



## **DATA PROTECTION POLICY**

### **The General Data Protection Regulation or “GDPR” (effective start date 25<sup>th</sup> May 2018)**

#### **Note:**

The Data Protection Policy set out in this document has been approved by the church's Trustees who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

Crofton Baptist Church (CBC) is committed to protecting personal data and respecting the rights of the individuals whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust by complying with all relevant laws, and adopting good practice.

Data Protection in the UK is changing in May 2018 and the new law gives individuals (you and me) more rights over how information about them is stored and used by organisations, including churches. In particular, organisations have to tell individuals what they are doing with the information they are storing and using. The Privacy Notice being issued to each individual is intended to give them that information and enable them to make informed choices about how their data is used and how CBC stays in touch with them.

The logical consequence of refusing consent or total erasure is that the individual literally “ceases to exist”. In our church this must not happen as we must not lose touch with our wider audience and the community at large. Accordingly the main course taken for the majority has been **to imply that consent is given unless they notify us in writing otherwise** as to any errors, erasures etc. they require to be made.

**To support this CBC needs a considered data protection policy that underpins its daily activities throughout the community**

The GDPR requires personal data to be processed in a manner that ensures its security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. It requires that appropriate technical or organisational measures are used.

## Crofton Baptist Church - Data Protection Policy

So CBC must:

- only collect information that we need for a specific purpose;
- keep it secure;
- ensure it is relevant and up to date;
- only hold as much as we need, and only for as long as we need it; and
- allow you, the data subject of the information, to see it on request.

Good information handling makes good business sense, and it provides a range of benefits. CBC can enhance our local reputation, increase community, member and employee confidence, and by making sure personal information is accurate, relevant and safe, save both time and money.

The information we supply about the processing of personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; or vulnerable adult with awareness disabilities

## Introduction

1. This new UK legislation applies to all personal data regardless of the size of the organisation and the regulation comes into law while the UK is still a member of the EU (and equivalence should follow).

In the full text of GDPR there are 99 articles setting out the rights of individuals and obligations placed on organisations covered by the regulation. These include allowing people to have easier access to the data companies hold about them, a new fines regime and a clear responsibility for organisations to obtain the consent of people they collect information about.

2. The principles are based upon:
  - The right of an individual (data subject) to know what data is being held about them and to check its accuracy; and
  - The concept that an individual's personal information should be used only for the specific purposes for which it is expressly held by an organisation and not disclosed to those who are not authorised to hold it.
  - It is the responsibility of the organisation to know what data it holds and to safeguard it.
- 3 Personal data relates to a living individual (or business entity) that can be identified from that data directly (or from that data plus other information in your possession). Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.
- 4 GDPR requires, Crofton Baptist Church, as an organisation to:
  - Notify all individuals (data subjects) that have personal data held by us, either in hard copy or electronic format, of:
    - Our Data Protection Policy by means of the "***Data Privacy Notice***" and
    - The nature of personal data held by us and their access to it by means of the "***Data Privacy Notice***"
    - Obtain the data subject's consent to hold such of their personal data that we currently hold (in either hard copy or electronic format) under the terms of the "Data Protection Policy" as set out here.
    - Draw the individual's attention to the availability and access of this policy document either on the website or in hard copy or electronic format by means of the "***Data Privacy Notice***". This should assist their full understanding of their personal rights relating to their personal data held by CBC.
- 5 The GDPR is not a break from the current data protection regime. It now puts an onus on an organisation to change its ethos to data protection in **that it must now show how it complies, not just that it complies**. It applies to data controllers and data processors and employees and volunteers alike.

## Crofton Baptist Church - Data Protection Policy

- 6 **This new accountability principle requires demonstration of compliance.** It introduces a mandatory requirement to conduct a risk or a Privacy Impact Assessment (PIAs) where the processing of data is likely to significantly impact on the rights and freedoms of the data subject.

