



# Heathcote Parish Church

## Data Protection Privacy Policy

Aspects of Church life, where personal data is collected and different Church members hold this information for their roles within Heathcote Parish Church (HPC), were identified by a data audit. With the introduction of the General Data Protection Regulation (GDPR) on 25 May 2018 and the Church's position as a data holder this requires a Privacy Policy to ensure all the relevant personnel hold and use individuals' personal data securely and with their consent.

The two Data Controllers for Heathcote Parish Church are the Vicar (contact details below) and the Data Protection Lead for the Church – they have been assigned to this role under the direction of the Church's Parochial Church Council (the PCC). This means the PCC decides how personal data is processed and for what purposes, in accordance with the GDPR and the Church of England's (CofE) Church Representation Rules (CRR).

### **Data Collection**

The following are the main areas of Church life where data is collected

#### **Church Membership and Data Consent**

Creating and maintaining a database that records individuals' consent (over-13s) and aspects of their church activities and financial giving, as recorded below. The Data Protection Lead shares data with the Vicar, and, as necessary with other church members to enable them to fulfil their church roles.

#### **Church Governance**

The governance of the Church through a Parochial Church Council and those members of the church family, eligible to be on the Electoral Roll. The Electoral Roll Officer collects and stores this data and shares it with the Vicar, who is also the PCC Chairman. The CofE's CRR apply and require the annual publication of this information.

#### **Financial Giving**

Records of financial giving to HPC by standing order, additionally Gift Aid may be applied to taxpayers' giving. These are administered and held by the PCC Treasurer; a Church volunteer, claiming Gift Aid from HMRC may also have access to them.

#### **Safeguarding and Work with Children**

Many roles in church life are now regarded as having a safeguarding element to protect minors and vulnerable adults. It is a requirement from the Diocese of Coventry that church members undergo training at the appropriate level for their varying roles. The Parish's Safeguarding Officer identifies those who need training and records these details and requires sight of online training and DBS certificates. Registration details for minors (i. e. under-18s, *note* however, from the age of 13, individuals, although minors, complete their own Data Consent Forms) are collected from a parent (or guardian) for HPC's Youth and Junior Church and Jack-in-the-box pre-schoolers' group by the Church's Lead for Youth Church and Junior Church, and Jack-in-the-box.

### **Dissemination of News and Events**

The church family receive a weekly emailed newsletter sent by its compiler of Church news and events, and ad hoc mailings from the Vicar.

### **Sunday Morning Rota and Small Groups**

A rota of duties for Sunday mornings is maintained; a Church Directory is compiled for church members to re-arrange rota duties and to enable members of small groups to communicate with other group members.

### **Church of England Records**

Official records for baptisms, confirmations, marriages, and funerals are maintained.

### **Pastoral Work**

The confidential records and notes gathered through the Vicar's pastoral work are maintained.

### **Forms in Use at Heathcote Parish Church**

Personal information, in the main, is first collected in a paper format before its transfer to computer files. Currently the forms in use are:

- a. Data Consent Form (to be used in conjunction the Guidance Notice, see below)
- b. Welcome Slip
- c. Nomination Form for the Parochial Church Council
- d. Nomination Form Churchwarden
- e. Nomination Form Deanery Synod
- f. Electoral Roll Application Form
- g. Standing Order and Gift Aid Combined Form
- h. Registration Form for Minors in Junior Church and Youth Church
- i. Registration Form for Jack-in-the-Box

### **Other Paper Documents in Use at Heathcote Parish Church**

- i. Church Register Books
- ii. Church Directory
- iii. Safeguarding Training Certificates
- iv. DBS Certificates
- v. Junior Church Register
- vi. Jack-In-The-Box Register

### **Data Holding – Paper Files**

Paper files are largely held according to the CofE guidelines of *Keep or Bin. . .? The Care of Your Parish Records* ([www.lambethpalacelibrary.org/files/Parish\\_Records\\_0.pdf](http://www.lambethpalacelibrary.org/files/Parish_Records_0.pdf)). Most of the data collected by paper forms and files will also be stored digitally, these original hard copies will be stored in a locked filing cabinet or locked cupboard. Documents when they are no longer required will be destroyed/shredded.

The Electoral Roll is revised annually and every six years there is a new Roll. The last new Roll was created in 2019, in line with other parishes in the country. Existing members on the Roll were required to fill out a new application form and the superseded forms destroyed. Current Electoral Roll forms are stored in a locked filing cabinet.

Welcome Slips are intended for new visitors to HPC and include space for consent to be contacted by email and phone only, if this individual eventually becomes part of the church family then the full Data Consent Form is substituted, and the Welcome Slip is destroyed.

Members of the church family who decide to use a standing order for their financial giving to HPC complete a form that is passed to their bank. On the other half of the same A4 sheet there is a Gift Aid declaration form, which taxpayers can opt to complete. The PCC Treasurer keeps account of giving and the Treasurer or a Church volunteer regularly submits Gift Aid claims to HMRC. HMRC tax rules require that records are kept for six years, plus the current year. Gift Aid forms and any paper bank statements will be stored in a locked filing cabinet. Financial paper records that are no longer needed will be destroyed.

