

# St Paul's Church, Kingston Hill

## Data Protection Policy



### 1. Introduction

St Paul's Church uses personal data about individuals for the purpose of general church administration and communication. We recognise 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 General Data Protection Regulation 2017 (GDPR). St Paul's Church fully endorses and adheres to the eight principles of the GDPR. 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 Church must adhere to these principles. The Administrator (currently Caroline Dennis) is the Data Controller for the purposes of the Data Protection Act on behalf of St Paul's Kingston Hill.

### 2. The 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 recognise 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. 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. Please see the section on the Database below (section 5, point d).

### 3. Maintaining Confidentiality

St Paul's Church will treat all your personal information as private and confidential and not disclose any data about you to anyone other than other members of the church in order to facilitate the administration and ministry of the church. You control what information is shared with other church members via the My ChurchSuite system, and may choose to share certain information only with the Administrator (Data Controller).

Information and data stored by the Church Office (mainly via the ChurchSuite system) will not be distributed in any form which breaches the Data Protection Act.

Your personal information will not be shared with any other person, company or church, except where you give explicit permission to do so, e.g. to the Diocese or the Charity Commission.

All St Paul's Church staff will be required to sign this Data Protection Policy.

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

- a) Where we are legally compelled to do so.
- b) Where there is a duty to the public to disclose.
- c) Where disclosure is required to protect your interest.
- d) Where disclosure is made at your request or with your consent. *(This covers access to your data via ChurchSuite if you have given permission for this.)*

#### **4. Use of Personal Information**

St Paul's Church will use your data for three main purposes:

- a) The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes.
- b) Contacting you to keep you informed of church activities and events. In such cases all group emails will be sent as blind copies ('bcc') to protect your privacy.
- c) Statistical analysis; gaining a better understanding of church demographics.

*N.B. although collated church data may be passed to a third party, such as the number of small group members or volunteers, no individual personal data will be disclosed.*

#### **5. The Database (ChurchSuite)**

Information contained on the database will not be used in any other ways than those set out in this section. The database is accessed through the cloud and therefore, can be accessed through any computer or smart device with internet access. The server for the database is in the UK and hosted by ChurchSuite.

- a) Access to the database is strictly controlled through the use of name specific passwords, which are selected by the individual.
- b) Those authorised to use the database only have access to their specific area of use within the database. This is controlled by the Data Controller.
- c) The only people who will have secure and authorised access to all areas of the database are St Paul's Church Staff. Church members have limited access via My ChurchSuite and can control what elements of their personal information other church members can view.
- d) The database will NOT be accessed by any authorised users outside of the EEA, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.
- e) All access and activity on the database is logged and can be viewed by the Data Controller.
- f) All individuals who are the subject of personal data held by St Paul's Church 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 St Paul's Church is doing to comply with its obligations under the 1988 Data Protection Act.
- g) Personal information is made available to others within the church via the password protected members area 'My ChurchSuite', but only when individuals have explicitly agreed to this. Every user of My ChurchSuite is reminded each time they log on that the information held there is only for personal church related business, and may not be sold or used for any other purpose.
- h) The need to process data for normal purposes is communicated to all users. Sensitive data, for example, about health, will not be processed without express permission.

#### **6. Rights to Access Information**

Those whose personal information is held by St Paul's Church have the right to access any such data whether it is kept electronically or on paper. This right is subject to certain exemptions, for instance if it relates to another individual. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which St Paul's Church holds about you.
- The right to request that St Paul's corrects any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for St Paul's to retain such data.

- The right to withdraw your consent to the processing at any time.
- The right to request that the Data Controller provides you with your personal data and, where possible, to transmit that data directly to another data controller (the right to data portability).
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data.
- The right to lodge a complaint with the Information Commissioner's Office.

Any person who wishes to exercise this right should make the request in writing to the St Paul's Church Data Controller, using the standard letter which is available online from [www.ico.gov.uk](http://www.ico.gov.uk)

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

St Paul's Church aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 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.

## **7. How long do we keep your personal data?**

We keep data in accordance with the guidance set out in the guide "Keep or Bin: Care of Your Parish Records" which is available from the Church of England website: <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx> Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

## **8. Photographs**

Photographs taken within the church building or at church events may include individuals or groups of individuals attending these events. These photographs may be used in communications or publicity by St Paul's Church, and may thus appear on our website, on social media, or on printed material.

If photographs are taken for official use, such as for the church notice board or PCC papers, and these images are stored with names or other personal details, the Data Protection Act does apply. In such cases the photographer should ask permission for the photograph to be used in this way to ensure compliance with the Act.

Photographs taken at St Paul's Church purely for personal use are, however, exempt from the Data Protection Act. This means that individuals can take photographs of those participating in church events without coming under the Act. Such images should not, however, be shared, e.g. on social media, with the personal details of any other individuals, including names, without their express permission.

## **9. Contact Details**

To exercise all relevant rights, queries or complaints please in the first instance contact the Administrator at St Paul's Church Office, Queens Road, Kingston upon Thames, KT7 7SF; [office@stpaulskingston.org.uk](mailto:office@stpaulskingston.org.uk) or 020 8549 5444.