any Data Subject request they receive to the Charity's IT Manager who will consider the request, consulting with the appropriate team if necessary and prepare an appropriate response.

13. ACCOUNTABILITY

- 13.1 The Charity is responsible for, and must be able to demonstrate, compliance with the data protection principles. In practice this means that we need to be proactive and organised about our approach to data protection and evidencing the steps that have been taken to comply.
- 13.2 The Charity should keep and maintain accurate records reflecting its Processing including records of Data Subjects' consents and procedures for obtaining consents.

14. PRIVACY BY DESIGN AND DATA PROTECTION IMPACT ASSESSMENT (DPIA)

- 14.1 We must also conduct DPIAs in respect of high risk Processing. Some examples of high risk Processing include, systematic and extensive profiling with significant effects on data subjects; when Processing biometric data; or data matching by combining, comparing or matching Personal Data obtained from multiple sources. It is not envisaged that the Charity will engage in high risk processing.

- 14.2 However, if Personnel believe they should conduct a DPIA they should contact the Charity's IT Manager for further advice and guidance.

15. SHARING PERSONAL DATA

- 15.1 Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.
- 15.2 Personal Data may only be shared with Personnel if the recipient has a role-related need to know the information.
- 15.3 You agree that we may share your personal information with:
- 15.3.1 service providers, suppliers and contractors who provide services to us; and
 - 15.3.2 our regulators, including the Charity Commission for England and Wales, Companies House and the Information Commissioners' Office.
- 15.4 We may also disclose your personal information to other third parties, for example if we are under a duty to disclose or share your personal information in order to comply with any legal obligation. This includes, in relation to safeguarding disclosures, with the Police and with the local safeguarding agencies. We are able to share personal data where we believe necessary to protect a person from harm or abuse, or risk of the same. We may also share information with the Police where we believe this is necessary for the prevention or detection of crime or to support the apprehension of someone who has committed an offence.

16. COMPLAINTS

- 16.1 Any complaint relating to the Processing of Personal Data must be immediately forwarded to the Charity's IT Manager who will report to the Trustees for advice regarding the management of the complaint.
- 16.2 Any complaint will be treated seriously and any allegation of a breach of this policy will be properly investigated.

17. CONSEQUENCES OF FAILING TO COMPLY WITH THIS POLICY

- 17.1 Failing to comply with this policy may amount to breach of contract, breach of trust or otherwise breach of the standards expected of the Charity. The Trustees will take appropriate action in the event of a data breach, and this will include improvement work to prevent incidents reoccurring.

18. REVIEWING AND AMENDING THIS POLICY

- 18.1 This Policy will be reviewed by the Trustees every three years or more frequently as circumstances require.

APPENDIX 1

Personal information of trustees

- 1.1 We collect and use personal information about you in connection with your position as a trustee. The personal information we collect includes:

1.1.1 Information that you provide to us

The information that you provide to us may include general contact information (including name, email and telephone number), financial information and details of relevant interests held and conflicts declared.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) as part of our trustee recruitment process;
- (c) as part of a trustee skills audit; and/or
- (d) to assist with the assessment and reimbursement of reasonable expenses claimed.

1.1.2 Information we may collect from you

Technical Information: your IP address (i.e. your computer's address on the internet).

1.1.3 Information we may receive from other sources

Information we obtain from publicly available sources including the Charity Commission and Companies House website.

Information we obtain from referees as part of the recruitment process.

- 1.2 Information about third parties:

- 1.2.1 In the course of your relationship with us you may provide us with personal information relating to third parties, including persons and organisations connected to you.
- 1.2.2 We will use this personal information in accordance with this Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us and that you have made the information in this Policy available to the third party.

- 1.3 How do we use the personal information collected?

- 1.3.1 Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
Making a decision about your appointment as trustee.	• This processing is necessary for our legitimate business interests i.e. our