An audit is currently under way across the CBC community to establish the nature and format of data held in various locations. This will give rise to issues or concerns relating to CBC and any weaknesses in its data handling. Such will then be addressed in a PIA

- 7 On a basic level some activities involve handling personal data. It is the organisation's responsibility to keep such information secure and ensure that individual's rights are respected.
- 8 Personal information can be:
- Factual (e.g. Name, address or date of birth), or it can be
  - Opinion (e.g. performance appraisal), or
  - Statement of intention about them, or the new classification
  - Online identifiers (e.g. computer IP addresses)
- 9 New rights include the right to "data erasure" and "data portability". A requirement to notify any relevant body or data subject of data breaches within 72 hours of becoming aware of the breach. Notification will not be necessary if the breach is unlikely to risk the rights and freedoms of the relevant data subjects.
- 10 There are hefty financial penalties for severe breaches and non-compliance. Accordingly we will have to institute an awareness and training programme for those involved in church activities which include either church members or community outsiders. We must introduce and maintain within the wider church an ethos of caring about such data and its safety.

- 11 There are 3 key focal points that need to be addressed:
- Children (requiring written Parental consent) and Vulnerable Adults which must be handled in a clear and sensitive manner;
  - Employees (requiring written consent as it is an amendment of their contract of employment);
  - General membership - nearly everybody else involved in church activities (thus seeking implied consent but requesting refusal or partial withdrawal of consent in writing)

Each group will receive its own relevant version of the Data Privacy Notice and Consent document. See attachments.



## **Data Protection Policy (Full Version)**

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## **1. Personal data**

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the 'GDPR').

## **2. Data Controller**

The Trustees of Crofton Baptist Church ("TCBC") are ultimately responsible as the Data Controller; but the day to day responsibility rests with the Data Protection Officer "DPO" and in turn those individuals (the external Data Processors and CBC staff and volunteers) responsible for the direct input and thereby maintaining a responsibility to the Data Controller through the DPO.

This means that the TCBC decide how personal data is processed and for what purposes. See Schedule 2 for the data operational hierarchy.

Any organisation can appoint a DPO. Regardless of whether the GDPR obliges CBC to appoint a DPO, TCBC must ensure that CBC has sufficient staff, volunteers and skills to discharge our obligations under the GDPR.

## **3. How do we process personal data?**

"CBC" complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use personal data for the following purposes: -

- To administer membership records;
- To maintain our financial accounts and records (including the processing of gift aid);
- To provide news and information about events, activities and services at the church;
- To fundraise and promote the interests of the church;
- To manage volunteers;
- To enable the church to provide voluntary services for the benefit of the public in our local community;
- To provide contact details of officers and others with specific responsibilities (e.g. DBS signatories).

## **4. What is the legal basis for processing personal data?**

- Processing is carried out by a not-for-profit body with a religious aim provided: -
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
    - there is no disclosure to a third party without consent or legal requirement; or
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement; or
- Explicit consent of the data subject has been given.

## **5. Sharing personal data**

Personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church.

We will only share personal data with third parties

- with the data subject's consent, or
- if so required by law.

## **6. How long do we keep data?**

We retain data on the following basis:

<b>Record Type</b>	<b>Retention Period</b>
Membership rolls	Indefinitely
Members, adherents and friends contact details	24 months after the last contact
Junior Heroes registers	until the child/young adult reaches the age of 21.
Junior Heroes contacts	24 months after the last contact
Friday Heroes roll	24 months after the last contact
Friday Heroes contacts	24 months after the last contact
Gift aid declarations and paperwork	6 years after the calendar year to which it relates
Registers of Marriage	As required by the Registrar General
Register of Baptisms	Indefinitely
Photographs and videos for Church Photo Book and Church events	Indefinitely
Personal data relating to events for which additional information is gathered e.g. Capernwray, Soul Survivor, etc.	Disposed of immediately after the event unless anything has occurred (e.g. an accident) which indicates that records should be retained for a longer period.
Records of attendance of children/young people and helpers	Indefinitely for safeguarding purposes
Insurance Records	Indefinitely
Safeguarding matters	Indefinitely or until advised otherwise by authorities
Accident Books	3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21)
Complaints (non -safeguarding)	3 years after resolution of complaint (unless further action is anticipated)
Minute Books	Indefinitely
Employee Records	6 years after the date of termination of employment
Pension Records (money purchase)	6 years after transfer or value taken
Other Record	On case by case basis

