

Annual Letter from Governance team

To: PCC Secretaries

cc: Parish Priests, Churchwardens

Introduction

Firstly, thank you for taking on the role of PCC secretary and playing such a crucial part in ensuring effective governance within your church. And welcome to those who are new to the role. This email is to update you on recent key governance developments and take a look at the year ahead.

APCMs and Deanery Synod elections

As you will know, we are now in APCM season.

Guidance and the necessary forms can be found at: [Annual Parochial Church Meeting \(APCM\) | Diocese of London](#) or at: [Parish Resources - APCM & Electoral roll](#)

You will be sent a link about a week after Easter to update APCM results, remove outdated postholders and enter the latest contact details for parish officer roles. We use this data securely for our contact management system; please help us stay in touch by ensuring it is accurate.

This year, a key activity at the APCM is the election of lay members to your Deanery Synod. Instructions for the elections can be found in the Church Representation Rules: [Church Representation Rules online - part 9 | The Church of England](#).

- In December 2025, each parish was sent a notice of their allocation (based on last year's electoral roll figures). This may be different to the previous term because of changes in the number on the electoral roll as reported after the 2025 APCM, and/or because the scale of representation was recalculated to meet the requirements of the Church Representation Rules. If you are not sure of your allocation, then please contact your Deanery Synod secretary who has a full list.
- The number of places allocated for your parish remains the same for the 3-year deanery synod term regardless of any changes to electoral roll numbers during that period.
- Those elected previously to the deanery synod are no longer members of the deanery synod unless they are re-elected.
- The term of office of the lay representatives will run from 1 July 2026 until 30 June 2029.

Please do encourage the members on your electoral roll to take part, to get as broad a representation as possible at Deanery level. The members of Deanery Synod will be the people who can nominate and vote for members of the General Synod in elections later this year – an opportunity that only comes round once every 5 years.

It is very important that we have the details of your Deanery Synod Representatives as soon as possible, and no later than 1 July 2026, as otherwise they may lose the opportunity to take part in the General Synod elections.

The Charity Governance Code

An updated Charity Governance Code ([Charity Governance Code - Charity Governance Code](#)) was published in November 2025. The Code is intended as a framework for reflection, discussion and improvement, applied in ways that are realistic for parish life. It is not a legal requirement to follow the code, but it is strongly endorsed by the Charity Commission and widely used as the benchmark for trustee good practice. Used well, the Code can help PCCs govern faithfully, confidently and transparently, in service of the parish and its mission.

Key changes in the updated Code include the introduction of a new Foundation principle about the role and responsibilities of trustees; a greater focus on behaviours, culture and decision-making (not just policies); and clearer indicators to help trustees judge whether governance is “working”. A short briefing note is attached to this email with more detail on the updated sections of the Code.

Data protection

The Data (Use and Access) Act 2025 (DUAA) introduces the most significant changes to UK data protection law since GDPR. It amends UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR). Key provisions affecting charities came into force on 5 February 2026, with a further requirement on complaints handling from 19 June 2026. Changes that are likely to be relevant to parishes:

- “Soft opt-in” for charity marketing. For the first time, charities can rely on a PECR “soft opt-in” to send fundraising and campaign emails/texts without explicit GDPR consent. This means a parish can contact people without explicit written consent, but only if strict conditions are met.
- Stronger expectations on governance and accountability. DUAA reinforces that trustees are accountable for lawful and transparent data use. This aligns with wider Charity Governance Code expectations on risk management and public trust.
- Easier handling of Subject Access Requests (SARs). Charities are now only required to conduct “reasonable and proportionate searches” when responding to SARs.
- DUAA allows some non-intrusive cookies (e.g. analytics and functionality cookies) to be set without consent for insight into website use.
- Changes to complaints handling (new requirement). From 19 June 2026, organisations must have a clear internal data protection complaints process and give individuals the opportunity to complain to the charity before escalating to the ICO. Your policies and procedures may need updating to reflect this.

A short briefing note is attached to this email with more detail on each of these points.

