

Data Protection Policy

Introduction

At Hope Hamilton Church we maintain records of personal data necessary to carry out the functions of the organisation. However, we take the privacy of our members seriously and have put in place the following guidelines to ensure best practice and compliance with GDPR legislation.

Principles of the policy

We uphold the principles that:

- Personal data may only be processed with the explicit consent of the individual.
- That people can choose what data is held about them and how it is used.
- That people can opt to have their personal data deleted at any time
- That the PCC is open and transparent about the personal data it holds and how it is used.
- That we maintain confidentiality and never pass personal data to any third party except with the clear consent of the individual concerned.
- That we maintain accurate records which are regularly reviewed.
- That personal data that is not required is discarded securely.

The scope of this policy outlines the nature of information held, where it is stored, who has access to it, how long it is held, how consent it gained, the process for deleting data and the management of data breaches.

Definition of terms

Personal data – information about a living person which is capable of identifying that individual.

Processing – anything that is done with that data including storing it.

The data subject – the person about whom the data refers.

Data controller – the person or organisation who processes personal data – in this case the PCC of Hope Hamilton Church

Exceptions

1. Church rotas do not fall within this policy as only names are used.
2. In situations covered by safeguarding procedures when the passing on of personal data is legally mandated.

Policy

Description	How consent is obtained?	Where is data held?	Who has access?	How long is data held?	How is it deleted?
Electoral roll forms	Forms are signed by the applicant.	Data is transferred to a spreadsheet. The spreadsheet is on the vicar's / PCC secretary's password protected computers. Signed forms are scanned and stored on the vicar's computer then shredded. The ER is published annually on the church inside noticeboard before the APCM but address information is withheld.	The vicar / PCC secretary	The database is re-created every 6 years.	Every 6 years when the new Electoral Roll is complete previous versions are deleted.
Gift Aid declarations	Declaration forms are signed by the donor.	Treasurer's password protected computer. Signed forms are scanned and stored on the treasurer's computer then shredded. We are currently moving towards using the Parish Giving Scheme: any donors who give using the PGS have their details kept by the PGS.	Treasurer	It is held until the end of the calendar year in which the donor stops their donation (To complete the Gift Aid claim)	Scanned consent forms deleted when the donor stops their donation.

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Description	How consent is obtained?	Where is data held?	Who has access?	How long is data held?	How is it deleted?
Church directory	Church members sign a form to allow their data to be held and tick boxes to specify which details may be circulated to other church members.	Database on secretary's / vicar's computer. Signed forms are scanned and held on the vicar's password protected computer (and then shredded?)	Database held by vicar / secretary	The directory is renewed annually	Information is given on the form for how to unsubscribe: after an email to the vicar / secretary the data is deleted from the database.
Email database	Church members sign a form and tick a box if they wish to receive information by email.	Email addresses held on the church's official email account address book (admin.hope@gmail.com and vicar.hope@gmail.com)	Secretary / vicar?	Updated with the directory usually bi-annually.	Information is given on the form for how to unsubscribe (an email to the secretary / vicar). Information is also shown on the Privacy Notice on the website.
DBS database	Applicants sign a form consenting to DBS checks and their records being maintained.	Database on Safeguarding Lead's password-controlled computer.	Safeguarding Lead, Safer Recruiter, Vicar	DBS checks are renewed every 5 years.	DBS information is maintained indefinitely.
Children's group consent forms.	Parents signs forms for their children to attend children's groups	Locked filing cabinet in the locked church office.	Safeguarding Lead, Safer Recruiter, Vicar, Group Leaders	Database is renewed annually	Previous database is deleted.
PCC WhatsApp group Baptism application forms	Verbal consent Applicants sign the form to allow for their data to be held.	PCC members Forms stored in secure church filing cabinet in the locked church office.	All members have admin status Vicar	Members can opt in or out at anytime. Forms for baptism that have taken place in the year are deleted annually when this policy is renewed.	Self-regulated. Forms are shredded.
Marriage application forms.	Applicants sign the form to allow their data to be held and that the information may be passed on for the purposes of Banns.	Forms stored in secure church filing cabinet in the locked church office.	Vicar	Forms are discarded after 5 years.	Forms are shredded
Funeral booking letters.	Funeral directors send emails with contact details of NoK for funerals.	Vicar's computer and forms stored in secure church filing cabinet in the locked church office.	Vicar	Forms for funerals that have taken place in the year are deleted when there is no need for ongoing pastoral care.	Forms are shredded

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Description	How consent is obtained?	Where is data held?	Who has access?	How long is data held?	How is it deleted?
Baptism and confirmation registers.	Verbal explanation of entries into registers	Registers are stored in the locked church office.	Vicar	Indefinitely	Not applicable.

Management of data breaches

Prevention

- Members of the PCC are familiar with the policy and review it annually.
- Those responsible for storing and processing data are familiar with the policy and give account to the PCC annually for its implementation.
- This policy is available on the church website along with the Privacy Notice

In the event of a data breach

1. The contact details of the Information Commissioners Office are given on our Privacy Notice.
2. The PCC will be made aware of the breach.
3. A PCC member will be asked to investigate the breach and report to the PCC.
4. The Diocesan registrar will be made aware of the breach as soon as possible.
5. The subject of the breach will be made aware and receive a report of the investigation and subsequent actions.

Review

This policy will be reviewed annually by the PCC and published on the church website.