



Data Protection Policy

1. Overview

Key details

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1.1 Introduction

St Peter's Church, Streatham (referred to as St Peter's Church) needs to gather, store and use certain types of information about individuals.

These individuals can include priests, worshippers, employees, contractors, suppliers, volunteers, event participants/audiences and potential participants/audiences, church contacts and other people the church has a relationship with or regularly needs to contact. The term used in this document to represent these roles is 'worshippers and associates'.

This policy explains the framework for how this data will be collected, stored and used in order to meet St Peter's data protection standards and comply with the General Data Protection Regulations (GDPR).

1.2 Why is this policy important?

This policy ensures that St Peter's Church:

- Protects the rights of our worshippers and associates
- Complies with data protection law and follows good practice
- Protects the church from the risks of a data breach

1.3 Phasing in

St Peter's Church will endeavour to comply with this policy, but will apply the principles in a phased approach specifically as follows:

- Existing mailing lists will be used until September 2018. During this period, verification of consent will be sought from those on the mailing lists. This activity of consent will be tracked by the PCC.
- All mailing communications will include an opt-out option from 25th May 2018.
- A Data Retention review, led by the Data Protection Officer, regarding existing personal data stored by St Peter's Church will be conducted by end of September 2018 and reported to the PCC. Recommendations for deletion of unneeded data will be proposed and agreed by the PCC.

2. Roles and responsibilities

2.1 Who and what does this policy apply to?

This applies to *all* those handling data on behalf of St Peter's e.g.:

- PCC members
- Employees and volunteers
- Worshippers
- Contractors/3rd-party suppliers

It applies to all data that St Peter's holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g. financial)

2.2 Roles and responsibilities

The St Peter's Church, Streatham, Parochial Church Council (PCC) is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for St Peter's Church is [Sheila Launchbury, PCC Secretary](#). They, together with the PCC, are responsible for the secure, fair and transparent collection and use of data by St Peter's. Any questions relating to the collection or use of data should be directed to the Data Protection Officer.

Everyone who has access to data as part of St Peter's Church has a responsibility to ensure that they adhere to this policy.

St Peter's Church may use third party Data Processors (e.g. Mail Chimp) to process data on its behalf. St Peter's will ensure all Data Processors are compliant with GDPR.

3. Data Protection Principles

a) We fairly and lawfully process personal data in a transparent way

St Peter's Church will only collect data where lawful and where it is necessary for the legitimate purposes of the church.

- A worshipper's or associate's name and contact details will be collected when they complete a "Welcome to St Peter's" form or by similar means when they first start an association with St Peter's. At this time, the worshipper or associate will be asked to state their preferences for how their details might be used or retained.
- This information will be used to contact the worshipper or associate regarding church administration and activities. Other data may also subsequently be collected in relation to their role within the church, including their payment history for stewardship giving.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to St Peter's Church's completing tasks expected as part of the worshipper's or associate's role within the church).

- Further information, including personal financial information and criminal records information may also be collected in specific circumstances where lawful and necessary (in order to process payment to the person or in order to carry out a DBS check).
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to St Peter's Church's completing tasks expected as part of working with the individuals),
- An individual's name and contact details will be collected when they make a booking for an event. This will be used to contact them about their booking and to allow them entry to the event.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to St Peter's Church's completing tasks expected as part of the booking),
- An individual's name, contact details and other details may be collected at any time (including when booking tickets or at an event), with their consent, in order for St Peter's Church to communicate with them about and promote church activities. See 'How we get consent' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent')
- Pseudonymous or anonymous data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access our website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the St Peter's Church website' below.
 - Lawful basis for processing this data: Consent (see 'How we get consent')

b) We only collect and use personal data for specific, explicit and legitimate purposes and will only use the data for those specified purposes.

When collecting data, St Peter's Church will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.

c) We ensure any data collected is relevant and not excessive

St Peter's Church will not collect or store more data than the minimum information required for its intended purpose; e.g. we need to collect telephone numbers from worshippers or associates in order to be able to contact them about church administration, but data on their marital status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of church administration.

d) We ensure data is accurate and up-to-date

Where appropriate, St Peter's Church will ask worshippers or associates to check and update their data on an annual basis. Any individual will be able to update their data at any point by contacting the Data Protection Officer.

e) We ensure data is not kept longer than necessary

St Peter's Church will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).

The storage and intended use of data will be reviewed in line with St Peter's Church's data retention policy. When the intended use is no longer applicable (e.g. contact details for a worshipper or associate who has left the church), the data will be deleted within a reasonable period.

f) We keep personal data secure

St Peter's Church will ensure that data held by us is kept secure.

- Electronically-held data will be held within a password-protected and secure environment
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position
- Access to data will only be given to relevant trustees/PCC members or associates/contractors where it is clearly necessary for the running of the church. The Data Protection Officer will decide in what situations this is applicable and will keep a master list of who has access to data.

g) Sharing of data

Your personal data will be treated as strictly confidential and will only be shared with other worshippers and associates in order to carry out a service to other church worshippers or associates or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

h) Transfer to countries outside the EEA

St Peter's Church will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

4. Individual's Rights

When St Peter's Church collects, holds and uses an individual's personal data that individual has the following rights over that data. St Peter's Church will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

4.1 Individual's rights

- *Right to be informed:* whenever St Peter's Church collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- *Right of access:* The right to request a copy of your personal data which the St Peter's Church holds about you;
- *Right of rectification:* Right to request that the St Peter's Church corrects any personal data if it is found to be inaccurate or out of date;
- *Right to erasure:* The right to request your personal data is erased where it is no longer necessary for the St Peter's Church to retain such data. St Peter's Church's data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - There is a legal requirement to keep the data.
- *Right to object:* individuals can object to their data being used for a particular purpose. St Peter's Church will always provide a way for an individual to withdraw consent in all outreach communications. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- *Right to restrict processing:* The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- *Rights to portability and automated decision making:* Though unlikely to apply to the data processed by St Peter's Church, we will also ensure that rights related to portability and automated decision making (including profiling) are complied with where appropriate.

