



Data Privacy Guidance For Staff & Volunteers

The Church of Christ the King, Kettering.

This Policy and Procedure was adopted at a Parochial Church Council meeting

held on 16th January, 2023

Signed: 

By Warden on behalf of PCC

Signed: 

Vicar and Mission Leader

*Reviewed annually by the policy owner and brought to the PCC for review
and approval every 3 years. Next review by PCC due January 2026.*

Introduction

Christ the King staff and volunteers process and work with personal data to deliver a variety of group activities and events throughout the year. These guidelines have been produced as a guide for them, to ensure that the church of Christ the King complies with current Data Protection legislation.

The information in this factsheet is derived from the Guide to the General Data Protection Regulation (GDPR), the requirements of the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, the Privacy and Electronic Communication (EC Directive) Regulations 2003 and guidance issued by the Information Commissioner's Office (ICO), hereinafter referred to as the Legislation.

Further detailed guidance can be obtained from the Information Commissioner's website – see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

1 Why is data protection important?

All public and private organisations are legally obliged to protect any personal information they hold. This document provides guidance to staff and volunteers who work with congregation members' and visitors' personal data. Personal data includes names and contact details.

2 How does it apply to staff and volunteers?

As part of the church of Christ the King, all ministry areas and groups need to comply with the requirements of the legislation. The PCC hold, maintain and enforce the policy and guidance. However, as a church we are not currently required to register with the ICO or have a specific Data Protection Officer, as defined by the legislation. The PCC have taken the decision to voluntarily register with the ICO as an act of best practice. Sabina Davies is the current Data Protection Officer.

Ministry heads and their teams are required to ensure that any personal records they keep are maintained using the guidance included in this document.

Data Protection legislation requires organisations to take care over the personal information on individuals that they hold and to use it only for relevant communication.

Broadly, the legislation covers any information held on a computer or in a filing system, that relates to living individuals. For example, this may include information such as name, address, date of birth and opinions about the individual, images and video, or any other information from which the individual can be identified.

3 What staff and volunteers need to do

Volunteers, particularly those dealing with ministry area event or group registration details, are responsible for ensuring that any personal data is processed in accordance with the principles of the legislation. Where an issue arises with respect to data protection, volunteers should follow the advice provided on these pages.

a) Fairly and lawfully processed

The legislation requires organisations to ensure that all personal data received from members is processed fairly and lawfully and that they are open and honest (transparent) about the reasons for obtaining the data. In practice, this means that staff and volunteers must be clear as to why they are collecting personal data and what they intend to do with it.

Personal data is regularly collected from members of the church and the public through registration for one of the ministry area groups, activities, or events (eg Friday night youth and children's groups). Anyone registering with a ministry area should be advised of the church's privacy statement when joining/ completing registration details. The privacy notice/statement stipulates that individuals must give their consent to the processing of personal data for the purposes specified. It is suggested that they are also asked for their preference in how they wish to be contacted.

If they are vulnerable adults or children, permission to use the specified methods of communication should also be sought.

Registration data should only be used for:

- I. Managing membership status and subscriptions
- II. Providing effective and appropriate membership services
- III. Communicating with members with regard to organisational issues
- IV. Promoting CtK events and group activities

b) Processed for specified purposes

Any personal data should only be used for purposes for which it was collected. Ministry areas or groups should only share information about other individuals or organisations that fit within that purpose. Examples of this may include: promoting other churches' or organisations' events (eg New Wine) with non-church members.

Under **no** circumstances should ministry areas or groups pass on any personal data relating to members or prospective members to third parties without consulting the Incumbent, Standing Committee, PCC and the individual.

c) Adequate, relevant and not excessive

Only data needed for the specific purpose should be asked for or recorded. Information that is not relevant for the purpose must not be collected simply because it might be useful in the future.

d) Accurate and, where necessary, kept up to date

Ministry area heads should ensure that any database is maintained and kept updated to ensure effective communication with those people linked to the ministry area or group.

Ministry areas should ensure that group members are able to simply update or change their contact details, either through a form or via the website. (ie a termly mailing giving the current details held and a slip/form to make any changes that are required). Any changes should be communicated to the team leading the group/ministry area as required. On receipt of any updated information, ministry areas and groups should discard or archive previous records and replace them with the new information where appropriate.

It is important that inaccurate and out of-date information is regularly deleted/destroyed and inaccurate records corrected (ie archived either encrypted/password protected digitally or in hard copy and securely stored in accordance with diocesan rules on how long records should be kept. Where paper records are to be destroyed they should be shredded.

e) Not kept for longer than is necessary

It is important that appropriate data retention periods are defined and adhered to. In essence data should not be retained for any longer than is necessary to fulfil the reason it was collected unless otherwise required by law.

