

SCOTFORTH ST PAUL'S CHURCH, LANCASTER

DATA PROTECTION POLICY

Introduction

The Parochial Church Council (PCC) of St Paul's Church, Scotforth collects and uses personal information about staff, clergy and individuals who come into contact with the Church and is known as the 'Data Controller' for data.

The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church's mission in the community. The PCC works together with:

- The incumbent of the parish;
- The bishops of the Diocese of Blackburn;
- The Church of England.

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible for how we process data.

Purpose and Principles

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the General Data Protection Regulations 2018 and other related legislation. The Data Controller will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

All persons involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines, they will be known as 'Data Processors'.

We will use personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules);
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To minister to parishioners and provide them with pastoral and spiritual care (such as visiting when they are gravely ill or bereaved) and to organise and perform ecclesiastical services such as baptisms, confirmations, weddings and funerals;

- To deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of the Data Controller;
- To administer the parish, deanery, archdeaconry and diocesan membership records;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that has been made (including Gift Aid information);
- To seek views or comments;
- To notify changes to our services, events and role holders where applicable;
- To send communications which individuals have requested and that may be of interest to them. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution.

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England), e.g. safeguarding work to protect children and adults at risk. We will always take into account the individuals interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Church Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns.

We may also process data if it is necessary for the performance of a contract with an individual, or to take steps to enter into a contract, e.g. processing data in connection with the hire of church facilities.

Religious organisations are also permitted to process information about individual's religious beliefs to administer membership or contact details.

Where information is used other than in accordance with one of these legal bases, we will first obtain consent to that use.

Sharing of personal data

Personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we would need to share data with some or all of the following (but only where necessary):

- The appropriate bodies of the Church of England including other Data Controllers;
- HMRC for tax purposes;
- Safeguarding authorities;
- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Blackburn to support the mission of the Church in our parish;
- On occasion, other churches with which we are carrying out joint events or activities.

How long do we keep personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time, e.g. financial records – 6 years plus current year for HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we will delete it when it is no longer needed.

Privacy Notice

The Data Controller has produced a Privacy Notice which will be reviewed annually. This is available on our website – stpauls-scotforth.org or a printed copy is available from the Parish Office (tel: 01524 843135, email: office@stpauls-scotforth.org).

Rights of access to information

The following rights to access with regards to personal data are listed below, in order to process any request we would need to verify the identity of the individual making the request for security purposes. In such cases we will need the individual to respond with proof of identity before any rights can be exercised, e.g. passport, driving licence, utility bills with the current address, birth/marriage certificates, P45/P60, credit card or mortgage statement (this is not an exhaustive list).

1. The right to access information we hold on an individual (Subject Access Requests):
 - At any point an individual can contact us to request the information we hold as well as why we have that information, asking who has access to the information and where we obtained the information from. Once we have received a request we have one month in which to respond giving a full report;
 - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee;
 - We will keep a log of all Subject Access Requests.
2. The right to correct and update the information held on the individual:
 - If the data held is out of date, incomplete or incorrect, the individual can inform us and the data will be updated.
3. The right to have information erased:
 - If the individual feels that we should no longer be using their data or that we are illegally using the data, they can request that we erase the data we hold;
 - On receipt of a request for data to be erased we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purposes(s)).
4. The right to object to processing of personal data:
 - An individual will have the right to request that we stop processing their data. Upon receiving the request we will contact the individual and let them know if we are able to

comply or if we have legitimate grounds to continue to process their data. Even after the individual has exercised their right to object, we may continue to hold their data to comply with their other rights or to bring or defend legal claims.

5. The right to data portability:

- An individual will have the right to request that we transfer some of their data to another Data Controller. We will comply with their request, where it is feasible to do so, within one month of receiving their request.

6. The right to withdraw consent to the processing at any time for any processing of data to which consent was sought:

- An individual can withdraw their consent easily by telephone, email, or by post via the Parish Administrator or Data Protection Officer (tel: 01524 843135, email: office@stpauls-scotforth.org or post: St Paul's Parish Office, St Paul's Parish Hall, 41 Scotforth Road, Lancaster, LA1 4TS).

7. An individual has the right to object to the processing of personal data where applicable.

8. An individual has the right to lodge a complaint with the Information Commissioner's Office, www.ico.gov.uk or telephone 0303 123 1113.

Transfer of Data Abroad

Our website is accessible from overseas so on occasion some personal data (for example in a notice sheet, parish magazine) may be accessed from overseas.

Further processing

If we wish to use personal data for any additional purpose we will always contact the individual providing them with a new consent form explaining any new use prior to commencing the process and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek individual consent prior to the new processing.

Processing personal data about children

Under the General Data Protection Regulations 2018 parental consent will be required for the processing of personal data of children aged under 13 years of age. The UK Government has adopted the reduced age of 13 (as opposed to EU age of 16) for providing consent. Children aged over 13 years will be asked to sign their own consent forms in line with this ruling.

Data Breach

A personal data breach is one that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. We are required under the new regulations to

report any data breach to the Information Commission within 72 hours, also informing them of the scope and cause of the breach, mitigation actions we plan to take and how we plan to address the problem. In line with all accountability requirements, all data breaches must be recorded along with details of actions taken.

Response Plan: Any data breaches must be reported immediately to the Data Protection Officer via the Parish Office. The Data Protection Officer will assume responsibility for investigating the cause of the breach and produce a response plan in addition to reporting to the Information Commission. For example, if the data breach is electronic then further investigation may need to be undertaken by an Incident Response Company; if papers are lost or stolen then ensuring it is reported to the relevant authorities.

Contacts

If you have any enquiries in relation to this policy then please contact the Data Protection Officer who will also act as the contact point for any subject access requests.

Telephone: 01524 843135

Email: office@stpauls-scotforth.org

Address: Data Protection Officer, St Paul's Parish Hall, Scotforth Road, Lancaster, LA1 4TS

Review

This policy will be reviewed annually at the June PCC.

Date of Adoption: 11th June 2020