Michelle Gardner (Head of Governance, London Diocesan Fund)

Note: Previous annual letters can be found on our website: <https://www.london.anglican.org/church-and-parish-support/governance-pccs-and-synods/pcc-secretaries/> [see ‘Resources’ – there was no letter in 2025].



Charity Governance Code 2025

Audience:	PCC members (charity trustees)
Purpose:	To explain the Charity Governance Code 2025 and what it means for parish governance

Why this matters for PCCs

Every Parochial Church Council (PCC) is a charity, and every PCC member is a charity trustee. This brings legal duties and responsibilities, alongside the PCC's role in supporting the mission and ministry of the parish.

The Charity Governance Code 2025 sets out what good governance looks like in practice. It is designed to help trustees: govern confidently and responsibly; support the charity's purpose and public benefit; and build trust with the public, donors and beneficiaries. The Code uses an "apply or explain" approach: charities are encouraged to apply the principles in ways that make sense for their context or explain what they do instead.

The Code is intended as a framework for reflection, discussion and improvement, applied in ways that are realistic for parish life. Application of the Code is not a legal requirement, but it is strongly endorsed by the Charity Commission and widely used as the benchmark for trustee good practice. This is not about bureaucracy, but about clarity and confidence.

Used well, the Code can help PCCs govern faithfully, confidently and transparently, in service of the parish and its mission.

For PCCs, the Code complements (and does not replace): Church of England Measures and Canon Law; diocesan policies and guidance; or existing PCC accountability arrangements.

What changed in the 2025 Code?

The 2025 update is a refresh, not a complete rewrite. Its key aims are to be clearer, more practical and more proportionate, especially for smaller charities like many parishes.

Key changes include: one Code for all charities (no separate "small charity" version); greater emphasis on behaviour, culture and decision-making; practical indicators to help trustees judge whether governance is working well.

The eight governance principles (2025)

The Code now sets out eight universal principles:

1. Foundation (*new*)

Trustees understand their role, legal duties and responsibilities, and commit to ongoing learning.

2. Organisational Purpose

The charity is clear about its mission and how it delivers public benefit.

3. Leadership

The board provides leadership consistent with the charity's values and vision.

4. Ethics and Culture (*merged principle*)

Integrity, openness, accountability and values shape how the charity operates.

5. Decision-making (*new split*)

Decisions are informed, transparent and focused on the charity's purpose.

6. Managing Resources and Risks (*new split*)

Money, people and buildings are stewarded responsibly, and risks are identified and managed.

7. Equity, Diversity and Inclusion (EDI) (*expanded*)

The charity works towards fairness, inclusion and representation.

8. Board Effectiveness

The board works well together, with the right mix of skills, experience and review.

These principles are interconnected: good governance depends on how they work together in practice.

Notes on the new/ updated principles

Principle 1: PCC members as charity trustees (Foundation principle)

The new Foundation principle makes explicit what has often been assumed.

For PCC members, this means:

- understanding that PCC membership is a governance role, not just representation;
- knowing the PCC's charitable purpose: *"to promote in the parish the whole mission of the Church"*;
- understanding collective responsibility for decisions, finance and safeguarding; and
- being willing to learn and ask questions.

Practical examples for PCCs

- Clear induction for new PCC members
- Regular reminders of trustee responsibilities
- Access to diocesan or national training where available.

Principle 4: Ethics, culture and how PCCs work together

By merging *Integrity* and *Openness and Accountability* into Ethics and Culture, the Code highlights that how decisions are made matters as much as what is decided.

For PCCs, this includes:

- respectful and prayerful decision-making;
- openness about conflicts of interest;
- a healthy culture where challenge is welcomed;
- transparency with the congregation; and
- a strong safeguarding culture.

This reflects growing expectations that trustees pay attention to tone, behaviour and relationships, not just compliance.

Principles 5 and 6: Decision-making and managing risk

The Code now separates:

- Decision-making (how and why decisions are taken), from
- Managing resources and risks (how money, people and assets are stewarded).

This encourages PCCs to:

- be clearer about major decisions (e.g. buildings, staffing, mission priorities);
- ensure decisions are properly recorded in minutes;
- recognise risks beyond finance, including:
 - safeguarding,
 - reputational risk,
 - volunteer capacity,
 - digital and data risks.

