

### Introduction

1. St Peter's, Oundle (SPO) Church is fully committed to compliance with the requirements of the Data Protection Act 1998 (DPA).
2. SPO recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper or electronic media will be subject to the appropriate legal safeguards as specified the DPA.
3. SPO uses personal data about living individuals for the purpose of efficient church administration and effective communication with its members.
4. The PCC's Data Protection Lead is the Data Controller for the purposes of the DPA on behalf of SPO.

### Scope

5. This policy applies to all staff and authorised volunteers (e.g. team leaders or children's workers) who handle personal data, whether it relates to colleagues, church members or anyone else.

### Aim

6. This policy aims to help staff and volunteers comply with the DPA and minimise risk to SPO, by setting clear guidelines relating to the processing, storage and disposal of data.

### Definitions

7. The DPA distinguishes between 'personal data' and 'sensitive personal data'.
8. 'Personal data' relates to a living individual who can be identified from that data; or from that data and other information in the possession of, or likely to come into the possession of the Data Controller and includes an expression of opinion about the individual and any indication of the intentions of the Data Controller, or any other person in respect of the individual.
9. 'Sensitive personal data' is data consisting of information about an individual's racial or ethnic origin; political opinion; religious or other beliefs; trade union membership; physical or mental health or condition; sexual life; or criminal proceedings or convictions.

### Principles

10. SPO fully endorses and adheres to the 8 principles of the DPA. These specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transporting and storing personal data. Those involved in any of these processes for SPO must adhere to these principles.

11. The principles require that personal data shall:
  - a. Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
  - b. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
  - c. Be adequate, relevant and not excessive for those purposes.
  - d. Be accurate and, where necessary, kept up to date.
  - e. Not be kept for longer than is necessary for that purpose.
  - f. Be processed in accordance with the data subject's rights.
  - g. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
  - h. Not be transferred outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Maintaining Confidentiality**

12. SPO will treat all personal information as private and confidential and not disclose any such data to anyone other than the staff and authorised volunteers of the church in order to facilitate the administration and day-to-day ministry of the church.
13. Information and data stored by the Church Office will not be distributed in any form such as digital, hard copy or any other form which might breach the DPA.
14. Personal information will not be given or sold to any third party, company or church.
15. All staff and authorised volunteers who have access to personal data obtained under this policy will be required to agree and sign this Policy.

### **Exceptions**

16. There are 4 exceptions to the above which are permitted by law:
  - a. Where we are legally compelled to do so
  - b. Where there is a duty to the public to disclose
  - c. Where disclosure is required to protect our interest
  - d. Where disclosure is made at your request or with your consent

### **Use of Personal Information**

17. SPO will use personal data for 4 main purposes:
  - a. The day-to-day administration of the Church including pastoral care and oversight, calls, emails and visits, preparation of ministry rotas, maintaining financial /giving records for audit and tax purposes, life groups, teams, events and activities.
  - b. Contacting members to keep them informed of church news, activities and events
  - c. Statistical analysis to gain a better understanding of church demographics
  - d. With specific individual permission, for the production a church contact list on our membership database which will be made available to other members of SPO

e. Data will be held whilst individuals are a member of the church and retained for only as long as necessary. Statutory information will be retained in accordance with the law; non-statutory information will be retained in accordance with CIPD guidance.<sup>1</sup> For staff this will normally be for 6 years after employment has ceased and for church members for 18 months after they notify us that they have left the church or have been removed from the Electoral Roll, whichever is later, or we receive a written request. There is an aide memoire on personal data retention periods at Annex B.

## **Membership Database**

18. Membership information is held on SPO's membership database, currently iKnow, and may be accessed by staff and by members via the iKnow website. All data is stored on secure servers operated by iKnow. Accounts are password protected.
19. Newcomer information collected by the Church Office will be stored on the database and not used for any purposes other than those set out in this section.
  - a. Full membership information is only available to staff and authorised volunteers on a need-to-know basis.
  - b. A limited amount of personal information may be made visible by individual members to others within iKnow. The details they can make visible to others are: their address, email and telephone number(s). Members will be given the opportunity to 'opt in' to this. This 'visible' information will be made available on iKnow and may be printed off or passed orally, via the office, to other members, e.g. those without internet access.
  - c. An individual's data will not be accessed by users outside of the EU unless prior consent has been given by the individual concerned.