- *Right to complain:* The right to lodge a complaint with St Peter's Church and the Information Commissioners Office.

5. How do we get consent?

St Peter's Church will regularly collect data from consenting worshippers and associates for outreach purposes. This includes contacting them to promote services and events, updating them about church news, fundraising and other church activities.

When data is collected for this purpose, we will provide:

- A method for worshippers/associates to show their positive and active consent to receive these communications (e.g. a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like St Peter's Church to send you email updates with details about our forthcoming services and events, fundraising activities and opportunities to get involved')

Data collected will only ever be used in the way described and consented to.

Our outreach communications will contain a method through which a recipient can withdraw their consent (e.g. an 'unsubscribe' link in an email). Opt-out requests such as this will be processed within 14 days.

6. Cookies on St Peter's Church websites

A cookie is a small text file that is downloaded onto 'terminal equipment' (e.g. a computer or smartphone) when the user accesses a website. It allows the website to recognise that user's device and store some information about the user's preferences or past actions. For example, it can be used to remember your username to save time when you login.

The St Peter's Church web site (www.stpeters-streatham.org) is hosted with a service provider (www.webeden.co.uk) which uses cookies to monitor or record visitor data. The use of cookies allows us to improve visitor's experience of our website by, for example, allowing for a 'logged in' state, and by giving us useful insight into how users as a whole are engaging with the website.

The privacy policy for Webeden can be found here: <https://webeden.co.uk/privacy.html>

The church website(s) will include a copy of this privacy and data retention policy for reference.

7. Contacting us

To exercise all relevant rights, queries or complaints, please in the first instance contact the PCC of St Peter's Church Streatham in one of the following ways:

- By post:
 - St.Peter's Church, Streatham PCC
C/o The Vicarage, 113 Leigham Court Road, Streatham, London SW16 2ND
- Via email:
 - secretary@stpeters-streatham.org
- By telephone
 - 020 8769 2922

You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.



Data Retention Policy

1. Overview

1.1 Introduction

This policy sets out how St Peter's Church will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary.

It forms part of St Peter's Church Data Protection Policy.

1.2 Roles and responsibilities

St Peter's Church is the Data Controller and will determine what data is collected, retained and how it is used. A Data Protection Officer is nominated for St Peter's Church and is identified in the Data Protection Policy. They, together with the PCC are responsible for the secure and fair retention and use of data by St Peter's Church. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

2. Regular Data Review

A regular review of all data will take place to establish if St Peter's Church still has good reason to keep and use the data held at the time of the review.

As a general rule a data review will be held every 2 years and no more than 27 calendar months after the last review. The first review will take place by end of September 2018

2.1 Data to be reviewed

- St Peter's Church stores data on:
 - Digital documents (e.g. word processor and spreadsheets) stored on personal devices held by PCC officers and members or other associates.
- Data stored on third party online services e.g. Google Drive, web site host
- Physical data stored at church, at the vicarage or at the homes of PCC members, worshippers or associates

2.2 Who the review will be conducted by

The review will be conducted by the Data Protection Officer with other PCC members, worshippers or associates to be decided on at the time of the review.

2.3 How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
 - Priority will be given to any instances where data is stored in active lists (e.g. where it could be used) and to sensitive data.
 - Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails) then the data may be retained safely and securely but not used.

2.4 Criteria for retention

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use and engagement by the individual	Continue to use	Request consent
If appropriate, can the data be anonymised	Anonymise data	Continue to use

3. Statutory Requirements

Data stored by St Peter's Church may be retained based in statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Records of baptisms, marriages and funerals
- Giving and Gift Aid records
- Details of payments made and received (e.g. in bank statements and accounting records)
- PCC meeting and sub-committee minutes
- Contracts and agreements with suppliers and employees
- Insurance details
- Tax and employment records
- Accident book – a record of an incident in the church grounds

As a general policy, we keep data in accordance with the guidance set out in the guide *Keep or Bin: Care of Your Parish Records* which is available from the Church of England website. Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

4. Church Archives

We periodically deposit church records, including committee minutes and relevant correspondence and church publications (e.g. magazines, service papers, etc) at the London Metropolitan Archive. This data is accessible to members of the public and is retained as a statutory and/or historic record.

The Data Protection Officer assisted by PCC members and associates will review any future records (after 29th May 2018) to be deposited at the London Metropolitan Archive for suitability, and will gain approval from the PCC prior to depositing these records.

5. Other data retention procedures

4.1 Worshipper or associate data

- When a worshipper or associate leaves St Peter's Church and all administrative tasks relating to their worship or associateship have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

4.2 Mailing list data

- If an individual opts out of a mailing list their data will be removed as soon as is practically possible.
- All other data will be stored safely and securely and reviewed as part of the next two year review

4.3 Volunteer and freelancer data

- When a volunteer or freelancer stops working with St Peter's Church and all administrative tasks relating to their work have been completed any potentially sensitive data held on them will be deleted – this might include bank details or medical data
- Unless consent has been given data will be removed from all email mailing lists
- All other data will be stored safely and securely and reviewed as part of the next two year review

4.4 Other data

- All other data will be included in a regular two year review.