Purpose	Legal Basis
	interest in recruiting trustees with the necessary skills and experience.
Administering contract(s) that we may enter into with you.	This processing is necessary for the performance of any contractual obligations owed to you.
To communicate with you about and in relation to matters of governance (e.g. informing you of relevant meetings).	This is in our legitimate interests in order to ensure that we are properly governed and to ensure that the board can properly fulfil its duties.
Making decisions about reimbursement of expenses.	This processing is necessary for our legitimate business interests i.e. to ensure that trustees are reimbursed appropriately for reasonable expenses incurred in performing their trustee duties.
Monitoring attendance at trustee meetings.	- This processing is necessary for us to comply with our legal obligations. - This processing is also necessary for our legitimate business interests i.e. ensuring that a quorum of trustee are present when decisions are taken.
Recording accurate minutes of meetings.	This processing is necessary for our legitimate business interests i.e. ensuring records are kept of discussions and resolutions made at meetings to ensure that we fulfil our governance responsibilities.
To monitor your use of our information and communication systems (including our WiFi).	This processing is necessary for our legitimate business interests i.e. ensuring that our resources are used for the purposes for which they are provided to trustees and not used for unlawful purposes, or purposes which do not meet the standards of behaviour we expect of our trustees.
Dealing with legal disputes.	This processing is necessary for us to comply with our legal obligations.
Complying with our legal or regulatory obligations (including in connection with a court order and our safeguarding obligations) and in doing so, will need to disclose your personal information to third parties, including relevant regulators and our professional advisors (including our lawyers).	This processing is necessary for us to comply with our legal obligations i.e. minutes of meetings, annual accounts, reporting to Companies House and the Charity Commission.

Purpose	Legal Basis
To prevent fraud.	This processing is necessary for our legitimate business interests i.e. ensuring high levels of probity in our trustees.
To enforce or apply the agreements concerning you (including any agreements between you and us).	- Depending on the circumstances: - the processing is carried out for our legitimate business interests in order to conduct and manage our business; or - in connection with legal proceedings (i.e. the establishment, exercise or defence of legal claims).

- 1.3.2 We may be required to obtain your personal information to comply with our legal requirements. If you do not provide the relevant personal information to us when you apply for the position of trustee, we may not be able to process the application.
- 1.3.3 Where we rely on our legitimate interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will usually include:
- (a) pursuit of our charitable objects;
 - (b) compliance with applicable legal and regulatory obligations and any guidelines, standards and codes of conduct; and
 - (c) protection of the Charity, the other trustees, our employees and other data subjects, or those of a third party.

APPENDIX 2

Personal information of Personnel (subject to APPENDIX 1 in relation Trustees)

- 1.1 We collect and use personal information about you in connection with your role in the Charity. The personal information we collect includes:

1.1.1 Information that you provide to us

The information that you provide to us may include general contact information (including name, email and telephone number), information received as part of our recruitment process (including DBS checks, references and other information included in a CV, cover letter or application form), national insurance number, financial information, health information and performance information.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) as part of our recruitment process; and/or
- (c) during the course of your engagement with the Charity.

1.1.2 Information we hold about our community

[We hold information pertaining to members of our community, their family history and their relationship with the Charity.

Each member of the community will have a file maintained by the Charity containing their personal details. This may include medical and care history, as well as their personal affairs.]

1.1.3 Information we may collect from you

Technical Information: your IP address (i.e. your computer's address on the internet).

1.1.4 Information we may receive from other sources

Information we obtain from publicly available sources including the Charity Commission and Companies House website.

Information we obtain from referees as part of any engagement process.

Information we obtain from your GP, occupational health physicians and other health professionals.

Information we obtain from HMRC.

- 1.2 Information about third parties:

- 1.2.1 In the course of your relationship with us you may provide us with personal information relating to third parties. This includes details of your next of kin, emergency contact(s) and your GP.
- 1.2.2 We will use this personal information in accordance with this Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent

of the third party to share such personal information with us for the purposes for which we will process the same and that you have (where applicable) made the information in this Policy available to the third party.

1.3 How do we use the personal information collected?

1.3.1 Your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
Making a decision about your engagement and determining the scope of your role.	- This processing is necessary for the performance of our contractual obligations between you and us. - This processing is necessary for our legitimate business interests i.e. our interest in engaging support services to deliver our services to our beneficiaries.
Assessing qualifications for a particular job, including decisions about promotions.	This processing is necessary for our legitimate business interests i.e. ensuring that promotions or decisions about work allocation are taken on merit and in ensuring that our staff have the skills and qualifications necessary to deliver their roles.
Assessing your eligibility.	Depending on the circumstances, we process your personal information to carry out our legal obligations to ensure you are eligible to fulfil a role or with your explicit consent.
Administering contract(s) that we have entered into with you.	This processing is necessary for the performance of our contractual obligations owed to you.
To fulfil our obligations to you as a Charity	- This is necessary in order to support the delivery of our charitable purposes and supports our legitimate interests - Where the information is special category information, we may process that information where necessary for the provision of religious, family, education or community based activities by any person
To communicate with you about your employment or engagement.	- The legal basis will fall into one of the following categories depending on the communication and the purpose for which it sent: - our legitimate business interests i.e. to help us manage our relationship with you; and/or