## **Security of Other Data**

20. Electronic Security. All staff and authorised volunteers who store personal information obtained under this policy on any electronic system not connected to iKnow are to do so in accordance with the principles of the DPA and to take due care to ensure that the information remains secure through the use of passwords and encryption.
21. Physical Security. All staff and authorised volunteers are take appropriate physical security measures to ensure that all devices and paper records holding personal information are held safely and not accessible to unauthorised persons. In particular, all paper records and portable media should be locked away when not in use or carried on the person. They include:
  - a. Email / telephone / address books held on PCs, mobiles, PDAs, etc.
  - b. Data stored on memory sticks and/or portable hard drives
  - c. Personal letters, paper records and physical files.
22. Care should also be taken to ensure personal data is not left out where it can be seen by unauthorised individuals.

## **Rights to Access Information**

23. Employees and other subjects of personal data held by SPO have the right (with some legal exceptions) to access personal data that is being held about them either electronically or on paper. This right may be withheld if the information also relates to another individual

24. Specifically, individuals are entitled to:
  - a. Ask what information SPO 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 what SPO is doing to comply with the DPA
25. Any person wishing to exercise this right should make the request in writing to the Data Controller, using the standard letter available online from [www.ico.gov.uk](http://www.ico.gov.uk) SPO reserves the right to charge the maximum fee payable for each subject access request.

Addressed to The Data Controller, St Peter's Church, Parish Office, Oundle, PE8 4AL.

26. SPO 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 will be explained in writing. The Data Controller will direct requests to the member(s) of staff responsible for holding and managing the data concerned.
27. If personal details are found to be inaccurate, they can be amended on request.

### **Photographs**

28. Photographs taken within the church building, Church Centre or at church events may include individuals or groups of individuals attending these events.
29. Where photographs include children who are identifiable, permission will always be obtained before publication. This is done through the Children's Junior Church Leaders who will hold records on which children have parental permission for photographs to be published and whether permission is for internal and external use or solely for internal use.
30. These photographs will be used solely for the purpose of communicating to SPO members and for SPO advertising, marketing and public relations and may thus appear in any material, internal or external, on the website or other publicity material relating to SPO.
31. The DPA applies where photographs are taken for official use, such photographs of staff, PCC and team leaders for publications, notice boards and the website. These images are stored with personal details such as names. In such cases it will usually be enough for the photographer to ask for permission to ensure compliance with the Act.
32. Photographs taken at SPO purely for personal use are exempt from the DPA. This means that parents, friends and family members can take photographs for the family album of their children and friends participating in church events. However, they are strongly discouraged from publishing them e.g. online unless they have permission from the parents of all other children in the photographs concerned.

### **St Peter's Church, Privacy Statement**

33. SPO's privacy statement for members is at Annex A.

## Registration, Responsibilities and Review

34. **Registration.** SPO's CCTV system is registered in the Information Commissioner's public register of data controllers.
35. **PCC.** The PCC, as the 'trustees' of SPO and employer of its staff, must comply with the Data Protection Act." The PCC have overall responsibility for implementing and monitoring this policy, which will be reviewed in accordance with our Policy on Policies.
30. **Data Controller.** The PCC Member responsible for Data Protection is also the Data Controller and is responsible for ensuring compliance with the Data Protection Act on behalf of the PCC. They are responsible for the overall monitoring and reviewing this policy on behalf of SPO and for recommending training needs.
31. **Incumbent.** The Incumbent is responsible for ensuring staff and authorised volunteers are given the time and resource in order to do appropriate training.
32. **Director of Operations.** The Director of Operations is responsible for advice and implementation.
33. **Staff and Authorised Volunteers.** Staff and authorised volunteers are to ensure they understand and comply with this Policy and the DPA insofar as it applies to their role.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Name: \_\_\_\_\_ Appt: \_\_\_\_\_  
on behalf of the PCC

