

Data Protection Policy for Wymondley Baptist Church

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| Last updated | 15 April 2019 |
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Definitions

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| The Church | Means Wymondley Baptist Church. |
| GDPR | Means the General Data Protection Regulation. |
| Responsible Persons | Means the Deacons/Trustees of Wymondley Baptist Church. |
| Register of Systems | Means a register of all systems or contexts in which personal data is processed, accessed or shared by the the Church. |

1. Data protection principles

The Church is committed to processing data in accordance with its responsibilities under the GDPR as detailed below.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, are erased or rectified without delay;
- e. 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
- f. 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.

2. General provisions

- a. This policy applies to all personal data processed by the Church.
- b. The Responsible Persons shall take responsibility for the Church's ongoing compliance with this policy. The Church does not need to appoint a Data Protection Officer for the following reasons:
 - i. The Church is not a public authority or body;
 - ii. The Church's core activities do not require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); and
 - iii. The Church's core activities do not consist of large scale processing of special categories of data or data relating to criminal convictions and offences.
- c. This policy shall be reviewed at least every three years.
- d. The Church is not required to register with the Information Commissioner's Office as an organisation that processes personal data for the following reasons:

A specific exemption applies to bodies or associations that are not established or conducted for profit.

 - i. The Church is only processing data for the purposes of establishing or maintaining membership or support for a body or association not established or conducted for profit, or providing or administering activities for individuals who are members of the body or association or have regular contact with it;
 - ii. The Church only holds information about individuals whose data is needed to process for this exempt purpose; and
 - iii. the personal data the Church processes is restricted to personal information that is necessary for this exempt purpose

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Church shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Church shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the Church must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Church shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Church's systems.

5. Data minimisation

- a. The Church shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- b. Consideration will be given to the data being held to confirm that the conditions of the Church's membership policy are met, for example that members are 16 years old or above.
- c. Consideration will be given to only process the personal data required to uniquely identify Church members as individuals for the purpose of maintaining a record of their Church membership.
- d. Consideration will be given to allow Church members or those associated or having regular contact with the Church to opt in to share personal data with one another, for example email addresses or phone numbers. This will not exempt Church members or those associated or having regular contact with the Church from providing the Church with the personal data required for the effective running of the Church.

6. Accuracy

- a. The Church shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Church members or those associated or having regular contact with the Church will be able to request that the personal data processed by the Church is updated.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Church shall put in place an archiving policy for each area in which personal data is processed and review this process every three (3) years.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.
- c. Church members personal information shall be stored until either the individual resigns their membership or written notice is provided by the Responsible Persons that their membership is being cancelled.
- d. Those associated or having regular contact with the Church will have their personal data removed after not attending any activity of the Church for a period of no more than two (2) years as long as the condition in paragraph e below is not applicable.
- e. Church members and those associated or having regular contact with the Church will have their personal data retained as required by the law to maintain records for the purposes of Safeguarding or any other statutory requirements. This period may be longer than the periods detailed above.

8. Security

- a. The Church shall ensure that personal data is stored securely using physical security, such as lockable cupboards, or cabinets etc, when required. Where data is held electronically modern software that is kept-up-to-date will be used, including the use of passwords or other security measures.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Church shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/>).

END OF POLICY

References

1. Need to appoint a DPO

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/>

2. Need to register with the ICO

<https://ico.org.uk/media/for-organisations/documents/2259094/dp-fee-guide-for-controllers-20180601.pdf>