

The Parish of The Sherbornes with Pamber

Data Protection Policy

The Sherbornes with Pamber PCC (The PCC) uses personal data about living individuals for the purpose of general church administration and communication.

The PCC recognises the importance of the correct and lawful treatment of personal data. 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 Legitimate Interest 6(1)(f), Contract 6(1)(b) or Legal Obligation 6(1)(c) clauses of the General Data Protection Regulations. I

The PCC fully endorses and adheres to the eight principles of the GDPR. (see below) 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 the PCC must adhere to these principles.

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 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 any other country 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.

1. Maintaining Confidentiality

The PCC will treat all your personal information as private and confidential and not disclose any data about you to anyone other than church members, and the leadership team of the church in order to facilitate the administration and day-to-day ministry of the church.

The PCC staff and volunteers who have access to Personal Data will be required to agree to sign a Confidentiality Policy and a Data Protection Policy.

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

1. Where we are legally compelled to do so.
2. Where there is a duty to the public to disclose.
3. Where disclosure is required to protect your interest.
4. Where disclosure is made at your request or with your consent.

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2. Use of Personal Information

The PCC will use your data for three main purposes:

1. 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.
 2. Contacting you to keep you informed of church activities and events.
 3. Statistical analysis; gaining a better understanding of church demographics.
- N.B. although collated church data may be passed to a third party, such as number of small groups or small groups' attendance, no personal data will be disclosed.*

The Database

Information contained on the database will not be used for any other purposes than set out in this section. The database is accessed through the internet 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 Church Builder. The data held is encrypted and is backed-up each day.

1. Access to the database is strictly controlled through the use of name specific passwords, which are selected by the individual.
2. Those authorised to use the database have access only to their specific area of use within the database. This is controlled by the Data Controller and other specified administrators. These are the only people who can access and set the security parameters.
3. People who will have secure and authorised read access to the database include core congregation members*, PCC Staff, Data Coordinators, Small Group Leaders and The PCC Trustees. * a member of the core congregation is defined as anyone who attends services at least once a month.
4. Group emails **relating to church business** will normally be sent through Church Builder which has several features for Data Protection regulation compliance including an 'Unsubscribe' button on all emails. e.g. Homegroup leaders communicate to their HG or an email to all women about a women's ministry event.
5. 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.
6. All access and activity on the database is logged and can be viewed by the Data Controller.
7. Subject Access - all individuals who are the subject of personal data held by The PCC 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 PCC is doing to comply with its obligations under the 1988 Data Protection Act.

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8. Personal information will not be passed onto any third parties outside of the church environment.
9. Subject Consent - The need to process and communicate information for normal purposes has been communicated to all existing data subjects. New members will be asked to sign a consent form.
10. Downloads of data from Church Builder must be to password protected devices only. Downloaded data should be destroyed as soon as possible and not kept for more than a year.
11. Print outs should be kept in locked rooms, drawers or cabinets and should not be kept for longer than one year. They should never be left in public places (Note: The church is a public place).

Rights to Access Information

Everyone whose personal data is held by the Parish of The Sherbornes with Pamber is able to access their data within Churchbuilder and correct their data if it is incorrect. The PCC have the right to access any personal data that is being held about them. They also have a right to view any data held about them in manual filing systems. This right is subject to certain exemptions: Personal Information may be withheld if the information relates to another individual. Any person who wishes to exercise this right should make the request in writing to the PCC Data Officer, using the standard letter which is available online from www.ico.gov.uk

If personal details held manually are inaccurate, they can be amended upon request. The PCC 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.

The PCC has read and understood this policy and agrees to adhere to its contents. The PCC has unanimously agreed to adopt this policy. (See minutes of the PCC held on 21 November 2022).

Signed on behalf of the PCC:

Andrew Spence

PCC Secretary

Date: 21 November 2022