



# ST THOMAS'S CHURCH

## DATA PROTECTION POLICY

ST THOMAS'S CHURCH keeps and uses personal data about living individuals (data subjects) for the purpose of general church administration and communication. ST THOMAS'S CHURCH will maintain registration as a data controller under the terms of the Data Protection Action, 1998. A specific employee will act as Data Protection Officer to ensure compliance with this policy.

ST THOMAS'S CHURCH 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 Data Protection Act 1998.

ST THOMAS'S CHURCH fully endorses and adheres to the eight principles of the Data Protection Act. 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 ST THOMAS'S CHURCH must adhere to these principles.

This policy will be reviewed biennially by St THOMAS'S Parochial Church Council or at other times as appropriate.

### 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 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. Not be 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.

## 1. Maintaining confidentiality

ST THOMAS'S CHURCH will treat all personal information of data subjects as private and confidential and not disclose any of this data to anyone other than the staff and leaders of church activities in order to facilitate the administration and day-to-day ministry of the church.

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

- 1. Where we are legally compelled to do so.
- 2. Where there is a duty to the public to disclose.
- 3. Where disclosure is required to protect a data subject's interest.
- 4. Where disclosure is made at the request or consent of a data subject.

All ST THOMAS'S CHURCH staff and volunteers who have access to personal data will be required to agree to sign the ST THOMAS'S CHURCH Confidentiality Policy and Data Protection Policy

#### 2. Use of Personal Information

ST THOMAS'S CHURCH uses this data for three main purposes:

- 1. The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, ministry to children and young people, preparation of rotas, maintaining financial records of giving for audit and tax purposes.
- 2. Contacting people to keep them informed of church activities and events.
- 3. Statistical analysis to gain a better understanding of church demographics. Although collated church data may be passed to a third party, such as the number of small groups or small group attendance figures, no personal data will be disclosed.

#### 3. Subject access and consent

- 1. Subject Access: all individuals who are the subject of personal data held by ST THOMAS'S CHURCH are entitled to:
  - Be shown what information the church holds about them and to correct it if errors are found.

- Request the Data Protection Officer for access to their personal data.
- Be informed how to keep it up to date and accurate.
- Be informed what ST THOMAS'S CHURCH is doing to comply with its obligations under the 1988 Data Protection Act.
- 2. Personal information will not be passed onto any third parties outside of the church environment.
- 3. Subject Consent: The need to process data for normal purposes has been and will be communicated to all data subjects. If the data is sensitive, for example, information about health, race or gender, and criminal record, express consent to process the data will be obtained. Parents and legal guardians will be considered as the responsible party for those aged under 18.

## **Electronic data storage**

Information contained on the ST THOMAS'S CHURCH databases will not be used for any other purposes than set out in this document.

- 1. Access to the databases is strictly controlled through the use of name-specific passwords, which are set up and authorised by the Data Protection Officer.
- 2. Those authorised to use the databases only have access to their specific area of use within the databases. This is controlled by the Data Protection Officer who is the only person who can access and set these security parameters.
- 3. People who will have secure and authorised access to the databases include ST THOMAS'S CHURCH Staff, and leaders of ST THOMAS'S CHURCH ministries. The Data Protection Officer will keep a record of any persons authorised to access or enter this data.

Any authorised user who maintains such personal information on their own computers and related storage devices will only do so for purposes directly related to their involvement in ST THOMAS'S CHURCH (e.g. as house group leaders). As in the case of church databases, Data Subjects have the right to see any information about them.

## **Rights to access information**

Employees and other subjects of personal data held by ST THOMAS'S CHURCH have the right to request access to any personal data that is being held in manual filing systems and in computer databases. This right is subject to certain exemptions: in particular, personal Information may be withheld if it relates to another individual.

Any person who wishes to exercise this right should make the request in writing to the ST THOMAS'S CHURCH Data Protection Officer, using the standard letter which is available on line from <a href="https://www.ico.gov.uk">www.ico.gov.uk</a>

ST THOMAS'S CHURCH reserves the right to charge the maximum fee fixed by the government payable for each subject request. If personal details are inaccurate, they can be amended upon request.

ST THOMAS'S CHURCH aims to comply with requests for access to personal information as quickly as possible, and will ensure that this is provided within 40 days 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.