



COASTLANDS COMMUNITY CHURCH

DATA PROTECTION POLICY

INTRODUCTION

Coastlands Community Church currently stores all data regarding its members, so it can contact them on an as needed basis, review DBS data and enable members to contact each other. Under new regulations called the General Data Protection Regulation (2018), individuals now have more rights and protection as to how their personal data is both collected, accessed, used and stored by organisations. Here at Coastlands we regard data protection very seriously and this policy will describe how this data will be collected, handled stored and protected to comply with Data Protection Law.

REASON FOR POLICY

This data protection policy will ensure that Coastlands Community Church will:

1. Comply with data protection law and follow good practice.
2. Protects the rights of employees and congregation members at all times.
3. Is open and transparent about how it stores and processes individual's data.
4. Protects itself from the risk of a data breach.

DATA PROTECTION LAW

The Data Protection Act (1988 replaced by Data Protection Bill 2018 and subsequent General Data Protection Regulation) stipulates how organisations such as Coastlands Community Church must collect, handle and store information of a personal nature. These rules apply whether data is stored electronically or on paper. To comply with the law Coastlands Community Church will ensure any data collected will be:

1. Collected fairly and for lawful purposes only.
2. Accurate and kept up to date.
3. Processed as needed by Coastlands Community Church within its legal and moral boundaries and in accordance with the rights of data subjects.
4. Be adequate relevant and not excessive.
5. Not held longer than is necessary.
6. Be protected in appropriate ways.
7. Not be transferred outside of Coastlands Community Church or any of its outreach groups without the express permission and consent of the church member/attendee **UNLESS** there is a safeguarding issue (see safeguarding section)

WHAT DATA DO WE HOLD?

Coastlands Community Church holds the following information:

Congregation Members

Names

Postal Addresses

Telephone/mobile phone numbers

Email addresses

Consent to be filmed/photographed

DBS records
Training records
Minutes of meetings and other relevant documentation including financial reports and budget details
Social media information via Facebook members page

Outreach Projects – Busybees, Ignite, Refresh

Names
Postal Addresses
Dates of birth if under 18
Parental consent for both attendance and for under 18 attendees to be photographed/filmed as a means of promoting awareness of the project
Telephone/mobile phone numbers
Next of kin details
Relevant medical information e.g. allergies medical conditions

Financial Records

Gift Aid records of donors and amounts given
Payroll details of salaries paid to employees
Accounts for all church activities

WHY DO WE HOLD THIS DATA?

Congregation members

This data is held to enable church members to be contacted by Church leadership as needed, for example to notify of events, grow groups etc, to enable church members to contact each other. To enable Gift aid to be sourced from church members who pay tax. To carry out DBS checks for those working in regulated activities within the church. To share church events via members page on social media. To give information to Charities Commission and other legal bodies as required.

Outreach projects

This data is held to enable those facilitating the outreach projects to maintain contact with the attendees and, if under the age of 18 ensure parental consent to attend and contact details have been obtained. To share events via Coastlands members page/ignite members page on social media

Financial Records

This data is held to comply with all accounting requirements of the Charity Commission and HMRC for Gift Aid, PAYE for employees and Corporation Tax.

HOW DO WE PROTECT THIS DATA?

To ensure all information gathered is treated in the strictest confidence in line with GDPR Coastlands Community Church have put in place the following:

Coastlands Community Church have appointed **Pastor Mark Rowland** to be the Data Protection Officer (DPO). This person will steward all information stored to make sure it complies with legislation and monitor GDPR for any legislative changes that may

affect the church. They will also liaise with the Data Controller(DC) who are the **Trustees of Coastlands Community Church** re the storage of information.

Only the DPO, DC and other nominated persons, in this instance **Karen Wells** who is Coastlands Community Church's DBS co-ordinator, will have access to personal information, dependent on what it is needed for.

No data will be shared informally. When access to confidential information is required it **must** be through the DPO. Personal data should not be disclosed to unauthorised people either within or outside of Coastlands Community Church.

Data will be regularly reviewed and updated if found to be out of date. If no longer required, it will be deleted and disposed of.

Consent will have been gained from all Church attendees as to what information is given and what it is used for

SAFEGUARDING AMENDMENT TO DATA PROTECTION BILL 2018

This amendment provides lawful ground for the processing of special interest personal data without consent if the circumstances make it justifiable, where it is in the substantial public interest and necessary for the key purpose of

- Protecting an individual from neglect or physical mental or emotional harm; or
- Protecting the physical mental or emotional well-being of an individual.
- Where that individual is a child or adult at risk.

Whilst it is still expected that seeking consent from an individual will be considered (and in this circumstance it would need to be explicit) if in the circumstances consent cannot be given, or the data controller cannot reasonably be expected to obtain it because it would put the individual concerned needing protection at an unacceptable risk, then the ground applies.

DATA STORAGE/ACCESS

All data collected will be held in as few places as necessary and updated as any changes are identified.

All financial data is stored on a password protected laptop in the care of the Treasurer Mr Denis Bradshaw following express consent by the Trustees of the church. This data is used for Payroll, Gift Aid claims, and church accounts. As well as password protection of the laptop, there is also additional password protection for each software function. Those individuals whose data is stored can contact the Treasurer to have their details changed or be contacted by the Treasurer re: the same.

When data is stored on paper it is kept in a secure place where unauthorised people cannot see it. This also applies to data which has been stored electronically but printed off for a specific reason. When not required the paper or files will be kept in a locked drawer or filing cabinet.

Any paper printouts should not be left where unauthorised people can see them, for example a register left unattended on a table

Any printout no longer required should be shredded and disposed of in a secure manner.

Where data is stored electronically, other than what has been agreed for Mr D Bradshaw, it is kept on a USB flash drive or memory hard disc which is securely stored with access agreed by the DPO.

Where data is given for the whole congregation, such as a church directory, all members will be made aware of the sensitivity of the data and how to use it. Consent will also be sought from all members as to whether they wish to have their details put on the list. This data will be stored in the same way at point of source.

Data will be backed up on a regular basis.

WHO CAN ACCESS THIS DATA?

All individuals who are the subject of personal data held by Coastlands Community Church are entitled to:

Ask what information the church holds about them and why

Ask how to gain access to it

Be informed as to how to keep it up to date

Be informed how the church is meeting its data protection obligations

If an individual contacts Coastlands Community church requesting this information, it is called a ***subject access request***.

Subject access requests from individuals should be made via email to the Data Controller at ***coastlands.walton@gmail.com*** or in writing to ***Coastlands Community Church, 32 Hall Lane, Walton on the Naze, Essex C014 8QA*** if email access is not available.

The Data Controller will always verify the identity of anyone making a subject access request and the nature of the request before handing over any information, especially if it another party making the request.

In certain circumstances Data Protection legislation allows personal data to be disclosed to law enforcement agencies without the consent of the church member (see safeguarding section) under these circumstances Coastlands Community Church will disclose the requested data. The data controller will, however, ensure that the request is legitimate, seeking assistance from the DPO, Elders, Trustees and legal advisers as necessary.

PROVIDING INFORMATION

Coastlands Community Church aims to ensure that individuals are aware that their data is being processed and that they understand:

How the data is being used

How to exercise their rights

To enable this Coastlands Community Church has a Data Privacy Notice setting out how data relating to the church is used. This can be found on the Coastlands Community Church website.