

General Data Protection regulation Action Plan

We are not required to register with the ICO as a data processor and do not require a data Protection Officer.

Person responsible for data protection Andrew Banks (Deacon)

Awareness

Fixed item on agenda at Annual General Members meeting
Fixed item on monthly agenda at OB meetings and reviewed annually
Inform organisation leaders of their responsibilities
Add awareness training to safeguarding and fire safety training
Retain cover with insurers for data breach
Review data protection compliance on risk register

Identify Data

Annual Data Audit – What, why, how stored, who has access, sensitivity, how long held, third parties – eg Payroll
Processes

Privacy Notices

Review annually
Specify for what purpose data collected and retained.
Minimal information and how long retained.
Security

Include Lawful basis for processing data for each set of personal data:

- Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- Legal obligation: the processing is necessary for you to comply with the law.
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- Live Streaming, Transcription and Translation Services
- Third-Party Data Processors
- International Data Transfers

Procedures

Review annually
Train regularly

Consent

Review how we seek, record and manage consent

V1.3 Reviewed Feb 2026

Refresh existing consents

Must be specific, informed and affirmative and be periodically refreshed

Can we demonstrate?

Children

Obtain Parental or guardian consent to process and hold data

Data Security

Encryption of electronic data

Hard copies held securely

Personal devices – advice given

Storage secure

Access limited to essential