## **7. Security of personal data**

CBC will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.

We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing.

Measures will include technical and organisational security measures. In assessing what measures are the most appropriate we will take into account the following, and anything else that is relevant:

- The quality of the security measure;
- The costs of implementation;
- The nature, scope, context and purpose of processing;
- The risk (of varying likelihood and severity) to the rights and freedoms of data subjects; the risk which could result from a data breach.

Measures may include:

- Technical systems security;
- Measures to restrict or minimise access to data;
- Measures to ensure our systems and data remain available, or can be easily restored in the case of an incident;
- Physical security of information and of our premises, and
- Organisational measures, including policies, procedures, training and audits; regular testing and evaluating of the effectiveness of security measures

## **8. Keeping records of our data processing**

To show how we comply with the law we will keep clear records of our processing activities and of the decisions we make concerning personal data (setting out our reasons for those decisions).

## **9. Individual Rights - “Your rights and your personal data “**

Unless the data is subject to an exemption under the GDPR, you have rights with respect to your personal data.

Further information and advice about your rights can be obtained from the data protection regulator. See contact details below.

An outline of an individual’s (your) rights follows:

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
2. The right of access	The right to request a copy of the personal data which Crofton Baptist Church holds about you (a Subject Access Request or 'SAR').
	Also the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
3. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with the national data protection regulator.

<b>Rights</b>	<b>What does this mean?</b>
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

## **10. Further processing**

If CBC wishes to use an individual's personal data for a new purpose, not covered by the ***Data Privacy Notice*** and this Data Protection Policy document, then we will provide them with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek an individual's prior consent to the new processing.

## **11. Data protection impact assessments**

When CBC is planning to carry out any data processing which is likely to result in a high risk we will carry out a Data Protection Impact Assessment (DPIA). These include situations when we process data relating to vulnerable people, trawling of data from public profiles, using new technology, and transferring data outside the EU. Any decision not to conduct a DPIA will be recorded.

We may also conduct a DPIA in other cases when we consider it appropriate to do so. If we are unable to mitigate the identified risks such that a high risk remains we will consult with the ICO.

DPIAs will be conducted in accordance with the ICO's Code of Practice '[Conducting privacy impact assessments](#)'.

## **12. Dealing with data protection breaches**

Where staff or volunteers or contractors working for us, think that this policy has not been followed, or data might have been breached or lost, this will be reported **immediately** to the Data Operations Manager and the Data Controller, who will in turn immediately notify The Trustees collectively of the potential breach. CBC will keep records of personal data breaches, even if we do not report them to the ICO.

TCBC 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.

In situations where a personal data breach causes a high risk to any person, TCBC will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

### **13. Subject Access Requests (SARs)**

Individuals can request information verbally or in writing. Such requests are SARs. To better police the CBC system we should request that it in writing to the Data Protection Officer

#### **Individuals have the right to obtain:**

- confirmation that you are processing their data; \*
- access to their personal data; and
- other supplementary information – this largely corresponds to the information that you should provide in a privacy notice.

#### **Individuals also have the right to:**

- receive copy of the personal information that we hold;
- have personal data rectified if it is inaccurate or completed if it is incomplete;
- to be forgotten and can request the erasure of personal data when certain criteria are met;
- to block or restrict the processing of their personal data;
- to data portability allowing individuals to obtain and reuse their personal data for their own purposes across different services.

