

GENEVA ROAD EVANGELICAL BAPTIST CHURCH

DATA PROTECTION POLICY

INTRODUCTION

Geneva Road Evangelical Baptist Church (“the Church”) holds and processes personal data about living individuals for the purpose of general Church administration and communication.

The Church is committed to complying with Data Protection legislation and the rights of individuals under that legislation. The Church is also committed to complying with the ‘Eight Principles of Data Handling’ as set out below.

SCOPE

This policy applies to all trustees, employed staff, church members and volunteers who obtain, handle or store personal information or data on behalf of the Church. The principles in this policy must be adhered to at all times.

The Church Trustees are the Church’s data controller and data protection officer is the Church Secretary, Mr G S Friston. Any query about data protection must be referred to him.

USE OF PERSONAL INFORMATION

The Church holds and uses personal information and data about living individuals solely to facilitate:

1. Normal church administration including employee data, membership records, rotas, lettings, Disclosure and Barring Service check records and financial records of giving for tax purposes
2. Day-to-day administration of church groups and meetings
3. Pastoral care
4. The production of the Church Prayer Diary and Directory
5. Communications regarding church activities.

All personal information which is held by the Church (other than information contained in the Church Prayer Diary and Directory, a copy of which is given to all whose details are contained in it) will be treated as private and confidential and will not be disclosed to anyone other than the Church office bearers in order to facilitate the administration and day-to-day ministry of the Church.

Personal information or data will only be disclosed to a third party if one of the following applies:

1. We are legally compelled to do so
2. There is a public duty to disclose
3. Disclosure is required to protect the interests of the individual concerned
4. The individual concerned has requested or given consent to the disclosure.

CATEGORIES OF DATA

Data is information which is recorded with the intention that it should be processed electronically or is recorded as part of a manual filing system. Personal data held in electronic records includes information about a living individual contained on or sent via:

- A desktop, laptop or tablet computer within a file/folder or sent via an email,
- A portable hard drive, CD, DVD, or USB stick,
- A mobile phone e.g. a txt message, file or folder or voicemail
- A landline phone e.g. voicemail or fax machine

It is important to note that personal data also includes images from which an individual could be identified such as digital photos, videos and CCTV images.

There are two categories of data:

1. Personal Data is information relating to a living individual who can be identified from that data or from expressions or opinions about that individual
2. Sensitive Personal Data is information relating to:
 - Racial or ethnic origins of the person
 - Political opinions
 - Religious beliefs or other beliefs of a similar nature
 - Trade union membership
 - Physical or mental health
 - Sexual life
 - The commission or alleged commission of any offence
 - Any proceedings for any offence committed or alleged to have been committed by the data subject.

In order to process these two types of data, consent from the individual must be obtained by the Church. Explicit consent must be given when it is sensitive personal data and additional safeguards must be in place where this data is processed. Any such information held by or processed by church staff or volunteers on church owned or personal equipment used in connection with the holders' role within the church must be handled in a way to comply with this policy.

PROCESSING THE DATA

The Church will only process data if at least one of the following conditions is satisfied:

1. The processing is necessary to further the legitimate interests of the Church, provided that such processing does not prejudice the rights and freedoms, or legitimate interests of the person concerned
2. The person concerned has given explicit or implicit consent (i.e. by email contact)
3. In compliance with a legal obligation (i.e. by court order requiring disclosure of information).

The Eight Principles of Data Handling

The Data Protection Act 1988 and the General Data Protection Regulations set out eight principles for data handling:

1. Personal data must be fairly and lawfully processed
2. Personal data must be processed for a specified and lawful purpose
3. Personal data must be adequate, relevant and not excessive for those purposes
4. Personal data must be accurate and up-to-date
5. Personal data must not be kept for longer than is necessary
6. Personal data must be processed in line with the data subject's rights
7. Personal data must be kept secure from unlawful or unauthorised processing and protected against accidental loss, destruction or damage
8. Personal data must not be transferred to other countries that have inadequate data protection.

APPLYING THE PRINCIPLES

All Geneva Road Evangelical Baptist Church Trustees, the pastor, and volunteers who process Personal Data on behalf of the Church will be required to agree to this policy.

The Trustees will appoint one of their number to act as Church Data Protection Officer. All questions and concerns in relation to this policy should be addressed to that person. As of 31 January 2018 that person is Geoff Friston.

