

CRANBROOK BAPTIST CHURCH DATA PROTECTION POLICY

Introduction

Cranbrook Baptist Church holds and processes personal data about living individuals for the purpose of general church administration and communication.

As a church we are committed to complying with the six principles of the 2018 General Data Protection Regulations (GDPR) as set out below. We recognise that this relates to all personal data, whether it is held on paper, on computer or other media.

All church staff members or volunteers who obtain, handle, process or store personal data for Cranbrook Baptist Church must adhere to these principles.

The Data Controller of Cranbrook Baptist Church is defined as the Charity Trustees (the minister and deacons).

The Principles (2018 GDPR)

The Regulations require that data is:

- 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, scientific or historical research purposes 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 they are processed;
- 4) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

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.

Use of personal information

Cranbrook Baptist Church holds personal information about staff, church members, regular church attendees and other individuals who have provided such information for a specific purpose. This information is used for the following purposes:

1. The production of our annual Church Fellowship List - copies of which are given to those whose names appear on it.
2. The day-to-day administration of the church (including maintaining membership records, providing pastoral care and oversight, preparation of rotas and maintaining financial records of giving for tax purposes).
3. The day-to-day administration of church activities (including Rainbow Toddlers, Kids Club and Holiday Club).
4. Contacting those people whose contact details we hold to keep them informed of relevant church activities and events.

All personal information which is held by the church (other than the information included in our Church Fellowship List) will be treated as private and confidential and not disclosed to anyone other than the Charity Trustees or leaders in charge of church activities, in order to facilitate the administration and day-to-day ministry of the church.

Personal data will only be disclosed to a third party if one of the following circumstances applies

- We are legally compelled to do so
- There is a public duty to disclose
- Disclosure is required to protect the interests of the individual concerned
- The individual concerned has requested (or given their consent to) the data being disclosed

Applying the principles

1. All Cranbrook Baptist Church staff and volunteers who process Personal Data on behalf of the church will be required to sign our Data Processor agreement.
2. The Trustees will appoint one of their number to act as the Church's Data Protection Officer. All questions and concerns in relation to this policy should be addressed to them. As of 11 May 2017 this person is **Mark Durdle** and can be contacted via the church office.
3. When personal information is collected for use by Cranbrook Baptist Church we will ensure that
 - a) this information is necessary for church purposes
 - b) where none of the other legal conditions apply to the processing, consent is given
 - c) the subject is informed of the duration the information is stored for and is not kept for longer than it is needed
 - d) those people supplying the information are aware of this policy and how they can obtain a copy.
4. All individuals whose names and contact details are published in the Church Fellowship List will be asked to give explicit consent for their details to be included. We will ensure that specific information will be removed from the List if the individual concerned requests this.
5. Personal information (including photographs) of individuals will not be published on our website without obtaining explicit and informed consent from the individuals concerned or their parents. We will never publish the names of children and young people alongside their photographs.
6. We will ensure that all church members and attendees are aware of who to contact to update the information held about them by Cranbrook Baptist Church.
7. A copy of this policy will be available from the Church Secretary.
8. All personal information held by staff and volunteers on behalf of Cranbrook Baptist Church will be held and processed in a sufficiently secure manner (whether in paper or electronic form) to prevent unauthorised access (whether by unauthorised church staff or third parties). This means we will:

- Store paper based information in secure lockable cupboards or rooms which are locked except when occupied by authorised staff or volunteers
- Use password protection and encryption of particularly sensitive electronic documents
- Restrict access to both paper and electronic personal data to those who need to process it for one of the above uses
- Ensure that personal information is transmitted securely in a way that cannot be intercepted by unintended recipients
- Personal data cannot be transferred (or stored) outside of the European Union unless this is permitted by the GDPR. This includes storage on a "cloud" based service where the servers are located outside the EU.

In The Event of a Breach

1. Those aware of the breach will report it to a Deacon/The Minister as soon as possible.
2. We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within **72 hours** from when someone in the church becomes aware of the breach.
3. In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

Rights to access information

Staff, Church Members and other individuals whose personal information is held by Cranbrook Baptist Church have the right to access that information. This right is subject to certain exemptions outlined in the GDPR.

Any person who wishes to exercise this right should make the request in writing to the Church Secretary. We will aim to comply with such requests as quickly as possible, but will ensure that it is provided within 30 days of receipt of a written request unless there is a good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request. If personal details are inaccurate, they can be amended upon request.

This policy was agreed by the Charity Trustees of Cranbrook Baptist Church on 14 June 2018.

Acknowledgement: Baptist Union Guideline L13 Data Protection