

Data Protection Policy for St Paul's with St Mary's

**Agreed by the Church Council on 7 December 2015,
to be reviewed by the Church Council on 7 December 2018**

1. INTRODUCTION

The Office Manager is the Data Controller for the purposes of the Data Protection Act on behalf of St Paul's with St Mary's.

St Paul's with St Mary's uses personal data about living individuals for the purposes of general church administration and communication.

St Paul's with St Mary's recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998.

St Paul's with St Mary's fully endorses and adheres to the eight principles of the Data Protection Act. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for St Paul's with St Mary's must adhere to these principles.

2. THE PRINCIPLES

The principles require that personal data shall:

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met
2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose
3. Be adequate, relevant and not excessive for those purposes
4. Be accurate and, where necessary, kept up to date
5. Not be kept for longer than is necessary for that purpose
6. Be processed in accordance with the data subject's rights
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures
8. And not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

3. MAINTAINING CONFIDENTIALITY

St Paul's with St Mary's will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the clergy, employed staff, authorised leadership and ministry overseers/co-ordinators of the church in order to facilitate the administration and day-to-day ministry of the church.

Information and data stored by the Church Office will not be distributed in any form such as digital, hard copy or any other form which might breach the Data Protection Act.

Your personal information will not be given or sold to any other person, company or church.

All employed staff are required to sign a confidentiality clause written into their contract of employment.

All clergy, employed staff and authorised leadership and ministry overseers/co-ordinators who have access to personal data obtained under this policy will be required to agree to and sign this Data Protection Policy.

There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to do so
- Where there is a duty to the public to disclose
- Where disclosure is required to protect our interest
- Where disclosure is made at your request or with your consent

4. USE OF PERSONAL INFORMATION

St Paul's with St Mary's will use your data for five main purposes:

1. The day-to-day administration of the Church including pastoral care and oversight, calls, emails and visits, preparation of ministry rotas, maintaining financial / giving records for audit and tax purposes
2. Contacting you to keep you informed of church news, activities and events
3. Statistical analysis to gain a better understanding of church demographics
4. With your specific permission, for the production of a church contact list which will be made available to other members of St Paul's with St Mary's.
5. Data will be held whilst you are a member of the church and destroyed 18 months after you leave the church or we receive a written request from you. The exception to this will be where need to keep statutory records for a longer period.

5. THE MEMBERSHIP DATABASES

Membership Information is held on the Church Membership Database or on the Membership Database section of the St Paul's with St Mary's Website.

The Membership Database is stored on the church computer, the main computer in the church office and can be accessed via this computer only. The Membership Database on the Church Website is individually password protected and can only be accessed by users who have specific permission to do so.

Information collected by the Church Office will be stored on the Database and will not be used for any other purposes than set out in this section.

1. Access to the Database is strictly controlled through the use of name specific passwords, which are setup and authorised by the Data Controller.
2. Only the clergy and church staff and authorised leadership and ministry overseers/coordinators have access to the full database.
3. The Database will NOT be accessed by any authorised users outside of the EU, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.
4. Personal information will not be passed onto any third parties outside of the church environment.
5. Personal information may be made available to others within the church environment via the password protected members area of the church website with the express permission of the data subject who will be given the opportunity to 'opt out' to this. This information may also be published in a church contact list which will be made available, via the office, verbally or in paper form to church members without website access after appropriate security checks.
6. The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained.

7. STORAGE OF DATA ON OTHER ELECTRONIC MEDIA

All clergy, employed staff and authorised leadership and ministry overseers/co-ordinators who store personal information obtained under this policy on any electronic system not connected to the St Paul's with St Mary's computer network or part of the St Paul's with St Mary's website are required to do so in accordance with the principles of the Data Protection Act and to take due care to ensure that the information remains secure through the use of passwords and encryption where appropriate. This includes:

- Email / telephone / address books held on personal computers, mobile phones, PDA's etc
- Data stored on memory sticks and/or portable hard drives

7. RIGHTS TO ACCESS INFORMATION

Employees and other subjects of personal data held by St Paul's with St Mary's have the right (with some legal exceptions) to access any personal data that is being kept about them either electronically or in paper-based filing systems. This right may be withheld if the personal information also relates to another individual.

Specifically, all individuals who are the subject of personal data held by St Paul's with St Mary's are entitled to:

- Ask what information the church holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what the Church is doing to comply with its obligations under the 1998 Data Protection Act.

Any person who wishes to exercise this right should make the request in writing to the Data Controller, using the standard letter which is available on-line from www.ico.gov.uk. St Paul's with St Mary's reserves the right to charge the maximum fee payable for each subject access request.

St Paul's with St Mary's aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

If personal details are found to be inaccurate, they can be amended upon request.

8. PHOTOGRAPHS

Photographs taken within the Church building or at Church events may include individuals or groups of individuals attending these events. These photographs will be used solely for the purpose of St Paul's with St Mary's advertising, marketing and public relations, and may thus appear in any advertising internal and or external, website or other publicity material.

The Data Protection Act DOES apply where photographs are taken for official use, such as for identity passes, and these images are stored with personal details such as names. Where the Act does apply, it will usually be enough for the photographer to ask for permission to ensure compliance with the Act.

Photographs taken at St Paul's with St Mary's purely for personal use are exempt from the Data Protection Act. This means that parents, friends and family members can take photographs for the family album of their children and friends participating in church events.

9. WEBSITE PRIVACY STATEMENT

The following statement is provided for users of the St Paul's with St Mary's Website:

At St Paul's with St Mary's we collect different types of information about our users for the following main reasons:

1. To provide an interactive web site where email is used to communicate with the users.
2. To provide a security mechanism whereby we can restrict content to certain groups of users.
3. To help us to improve the service we offer.

Our principles

We are absolutely committed to protecting your privacy. Our policy can be summarised in one sentence: **we will not share your information with others without your consent.**

We have established the following three principles:

1. We will respect your email privacy.
2. All group emails will be sent as bcc... to protect your privacy.
3. We will not share any individual user details (including your email address) to any third party without your consent.

What information do we collect?

- We collect information on our users through registration.
- The minimum information we need to register a user is your first and last name, your post code and a password.

Who will have access to your information?

- You have control over who is able to access specific items of information.
- By default your information will not be visible to anyone else using the site.
- You can change these settings from your Personal Profile page.

What else you should know about privacy

- Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an individual are responsible for the security of and access to, your own computer.
- Please be aware that whenever you voluntarily disclose personal information over the Internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the secrecy of your usernames and passwords and any account information. Please be careful and responsible whenever you are using the Internet.
- Our pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.