



**SEAN International**  
Reg. Charity No 286965

## **Data Protection Policy**

(Revised and Adopted by Trustees September 2024)

### **1. Aims of this Policy**

SEAN International (SEAN) needs to keep certain information on its supporters, Partners, Staff, service users and Trustees to carry out its day-to-day operations, to meet its charitable objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the UK General Data Protection Regulation (UK GDPR - 2021). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organisation.

### **2. Definitions**

The definition of **'Processing'** is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

This policy covers data collected in relation to its supporters, Partners, Associates, volunteers, service users, Staff and Trustees.

### **3. Types of information processed**

SEAN processes the following personal information:

1. Names, contact details, and in some cases other identity information of supporters, donors, employees, consultants, contractors, volunteers, service users, Trustees and people linked with Partner organisations around the world for the purposes of contractual obligations and communication;
2. Donors details and details of donations for the purposes of financial accountability;
3. Information indicating the relationship of individuals to Partner organisations;
4. E-mail addresses of those who relate to SEAN on a regular basis;
5. Information about ethnicity and religious beliefs of individuals is only collected and stored in relation to SEAN's ministry of Christian Leadership and Discipleship training.
6. Trustees are expected to assent to the vision and values of the organisation and may be required to do so in writing;

7. Gender and age details for the purposes of legal obligations;
8. Information about political opinions, membership of a trade union, physical or mental health, criminal convictions of individuals is not collected or used by SEAN for its day-to-day operations, but may be given to SEAN as part of received Prayer Requests and shared by SEAN to other groups for the same where consent is given.
  - a. SEAN requires people who ask for prayer to have obtained prior consent to share personal information about others for whom they are requesting prayer. SEAN will check for this consent.
  - b. SEAN will seek consent to share a Prayer Request with others, and such sharing will be governed by the scope<sup>1</sup> of the consent received.

## 4. Data Security

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

1. Wherever possible, SEAN will not store personal data on personal computers but will use online storage using systems hosted by 3rd party service providers with whom SEAN has contracted, and with whom specific contractual measures have been undertaken to protect data and privacy in accordance with UK GDPR;
2. When it is necessary to store personal information on personal computers or mobile devices SEAN will take all reasonable measures to protect such information such as password protection and, wherever possible, encrypted storage drives;
3. SEAN will take measures to ensure that printed or hard copy records of personal information are stored securely;
4. Bulk storage of SEAN data for backup purposes, which may include personal information, will be done on encrypted devices and/or saved in encrypted form on backup media, and physically stored securely at the premises of the data backup operator(s);
5. People on SEAN's mailing list can only update their personal details on SEAN's mailing list through their own email account, or by contacting SEAN via email and/or in writing (postal service), for which proof of identity may be required;
6. Access to and ability to update information containing personal information will be restricted to authorised personnel only (see below)

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<sup>1</sup> SEAN shares Prayer Requests with others within (Staff, Associates, Volunteers and Trustees) and outside the organisation as constitutes our Prayer Network. All individuals are subject to this data protection policy or corresponding non-disclosure agreement.

## 5. Policy Implementation

### a. Responsibilities

Overall responsibility for personal data in a not for profit organisation rests with the governing body. In the case of SEAN this is the Board of Trustees as the Data Controller.

The governing body delegates data protection tasks to the Management Committee. The Management Committee is responsible for:

1. understanding and communicating obligations under the UK GDPR;
2. identifying potential problem areas or risks;
3. producing clear and effective procedures.

### b. Who will process personal information

Groups of people who will process personal information are:

1. SEAN Staff
2. SEAN Associates
3. SEAN Trustees
4. Volunteers<sup>2</sup> (under the supervision of a SEAN Staff member or SEAN Associate)

All Staff, Associates, Trustees and Staff who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.

According to the severity of the offence, breach of this policy will result in disciplinary proceedings or legal remediation (as applicable) and may also result in the removal of access rights to SEAN Data.

### c. How we will process personal information

In line with the UK General Data Protection Regulation (UK GDPR), SEAN International will ensure that personal data will:

- Be obtained fairly and lawfully;
- Be obtained for a specific and lawful purpose;
- Be adequate, relevant but not excessive;
- Be accurate and kept up to date;
- Not be held longer than necessary;
- Be processed in accordance with the rights of data subjects;
- Be subject to appropriate security measures;
- Be subject to the guidelines for international transfer, storage and processing of data.

We will ensure that:

1. Everyone managing and handling personal information is trained to do so.
2. Anyone wanting to make enquiries about handling personal information, whether a member of Staff, an Associate, volunteer or service user, knows what to do;
3. Any disclosure of personal data will be in line with our procedures and policies.
4. Queries about handling personal information will be dealt with swiftly and politely.

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<sup>2</sup> Who are not Associates.

## d. How we will update information

We will take the following measures to ensure that personal information kept is accurate:

1. Encourage contacts to inform us of change of personal details whenever we issue our newsletter;
2. Encourage contacts on our mailing list to keep their contact details up-to-date via our email marketing provider. Information provided in this way will regularly be used to update our contact database;
3. Provide a means for contacts and Partner organisation personnel to submit change of personal details via email and in writing (postal service);
4. Provide means for Staff and Associates to update personal information for contacts that fall within their defined role and scope of responsibilities.

Personal sensitive information will not be used apart from for the exact purpose for which permission was given.

