



ST THOMAS
CHURCH LANCASTER
SHARING GOD'S LOVE FROM THE HEART OF THE CITY



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 PCC and Incumbant will maintain registration as a data controllers under the terms of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018). 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 2018 and GDPR.

ST THOMAS'S CHURCH fully endorses and adheres to the 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:

- (a) be processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- (b) be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ('purpose limitation');
- (c) be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- (d) be accurate and, where necessary, kept up to date. ('accuracy');

(e) be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; ('storage limitation');

(f) be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

The GDPR restricts transfers of personal data outside the protection of the GDPR, unless the rights of the individuals in respect of their personal data is protected in another way, or one of a limited number of exceptions applies

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 (see St Thomas' Data Privacy notice for more detail)

Set out in more detail in St Thomas' Privacy Notice

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 Legal Basis for Processing

1. All individuals who are the subject of personal data held by ST THOMAS'S CHURCH have rights set out in GDPR, and listed in St Thomas' Privacy Notice. Those rights include 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 DPA 2018 and GDPR.
2. Personal information will not be passed onto any third parties outside of the church environment.
3. The need to process data for normal purposes has been and will be communicated to all data subjects, by use of St Thomas' Privacy Notice based on Legitimate Activity and Legal Obligation. Consent is obtained for the communication of news and events. Parents and legal guardians will be considered as the responsible party for those aged under 13.

Electronic data storage

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

1. Access to the databases and the information management system are strictly controlled through the use of name-specific passwords, which are set up and authorised by the Data Protection Officer or the Church Manager.
2. Those authorised to use the information management system only have access to their specific area of use within the system. This is controlled by the Data Protection Officer and Church Manager who are 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 either verbally or in writing to the ST THOMAS'S CHURCH Data Protection Officer, the standard letter which is available on line from www.ico.gov.uk might be helpful

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 it without undue delay and at the latest within one month of receipt of a request 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.