#### **CBC's response to SARs**

Responses should be both timely and considered. In certain cases it may be appropriate to refuse the request after considering all the circumstances.

#### **Time Limit**

- must provide the information without delay and at least within one calendar month of receiving it. This can be extended by a further two months for complex or numerous requests (in which case CBC must inform the individual and give an explanation). It is good practice to make a note on the record of whether the request or data is under dispute and why or the reason for the delay
- calculate the time limit from the day after receiving the request (whether the day after is a working day or not) until the corresponding calendar date in the next month. A calendar month ends on the corresponding date of the next month (e.g. 2 January to 2 February); unless that date does not exist in which case it is the last day of the next month (e.g. 31 January to 28 February).

If the corresponding date falls on a weekend or a public holiday, you have until the next working day to respond (e.g. receive a request on 30 March and the time limit starts from the next day (31 March). As there is no equivalent date in April, we have until 30 April to respond. However, if 30 April falls on a weekend, or is a public holiday, we have until the end of the next working day to respond).

This means that the legal deadline will vary from 28 days to 31 days depending on the month. For practical purposes if a consistent number of days is required (e.g. for a computer system), it may be helpful to adopt a 28-day period to ensure compliance as this is always within a calendar month.

## **Verification**

Naturally under data security measures CBC must verify the identity of the person making the request, using “reasonable means”. If we have shared the personal data with other organisations (for example other controllers and processors) CBC must inform them of the request where possible.

## **Response format**

If the request is made electronically, you should provide the information in a commonly used electronic format.

## **14. Managing the personal information held**

When processing personal data within the IT system CBC needs to recognise the risks involved and take appropriate technical and organisational measures to secure the data.

CBC should regularly review the information it processes or stores to identify when it needs to take action (e.g. correct inaccurate records). “Records” management policies, with rules for creating and keeping records (including emails) might help.

Conducting regular data quality reviews of systems and manual records CBC holds will help to ensure the information continues to be adequate for the purposes it is processed for. The data quality checks to provide assurances on the accuracy of data inputted by staff and volunteers alike

Any data accuracy issues identified should be communicated as lessons learned to staff and volunteers through ongoing awareness campaigns and internal training

## **15. Contact Details**

To exercise all relevant rights, queries of complaints please in the first instance contact the Data Operations Manager at [secretary.croftonbc@googlemail.com](mailto:secretary.croftonbc@googlemail.com) heading the email as “Data Protection Policy”

The Information Commissioners Office can be contacted:

Telephone: 0303 123 1113, or

Email <https://ico.org.uk/global/contact-us/email/> or

Postal mail or in person at:

The Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow, Cheshire.  
SK9 5AF.

### **Schedule 1 – Definitions and useful terms**

The following terms are used throughout this policy and have their legal meaning as set out within the GDPR. The GDPR definitions are further explained below:

#### **Data controller**

The data controller means any person, company, authority or other body who (or which) determines the means for processing personal data and the purposes for which it is processed. It does not matter if the decisions are made alone or jointly with others.

The data controller is responsible for the personal data which is processed and the way in which it is processed. We are the data controller of data which we process.

**However, if you are a controller, you are not relieved of your obligations where a processor is involved – the GDPR places further obligations on you to ensure your contracts with processors comply with the GDPR.**

#### **Data processors**

Data processors include any individuals or organisations, which process personal data on our behalf and on our instructions e.g. an external organisation which provides secure waste disposal for us. This definition will include the data processors' own staff (note that staff of data processors may also be data subjects).

