

# Draft Data Protection Policy

## 1. Preamble

Tilehouse Street Baptist Church, Hitchin, (**The Church**) is committed to protecting personal data and respecting the rights of our data subjects; the people whose personal data we collect and use.

We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.

This policy shows the Church's conformity to the requirements of the Data Protection Act 1998 (**The Act**) and the subsequent General Data Protection Regulation 2016 (**GDPR**) - EU Regulation 2016/679.

## 2. Summary

The following sections will define how **The Church** will follow the requirements of the Act.

- Definition of terms and responsible persons or bodies
- The types of data **The Church** will collect and means of storage
- The purpose of the data collected
- Fair and lawful processing
- The privacy statement
- The retention statement
- The data security statement
- Training and guidance
- Approval and review

## 3. Definitions

### 3.1. Terms

Technical terms shall be as defined in **The Act** or the **GDPR**. Such terms are emboldened in the text

### 3.2. Data Controller

The **Data Controller** shall be the Trustees of Tilehouse Street Baptist Church, Hitchin.

### 3.3. Data Protection Officer

The **Data Protection Officer** shall, initially, be the Church Minister. The Church Meeting shall have the power to appoint any other Church member to this function if required.

### 3.4. Data Processing Persons

Data **processing** may be carried out by any person, church member or volunteer, authorised by the Data Controller to process data in their role within the Church.

## 4. Types of Data and means of storage

The following types of **personal data** may be collected by **The Church**.

- Personal contact details, such as name, address, telephone (or mobile) number, email address
- Personal financial details where required for the conduct of **The Church's** business, such as payment of salaries, expenses, collection of donations
- Sensitive personal data where necessary to provide pastoral care, or in connection with protection of children and adults at risk.
- Images and video
- Sound recordings

Data may be stored in paper form, as computer records on magnetic disks, optical disks or other memory devices, on film or magnetic tape.

## 5. Purpose of data collected

Data may be collected and processed for the following purposes:

- to maintain the list of Church members, regular attenders, (and former members where agreed by them);
- provide pastoral support for members and others connected with the Church;
- provide services to the community;
- safeguard children and adults at risk;
- recruit, support and manage staff and volunteers;
- maintain accounts and records;
- promote services;
- maintain the fabric of property and premises;
- respond effectively to enquirers and handle any complaints.

## 6. Fair and Lawful Processing

Data will be processed by **The Church** in accordance with Articles 5 and 6 of the **GDPR** by means of the following:

- 6.1. If necessary, the Church will request permission from **data subjects** when collecting data ;
- 6.2. The Church will explain why it is collecting data and what use will be made of it in a Privacy Statement;
- 6.3. The Church will advise **data subjects** how long it will keep data in a Retention Statement;
- 6.4. The Church will ensure that data is kept accurate and up to date
- 6.5. The Church will apply appropriate security to the personal data in a Data Security Statement;
- 6.6. The data collected will be adequate, relevant and not excessive.
- 6.7. Processing will be lawful if it is necessary for the purposes of the legitimate interests pursued by the **Data Controller**.
- 6.8. In addition to the above there are separate conditions to be met when dealing with sensitive personal data.
  - The explicit consent of the data subject has been obtained, OR
  - the processing is carried out as part of the legitimate activities of the Church: with the appropriate safeguards for the rights and freedoms of the **Data Subjects**; relates only to individuals who are members or who have regular contact with it in connection with its purposes; and does not involve disclosure of the sensitive personal data to a third party without the consent of the data subject.

## 7. Privacy Statement

- 7.1. This statement is intended to be generic. Specific statements may be produced for various purposes and events.
- 7.2. For the purposes of the Data Protection Act 1998, the **Data Controller** is the body of Trustees of Tilehouse Street Baptist Church, Hitchin, SG5 2EE.
- 7.3. The **Data Protection Officer** is the Church Minister, Rev Jane Robson at the same address.

7.4. You are giving your permission for the Church to collect **Personal data**

7.4.1. to allow the Church to communicate with you,

7.4.2. for the purposes of establishing or maintaining membership or support for the Church, or providing or administering activities for individuals who are either a member of the Church or who have regular contact with it

7.4.3. for the purposes of advertising, marketing and public relations in respect of the Church's activities or services

7.5. The Church will respect the privacy of your information and only make it available to those with legitimate reason to require it.

7.6. The Church will retain your information only as long as necessary to fulfil the purpose for which it was gathered.

7.7. Contact details of Church members may be published in a Membership List which will be released to members. This document may be seen by non-members.

7.8. Holders of Church posts and other volunteers may have their contact details published for the purpose of promoting the Church's activities.

7.9. Photographs, videos or sound recordings may be published by the Church in a variety of media for publicity, archival purposes or historical research.

7.10. Your rights to the protection of the General Data Protection Regulations, 2016 are not compromised by this Statement. In particular you have the right:

7.10.1. to withdraw consent at any time

7.10.2. to request copies of the information held

7.10.3. to request correction of any errors

7.10.4. to request your data be erased.

7.10.5. to lodge a complaint with an authority, such as the Information Commissioner's Office.

## 8. Retention Statement

Data will not be kept longer than necessary. Typical retentions are as follows.

8.1. **Members' personal data:** Contact details and banking data will be deleted once membership ceases. Names will be retained indefinitely for historical and research purposes.

8.2. **Associate Members:** Kept as long as they wish to remain on the list.

8.3. **Other persons' data:** Contact details collected for informing of future events will be deleted once the event has taken place. A similar principle will apply to data collected for other reasons.

8.4. **Financial Data:** Kept as long as required by statute or other legal requirement (eg tax records).

8.5. **Safeguarding Data:** Kept as long as required by statute.

8.6. **Contractors' details, invoices and warranties:** Kept as long as deemed relevant.

8.7. **Photographs and other media:** Kept indefinitely for archival or research purposes or until deemed irrelevant.

## 9. Data Security Statement

The Church will implement security measures which provide a level of security which is appropriate to the risks involved in the processing and the consequences of unauthorised access or loss of data. The measures adopted for the various categories of data are as follows.

9.1. **Personal data:** such as contact details, must be stored in locked premises if held on paper, or on password protected computers. Membership lists may be freely available to members and volunteers, but will not be deliberately distributed elsewhere.

9.2. **Personal Sensitive Data:** Access to financial information will be restricted to members of the Finance Committee and held, if on paper, in locked premises, or on password protected computers.. Access to safeguarding information will be restricted to the Safeguarding Team and held if on paper in locked premises or on password protected computers.

9.3. **Suppliers and Contractors Data:** is not deemed confidential and may be held in any open form, such as catalogues, loose leaf folders or unprotected computers.

9.4. **Photographs and other media:** are not deemed confidential and may be held in any convenient format.

The Church shall protect its data against loss or corruption by instituting a back-up procedure for the various repositories of data.

## 10. Training and Guidance

We will provide training at least annually for Church members and volunteers to raise awareness of their obligations and our responsibilities, as well as to outline the law.

## 11. Approval and Review

This document shall be presented to the Church Meeting for approval.

It shall be subject to periodic review and update.

Approved by .Church Meeting on 17 May 2018