Annexes:

- A. SPO Privacy Statement
- B. SPO Retention of Personal Information – Aide Memoire

## ST PETER'S, OUNDLE - PRIVACY STATEMENT

### Why we collect information

1. At SPO, we collect different types of information about our members for the following main reasons:
  - a. To enable SPO to communicate effectively to its members about events, activities and the life of the church
  - b. To enable SPO to intelligently plan and tailor its events and activities to its members based on the information they provide
  - c. To provide an interactive database for our members where:
    - i. Life Groups, Teams, and rotas can be easily managed
    - ii. Members can contact one another
    - iii. Members can find out about what is going on
    - iv. Personal information can be held safely and securely and only seen by those who need to know

### Our principles

2. We are committed to protecting your privacy. Our policy can be summarised in one sentence: **we will not share your information with others without your consent.**
3. To do that we will:
  - a. Respect your email privacy. You will only receive emails from SPO in relation to areas you have expressly signed up for.
  - b. Send out all group emails as Bcc... to protect your privacy.
  - c. Not share any your user details (including your email address) to a third party without your consent.

### What information do we collect?

4. We collect information on our users primarily from the Welcome Card; these details are entered onto iKnow.
5. The minimum information we need to register you is your first and last name and your email address. Without that we have no means of contacting you. However, it is helpful if you are able to provide other details as requested.

### Who will have access to your information?

6. Once you are invited to join iKnow you have freedom to update and add to your details and set what is visible to other members. You can only view other people's information if you have signed up to share your own.
7. Members of staff and certain authorised volunteers (such as our Administrator) may be able to see all your details, but only on a need-to-know basis. This is necessary for the smooth operation of the church and its activities.

**What else you should know about privacy**

8. You are solely responsible for the security and access to your own computer. To that end, do close your browser when you have finished with IKnow, especially if you are sharing a computer or using a computer in a public place. This is to ensure unauthorised persons cannot access your personal information and correspondence.
9. You are also responsible for maintaining the secrecy of your usernames, passwords and account information. In particular, we recommend that you password protect your devices and do not share your iKnow account password with others or enable your device to memorise it. It is important to use strong passwords that you can memorise; they should not be written down or shared.
10. Please be careful about sharing information about other members of SPO on social media. In particular, you should get parental permission to post photographs of other children on the Internet.

**ST PETER'S, OUNDLE - RETENTION OF PERSONAL INFORMATION – AIDE MEMOIRE**

This is only a brief summary; for more, ask D Ops or follow the CIPD link below. If in doubt, keep records for at least 6 years, to cover the time limit for civil legal action.

**Statutory Retention Periods**

<b>Record types</b>	<b>Statutory retention period</b>
Accident books, accident records/ reports	3 years Child / young adult: age 21
Accounts	3 years for private companies, 6 for PLCs
Tax records	3 years
Medical (for lead or asbestos or those specified by COSHH)	40 years
Medical (Ionising Radiation)	Until age 75, but in any event at least 50 years
Children & young adults	Until age 21
Retirement Benefits Schemes –notifiable events	6 years
Statutory Maternity Pay records	3 years
Wage/salary records (also overtime, bonuses, expenses)	6 years

**Recommended Non-Statutory Retention Periods**

<b>Record types</b>	<b>Recommended retention period</b>
Application forms and interview notes (unsuccessful candidates)	6 months – 1 year
H&S assessments, consultations and committees	Permanently
Inland Revenue/HMRC approvals	Permanently
Money purchase details	6 years
Parental leave	5 years from birth/adoption 18 years if child receives disability allowance
Pension scheme investment policies	12 years
Pensioners' records	12 years
P files and training records	6 years
Redundancy	6 years
Senior executives' records	Permanently
Statutory Sick Pay records	6 years
Trust deeds and rules	Permanently
Trustees' minute books	Permanently

<https://www.cipd.co.uk/knowledge/fundamentals/people/hr/keeping-records-factsheet#7766>