Purpose	Legal Basis
	- performance of a contract between you and us.
Paying you and processing payments to you.	• This processing is necessary for the performance of our obligations owed to you. • This processing is necessary for us to comply with our legal obligations.
Liaising with your pension provider.	• This processing is necessary for the performance of our obligations owed to you. • This processing is necessary for us to comply with our legal obligations.
To monitor your use of our communication systems to ensure compliance with relevant policies.	• This processing is necessary for our legitimate business interests i.e. ensuring that our resources are used for the purposes for which they are provided not used for unlawful purposes, or purposes which do not meet the standards of behaviour we expect of our Personnel. • We also have a legitimate interest in ensuring that communications are appropriate and do not breach obligations of confidentiality.
Dealing with any legal matters or disputes involving you.	• This processing is necessary for us to comply with our legal obligations.
Complying with our legal or regulatory obligations (including in connection with a court order and our safeguarding obligations)	• This processing is necessary for us to comply with our legal obligations.
To prevent fraud.	• This processing is necessary for our legitimate business interests i.e. ensuring high levels of probity.
For contacting next of kin in an emergency situation.	• The processing is necessary in order to protect your vital interests
To enforce or apply the agreements concerning you (including agreements between you and us).	• Depending on the circumstances: - the processing is carried out for our legitimate interests in order to conduct and manage our business; or - in connection with legal proceedings

- 1.3.2 Where we rely on our legitimate interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will usually include:
- (a) pursuit of our charitable objects;
 - (b) compliance with applicable legal and regulatory obligations and any guidelines, standards and codes of conduct; and
 - (c) protection of the Charity, the trustees, our contractors and other data subjects, or those of a third party.

APPENDIX 3

Personal information of others, including visitors and those who engage in Charity activities

- 1.1 We may collect and use personal information about you in the course of your interactions with the Charity. This may be as a visitor, a speaker and/or reciter at an event or as someone otherwise coming into contact with the Charity and its community. The personal information we may collect includes:

1.1.1 Information that you provide to us

The information that you provide to us may include general contact information including name, email and telephone number.

This information may be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when you contact us;
- (c) when you provide us with your details for us to communicate with you;
- (d) when you send in documents required to support the hosting of an event, an application or report made to the Charity, when you tell us more about you etc; and/or
- (e) in your communications with us;

You may also share other information with us in the context of the Charity and members of its community, and this may include safeguarding disclosures. You should note our safeguarding policy in this regard as your personal information may be used by us in order to fulfil our statutory obligations in relation to safeguarding, as well as in order to keep you safe and free from harm.

1.1.2 Information we may collect from you

Technical Information: your IP address (i.e. your computer's address on the internet).

1.1.3 Information we may receive from other sources

Information we obtain from publicly available sources including social media websites, the Charity Commission and Companies House websites.

- 1.2 Information about third parties:

- 1.2.1 In the course of your relationship with us you may provide us with personal information relating to third parties.
- 1.2.2 Such personal information may include contact details for representatives of third parties involved in hosting or participating in an event, for example speakers, reciters, vendors, donors or lenders.
- 1.2.3 We will use this personal information in accordance with this Policy. If you are providing personal information to us relating to a third party, you confirm that you have the consent of the third party to share such personal information with us (where appropriate, other than where sharing such information places you at risk of a breach of confidentiality or risk of harm).

1.3 How do we use the personal information collected?

- 1.3.1 We use your personal information in connection with the delivery of our charitable objects through the hosting of events. In particular, your personal information may be used by us, our employees, service providers, and disclosed to third parties for the following purposes. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
To communicate with you and other individuals in connection with the delivery of our charitable purposes, e.g. when we have decided to host an event at our premises.	- This processing is necessary for compliance with a legal obligation; or - This processing is necessary for the purposes of our or a third party's legitimate interests.
To assess any invitations or applications that are made to speak at and/or host an event at the Charity, decide whether the application will be successful, process and review the due diligence and keep records of the event.	- This processing is necessary for compliance with a legal obligation; or - This processing is necessary for the purposes of our or a third party's legitimate interests.
We may ask you what you think about our services and to maybe complete a satisfaction survey. This feedback will be used to help us improve those services.	- This is in our legitimate interests in order to improve the services that you and others who contact us for advice and support receive from us. - The feedback will always be anonymised where it contains categories of sensitive personal information and, as a matter of good practice, even where it does not contain such information.
We may ask you to share your experience of your interactions with us for us to share with the general public / for marketing or website purposes.	- Explicit consent. - You are free to refuse or withdraw your consent at any time. Refusing or withdrawing consent will not impact upon the services that you receive from us.
Data pertaining to your characteristics or your background in order to understand the demographic of people we support and identify the impact we are having in hosting events.	- Explicit consent. - You are free to refuse or withdraw your consent at any time. Refusing or withdrawing consent will not impact upon the services that you receive from us.
To manage and operate our activities.	- This is in our legitimate interests because it furthers our aims, objectives and business. - Where the information that we are processing is special category information, we may process that information for reasons of substantial public interest. In certain circumstances we may, as an alternative, seek your explicit consent.

