

# Privacy Policy & General Data Protection Regulations

## Background

The Data Protection Act 1998 is being replaced by the General Data Protection Regulations in May of this year. It's main effect for us is to reinforce the need for full transparency of the personal data we hold and respect for the privacy of those we encounter in our everyday work at Christ Church.

As a sign of the importance placed on the GDPR, maximum fines are high, but this is not the reason that we must take extra care with personal data that we hold and process. We have a moral and ethical responsibility to ensure that we manage personal data in a professional, respectful and responsible way.

Under the GDPR Personal data is any information relating to an identified or identifiable natural person (a natural person is an individual rather than a legal person like a company) 'data subject' = identifiable person who can be identified by an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to person's physical, physiological, genetic, mental, economic, cultural or social identity.

As an organisation, we must review our practices and update our privacy policies. Our website has an updated privacy statement relating to all our online data capture (newsletter subscriptions, contact requests). To do this effectively we must carry out a data audit.

## Our Lawful Basis for processing personal data

1. We have the subject's consent explicitly provided at the point of contact and options to unsubscribe or opt out.
2. We have some obligations relating to the management of electoral roll data
3. We have a legitimate interest in maintaining data to enable membership and subscription data relating to the church and its activities.
4. Where personal data is provided in the process of establishing a contract for use of the church or its facilities we have a contractual & legal requirement to retain it.

These lawful bases for retaining and processing personal data are all subject to different rights:

	Right to erasure	Right to portability	Right to object
Consent	✓	✓	<b>X</b> but right to withdraw consent
Legal Obligation	<b>X</b>	<b>X</b>	<b>X</b>
Legitimate interests	✓	<b>X</b>	✓
Contract	✓	✓	<b>X</b>

Personal data sources	Electronic	Print	Access	Source	Purpose	Notes	Actions
Electoral roll information	Y	N	P.O. PC	Sign up	Record of those registered	Possible to access via Dropbox	Review dropbox share policy & access. Log off PC when unattended. Delete details older than 3 years
Gift Aid Donor information	Y	Y	SG PC	Sign up	Gift aid records are required by law to confirm entitlement to tax reclaims	Printed declarations are held in Gift Aid secretary's house	Move finally to electronic only copy and destroy paper records
Office contact lists	Y	Y	Office Wall	Sign up	To enable contact between key church workers	Names & phone numbers only by agreement.	Secure office when not in use
Baptism Family contacts	Y	Y	P.O. PC	Sign up	To enable contact with baptism families	Opt in - purpose must be clearly explained at point of opt in. Needs reminder of option to opt out	Check frequency and nature of the use of this list
Wedding family Lists	Y		P.O. PC	Sign up	To enable contact with wedding couples	Opt in - purpose must be clearly explained at point of opt in. Needs reminder of option to opt out	Confirm how this list is used

Personal data sources	Electronic	Print	Access	Source	Purpose	Notes	Actions
Newsletter subscription	Y	N	SG PC	Sign up	News and general communication	On-line opt in	Ensure clear opt out method is included in emails
Beer Festival Attendee records	Y	N	CCCC	Opt in	Latest news on annual beer festival	On-line opt in	Is automatically renewed each year as part of booking process. Delete records of previous attendees who do not agree to contact within 3 months
Floodlighting requests	Y	Y	P.O. PC	Opt in	Contact details held to confirm bookings	Shared with Parish Mag with bookers agreement	
Burial Records	Y	Y	BB PC	Burial Records	Electronic entry protected by password. Grave purchaser details held for admin purposes	Public On-line records do not display Grave purchaser details	
Safeguarding Group	Y	N	AP/P.O.PC				
Revelations Youth Group	N	Y	DH	Opt in	Consent forms and emergency medical details for young people		Should contain information about how to withdraw consent?
Revelations Youth Group Email list	Y	N	DH	Opt in	News about events and meetings	Details of those DBS checked. Names and notes only	As per our safeguarding policy



## **Personal Data processors**

Parish clerk - Carol Simmons  
Parish Administrator - Helen Parker Drabble  
Vicar - Simon Stevenette  
Associate Minister - Norma McKemey  
Associate Minister - Daphne Hardwick  
Lay Minister - Genny Williams  
Lay Minister - Anne McMillan  
Treasurer - Keith Tredget  
Safeguarding – Ailsa Palmer  
Revelations Youth Group – David Howell  
Gift Aid Secretary - Stephen Grosvenor  
Community Development - Chris Smith  
Church warden - Daniel Pitt  
Church warden - Pamela Bridgeman  
Operations Manager - Jenny Hatter  
Community Centre Volunteers – Judith Hawkins, Julia

## **Things to consider when we use (process) personal data**

Who does the processing benefit?  
Would individuals whose information we are using expect this processing to take place?  
What is your relationship with the individual?  
Are you in a position of power over them?  
What is the impact of the processing on the individual?  
Are they vulnerable?  
Are some of the individuals concerned likely to object?  
Are you able to stop the processing at any time on request?  
If data breaches are discovered do we have clear responsibilities identified for notification?

## **Data Protection Officer**

The scale of our activities does not specifically require a dedicated Data Protection Officer (DPO) but to ensure best practice and a smooth transition to the new regulations we will nominate Stephen Grosvenor ([s.grosvenor@gmail.com](mailto:s.grosvenor@gmail.com) 07885 217077) as responsible for our compliance.

Our policy is to ensure that all those engaged in data processing of personal data at Christ Church fully understand their responsibilities and abide by our data protection policies at all times.

## General Principles

1. Personal data held will be restricted to that required to maintain contact and communication and will never be used for purposes other than it was originally intended without obtaining a new permission or opt in for the new purpose.
2. We will identify and train all those who have access to and process personal data.
3. Volunteers or others aged under 16 will not be allowed access to data or to process it.
4. All personal data, whether held on paper or online or on PC shall be kept private, not shared with other organisations or individuals and access to it for processing must only be given to those designated as authorised to process data. All reasonable steps will be taken to protect data – e.g. securing offices, logging off PC's when unattended, protecting passwords and access codes. Clear guidelines will be provided to those identified as data processors and training given to new members.
5. We will conduct a review of our data holding and processes once per year and subject to legal and contractual constraints will remove old or redundant data. We will also review our privacy policy and our own compliance with it at the same time.
6. Where there is a request to access or erase personal data we will respond within 30 days.
7. We will ensure that everywhere we solicit personal data that we ensure that it is clear to the provider how it will be used - our privacy policies should also be publicly available if requested.