## e. Training

Training and awareness raising about UK GDPR and how it is followed in this organisation will take the following forms:

1. *On induction:* Staff and Trustees will be trained in all relevant policies on joining SEAN.
2. *At start of engagement:* Associates will be trained in all relevant policies on starting work with SEAN.
3. *At start of each work assignment:* Volunteers<sup>3</sup> will be trained and/or recapped (as applicable) in all data processing policies relevant to their work assignment.

General training/ awareness raising:

1. The Management Committee will review the processes and issues relating to Data Protection on a regular basis.
2. Data Protection will remain as a standing item on the Management team's agenda and will be discussed in detail no less than once a year.

## f. Unauthorised disclosure/Data Breaches

Any unauthorised disclosure of personal data to a third party by a Staff member or Associate may result in

- disciplinary proceedings or legal remediation (as applicable) according to the severity of the offence.

Any unauthorised disclosure of personal data to a third party by a volunteer<sup>4</sup> or Trustee may result in

- disciplinary proceedings or legal remediation (as applicable) according to the severity of the offence.

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<sup>3</sup> Who are not Associates.

<sup>4</sup> Who is not an Associate.

## 7. Subject Access Requests

Anyone whose personal information we process has the right to know:

1. What information we hold and process on them;
2. How to gain access to this information;
3. How to keep it up to date;

They also have the right to prevent processing of their personal data in some circumstances and the right to correct, rectify, block or erase information regarded as wrong.

Individuals have a right under the UK GDPR to access certain personal data being kept about them on computer and certain files. Any person wishing to exercise this right should apply in writing to the Regional Co-ordinator for their Region or to a member of the Management Committee.

The following information will be required before access is granted:

1. Full name and contact details of the person making the request
2. their relationship with the organisation (e.g. former/ current member of Staff, Trustee or, service user)
3. Any other relevant information- e.g. timescales involved

We may also require proof of identity before access is granted. The following forms of ID will be required:

1. Reference from a Partner or Church Leader confirming the identity of the individual.
2. Copy of photo ID such as Passport, Driving Licence, etc.

Queries about handling personal information will be dealt with swiftly and politely.

We will aim to comply with requests for access to personal information as soon as possible, but will ensure it is provided within the 30 days required by the UK GDPR from receiving the written request.

## Access to Historic Data

Access requests to historic records by external researchers will be vetted by SEAN's Management Committee and only approved where such access will not put living persons at a particular and known risk of persecution or other threat to life or liberty because of a living person's Christian faith. Further, SEAN's Management Committee may also redact or even block the publishing of results and reports from such research to ensure the same.

## 8. Review

This policy will be reviewed at intervals of three years to ensure it remains up to date and compliant with the law.

## Declaration

I confirm I have read and understood SEAN's Data Protection Policy and will act in accordance with it.

I am connected with this organisation in my capacity as a  
(*delete as appropriate*)

- Member of Staff
- Associate
- Volunteer<sup>5</sup>
- Trustee

Signature:

Print name:

Date:

Please return this form to: [dataprotection@seaninternational.org](mailto:dataprotection@seaninternational.org)

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<sup>5</sup> who is not an Associate

## Glossary

**‘Personal Data’** refers to any information relating to an identifiable living person. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

**‘Processing’** is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept in electronic form.

**‘Staff’** refers to employees of SEAN, who are subject to all the rules and regulations of SEAN.

**‘Associates’** refers to consultants<sup>6</sup>, contractors<sup>7</sup> and voluntary<sup>8</sup> workers who contribute to the *day-to-day* running of the SEAN as an organisation. Such individuals are subject to this policy and are also covered (or their companies as applicable) by a separate and corresponding Non-Disclosure Agreement (NDA).

**‘Trustees’** refers to people appointed to the Board of Trustees, as defined by our charitable charter, whose role is primarily to oversee and ensure the good operation of SEAN, and to hold the Management Committee (composed of specific Staff members, some Associates and some Trustees) to account for their day-to-day running of the organisation and the use of its resources and finances.

**‘Partners’** refers to organisations/churches with which SEAN has entered into a formal agreement to carry out its charity objectives of developing theological education principally by extension (known as “TEE”) so that it is accessible to a very wide range of people and by the publication of Christian literature and materials throughout the world.

## Document History

Date	Author	Action
15 May 2018	Steven Ridley David Ball	First draft of policy
23 May 2018		First review by Management Committee. Provisionally adopted by the committee.
2/3 August 2018	David Ball Steven Ridley	Additional comments added in connection with review of Principles of Partner Agreements & Partner Agreement Template.
22 August 2018	Steven Ridley	Updated data protection officer designation as agreed by Management Committee. Added clarifications to the definition of ‘Staff’.
24 August 2018	Steven Ridley	Document History section added.

<sup>6</sup> Are either self employed individuals or personnel of external companies, who are engaged and retained under contract to bring specific expertise to SEAN.

<sup>7</sup> Can be either self employed individuals or personnel of external companies, who are engaged under contract for specific projects.

<sup>8</sup> [Self-supporting] Individuals who provide their time and expertise to SEAN without remuneration, but may be reimbursed for some expenses.

3 September 2018	Steven Ridley	Second review by Management Committee. Amendment to cover the handling of Prayer Requests. Staff definition revised and new Associate group of individuals defined, and corresponding minor amendments throughout associated with this.
2 September 2019	David Ball	Beginning to revise document for SEAN Trustees.
3 September 2019	David Ball	Final revision for Trustees.
10 September 2019	David Ball	Adopted by Trustees
16th July 2024	David Ball	Document transferred to Public Shared Drive on Google Drive
17th September 2024	David Ball	Reviewed and Adopted by SEAN Trustees with minor amendments.