Practical examples

- Using agendas that distinguish decisions from discussion
- Regular review of parish risks, not just finances
- Clear delegation and reporting arrangements.

Principle 7: Equity, Diversity and Inclusion (EDI)

The Code expands “diversity” into Equity, Diversity and Inclusion, recognising that inclusion is about fairness and participation, not tokenism.

For PCCs, applied proportionately, this may involve:

- encouraging a wider range of people to stand for election;
- ensuring meetings are accessible and welcoming;
- being mindful of whose voices are heard in decision-making.

The Code recognises that small parishes may face constraints but encourages intentional reflection rather than perfection.

The Data (Use and Access) Act 2025 (DUAA)

Audience: All those in parishes with responsibility for data protection

Purpose: To explain the implications of DUAA for parishes

What is the Data (Use and Access) Act 2025, and how does it affect us?

The Data (Use and Access) Act 2025 (often shortened to DUAA) is a new law that updates UK data protection rules. It is the most significant change to UK data protection law since GDPR.

DUAA amends (but does not replace):

- UK GDPR
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)

In simple terms, the Act:

- makes some data protection rules clearer and more flexible for organisations, including charities;
- gives people stronger rights to understand and challenge how their data is used; and
- gives the Information Commissioner (the data protection regulator) stronger powers to take action where organisations get things wrong.

PCCs are charities, and PCC members are charity trustees, so the Act applies to parishes just as it does to any other charity. Trustees remain ultimately accountable for:

- lawful use of personal data (donors, beneficiaries, volunteers, staff)
- reputational risk arising from misuse of data
- ensuring appropriate systems, policies and oversight are in place

DUAA does not reduce trustee responsibility; in some areas it raises expectations of governance maturity, particularly around fundraising, complaints handling and regulatory engagement.

Key changes likely to affect PCCs

“Soft opt-in” for charity marketing

For the first time, charities can rely on a PECR “soft opt-in” to send fundraising and campaign emails/texts without explicit GDPR consent. However, a PCC may rely on this only where:

- the message supports the charitable purposes of the parish (for example, church activities or appeals);
- the person has already shown interest or support (for example, by donating, signing up to a mailing list, or attending events); and

- the person was given a clear chance to opt out, both when their details were collected and in every message.

Notes:

- This is not a free licence to email everyone. Messages must be reasonable, relevant and respectful; and opt-outs must be easy and honoured promptly.
- Many parishes will still rely on legitimate interests for a lot of their communications, and a legitimate Interests Assessment (LIA) is still required.
- Privacy notices, records of processing and CRM systems may need updating to reflect this.

Stronger expectations on governance and accountability

DUUA reinforces that trustees are accountable for lawful and transparent data use. This aligns with wider Charity Governance Code expectations on risk management and public trust.

It means that:

- Trustees must understand how supporter, beneficiary and volunteer data is used;
- data protection can no longer be treated as a purely operational issue;
- failure to oversee compliance may expose charities to regulatory and reputational risk.

Easier handling of Subject Access Requests (SARs)

PCCs are now only required to conduct “reasonable and proportionate searches” when responding to SARs. This:

- should reduce unnecessary burden on small organisations; but
- still requires fairness, care and good record-keeping.

Cookies and website analytics are more flexible

DUUA allows some non-intrusive cookies (e.g. analytics and functionality cookies) to be set without consent, provided they are low-risk and privacy-preserving. This means that parishes can gain better insight into website use without harming user trust — but transparency remains essential.

Changes to complaints handling (new requirement)

From 19 June 2026, organisations must have a clear internal data protection complaints process and give individuals the opportunity to complain to the charity before escalating to the ICO. Your policies and procedures may need updating to reflect this.

What has not changed

DUUA does not remove the need to:

- have a lawful reason for using personal data;
- keep data secure;
- be transparent about how information is used; or
- take safeguarding and confidentiality seriously.

Good data protection remains closely linked to trust, pastoral care and safeguarding culture.