If the data is for vulnerable children and/or adults the current diocesan retention periods must be adhered to.

(Please see the Peterborough diocesan website or contact the CTK safeguarding officer via the church office).

f) Processed in line with the rights of the individual

Currently the Church of Christ the King does not operate a single central database for all the ministry area groups and activities. It is important that each area ensures that it offers anyone registering with them complete transparency and, if requested, allows them to view the personal data that is being held on their database about them or their ward/child.

If they have given consent for pictures or video that has been taken of them or their children, they have the right to request that the images are deleted or removed from use at any time after the consent has been given.

(Further details of how to obtain consent for taking pictures and video can be found in the Christ the King guidelines for taking of photos and video)

g) Kept secure

In all cases great care must be taken to secure and maintain any personal data held, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Volunteers processing data must ensure that:

- i. Access to laptops/computers where personal data is stored is restricted to authorised users only;
- ii. Any database passwords are kept secure and not shared with other people;
- iii. Computers/laptops containing personal data should always be stored securely – ie not left in a vehicle overnight;
- iv. Data collection through the website must be done with appropriate security policies and the latest security software in place.

h) Not transferred to countries outside the European Economic Area unless the information is adequately protected.

If you are using bulk email tools or storing data on websites it is possible that the servers are located outside the European Economic Area. It is recommended that you only use services provided by companies who host data within the UK or have signed the appropriate agreements.

For more information on this please see:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

For Further information and how this policy relates to the wider Church of England and Peterborough Diocese please see:

<https://www.peterborough-diocese.org.uk/privacy-notice.php>

4 Privacy policy statement

DATA PRIVACY NOTICE



For the PCC and Church of Christ the King, Kettering.

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 data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

Who are we?

The PCC of Christ the King, Kettering is the data controller. This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

The PCC of Christ the King, Kettering 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 use your personal data for the following purposes:

- To enable us to provide a voluntary service for the benefit of the public on the Ise Lodge and in the Kettering area as specified in our vision and mission;
- To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at Christ the King;

What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations 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 political, philosophical, religious or trade union aim provided: - o 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.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order 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.

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 [see footnote for link]. 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.

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 of Christ the King Kettering holds about you;
- The right to request that the PCC of Christ the King, Kettering 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 of Christ the King, Kettering to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- 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 object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will 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.

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

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Office at CtK via Office@ctk.org.uk

FINAL APPROVED

5 Reporting Incidents & requests for data disclosures

In the event of a data protection breach, eg loss, theft or unauthorised access to personal details, this report form must be completed and returned to the PCC via the Church Office.

Data Protection Incident Report Form	
Your name	
Your contact details	
Was the personal information lost, stolen or accessed by unauthorised individual(s)? Please provide details.	
Please provide details of the type of personal information and number of records involved.	
Please provide details of the circumstances of the loss/theft/access.	
Please provide details of action taken to minimise or mitigate the effect on individuals involved, including whether they have been informed.	
Please provide details of how or if the loss is being investigated.	
Please provide details of remedial action taken to prevent any future occurrence and any other information you feel may assist the PCC Projects Group in making an assessment on how the matter should be followed up.	
Does the breach need to be reported to the ICO? If yes please give details.	

6 Definitions

- **Data:** is recorded information, whether stored electronically on computer or in paper based filing systems.
- **Personal:** means that the information is about an identifiable living individual.
- **Personal data** can be factual, such as a name, address or date of birth, or it can be an opinion, such as how a manager thinks an employee has performed at an appraisal. It can even include a simple email address.
- **Processing:** is any activity that involves the data. This includes collecting, recording or retrieving the data, or doing work on the data such as organising, adapting, changing, erasing or destroying it.
- **Special Category Data data:** includes information about someone's racial or ethnic origin, political opinions, and religious or other beliefs, trade-union membership, genetic, biometric data, data concerning a person's health, sexual orientation of sex life, or criminal proceedings or convictions. Sensitive personal data can only be processed under strict conditions. Under the legislation the processing of such data is forbidden unless we provide a legal basis under both Article 6 and Article 9 of the UK GDPR.
- **Data users:** include employees and volunteers whose work involves processing personal information. As a data user, you have a legal duty to protect the information you handle. You must follow your employer's data protection and security policies at all times.
- **Data subjects:** are the people the information is about. Within the church family, they may be current members or people applying for volunteer roles. Data subjects might also be customers, suppliers, clients, patients or other people about whom information is held. All data subjects have certain legal rights in relation to their personal information.
- **Data processors:** may be separate organisations that process information on behalf of data controllers. They must also follow the act and make sure information is handled properly.