Where personal information is collected for use by Geneva Road Evangelical Baptist Church we will ensure that:

- i. The information is necessary for Church purposes
- ii. The information is not kept for longer than it is needed
- iii. Those people supplying the information are aware of this policy and how they can obtain a copy of it
- iv. All individuals whose names and contact details are published in the Church Prayer Diary and Directory will be asked to give explicit consent for their details to be included. Specific information will be removed from the Directory if the individual concerned requests this.
- v. Personal information (including photographs) of individuals will not be published on our website without obtaining explicit and informed consent from the individuals concerned or, where they are children, from their parents
- vi. We will never publish the names of children and young people alongside their photographs (unless they are children or young people of a missionary family abroad)
- vii. We will ensure that all Church members and attendees are aware of who to contact to update the information held about them by the Church
- viii. A copy of this Policy will be displayed in the Church porch and rear entrance and will be available from the Church Secretary
- ix. All personal information held by Trustees, the pastor or volunteers on behalf of the Church will be held and processed in a sufficiently secure manner (whether in paper or electronic form) to prevent unauthorised access by any party. This means that we will:

- store paper based information in secure lockable cupboards
- use password protections and encryption of particularly sensitive electronic documents
- restrict access to both paper and electronic personal data to those who need to process it for one of the above uses
- ensure that personal information is transmitted securely in a way that cannot be intercepted by unintended recipients.

CONSENT

To process an individual's personal data the consent of the data subject must be obtained. A written record will be required of all consents obtained.

The Church should also issue a Privacy Notice to new members and parents of children attending Church meetings such as Sunday School, IMPS, FNYG, 7Up and Holiday Bible Club. Copies of such notices can be found at Annex A. These notices do not constitute a consent.

RIGHTS TO ACCESS INFORMATION

Trustees, the pastor, Church members and other individuals whose personal information is held by Geneva Road Evangelical Baptist Church have the right to access that information. This right is subject to certain exemptions outlined in the Data Protection Act.

Any person who wishes to exercise this right should make the request in writing to the Church Secretary. We will aim to comply with such requests as quickly as possible, but will ensure that it is provided within one month of receipt of the written request unless there is good reason for not doing so. The reason for not providing information, such as when an exemption applies which permits the Church to withhold personal data i.e. legal professional privilege or criminal investigation exemptions, or for any delay in providing the information will be explained in writing to the individual making the

This Policy was formally adopted by the Charity Trustees of Geneva Road Evangelical Baptist Church on 9 January 2018

Church Member / Attender Privacy Notice

GENEVA ROAD EVANGELICAL BAPTIST CHURCH

Under Data Protection legislation the church Charity Trustees of Geneva Road Evangelical Baptist Church are the data Controller and the Church Secretary acts as the Data Protection Officer.

We are collecting information to enable the church to keep in touch with you and provide pastoral support as appropriate. Data Protection legislation allows us to process this information as we regard it as being in the church's legitimate interest.

We would like to include your name and contact details in our Church Directory and Prayer Diary which will be recorded on computer and distributed in hard copy to all church members and regular attenders. A copy will also be held in the Vestry. If you are happy for your details to be included, please indicate below. You can ask for your details to be removed at any time.

To enable us to provide adequate pastoral support to you and your family, information may be recorded which may be regarded as sensitive. This information will be stored (in password protected documents). This information will NOT be disclosed to anyone without your consent.

You have the right to ask to see any information we hold about you (including the pastoral support information) by submitting a "Subject Access Request" to the Church Secretary. You also have the right to ask for information which you believe to be incorrect to be rectified. If you are concerned about the way your information is being handled speak to the Data Protection Officer. If you are still unhappy you have the right to complain to the Information Commissioners Office.

I give consent for my data to be processed by the church

Signed:

Date:

Full Name:

Church Children's Meeting Privacy Notice

GENEVA ROAD EVANGELICAL BAPTIST CHURCH

Under Data Protection legislation the church Charity Trustees of Geneva Road Evangelical Baptist Church are the data Controller and the Church Secretary acts as the Data Protection Officer.

We are collecting information to enable the church to run to Sunday School, IMPS, FNYG, 7Up, Holiday Bible (*delete as appropriate*) safely and ensure we can contact you (or other nominated adult) in case of emergency. Data Protection legislation allows us to process this information as we regard it as being in the church's legitimate interest. If you are unable/unwilling to supply the information requested then we will be unable to accept your child at Sunday School, IMPS, FNYG, 7Up, Holiday Bible (*delete as appropriate*)

The information you supply will be held in paper form in a folder which will be kept securely. Only the church Minister and meeting leaders will have access to this information. The forms will be destroyed once your child leaves Sunday School, IMPS, FNYG, 7Up, Holiday Bible (*delete as appropriate*). We will not pass this information on to anyone else.

If you are concerned about the way your information is being handled speak to the Data Protection Officer. If you are still unhappy you have the right to complain to the Information Commissioners Office.

I give consent for my data to be processed by the church

Signed:

Date:

Full Name: