

## Data Protection Policy

St Paul's Hadley Wood recognises 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 Data Protection Act 1998 (implementing the Data Protection Directive 95/46/EC).

St Paul's Hadley Wood uses personal data about individuals for the purpose of general church administration, pastoral care, communication and financial processing.

Any personal details that we hold will not be passed to any third party without the permission of the data subject. Data held by and on behalf of St Paul's Hadley Wood will not be used for any other purposes than those set out in this policy.

St Paul's Hadley Wood fully endorses and adheres to the eight principles of the Data Protection Act. 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 Hadley Wood must adhere to these principles. The eight principles state that personal data must be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose
- Accurate
- Secure
- Not kept longer than necessary for the purpose
- Processed in line with data subjects' rights
- Not transferred to people or organisations situated in other countries without adequate protection

This policy applies to all employees and volunteers of St Paul's Hadley Wood.

## Definitions in the Act

The Act defines personal data and its processing in the following terms:

**Data** is recorded information whether stored electronically on a computer, in paper-based filing systems or other media.

**Data subjects** include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

**Personal data** means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal). It is important that the information has the data subject as its focus and affects the individual's privacy in some way. Mere mention of someone's name in a document does

not necessarily constitute personal data, but personal details such as someone's contact details or salary would fall within the scope of the Act.

The types of personal data that St Paul's Hadley Wood may be required to handle include information about current, past and prospective parishioners, employees, volunteers, customers, suppliers, conference and course attendees, those running or leading courses and others with whom we communicate.

**Data controllers** are the people or organisations who determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the Act. St Paul's Hadley Wood is the data controller under the terms of the Act.

**Data users** include employees and volunteers of St Paul's Hadley Wood whose work involves using personal data held by the church. Data users have a duty to protect the information they handle by following our data protection and privacy policies at all times.

**Data processors** include any person who processes personal data on behalf of a data controller. This excludes volunteers or employees of St Paul's Hadley Wood (who are data users) but does include, for example, outside suppliers who are contracted to handle personal data on our behalf.

**Processing** is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

**Sensitive personal data** includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

These definitions attempt to summarise the terms used in the Act – please see here for the full definitions contained in the Act:

<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

### Maintaining Confidentiality

St Paul's Hadley Wood will treat all personal information as private and confidential and will not disclose such information to anyone other than those within St Paul's Hadley Wood who need access to the personal data in order to facilitate church administration, pastoral care, communication and day-to-day ministry of the church. Personal information will not be passed onto any third parties outside of the church environment unless consent is given, e.g. data stored on our banking systems, or for mailing purposes (e.g. through MailChimp). There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to do so
- Where there is a duty to the public to disclose

- Where disclosure is required to protect our interest (e.g. where it is necessary to share the information in connection with a legal proceeding, to obtain legal advice, or for establishing, defending and/or exercising our legal rights)
- Where disclosure is made at your request or with your consent

## Use of Personal Information

St Paul's Hadley Wood will use your data for two main purposes:

- The day-to-day administration of the church: including pastoral care, oversight, calls and visits, preparation of ministry rotas, maintaining financial records of giving (for audit and tax purposes), electoral roll, membership of groups and committees and general financial processing.
- Contacting you to keep you informed of church events and activities.

## The Data

Data may be held in paper and/or electronic format.

A record of where data is located, what the data is, what it is to be used for and who maintains, processes or uses the data is to be maintained by the church office. Due to the distributed nature of the data there is no obvious master data set.

When data is no longer required as detailed on our Data Retention Policy, both electronic and paper records are to be destroyed.

## Paper Records

Paper records are stored by those who have a need (as set out in this policy) to either maintain, process or use the data.

## Electronic Records

Electronic records are to be stored on a secure server located within our building and in 'cloud-based' systems such as Microsoft OneDrive or SharePoint which are managed centrally by the Operations team and key ministry leaders. These records are accessed by church equipment which is adequately protected physically and electronically with the latest updates to the operating system, antivirus and any other technical measures which are necessary. Some of these records are also accessed by privately owned equipment – in this case we ask the owner to sign an agreement stating they will adequately protect their equipment physically and electronically. The Church Administrator and key ministry leaders have control over privileges ensuring sensitive data is not freely open to anyone but is carefully controlled to those who have a need (as set out in this policy) to maintain, process or use the data.

## Financial Information

St Paul's Church does not use online banking and therefore does not store bank details.

## Rights to Access Information

All subjects of personal data held by St Paul's Hadley Wood have the right to access the data record that is kept about them, subject to statutory exemptions. Any person who wishes to exercise this right should make the request in writing to the Church Office, using the standard letter which is available from The Information Commissioner

<https://ico.org.uk/for-the-public/official-information/>

In accordance with the Legislation we will ensure that written requests for access to personal data are complied with within one month of receipt of a valid request (where permitted under the Legislation, we may take a further one month to respond but we will inform the individual of why this is necessary).

When a written data subject access request is received, the data subject will be given a description of a) the personal data, b) the purposes for which it is being processed, c) those people and organisations to whom the data may be disclosed, d) be provided with a copy of the information in an intelligible form.

St Paul's Hadley Wood reserves the right to charge a fee in line with the recommendations of the ICO.

### Data breaches and complaints

Employees, the incumbent and volunteers with responsibility should follow the Data Breach Procedure if they think they have accidentally breached any provision of this Data Protection Policy.

Should a reason arise for someone to wish to make a complaint, this can be done via our Complaints Procedure.