The Church Directory is issued to members of the church family involved in rota duties and/or are part of a small group, and others who have indicated their willingness to be included; it is only distributed to people included in the Directory. The Directory is distributed as a password protected pdf file, people are encouraged not to print this out and it has the following instruction printed in red: 'The directory is intended solely for the use of members of the Heathcote church family and is not for external circulation. If printing, please only print for your own use and destroy/shred any old paper copies.'

### **Data Holding – Computer/Digital Files**

Data transferred from paper files to digital files are to be held on password protected devices (laptops, tablets, phones, etc.).

Mailing lists are to be kept up-to-date and reviewed, at least, annually. When someone leaves the church family, personal information is removed from files and mailing lists. Mailings to a large number of recipients in the church family such as the newsletter, rotas and ad hoc communications from the Vicar are sent as blind copies; email communications within small groups and the PCC may display recipients.

### **Data Breaches**

We cannot know what a data breach might be, we can only surmise it might be one of several scenarios, such as, the loss of a memory stick/portable hard drive; a stolen laptop or tablet; identity theft, or paper files that are lost or compromised because of poor security.

We are to regard the information provided by members of the Heathcote Parish Church family as confidential, with its use restricted to Church functions and only shared with one another because of a perceived Church need.

The onus is on those of us who hold others' personal data to be discreet and security conscious and devices are to be password protected. Where at all possible, data will not be held on multiple memory sticks, e. g. paper files are kept securely when held in person, and once data has been transferred as digital files the paper files will be locked away in a cabinet or cupboard at HPC.

In the event of a data breach the Data Controllers should be contacted as soon as possible – the Vicar or the Data Protection Lead. Contact details are included at the end of the Guidance Notice, which also forms part of HPC's Privacy Policy and follows below.

# Heathcote Parish Church Parochial Church Council Data Protection Policy Guidance Notice

## **1. Your Personal Data – What Is It?**

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 possession of Heathcote Parish Church (HPC) or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation<sup>1</sup> (or GDPR).

## **2. Who Are We?**

In the terms of the GDPR, Heathcote Parish Church has two Data Controllers, they are the Vicar (contact details below) and the Data Protection Lead – they have been assigned to this role under the direction of the Church's Parochial Church Council (the PCC). This means the PCC decides how personal data is processed and for what purposes, in accordance with the GDPR.

## **3. How Do We Process Your Personal Data?**

The Parish 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 may use your personal data for the following purposes:

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; *note*, confidential data recorded in the course of the incumbent's pastoral work remains separate, and within the incumbent's sole control.
- To inform you of news, events, activities, surveys, and services running at HPC (including email distribution lists and communication within small groups).
- To administer membership records (including the Electoral Roll and the Church Directory).
- To manage our employees and volunteers (including rota duties, safeguarding requirements and PCC members).
- To maintain our own accounts and records (including standing orders and the processing of Gift Aid applications).
- To share your contact details with the Diocesan office so they can keep you informed about news in the Diocese of Coventry and events, activities, surveys, and services that will be occurring in the Diocese and in which you may be interested.

## **4. What is the Legal Basis for Processing Your Personal Data?**

- We require explicit consent of your personal data so that we can keep you informed about news, events, activities, surveys, and services and process your financial giving and keep you informed about Diocesan events.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.
- Processing is carried out by a not-for-profit body with a religious (political, philosophical or trade union) 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.

## 5. Sharing Your Personal Data

Your personal data will be treated as strictly confidential and will only be shared with other members of the Church to carry out a service to other church members or for purposes connected with the Church. We will only share your data with third parties outside of the parish with your consent, however it is a necessity to share Gift Aid data with the HMRC.

## 6. How Long Do We Keep Your Personal Data?

We keep data in accordance with the guidance set out in the guide: *Keep or bin: care of your parish records*, which is available from the Church of England website.<sup>2</sup>

Specifically, we retain Electoral Roll data while it is still current; Gift Aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

## 7. Your Rights and Your Personal Data

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

- The right to request a copy of your personal data which the PCC and the incumbent (the Vicar) holds about you.
- The right to request that the PCC and the incumbent corrects any personal data if it is found to be inaccurate or out-of-date.
- The right to request your personal data is erased where it is no longer necessary for the PCC and the incumbent to retain such data.
- The right to withdraw your consent to the processing at any time.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to lodge a complaint with the Information Commissioner's Office (contact details below).

## 8. Further Processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Guidance Notice, we will then provide you 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 your prior consent to the new processing.

## 9. Contact Details

To exercise all relevant rights, or queries of complaints, please in the first instance contact the Vicar ([vicar.hpc@gmail.com](mailto:vicar.hpc@gmail.com)) or at Heathcote Parish Church, Cressida Close, Heathcote, Warwick, CV34 6DZ. You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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<sup>1</sup> The Church of England has published a more detailed guide for parishes, see: <http://www.parishresources.org.uk/wp-content/uploads/Parish-Guide-to-GDPR-updated.pdf>

<sup>2</sup> Details about retention periods can currently be found in the Record Management Guides located on the Church of England website, see <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>