This does not include CBC staff or volunteers acting as such (data handlers/ inputters) and not as third parties in their own right as “suppliers” to CBC

**If you are a processor, the GDPR places specific legal obligations on you; for example, you are required to maintain records of personal data and processing activities. You will have legal liability if you are responsible for a breach.**

#### **Data subjects**

Data subjects include **all** living individuals who we hold or otherwise process personal data about. A data subject does not need to be a UK national or resident. All data subjects have legal rights in relation to their personal information. Data subjects that we are likely to hold personal data about include:

- The people we care for and support;
- Our employees (and former employees);
- Consultants/individuals who are our contractors or employees working for them;
- Volunteers;
- Tenants;
- Trustees;
- Complainants;

## **Schedule 1 – Definitions and useful terms (continued)**

### **Data subjects (continued)**

- Supporters;
- Enquirers;
- Friends and family;
- Advisers and representatives of other organisations.

**ICO** means the Information Commissioners Office.

This is the UK's regulatory body responsible for ensuring that we comply with our legal data protection duties. The ICO produces guidance on how to implement data protection law and can take regulatory action where a breach occurs. Contact details are in clause 15 of the policy document.

### **Personal data**

Personal data means any information relating to a natural person (living person) who is either identified or is identifiable. A natural person must be an individual and cannot be a company or a public body. Representatives of companies or public bodies would, however, be natural persons.

Personal data is limited to information about **living individuals** and does not cover deceased people.

Personal data can be **factual** (for example, a name, address or date of birth) or it can be an **opinion** about that person, their actions and behaviour.

### **Privacy Notice**

Privacy Notice means the information given to data subjects which explains how we process their data and for what purposes.

### **Format**

**Hard Copy** means in either paper, photocopy or other such media state.

**Electronic Copy** means in either computer, email, voicemail, Facebook, twitter or other such media format.

### **Processing**

Processing is very widely defined and includes any activity that involves the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing can also include transferring personal data to third parties, **listening** to a recorded message (e.g. on voicemail) or **viewing** personal data on a screen or in a paper document which forms part of a structured filing system. Viewing of clear, moving or stills images of living individuals is also a processing activity.

**Schedule 1 – Definitions and useful terms (continued)**

**Special categories of data** (as identified in the GDPR) include information about a person's:

- a) Racial or ethnic origin;
- b) Political opinions;
- c) Religious or similar (e.g. philosophical) beliefs;
- d) Trade union membership;
- e) Health (including physical and mental health, and the provision of health care services);
- f) Genetic data;
- g) Biometric data;
- h) Sexual life and sexual orientation.

The GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities

**Schedule 2 – Data Operational Hierarchy**

- |                             |  |
|-----------------------------|--|
| 1. Data Controller          | <p>Trustees have joint and several responsibilities</p> <p>A designated Trustee will act as the operational data controller representing the Trustees</p>  |
| 2. Data Protection Officer  | <p>Will have day to day managerial control of the data storage, acquisition, processing and safeguarding.</p> <p>Reports to the designated Trustee (Data Controller)</p>   |
| 3. Data Processor           | <p>These are EXTERNAL processors of our data. They will be nominated by team or activity leaders for appointment by the Trustees to the roles individually specified and overseen by the Data Protection Officer.</p>  |
| 4. Team or Activity Leaders | <p>Each team or activity leader is also to be considered for appointment as a lead processor/ data champion</p> <p>Have the data role of ensuring that none of the data relating to their sphere of activity is removed from the church premises without the proper signed authorisation of both the Data Protection Officer and Data Controller</p> |
| 5. Employees and Volunteers | <p>Have the responsibility of applying due care and attention to their duties with regard to all data. Sensible consideration must be given for the requesting or supplying of data in respect of the degree of confidentiality invoked.</p>   |

### **Schedule 3 – UK version GDPR Exemptions**

#### **What exemptions does the UK version of GDPR permit?**

EU Article 23 enables Member States to introduce exemptions to the GDPR in certain situations.

