

## **Christ Church and St. John's Radlett,**

### **Data Protection Policy**

#### **1. Introduction**

Christ Church and St John's need to collect and use certain types of information about the individuals who come into contact with our Church in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and will be subject to the appropriate safeguards as specified under the GDPR/Data Protection Act 2018.

#### **2. Data Controller and Use of Personal Data**

The Vicar and Churchwardens are the Data Controllers under the Act. Christ Church and St. John's use data collected for the following main purposes.

- a.) The day-to-day administration of the Church which includes pastoral care and oversight including calls and visits, preparation of the various duty rotas, maintaining financial records of giving for audit and tax purposes.
- b.) Contacting the data subjects to keep them informed of Church activities and events.
- c.) Statistical analysis, gaining an understanding of Church demographics. Collated statistics may be passed to a third party but no personal data will be disclosed.

#### **3. Disclosure**

Christ Church and St John's will treat all data subjects' personal information as private and confidential and will not share data with anyone other than the leadership and ministry coordinators of the Church in order to facilitate the administration and day-to-day ministry of the Church.

All Christ Church and St. John's staff and volunteers who have access to personal data will be required to sign a Confidentiality and Data Protection Agreement. They will receive instruction in the treatment of personal data, the need to comply with the confidentiality requirements set out in the GDPR/Data Protection Act 2018, and how to deal with any enquiries made for access to personal data.

There are circumstances where the law allows Christ Church and St John's to disclose data (including sensitive data) without the data subject's consent.

These are:

- a) Where we are legally required to do so.
- b) Where there is a duty to the public to disclose.
- c) Where disclosure is required to protect the interest of the data subject.
- d) Where disclosure is made at the request of, or consent by, the data subject.

Christ Church and St. John's regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal and will ensure that personal information is treated lawfully and correctly.

To this end, Christ Church and St John's will adhere to the Principles of Data Protection, as detailed in the GDPR/Data Protection Act 2018.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes.
- c) Shall be adequate, relevant and not excessive in relation to those purposes.
- d) Shall be accurate and, where necessary, kept up to date.
- e) Shall not be kept for longer than is necessary.
- f) Shall be processed in accordance with the rights of data subjects under the Act.
- g) Shall be kept secure from unauthorised or unlawful processing or accidental loss, destruction or damage by using appropriate technical measures and organisational processes.
- h) Shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of the data subject in relation to the processing of personal information.

Christ Church and St John's will through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the collection and use of information.
- Meet its legal obligations to specify the purposes for which information is used.
- Collect and process appropriate information only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements.
- Ensure the quality of information used.
- Ensure that the rights of the data subjects can be fully exercised under the Act.

These include:

- The right to be informed that processing is taking place.
- The right of access to their personal information and the ability to rectify or erase any incorrect information.
- To be informed how to keep their information up to date.

To be informed what Christ Church and St John's are doing to comply with their obligations under the GDPR/Data Protection Act 2018.

- Take appropriate technical and organisational security measures to safeguard personal information.
- Ensure that personal information is not transferred abroad without suitable safeguards.
- Treat data subjects justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information.
- Set out clear procedures for responding to requests for information.

#### **4. Data collection**

Informed consent is when a data subject clearly understands why their information is needed, who it will be shared with, and then gives their consent.

Christ Church and St John's will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, Christ Church and St John's will ensure that the data subjects:

- a) Clearly understands why the information is needed and what it will be used for.
- b) Grants informed consent, either written or verbal for data to be processed.
- c) Is competent enough to give consent and has given so freely without any duress.
- d) Has received sufficient information on why their data is needed and how it will be used

#### **5. Data Storage**

Information and records relating to data subjects will be stored securely and will only be accessible to authorised staff and volunteers.

Information will be stored for only as long as it is needed or required and will then be disposed of appropriately.

It is Christ Church and St John's responsibility to ensure all personal data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

Questions relating to this Policy Document should be directed to the Data Controllers for the time being at the following address

Church Office  
Christ Church Vision Hall  
Watling Street  
Radlett  
Hertfordshire  
WD7 7JJ

## 6. Data Protection Registration

Organisations that process personal data are subject to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, must be registered with and must pay the annual data protection fee to the Information Commissioner's Office (ICO).

Christ Church and St John's Radlett is duly registered, the Reference Number is ZA147370, the renewal falls due in October and the annual fee is paid by Direct Debit. A copy of the latest certificate is displayed in the Parish Office.

## 7. Additional GDPR Documents

Additional documents were created in 2018 to ensure compliance with GDPR Regulations. For ease of reference, a copy of the latest version of each document is attached to this policy.

## 8. Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Churchwardens. The Policy will be reviewed by the PCC every three years.

## Change Record

Date	Version	Change Description	Author
January 2016	1.0	Initial Policy approved by PCC	Denys Barrett
September 2017	1.1	Policy version reviewed and approved by PCC	Helen Warne
September 2020	2.0	Policy updated, reviewed and approved by PCC	Helen Warne