

Policy Number 11.

Benefice of Inkberrow with Cookhill and Kington with Dormston

A POLICY FOR DATA PROTECTION

The Benefice (including St Peter's Church Hall (PEC)) uses personal data about living individuals for the purpose of pastoral care.

The Benefice recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation (GDPR) act for 2018.

The Benefice fully endorses and adheres to the principles of GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for the Benefice must adhere to these principals.

The Principles

The principles require that personal data shall:

1. Be processed fairly and lawfully and shall not be processed unless certain conditions are met
2. Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose
3. Be adequate, relevant and not excessive for those purposes
4. Be accurate and, where necessary, kept up to date
5. Not to be kept for longer than is necessary for that purpose
6. Be processed in accordance with the data subject's rights
7. Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures
8. And not transferred to a country or territory 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

All personal data is to be treated as private and confidential information and is not to be disclosed to anyone other than those who need access to the personal data in order to facilitate Pastoral Care and Staff Administration in the administration of and day-to-day ministry of the church.

There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to do so
- Where there is a duty to the public to disclose
- Where disclosure is required to protect our interest
- Where disclosure is made at your request or with your consent

USE OF PERSONAL INFORMATION

Use of personal data is for the purpose of Pastoral Care and Staff Administration which includes:-

The Day-to-Day Administration of the Church: e.g. Pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes, Electoral roll, Membership of groups and committees.

Contacting you to keep you informed of Church Activities

THE DATA:

Data held by and on behalf of the individual churches within the Benefice will not be used for any other purposes than set out in this section.

Data is distributed among a number of computers (both Church and privately owned) and in paper format by those who have a need to either maintain, process or use the data.

A record of where data is located, what the data is, what it is to be used for and who maintains, process or uses the data is to be maintained by the Church office under the authority of the Data Controller. Due to the distributed nature of the data there is no obvious master data set, therefore, data which is master data is to be declared in the data record held by the Church office, and is to be used to maintain subsidiary data sets. When the circumstances

surrounding the holding of data change then the Church office is to be notified of the changes.

The Vicar will act on behalf of the Bishop of Worcester as the Data Controller for the Benefice. The Vicar may further delegate data controller status to others for pastoral care.

Where data is stored electronically it is to be stored on a machine that is adequately protected physically and electronically with the latest updates to the operating system, antivirus, firewall and any other technical measures which are necessary.

Electronic data is to be password protected. On computers that are dedicated to Church use, logon passwords with appropriate inactivity time shall be the minimum protection. For other machines, file and/or programme passwords must be used to protect the data.

When data is no longer required, electronically held data is to be erased, ensuring that temporary files and backups are also erased, and paper records are to be shredded.

Personal information will not be passed onto any third parties outside of the church environment.

Subject Consent: The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained.

Retention of Data: No Data will be kept for longer than its purpose except in areas of Safeguarding and finance.

Rights to Access Information

Employees and other subjects of personal data held by the Benefice, have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems. This right is subject to certain exemptions: Personal Information may be withheld if the information relates to another individual.

Subject Access: All individuals who are the subject of personal data held by the Benefice is entitled to:

- Ask what information that the benefice holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what the benefice is doing to comply with its obligations under the GDPR act 2018.

Any person who wishes to exercise this right should make the request in writing to the Data Controller, using the standard letter that is available online from www.ico.gov.uk

The Benefice aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within one month 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 within the original one month.

A Data Privacy Notice will be displayed in the individual churches within the Benefice, inline with the requirements of GDPR.