Member States can introduce exemptions from the GDPR's transparency obligations and individual rights, but only where the restriction respects the essence of the individual's fundamental rights and freedoms and is a necessary and proportionate measure in a democratic society to safeguard:

- national security;
- defence;
- public security;
- the prevention, investigation, detection or prosecution of criminal offences;
- other important public interests, in particular economic or financial interests, including budgetary and taxation matters, public health and security;
- the protection of judicial independence and proceedings;
- breaches of ethics in regulated professions;
- monitoring, inspection or regulatory functions connected to the exercise of official authority regarding security, defence, other important public interests or crime/ethics prevention;
- the protection of the individual, or the rights and freedoms of others; or
- the enforcement of civil law matters.

The UK version of GDPR does not apply to certain activities including processing covered by the Law Enforcement Directive, processing for national security purposes and processing carried out by individuals purely for personal/household activities

#### **What about other Member State derogations or exemptions?**

(Derogation = An exemption from or relaxation of a rule of law)

Chapter IX provides that Member States can provide exemptions, derogations, conditions or rules in relation to specific processing activities.

These include processing that relates to:

- freedom of expression and freedom of information;
- public access to official documents;
- national identification numbers;
- processing of employee data;
- processing for archiving purposes and for scientific or historical research and statistical purposes;
- secrecy obligations; and
- **churches and religious associations.**



## DATA PRIVACY NOTICE FOR ADULTS WITHIN THE CHURCH

### Introduction

At Crofton Baptist Church we take your privacy very seriously and are committed to ensuring that personal data is protected in accordance with data protection laws and in line with your expectations.

A new set of laws is being introduced in May 2018 called the General Data Protection Regulations. At Crofton Baptist Church we already have controls in place to ensure your data is stored and handled securely. However, we have reviewed our policy and procedures in the light of these new regulations to make sure we are not only complying with the law, but have good practice when it comes to looking after your personal data.

This privacy notice explains what personal data we hold, why we hold it, how we use it, the control you have over your personal data and the procedures we have in place to protect it.

### What personal data we hold

We hold personal details about you including your name, address, phone and e-mail details and your photograph. We will also hold bank details if you have opted to give to the church through the banking system and details of your giving if you are a regular giver and we are able to claim gift aid on your giving. If you are involved in working with children in the church, we will also hold DBS records about you.

### Why we hold personal data

We hold personal data about you in order to:

- provide you with news and information about events, activities and services at the church
- administer membership records
- maintain our financial accounts and records
- fundraise and promote the interests of the church
- work effectively with our volunteers
- keep the children and any vulnerable adults in our church safe
- enable the church to provide services for the benefit of people in our local community
- contact your next of kin in case of an emergency

### Who we share personal data with

Your personal data will be treated as private and will only be shared with other members of the church and congregation for purposes connected with the church activities. We will only share your data with third parties outside of the church with your consent, unless we are legally required to do so, for example, by a law enforcement agency or court. We will never share your data with any organisation to use for their own purposes.

### How we protect your data

## Crofton Baptist Church - Data Protection Policy

We take the security of your data very seriously. We have a data protection policy and internal procedures to ensure that your data is not lost, accidentally destroyed, misused or disclosed and to prevent any unauthorised access.

### **Storing your data**

We keep data in accordance with the guidelines set out in Data Protection Policy which is available on the church website.

### **How long we retain data**

Routinely we will only keep your personal information whilst you are actively involved in the church and its activities, although some data may be retained for longer. For full details of how long we retain certain personal data, please refer to our Data Protection Policy.

### **Your rights with respect to your personal data**

You can request that we amend or delete any personal data we hold about you at any time. You can also request to see what personal information we hold about you and this will be provided within one month of the date of request.

### **Questions about this privacy notice**

If you have any questions about this notice, please raise them with one of the Church Trustees (the leadership team), who are responsible for data privacy.

### **Further concerns**

If you are dissatisfied with the way your personal data is handled and you remain dissatisfied once you have raised the issue with a Church Trustee, please raise your concern with the Church Manager who acts as the Data Protection Officer for Crofton Baptist Church.

