

Data Protection Policy

1. Introduction

St Paul's Kingston 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 Kingston 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 Kingston must adhere to these principles. The PCC of St Paul's Kingston has appointed the Operations Manager (currently Caroline Dennis) as the Data Protection Officer for the purposes of the Data Protection Act. The PCC and staff team work together to decide how personal data is processed and for what purposes; and are collectively responsible for how we process personal data.

This policy should be read alongside the Privacy Notice which is displayed on our website.

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

2. The Principles

We are absolutely committed to protecting privacy and we will not share personal information with others without consent. We recognise that personal data shall:

- a. Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
- b. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- c. Be adequate, relevant and not excessive for those purposes.
- d. Be accurate and where necessary, kept up to date.
- e. Not be kept for longer than is necessary for that purpose.
- f. Be processed in accordance with the data subject's rights.
- g. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
- h. 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 Kingston will treat all personal information as private and confidential and not disclose any personal data to anyone other than other members of the church in order to facilitate the administration and ministry of the church. Church members control what information is shared with other church members via the My ChurchSuite system, and may choose to share certain information only with the staff team.

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. Personal information will not be shared with any other person, company or church, except where explicit permission has been given to do so, e.g. to the Diocese or the Charity Commission.

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 an individual's interest.
- d. Where disclosure is made at an individual's request or with their consent. (This covers access to individual data via ChurchSuite if permission for this has been granted.)

4. Use of Personal Information

St Paul's Kingston will use an individual's personal 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 individuals to keep them 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 connect 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 Kingston Staff. Church members have limited access via My ChurchSuite and can control what elements of their personal information other church members can view.
- d. All access and activity on the database is logged and can be viewed by the Data Controller.
- e. All individuals who are the subject of personal data held by St Paul's Kingston 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 Kingston is doing to comply with its obligations under the Data Protection Act.
- f. Personal information is made available to others within the church via the password protected members area 'My ChurchSuite'. When people are added to the system only their name and email are available and they are sent an email explaining what data is visible to others and how to change this themselves. 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.

- g. 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 Kingston 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 Kingston 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, note church members can correct this themselves via My ChurchSuite;
- The right to request your personal data is erased where it is no longer necessary for St Paul's to retain such data. In the case that you request that we erase the data we hold, we will confirm whether the data has been deleted or the reason why it cannot be deleted (e.g. because we need it for our legitimate interests or a regulatory purpose).
- The right to object to processing of your data.
- The right to data portability.
- The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- The right to object to the processing of personal data where applicable.
- The right to lodge a complaint with the Information Commissioner's Office.

Any person who wishes to exercise this right should send their request to us in writing (see contact details below). When exercising these rights, in order to process the request, we may need to verify identity.

St Paul's Kingston 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 *Save or Delete: the Care of Parish Records* which is available here: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>. We will only keep data for as long as we need it, however we may keep some records permanently if we are required to do so. Where we no longer need to process your personal data for the purposes set out in this Policy, we will delete your personal data from our systems.

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 Kingston, 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 Kingston 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 Church Office at St Paul's Church Office, Queens Road, Kingston upon Thames, KT7 7SF; office@stpaulskingston.org.uk or 020 8549 5444.



St Paul's Kingston

Record of Agreement to Data Protection Policy

To be signed by all staff members of St Paul's Kingston.

I understand that I will be handling sensitive personal data on behalf of St Paul's Kingston. I have read the contents of the Data Protection Policy (last reviewed March 2024) and the Privacy Notice (last reviewed January 2023) and agree to follow it, and raise any relevant requests for help, or concerns with the Data Protection Officer.

Name: _____

Date: _____