Priory Church of St Laurence, Blackmore Parochial Church Council
Data Protection Policy

1. Introduction

As a charity, Blackmore Parochial Church Council is not required to register under the General Data Protection Regulation, but, as we process personal data, we are required to follow and abide by the eight Data Protection Principles which state that personal data must be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose
- Accurate
- Not kept longer than necessary for the purpose
- Processed in line with data subjects' rights
- Secure
- Not transferred to people or organisations situated in other countries without adequate protection

This policy sets out how we ensure that this happens for all activities involving Blackmore Parochial Church Council. It applies to all employees and volunteers of the Parochial Church Council. It was approved by the PCC at its meeting on 9th May, 2018.

Our Data Protection Controller, Blackmore Parochial Church Council, is responsible for ensuring compliance with the Act. Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with them.

This policy is not part of any contract of employment but it is a condition of service that employees and others who process personal data will adhere to the rules of the policy. Any breach of the policy will be taken seriously. Any volunteer or employee who considers that the policy has not been followed in respect of Personal Data about them or others should raise the matter with the Data Protection Controller in the first instance who will then investigate the complaint.

2. Definitions in the Act

The Act defines Personal Data and its processing in the following terms:

Data is recorded information whether stored electronically on a computer, in paper based filing systems or other media.

Data Subjects include all living individuals about whom we hold Personal Data. A Data Subject need not be a UK national or resident. All data subjects have legal rights in relation to their Personal Data.

Personal Data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal). It can even include a simple email address. It is important that the information has the Data Subject as its focus and affects the individual's privacy in some way. Mere mention of someone's name in a document does not necessarily constitute Personal Data, but personal details such as someone's contact details or salary would fall within the scope of the Act.

The types of Personal Data that Blackmore Parochial Church Council may be required to handle include information about current and living, past and prospective parishioners, employees, volunteers, customers, conference and course attendees, those running or leading courses and others with whom we communicate.

Data Controllers are the people or organisations who determine the purposes for which, and the manner in which, any Personal Data is processed. They have a responsibility to establish practices and policies in line with the Act. Blackmore Parochial Church Council is the Data Controller under the terms of the Act.

Data Users include employees and volunteers of Blackmore Parochial Church Council whose work involves using Personal Data held by the church. Data Users have a duty to protect the information they handle by following our data protection and security policies at all times.

Data Processors include any third party who processes Personal Data on behalf of a Data Controller. This excludes volunteers or employees of Blackmore Parochial Church Council (who are Data Users) but does include, for example, outside suppliers who are contracted to handle Personal Data on our behalf.

Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

Sensitive Personal Data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive Personal Data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

3. The Data Protection Principles in Practice

Fair and lawful Processing

The Act is not intended to prevent the processing of Personal Data, but to ensure that it is done fairly and without adversely affecting the rights of the Data Subject.

For Personal Data to be processed lawfully, certain specific conditions have to be met. These include, among other things, requirements that the Data Subject has consented to the processing, or that the processing is necessary for the legitimate interest of the Data Controller or the party to whom the data is disclosed. The Data Subject must be told who the Data Controller is, the purpose for which the data is to be processed and the identities of anyone to whom the data may be disclosed or transferred.

We shall ensure that when Personal Data is collected, Data Subjects will be informed that their consent to the processing of data is assumed, that data will be held in accordance with this policy and in compliance with the requirements of the General Data Protection Regulation , details of which can be obtained from the Information Commissioners Office (see address below).

When sensitive personal data is being processed, additional conditions must be met. In most cases the data subject's explicit consent to the processing of such data will be required and processing will not be carried out until that has been obtained. All instances involving sensitive Personal Data will be referred to the Data Protection Controller who will ensure that the requirements of the Act are followed.

Processing for Limited Purposes

Personal Data may only be processed for the specific purposes notified to the data subject when the data is first collected or for any other purposes specifically permitted by the Act, such as complying with requests from the police or other authorities. We shall ensure that Personal Data is only collected for the legitimate purposes of Blackmore Parochial Church Council and that it is not subsequently used for any other purpose. If it becomes necessary to change the purpose for which the data is processed, the Data Subject will be informed of the new purpose before any processing occurs.

Adequate, Relevant and Non-excessive processing

Personal Data should only be collected to the extent that it is required for the specific purpose notified to the Data Subject. We shall ensure that only necessary data is collected and that any data which later becomes irrelevant will be destroyed.

Accurate Data

Personal Data must be accurate and kept up to date. We shall take steps to check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data will be destroyed.

Timely Processing

Personal data should not be kept longer than is necessary for the purpose for which it was collected. We shall ensure that data is destroyed or erased from our systems when it is no longer required.

Processing in line with Data subject's rights

Data must be processed in line with data subjects' rights. We shall ensure that data subjects have a right to the following:

- To request access to any data held about them (known as a subject access request – see section Dealing with Subject Access Requests)
- To prevent the processing of their data for direct-marketing purposes
- To ask to have inaccurate data amended
- To prevent processing that is likely to cause damage or distress to themselves or anyone else

Security and Disclosure of Personal Data

The Act requires us to put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We shall ensure that appropriate security measures are taken to prevent unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data.

In particular, we shall ensure that Personal Data is only disclosed in accordance with our policy. This includes the disclosure of contact details only to individual members of The Priory Church of St Laurence upon request for information.

We shall also take the following steps to secure personal data:

- Only those employees or volunteers who are authorised to use the data will be able to access it and process it
- Personal data will only be stored on our central computer system and not on individual PCs unless by resolution of Blackmore Parochial Church Council and password protected
- Desks and cupboards will be kept locked if they hold personal data of any kind
- When destroying personal data, paper documents will be shredded and physical media will be physically destroyed
- Data Users will be required to ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC or lock their computer when it is left unattended

When receiving telephone or email enquiries, employees and volunteers will be required to be careful about disclosing any personal data held on our systems. In particular they will:

- Check the caller's identity to make sure that data is only given to a person who is entitled to it
- Suggest that the caller put their request in writing where the employee or volunteer is not sure about the caller's identity and where their identity cannot be checked
- Refer to the Data Protection Controller for assistance in difficult situations

Personal Data will only be transferred to a third-party data processor, such as a supplier under contract to Blackmore Parochial Church Council, if they agree to comply with these procedures and policies, or if they put in place adequate measures which satisfy us that they will comply with the Act.

Dealing with Subject Access Requests

A formal request from a Data Subject for information we hold about them must be made in writing or by email to the Data Protection Controller. Employees or volunteers who receive a subject access request will forward it to the Data Protection Controller immediately, who will take appropriate action in accordance with the Act. Response must be made within one month of receipt without charge.

This Data Protection Policy and also the Data Privacy Notice will be reviewed annually and the result reported at the Annual Parochial Church Meeting.

Information Commissioners Office:
Helpline: 0303 123 1113
Website: https://ico.org.uk/

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