You also have the right to complain to the Information Commissioner Officer (ICO). The ICO can be contacted at the Information Commissioner Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or ico.org.uk

### **Legal information for Crofton Baptist Church**

The full legal information for the church, which is the ‘data controller’, is:

Crofton Baptist Church, a charity registered in England and Wales (number 1134220) with its registered address as Crofton Baptist Church, 100 Crofton Lane, Orpington, Kent BR5 1HD



## DATA PRIVACY NOTICE FOR PARENTS WITHIN THE CHURCH

### Introduction

At Crofton Baptist Church we take your privacy and that of your child very seriously and are committed to ensuring that personal data is protected in accordance with data protection laws and in line with your expectations.

This privacy notice explains what personal data we hold about your child, why we hold it, how we use it, the control you have over their personal data and the procedures we have in place to protect it.

### What personal data we hold

We hold personal details about your child's name, date of birth, dietary requirements, allergies and relevant medical conditions. We also hold details of their home address and the contact details of parents, carers and others who may be contacted in case of an emergency. From time to time, particularly if your child attends a residential event organised by or through the church, we may collect additional personal data.

### Why we hold personal data

We hold personal data about your child in order to:

- keep your child safe
- provide you with information about relevant events and activities at the church
- administer records
- enable our group leaders to work effectively with your child
- carry out our obligations around safeguarding

### Who we share personal data with

Your child's personal data will be treated as private and will only be shared with group leaders who are involved in children's activities. We will only share your child's data with third parties outside of the church with your consent, unless we are legally required to do so, for example, by a law enforcement agency or court. We will never share your child's data with any organisation to use for their own purposes.

### How we protect your data

We take the security of your child's data very seriously. We have a data protection policy and internal procedures to ensure that your child's data is not lost, accidentally destroyed, misused or disclosed and to prevent any unauthorised access.

## **Storing your data**

We keep data in accordance with the guidelines set out in Data Protection Policy which is available on the church website.

## **How long we retain data**

Routinely we keep your child's personal data for safeguarding purposes until they reach the age of 21. However, we may keep data for longer, for instance if your child is involved in an accident or has been involved in a safeguarding incident. For full details of how long we retain certain personal data, please refer to our Data Protection Policy.

## **Your rights with respect to your personal data**

You can request that we amend or delete any personal data we hold about your child at any time. You can also request to see what personal information we hold about your child and this will be provided within one month of the date of request.

## **Questions about this privacy notice**

If you have any questions about this notice, please raise them with one of the Church Trustees (the leadership team), who are responsible for data privacy.

## **Further concerns**

If you are dissatisfied with the way your child's personal data is handled and you remain dissatisfied once you have raised the issue with a Church Trustee, please raise your concern with the Church Manager who acts as the Data Protection Officer for Crofton Baptist Church.

You also have the right to complain to the Information Commissioner Officer (ICO). The ICO can be contacted at the Information Commissioner Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or ico.org.uk

## **Legal information for Crofton Baptist Church**

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## **INTRODUCTION OF GDPR GENERAL DATA PROTECTION REGULATIONS FOR PARENTS AND CARERS WITHIN THE CHURCH**

Dear parents and carers

A new set of laws is being introduced in May 2018 called the General Data Protection Regulations (GDPR). At Crofton Baptist Church we already have controls in place to ensure your child's data is stored and handled securely. However, we have reviewed our policy and procedures in the light of these new regulations to make sure we are not only complying with the law, but have good practice when it comes to looking after your child's personal data.

A privacy notice (which provides information about what data we hold, why we hold it and how it is shared, protected, stored and retained) is attached.

As part of our preparations for ensuring compliance with GDPR, we need your specific consent to allow us to continue to hold your child's personal data. We would be grateful if you would complete and return the tear off slip at the bottom of this note by xx xxx xx.

We need specific consent for each child, so please complete additional forms if you have more than one child involved in activities at the church.

