

# Data Protection Policy

## Christ Church, Chineham

### Purpose

The Church Council of Christ Church Chineham is a “data controller” under GDPR regulations, and personal data is handled on our behalf by Office Holders (Vicar/Lead Minister and any Curates), other members of staff (including our Administrator) and volunteer ministry leaders (here collectively known as “Leaders”, “we”, “us”).

The GDPR requires<sup>1</sup> that personal data (relating to any living individual who can be identified from that data) shall be:

1. **processed lawfully, fairly and in a transparent manner;**
2. **collected for specified, explicit and legitimate purposes** and not further processed in a manner that is incompatible with those purposes. This means that individuals should be told what you are going to do with their personal data before you use it and consent to such use;
3. **adequate, relevant and limited** to what is necessary in relation to the purposes for which they are used;
4. **accurate and, where necessary, kept up to date.** Personal data that is found to be inaccurate should be deleted or corrected without delay. All personal data should be periodically checked to make sure that it remains up to date and relevant;
5. **kept in a form which permits identification of data subjects for no longer than is necessary** for the purposes for which the personal data are processed;
6. **kept securely.** Personal data storage should be safe and secure – in lockable filing cabinets or in password protected computer files. Names and addresses of individuals should not be left unattended.

This Policy sets out how all Leaders are to ensure this, and what to do in the event of a breach. It is to be read in conjunction with the Church’s Privacy Policy.

### Protecting Data

Where we hold personal data, Leaders will ensure that

- they do not share it outside the church except for legal reasons, or informed consent;
- they respond promptly to data subject requests, including requests for removal, as directed by our data protection leader;
- where kept on a computing device, there shall be at least one password or passcode in place to unlock the device, not to be shared with any other family member;
- prayer requests relating to identifiable individuals are not published to a public written forum or publication, without informed consent. (This does not stop spoken prayers in services, events or meetings.)
- where photographs of church events are published to a public forum, individuals are not to be identified unless informed consent is given. Where children are included, we will respect any parents’ wishes that their child(ren) are not shown at all.

Additionally, we ask that wherever possible **email communication** to church groups be done through our Church Management System, which applies any relevant do-not-communicate preferences, provides an audit trail, and ensures that personal contact details aren’t inadvertently

---

<sup>1</sup> From “A Parish Guide to the GDPR” by Parish Resources, v2 Mar 2018, p.5

shared. Where our Church Management System isn't used, Leaders are to use blind copy to groups, unless they have consent for all recipients to share their email address amongst the group.

Where we hold information by data subject's consent, we aim to refresh this every 5 years.<sup>2</sup>

For **sensitive** personal data (records of pastoral conversations, financial information, details of disclosed criminal records, and data on children), Leaders will additionally ensure that they

- keep such data behind a second password or passcode (where held on a computing device), or in a locked cabinet;
- securely hold destroy such records as directed by the National Church guidance;
- only share with other Leaders as approved or directed by the Lead Minister and Church Wardens.

We request all Ministry Leaders not to keep details of pastoral conversations, beyond purely factual matters, as we then don't need to register with the ICO and pay a yearly fee. NB: this policy is overridden by any legal requirements, such as notes of conversations disclosing criminal or safeguarding matters.

We will require all Staff and those volunteers who handle sensitive personal data to sign a copy of this Data Protection Policy, indicating that they have read it and agree to abide by it.

Where someone requests a notice be included in our bulletin or other published forum that includes their contact details, we will consider this to include their informed consent.

## Documentation

We will follow national guidance and keep a **Register of Processing Activities (ROPA)** which "keep a written record of all your processing activities, security measures, and data retention practices", along with "the various types of processing" and "the purpose and legal basis" for it.<sup>3</sup>

We will also document our compliance. To do this our Data Protection Officer will keep a **Data Protection Log**, briefly noting individual rights requests, training, new leaders inducted agreeing this policy, reviewing policies, any breach details and PCC discussions. This will be brought to the PCC once a year, in the lead up to the Annual Congregational Meeting.

## Data Breach

In the event of a "data breach" – the deliberate or accidental sharing with those not authorised, however small – Leaders shall immediately inform our Parish Administrator, and then follow their guidance. This may include informing the Information Commissioner's Office (ICO) and/or Winchester Diocese, as well as the data subjects affected.

## Further Information

To discuss any aspect of this, to request training in handling data, please contact our Parish Administrator at 01256 474280 or [office@christchurchineham.org.uk](mailto:office@christchurchineham.org.uk).

Last update: v1.0, 6.3.2019

Approved by Church Council: 19.3.2019

---

<sup>2</sup> following "A Parish Guide to the GDPR" by Parish Resources, v2 Mar 2018, p.4

<sup>3</sup> following "A Parish Guide to the GDPR" by Parish Resources, v2 Mar 2018, p.3

# **Record of Agreement for Data Protection Policy**

## **Christ Church, Chineham**

I understand that I will be handling sensitive personal data on behalf of Christ Church Chineham. I have read the contents of the Data Protection Policy (dated 6.3.2019) and agree to follow it, and raise any relevant requests for help, or concerns with the Data Protection Officer.

Name

Date