East Midland Baptist Association
EMBA Church Suite Data Retention/Removal Protocol

This document sets out the administrative protocol to be followed when a an unsubscribe request, a deletion request, or a notification of death or leaving EMBA is received.

It should be read alongside the relevant EMBA Data Policies, which can be found here: https://www.embaptists.co.uk/about-us/structure-governance/emba-policies/

The protocol uses the Church Suite Flow system to ensure that all steps are followed at the appropriate time and that contacts are informed about what has happened.

Introduction

The EMBA uses Church Suite (CS) to send out a range of emails to people in its database. It does this in pursuit of its legitimate interest of "supporting, advising and resourcing EMBA member churches".

This can include (but is not limited to):

1. General newsletters, e.g. the EMBA Newsletter, occasional CYF newsletters.

2. Targeted mailings to people in specific roles or locations that may be of interest to them, e.g. emails about training events, opportunities to apply for funding or to give to an appeal

3. Targeted emails to people in specific roles which contain information that may be vital or important to their role, e.g. information for treasurers about changes in financial regulations, information for ministers about matters to do with their accreditation, information to DPS's about a safeguarding alert.

These emails include in the footer an option to delete or amend the data held, or to unsubscribe from mailing lists.

This protocol sets out what procedures to follow in these cases.

Unsubscribe request

When someone makes this request they will not receive any emails from Church Suite but their data will be retained.

In the case of point 3 above, the email can be sent to people in a specific role and the option "Do not respect Communication settings" can be used to communicate with the Contact. When this is selected, a reason is given and appears in the small print at the bottom of the email.

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Delete request

A delete request does not automatically delete anything from Church Suite. The EMBA is allowed to retain data when it has a legal basis to do so and this protocol ensures that only data necessary for that purpose is retained, for the right period of time. The preset emails acknowledge the request and explain this, with reference to our various Data Policies.

The request needs to be processed and a response to the requester given.   The following workflow should be carried out:

1. What is the role of the requester?
   If the person has a "Newsletter only" tag and their Primary Role is Newsletter only, we are processing their data on the basis of consent and they can be removed.
   a. Send them the Deletion request (Newsletter Only) preset email
   b. Delete them from the system

2. If the person has a role that requires data to be kept for 75 years (see Appendix):
   a. Send them the "Deletion request (75 years)" preset email
   b. Remove data from the fields shown in Appendix 2b – 75 year data retention
   c. Add to 75 year Deletion flow
   d. Archive the Contact

Deceased/Left Association

When the EMBA is informed that a contact is deceased or has left the association the "Delete Request" flow should be followed.

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Appendix 1. Primary Roles and their impact on deletion from Church Suite

Once the reason for retaining data after a request or information about death or leaving the Association has been received, the table below should be consulted, and the Contact should be added to the Deletion Request Flow.

Primary Role/pastoral status	Fields to check	Reason for data retention	Retention period
EMBA employed staff	Primary Role	Safeguarding	75 years
Minister In any capacity Pioneer Chaplain	Primary Role Additional Church Role Pastoral Status	Safeguarding	75 years
Volunteer worker In any capacity	Primary Role	Safeguarding	75 years
Employed Church Worker In any capacity	Primary Role	Safeguarding	75 years
Church Officers Secretary Treasurer Trustee Deacon	Primary Role Additional Church Role	Safeguarding	75 years
Church Safeguarding Officers Safeguarding Trustee DPS	Primary Role Additional Church Role	Safeguarding	75 years

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All data should be removed from the Contact's record except the following Fields, Key Dates and Organisation information:

Fields to retain	Key Dates to retain	Organisation
Names Address Contact Email Roles Chaplain place of work Pioneer ministry details Informal Preachers List Any relevant notes	Start and end roles DBS Checks Safeguarding trainings	Start and end dates in organisations Roles in organisations