**Andrew Crowson**

Andrew Crowson  
Church Manager

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Your child's name:

.....

I give my consent for my child's personal data to be held, stored and used in line with the guidance contained in the privacy notice.

Signed:

.....

Print name:

.....

Relationship to child:

.....

Date:

.....



## DATA PRIVACY NOTICE FOR EMPLOYEES WITHIN THE CHURCH

### Introduction

At Crofton Baptist Church we take your privacy very seriously and are committed to ensuring that personal data is protected in accordance with data protection laws and in line with your expectations.

This privacy notice explains what personal data we hold, why we hold it, how we use it, the control you have over your personal data and the procedures we have in place to protect it.

### What personal data we hold

We hold personal details about you including your name, address, phone and e-mail details, bank account and passport details and your photograph. If you are involved in working with children in the church, we will also hold DBS records about you. We hold telephone contact details about anyone who might need to be contacted on your behalf in an emergency. We also hold personnel information such as references and performance appraisal records.

### Why we hold personal data

We hold personal data about you in order to:

- protect your rights of employment
- ensure you are paid correctly
- keep the children and any vulnerable adults in our church safe
- appraise your performance

### Who we share personal data with

Your personal data will be treated as private and will only be shared with those members of the church who need to access it in order to carry out the functions of an employer. We will only share your data with third parties outside of the church with your consent, unless we are legally required to do so, for example, by a law enforcement agency or court. We will never share your data with any organisation to use for their own purposes.

### How we protect your data

We take the security of your data very seriously. We have a data protection policy and internal procedures to ensure that your data is not lost, accidentally destroyed, misused or disclosed and to prevent any unauthorised access.

### Storing your data

We keep data in accordance with the guidelines set out in Data Protection Policy which is available on the church website.

### How long we retain data

## Crofton Baptist Church - Data Protection Policy

Routinely we will only keep your personal information whilst you are in employment and for six years after your employment has ceased. However, we may keep data for longer, for instance if you are involved in an accident or have been involved in a safeguarding incident. For full details of how long we retain certain personal data, please refer to our Data Protection Policy.

### **Your rights with respect to your personal data**

You can request that we amend or delete any personal data we hold about you at any time. You can also request to see what personal information we hold about you and this will be provided within 25 days of the date of request.

### **Questions about this privacy notice**

If you have any questions about this notice, please raise them with one of the Church Trustees (the leadership team), who are responsible for data privacy.

### **Further concerns**

If you are dissatisfied with the way your personal data is handled and you remain dissatisfied once you have raised the issue with a Church Trustee, please raise your concern with the Church Manager who acts as the Data Protection Officer for Crofton Baptist Church.

You also have the right to complain to the Information Commissioner Officer (ICO). The ICO can be contacted at the Information Commissioner Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or ico.org.uk

### **Legal information for Crofton Baptist Church**

The full legal information for the church, which is the ‘data controller’, is:

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## **INTRODUCTION OF GDPR GENERAL DATA PROTECTION REGULATIONS FOR EMPLOYEES OF THE CHURCH**

Dear employee

A new set of laws is being introduced in May 2018 called the General Data Protection Regulations (GDPR). At Crofton Baptist Church we already have controls in place to ensure your data is stored and handled securely. However, we have reviewed our policy and procedures in the light of these new regulations to make sure we are not only complying with the law, but have good practice when it comes to looking after your personal data.

A privacy notice (which provides information about what data we hold, why we hold it and how it is shared, protected, stored and retained) is attached.

As part of our preparations for ensuring compliance with GDPR, we need your specific consent to allow us to continue to hold your personal data. We would be grateful if you would complete and return the tear off slip at the bottom of this note by 25 May 2018.

**Diane Moss**

Diane Moss  
Trustee

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Your name:

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I give my consent for my personal data to be held, stored and used in line with the guidance contained in the privacy notice.

Signed:

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Date:

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