Purpose	Legal Basis
To manage a dispute, appeal or complaint.	This is in our legitimate interests in order to provide our services and to benefit you and others who come to us for confidential support and advice.
To monitor who visits the Charity or a member of our community, or otherwise accesses our religious activities	- This is in our legitimate interests to support our charitable work - This may be necessary to ensure we meet our security and health and safety obligations, or another legal obligation
We may need to provide access to such third parties engaged by us to update our electronic systems, fix any issues with our systems and review, monitor and improve their security features.	It is in both our legitimate interests to ensure that the systems that we use to store and process your data are secure. We are, in any event, under a legal obligation to ensure that is the case. We will ensure that such third parties are bound by obligations of confidentiality.
To comply with any legal or regulatory obligations (including in connection with a court order).	The legal basis that we rely on is that the processing is necessary for compliance with a legal obligation.
To comply with legal and regulatory obligations in relation to safeguarding	- This is processed to comply with our legal obligations. - Where the information is special category information, we may process that information where necessary in relation to legal claims and/or where necessary to protect the health, safety and well-being of any person. - In the case of criminal offence data, we may process that information where necessary for protecting a child or adult at risk from harm or to protect their wellbeing - We may share information with the Police where necessary to protect or prevent crime, or apprehend offenders
To keep adequate records and information about our charitable activity	This is to ensure we meet our statutory and regulatory reporting obligations and to meet legal requirements
To communicate with third parties (e.g. the police, CPS) where we have concerns about your safety / wellbeing, or the safety / wellbeing of others, or have grounds to suspect criminal behaviour.	- This may be in the legitimate or vital interests of any victim or alleged victim and/or in compliance with a legal obligation. - Where the information is special category information, we may process that information where necessary in relation to

Purpose	Legal Basis
	legal claims and/or for reasons of substantial public interest. - Alternatively, we may seek to rely upon an exemption relating to the prevention and detection of crime or the apprehension and prosecution of offenders. - In the case of criminal offence data, we may process that information where necessary for protecting a child or adult at risk from harm or to protect their wellbeing, or where necessary for the prevention or detection of an unlawful act. - Where you have made an allegation to us, we may process information in order to prevent harm or risk of harm to you or others. Where this risk relates to you, we will seek to obtain your consent first, although there may be instances where we are required to process this data without your express consent
We may use CCTV images	- This is in our legitimate interests in order to ensure your safety and security and that of our beneficiaries and other visitors. - Where the information captured on CCTV is special category information, we may process that information where necessary in relation to legal claims and/or for reasons of substantial public interest.

1.3.2 Where we rely on our legitimate interests or those legitimate interests of a third party to justify the purposes for using your personal information, this will usually include:

- (a) pursuit of our charitable objects;
- (b) compliance with applicable legal and regulatory obligations and any guidelines, standards and codes of conduct;
- (c) protection of the Charity, the trustees, our contractors and other data subjects, or those of a third party; and/or
- (d) to keep people safe.

APPENDIX 4

Data Retention Schedule

- 1.4 There is no single legal retention period which applies to every document or written record that the Charity might produce. The Charity is under an obligation to maintain various records to comply with strict limitation periods set out in legislation and otherwise must not keep personal data any longer than is reasonably necessary for its particular purpose. The types of information the Charity holds includes contractual, employment, tax, health and safety and business-related information which may be retained for different periods.
- 1.5 How long do we hold the information collected?
- 1.5.1 For each of the categories of information we hold, we have set out the period for which it will usually be retained:

Category	Retention Period
Minutes of meetings	10 years
Tax records	10 years
Personnel documents	5 years
Health and safety records	5 years
Due diligence	5 years
Student records	5 years
Family services records	5 years
Personal Social Media Information	2 years