Catch22 Group Policy

Record of Processing Activity Policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Michael Oniyitan
Queries to:	Michael Oniyitan
Date created:	31/05/2018
Date of last review:	13/04/2026
Date of next review:	13/04/2027
Catch22 group, entity, hub:	Catch22 Charity
4Policies level (all staff or managers only)	All Staff

1. Purpose

The purpose of this policy is to document Catch22's approach to meeting Article 30 of the UK General Data Protection Regulation (UK GDPR). Article 30 requires that organisations keep records of their processing activities.

Catch22's Record of Processing Activity is a core element of the internal Data Protection programme, it is therefore crucial that this policy is understood and adhered to.

2. Scope

This policy applies to all company employees, volunteers, secondees, contractors, agency workers, and external users. The policy applies to data processing regardless of systems, data formats, and processing activities.

3. Record of Processing Activity

The Record of Processing Activity (ROPA) for Catch22 is held by the Data Protection function and requires input from all services on an annual basis. The ROPA is structured using the Information Commissioner's Office (ICO) template.

An information gathering questionnaire is used to assist services in providing the information required for the ROPA. If any service has not (or does not believe) they have completed the questionnaire, they must contact DPO@catch-22.org.uk immediately.

The ROPA may be provided to regulators, commissioners, and auditing partners where there is a legal or contractual basis to do so.

Senior Management will assist the Data Protection function to ensure the ROPA questionnaires are completed or reviewed when and where required.

The ROPA will be used to identify improvement opportunities across services including potential areas of non-compliance. It is therefore a requirement for all services to ensure this is completed on an annual basis. IT assists in supporting:

- Data Protection Impact Assessment gaps
- Legal Basis Assessment
- Data Mapping
- Data Flows
- Identification of international transfers and the presence or absence of transfer mechanisms

3.1 Shared Ownership

The central Catch22 Data Protection team store and oversee the ROPA. The Data Protection team will also prompt service leaders to review their previous ROPA entry(s) when the annual review is due.

The information required to both create and review ROPA entries is known and held by Catch22's functions. It is the responsibility of each function to:

- Complete a Processing Activity Questionnaire template when new processing is requested or to be completed
- Review and update the previous ROPA entries when prompted by the Data Protection Team
- Notify the Data Protection Team of any changes to existing processing so the ROPA can be updated to reflect that
- Send any requests from regulators or commissioners requesting a copy of the ROPA to DPO@catch-22.org.uk

It is the responsibility of any mobilising manager to complete and submit to DPO@catch-22.org.uk a completed Processing Activity Questionnaire prior to the mobilisation of a new service.

3.2 Audit Trails

All submitted Processing Activity Questionnaires must be documented within the Information Security Management System to assist with versioning and tracking of changes. Where changes are made directly to the ROPA without an updated questionnaire, the change must be logged as a ticket within the DPO@catch-22.org.uk inbox and ticket number documented against the ROPA entry.

4. Record of Processing Activity Requirements

The legal requirements for a ROPA include:

Data Controllers	
1	Name and Contact Details for the data controller, joint controllers, representatives, and Data Protection Officers
2	Purpose(s) of the processing
3	Categories of Data Subject
4	Categories of Personal Data
5	Categories of Recipients of Personal Data

6	Any transfer of information outside of the United Kingdom and/or European Economic Area (EEA), as applicable
7	Data Retention Timings
8	General description of the technical and organisational security measures
Data Processors	
1	Name and Contact details of the processors, data controller, joint controllers, representatives, and Data Protection Officers
2	Categories of processing carried out on behalf of each controller
3	Any transfer of information outside of the EEA and suitable safeguards
4	General description of the technical and organisational security measures

In addition to the requirements above, all ROPA entries include:

- Article 6 and 9 legal processing bases relied on
- Data Protection Act 2018 Schedule 1 conditions relied on where applicable
- Whether special category data being processed
- Whether criminal data is to be processed

5. Policy Compliance

Compliance Measurement

The Information Security Management Review Team will verify compliance to this policy through various methods, including but not limited to, reports, internal and external audits, and feedback from the policy owner.

Exceptions

Any exception to the policy must be approved and recorded by the Information Security Manager in advance and reported to the Management Review Team.

Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Continual Improvement

The policy is updated and reviewed as part of the continual improvement and process.

6. Related policies

- Data Protection Policy Suite
- Information Security Policy Suite

7. Document Version Control

	Last Modified	Last Modified By	Changes Made
1.0	30/01/2023	Beverley Clark	Policy Review – No Changes
2.0	30/06/2023	Beverley Clark	Policy Review – No Changes
2.1	01/07/2024	Jamie Wright	Extension to review date
2.2	10/09/2024	Jamie Wright	Extension to review date
2.3	19/11/2024	Michael Oniyitan	Policy Review – No Changes Made
3.0	13/04/2026	Ben Wright	Policy Review – Rebuilt, structure changed, and policy changed to DP 02

Annex 1: Equality Impact Assessment

Summary

This EIA is for:	DP 02 Record of Processing Activity Policy
EIA completed by:	Michael Oniyitan
Date of assessment:	24/02/2026
Assessment approved by:	Assistant Director - Justice

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.
Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	**Error! Bookmark not defined.**	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☒	☐	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☒	☐	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☒	☐	☐	
Race	☒	☐	☐	

Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins				
Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☒	☐	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☒	☐	☐	

More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.
• The ROPA Policy is procedural and governance-focused and applies equally across all Catch22 services and functions. • It does not introduce new processing activities but documents existing and proposed processing to meet legal accountability requirements. • Oversight by the Data Protection Team supports consistent decision-making and reduces the risk of discriminatory or unlawful processing. No negative equality impacts have been identified. The policy is considered to have an overall positive impact in promoting transparency, accountability, and protection of individual rights.