

The King's Church, Prestwood

Policy Documents

Data Protection Policy

Date completed:	August 2024
Responsible person(s)	KCP Trustees Data Controller is the Chair of Trustees (currently Mr Chris Shepherd)
Approved by/ date:	
Review date :	July 2025
Signed	

Data Protection Policy

The King's Church Prestwood uses personal data about individuals for the purposes of general church administration and communication and recognises the importance of the correct and lawful treatment of personal data. All personal data, whether held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998.

Employees and any others who obtain, handle, process, transport and store personal data for King's Church Prestwood must adhere to the following principles, as laid down by the Data Protection Act. Personal data may only be obtained, held or disclosed to others if:

1. Its use is fair and lawful.
2. It is used for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
3. The information held is adequate, relevant and not excessive in relation to the purpose for which it is being used.
4. The information held is accurate and, where necessary, kept up-to-date. Periodically all information held will be checked to ensure it remains accurate.
5. Information is kept for no longer than necessary for its purpose.
6. The information is processed in accordance with the data subject's rights.
7. The information is kept secure from unauthorised or unlawful processing, appropriate technical and organisational measures having been taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage to personal data.
8. Information is not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection.

The King's Church Prestwood claims the exemption for churches from the need to notify the Data Protection Registrar (provided by paragraph 5 of the schedule to the Data Protection (Notification and Notification Fees) Regulations — Statutory Instrument 188 of 2000). These exemption provisions as applied to churches are because the processing:

1. Is carried out by the church that is under the direction of the Elders and Trustees or others appointed by the church (i.e. the Data Controller).
2. Is for the purposes of establishing or maintaining membership of the church or for support of the church, or for administering activities for individuals who are either members of the church or have regular contact with it (this is the exempt purpose)

3. Is of personal data in respect of which the data subject is:
 - a) a past, existing or prospective member of the church or its associated organisations
 - b) any person who has regular contact with the church or its associated organisations
 - c) any person the processing of whose personal data is necessary for the exempt purposes
4. Is of personal data consisting of the name, address and other identifiers of the data subject or information as to:
 - a) eligibility for membership of the church or its associated organisations
 - b) other matters the processing of which is necessary for the exempt purposes
5. Does not involve disclosure of the personal data to any third party other than:
 - a) with the consent of the data subject, or
 - b) where it is necessary to make such disclosure for the exempt purposes, and
 - c) does not involve keeping the personal data after the relationship between the data controller and the data subject ends, unless and for so long as it is necessary to do so for the exempt purposes.

COLLECTING DATA

When collecting data from subjects, the King's Church Prestwood will obtain their consent to hold their personal information in line with the policies of this document and the data protection act 1998.

Collection, processing and use of personal data only occurs in support of our church's interests regarding the support of existing and potential members.

MAINTAINING CONFIDENTIALITY

The King's Church Prestwood will treat all personal information obtained as private and confidential and will not disclose it to anyone other than the leadership, ministry overseers, group leaders or other members of the church in order to facilitate the administration and day-to-day running of the church. All King's Church Prestwood staff and volunteers who have access to personal data will be required to adhere to the policies laid out in this document.

There are four legal exceptional circumstances to maintaining confidentiality:

1. Where there is legal compulsion to do so
2. Where there is a duty to the public to disclose
3. Where disclosure is required to protect the interests of the King's Church Prestwood
4. Where disclosure is made at the data subject's request or with the data subject's consent

THE USE OF PERSONAL INFORMATION

King's Church Prestwood will use personal data for four main purposes:

1. Keeping data subjects informed of church activities
2. Statistical analysis: gaining a better understanding of church demographics
3. The day-to-day administration of the church: e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, distribution of members contact details to other members, maintaining church records and financial records of giving for audit and tax purposes; legal agreements including conditions of employment
4. Child Protection and Adults At Risk Safeguarding Procedures

DATA HANDLING

1. Personal information will not be passed on to any third parties outside of the church environment.
2. The need to process data for normal purposes will be communicated to all data subjects. Some data held in personal records may be of a sensitive nature. King's Church Prestwood will only store sensitive data when it is relevant and necessary.
3. All individuals who are the subject of personal data held by King's Church Prestwood are entitled to:
 - a) Ask what information the organisation holds about them and why.
 - b) Ask how to gain access to it.
 - c) Be informed how to keep it up to date.
 - d) Be informed of what the organisation is doing to comply with its obligations under the 1998 Data Protection Act.
4. Personal data will not be retained any longer than is useful for the day to day running of King's Church Prestwood. In the case when personal data is no longer useful, it will be deleted, burned or shredded as appropriate. King's Church Prestwood reserves the right to keep non-personally identifiable data about individuals for statistical analysis.
5. For Child Protection purposes, records relating to children's activities will be kept securely in our care for an indefinite period.

PHOTOGRAPHIC IMAGES

King's Church Prestwood will seek to obtain individual consent of both still and moving images of individuals, but cannot guarantee the same level of security for crowd shots. We will only use such images for our own marketing and creative purposes, and will not pass any on to a third party without first obtaining consent.

HOW DATA WILL BE STORED

Data will be stored both in paper form and electronically. Neither will be used for any other purposes than set out in this document. Sensitive papers are kept in a locked cabinet, and destroyed when no longer needed. Electronic data (tables, emails and databases) are kept on a secure, password protected local computer which is backed up regularly, and are also destroyed when no longer needed. In addition:

1. Access to any sensitive data is strictly controlled and authorised by the Data Controller.
2. People who will have secure and authorised access to this data include King's Church staff; data inputters, ministry and group leaders and King's Church Prestwood Trustees.
3. Data will NOT be accessed by any authorised or non-authorised users outside of the EU, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.

RIGHTS TO ACCESS INFORMATION

Employees and other subjects of personal data held by the King's Church Prestwood have the right to access any personal data that is being kept about them. This right is subject to an exemption: Personal Information may be withheld if the information also relates to another individual. Any person who wishes to exercise this right should make the request in writing to the Data Controller, using the standard letter which is available online from www.ico.gov.uk. If personal details are inaccurate, they can be amended upon request.

King's Church Prestwood aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a completed form unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request.

SECURITY PROCEDURES

In order to keep personal data secure the following controls will be followed:

1. Personal data, whether in written or electronic form, will be kept under the supervision of the Data Control Officer.
2. With the approval of the Data Control Officer, personal data may be held at the home of other church members, but should be destroyed safely (deleting, shredding or burning) once it is no longer required.
3. Personal data must not be transferred between computers by means of email because of the insecure nature of email. Data transfer must be by means of physical paper or electronic means, e.g. memory stick.