

## Gorse Hill Baptist Church Data Protection Policy

### Purpose:

The purpose of this policy is to define the use of data held by Gorse Hill Baptist Church (GHBC).

GHBC is a vibrant, active congregation, committed to sharing the love of Christ in an open but responsible way. Data is collected and used by all its activities to help the church run these activities efficiently and safely and to comply with its legal obligations. However, we are also very aware of the safety and sensitivities of those involved, and thereby provide the following statement of policy, which will govern the data collected and how it is used at GHBC.

GHBC fully endorses and adheres to the six principles of the European General Data Protection Regulations (GDPR). These principles specify the conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Trustees, employees, members and volunteers at the church must abide by this policy and the principles.

### The Six General Data Protection Regulation Principles

- Personal data must be fairly and lawfully processed
- Personal data must be collected and processed for specific purposes
- Personal data must be adequate and not excessive
- Personal data must be accurate and up to date
- Personal data must not be kept for any longer than is necessary
- Personal data must be secure and kept from unauthorised use or accidental loss

### Who Is Responsible

The church's charity trustees are the data controller for the purposes of the GDPR. Activity leaders will manage and have access to the data to facilitate their activity; they will be responsible for day to day management of the data and will be informed of this policy.

### What Data Is Collected

GHBC collects and stores names, addresses, including email and phone numbers, birthday, relationship and related information. This is used for general church purposes, but may be used to make contact about follow-on or similar activities. Some activities necessitate the collection and storage of additional data, e.g. activities that make and serve food may use information on food allergies, children's activities may collect information on medical conditions, food allergies and doctor contact information. The treasurer also keeps financial information as obligated by legal requirements.

GHBC collects some data classified as 'Sensitive Personal Data'. This is collected with the express permission of the individual, by completion of appropriate forms. In rare cases data is retained as part of any ongoing pastoral care work or as part of any legal requirements.

GHBC also holds data about its employees in order to fulfil requirements of employment law and to fulfil its duties to its employees.

## How Long Do We Keep Data

Data will be kept for as long as it is relevant or legally required and refreshed regularly at intervals of a year or less. Up to date data is important to the smooth running of our activities and responsiveness in an emergency, so frequent updates and refreshment of data is important. Data will be checked for validity with its source. Some activities destroy previous data and renew all information with each refresh, this is applicable to children and youth work, where circumstances may change quickly, such activities may refresh data termly or even weekly.

## Where Do We Keep Data

Data is kept in two forms, both in a secure manner, to prevent unauthorised access

1. Paper form. Data is kept on the forms created at discovery. These forms are kept in locked cupboards at church; they may accessed before, during and after the relevant activities. Out of date forms will be shredded in the church office.
2. Computer form. Data is kept in several places in computer form. These are:
  - a. on personal computers at homes under password protection such that only the activity leader has access.
  - b. Cloud based services which have been selected for their data privacy policies, compliance to GDPR and where applicable to the U.S. Data Shield. Cloud based services currently used by GHBC include:
    - dropbox.com
    - airtable.com
  - c. GHBC email servers, where personal data is routinely transmitted via email messages, email will only be accessed via encrypted links and will only be sent from and to GHBC email addresses.
  - d. GHBC web servers, some data will be kept with our web server to allow member login to member services and to enable member emails.

Any data held is only accessible to those who organise the activity for which the data was discovered/collected.

## The Data Register

GHBC maintains a list of the types of data it holds by activity, The Data Register. It will record the type of data, where and why it is held, who has access and the refresh cycle.

The register will be available on the church's website at [ghbc.org.uk](http://ghbc.org.uk).

Changes to the data collected and stored will need to be approved by the data controller and added to the register. When a new activity gets underway the data types it wishes to collect and hold will be discussed with the data controller. If an existing activity wishes to collect a new data type, application will be made by the activity leaders to the data controller who will either accept or reject the application.

As part of each application the data controllers will examine the type of data to be held, where it is to be held, how it is to be held and who will have access.

On acceptance The Data Register will then be updated. Activity leaders will be reminded of the requirements of this policy. The church members will be informed of the changes.

## **Right of Correction**

GHBC wishes to keep all its data as up to date as possible, we will endeavour to make any corrections indicated by the individuals concerned. Please contact the activity leader(s) concerned or contact the Data Controller via email, phone or letter.

## **Right of Complaint**

The Data Controller will also investigate any Data Protection issue highlighted by an individual and may be contacted by email, phone or letter. This does not affect the individual's rights, particularly to take their complaint to the ICO.

## **Right of Access**

The right of an individual to know what data is being held about them and to check its accuracy will be upheld by GHBC. Requests should be made in writing to the Data Controller using the standard letter available from [www.ico.gov.uk](http://www.ico.gov.uk) or by email or phone. GHBC reserves the right to take up to 30 days to respond from receipt of the application.

## **Right to be Forgotten**

The right for an individual to be forgotten by GHBC will be upheld by GHBC. On request by the individual by email or letter, data held about that person will be erased from all records except where legal and authority requirements dictate it must be kept, e.g. financial information required for Gift Aid returns.

As erasure will be unrecoverable, applications for the right to be forgotten will not be acceptable by phone.

## **Data Breaches**

The GHBC data breach policy is the subject of a separate document.

## **Change Notice**

GHBC may change the content of this policy at a Members Meeting without notice. Current copies of this policy may be obtained at the church office or online at <https://www.ghbc.org.uk>

Revision Date: 03/05/2018

Background information: BUC Guideline Leaflet L13: Data Protection

ICO – Information Commissioners Office, [ico.org.uk](http://ico.org.uk)  
Data Controller, [gdpr@ghbc.org.uk](mailto:gdpr@ghbc.org.uk), 01793 534193