

Data Protection Policy

Everyone who has any connection with Christ Church Abingdon is important to us and our Data Protection Policy, in accordance with the General Data Protection Regulation (GDPR) effective from 25 May 2018, is designed to ensure that any personal information we have about anyone who is in contact with us in any way is securely protected and and, unless there is a lawful basis, will never be shared with others without consent. Also, anyone for whom we hold information has the right to know what information we hold and to ask for that information to be corrected if necessary, or removed if they so wish.

Our Policy is to adhere to the GDPR 7 principles, set out in Attachment 1.

To put this Policy into practice we will:

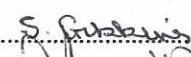
- a) Display our Data Privacy Notice, Attachment 2, at our Northcourt Road site and on Sundays at our Long Furlong site as well as on both our church websites. Printed copies can be provided on request.
- b) Provide different methods of obtaining consent to enable us to hold the information we require for the smooth "running" of our church. Note that under GDPR legislation we must get parental consent to hold personal data on any child under 13. To keep in line with our Safeguarding Policy, we will also require parental consent to hold any personal data for under 18s, except for (i) 16 year olds who can legally give their consent for their name and address to be on the Electoral Roll; (ii) where an over 13 year old has recently started attending a church youth group we will hold their name and emergency contact number while we endeavour to receive a parental consent form.
- c) Enable anyone who so wishes to review or change the information we hold about them and to remove this information unless we are required to keep it by law.
- d) Require all staff involved with the collection, processing and disclosure of personal data to be aware of their duties and responsibilities to adhere to this policy.
- e) Strongly encourage all voluntary leaders of any of our church ministries to keep secure all data they hold.
- f) Offer and provide advice and support to staff and voluntary leaders on the best way to keep data secure.
- g) Take appropriate immediate action, should it be necessary, in accordance with the GDPR legislation, in the event of any data breach.

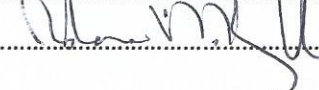
Note that Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held. It can include your name and age, your contact details, any Gift Aid data we may have on you. In short, if we hold this information in our files then it probably counts as personal data.

This Policy and the accompanying attachments will be reviewed by the PCC, as it is deemed appropriate, but no less frequently than every three years, and amended as necessary.

This Policy was approved by the North Abingdon PCC on 14th May 2018.

Incumbent:.....

Church Warden:.....

Church Warden:.....

Attachment 1: The 7 Principles

At the heart of the GDPR are seven key principles:

That personal data shall be...

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, historical research or statistical purposes subject to implementation of the appropriate measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (this also covers secure access to data).
7. The subject of accountability - i.e. the controller. Therefore Christ Church Abingdon shall be responsible for, and be able to demonstrate, compliance with the principles (this is a brand new principle).

Attachment 2 Data Privacy Notice

Everyone who has any connection with Christ Church is important to us. To serve you in the best way that we can, Christ Church needs to hold certain items of personal data about you.

We have certain legal obligations in the way that we process this personal data, and you have certain rights. These are described below.

Above all, this notice is to assure you that any information we have about you is securely protected, and will never be shared with any third parties unless you give your informed consent.



What do we mean by 'personal data'?

This is any information that can be used to identify you. It can include your name and age; your contact details; any Gift Aid data we may have on you ...In short, if we hold this information in our files then it probably counts as personal data.

What do we mean by 'processing'?

'Processing' is the overall term that covers the way we store, handle and use your personal data.

What do we do with this personal data?

The personal data lets us serve you as your church. In particular it lets us maintain our electoral roll, church directory, and church email lists; operate as a charitable organisation in the service of the Parish of North Abingdon and its people; manage our finances; operate as a responsible employer; and abide by other legal requirements.

What don't we do?

Your personal data is strictly confidential. It is only shared with other members of the church in order to carry out specific services to you or to other church members. It is only shared with third parties, inside or outside the parish, with your explicit consent, unless there is a lawful basis for doing so.

We do not acquire or retain any personal data that is not relevant to any of our purposes.

We do not acquire personal data speculatively on the grounds that it might come in handy one day.

What are our obligations?

Our obligations and your rights are set out by the General Data Protection Regulation¹. We are also advised by the recommendations of the Church of England in the guide 'Keep or Bin: Care of Your Parish Records'².

Personal data is gathered for specific purposes that help us perform our activities as a church, and is only used for those purposes. If a new purpose arises then a notice is sent to every individual whose personal data we hold, inviting their explicit consent for the new use. Personal data that is not needed is deleted.

We protect your personal data from loss, misuse, unauthorised access and disclosure.

If your personal data changes or is inaccurate then we will correct or update it promptly.

Personal data is time-limited, and is reviewed or deleted once that limit has been reached. Specifically:

- Electoral roll data is reviewed annually. Updates are made where necessary. Personal data of anyone who has left the parish must remain on ER copies for the last complete review + six years.
- Gift aid declarations and associated paperwork are retained for up to 6 years after the calendar year to which they relate.
- Parish registers (baptisms, marriages, funerals) are kept permanently. This is a legal requirement.
- Data relating to safeguarding and children's activities (including registers and DBS checks) is kept permanently.

What are your rights?

This is not a full list of all your rights, but these are the ones most likely to apply to you.

- You can ask for a copy of the personal data which we hold about you, and we will provide it within one calendar month.

¹ This can be found at https://ec.europa.eu/info/law/law-topic/data-protection_en

² This can be found at https://www.churchofengland.org/sites/default/files/2017-11/care_of_parish_records_keep_or_bin_-_2009_edition.pdf

- You can ask us to correct any personal data that is inaccurate or out of date. If there is any dispute about its accuracy, or the way we process it, you can request that a restriction is placed on further processing until the matter is resolved.
- You can ask us to erase your personal data when it is no longer necessary for us to retain it, if we have not already done so. (Note that we cannot erase data which we are legally required to retain.)
- You can withdraw your consent to our processing your personal data at any time.
- You can object to the way in which we process your personal data.

Finally, if you are dissatisfied with our handling of your personal data and you feel we are not addressing your concerns properly, you can lodge a complaint with the Information Commissioner's Office (ico.org.uk).

Any questions?

If you have any questions about our processing of your personal data, please contact the Parish Administrator in our Church Office:

✉ Church Office, Christ Church, Northcourt Road, Abingdon OX14 1PL; ☎ 01235 539172;
💻 office@cca.uk.net

Alternatively you can contact the Information Commissioner's Office:

✉ Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF;
☎ 0303 123 1113; 💻 <https://ico.org.uk/global/contact-us/email/>

This Data Privacy Notice was approved by the North Abingdon PCC on 14th May 2018

Incumbent:.....*KOM*.....

Church Warden:.....*S. Gibbons*.....

Church Warden:.....*W. M. G. J.*.....