**Data Protection Policy**

**Data Protection Policy for Harnham Parish Churches – updated and approved by the PCC November 2023 and to be reviewed annually**

**1. INTRODUCTION**

The administrator is the Data Controller for the purposes of the Data Protection Act on behalf of Harnham Parish. (Please note for the use of this document Harnham Parish means Harnham Parish Churches of St George, All Saints and Messy Church.)

Harnham Parish uses personal data about living individuals for the purposes of general church administration and communication.

Harnham Parish 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.

Harnham Parish 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 Harnham Parish must adhere to these principles.

**2. THE PRINCIPLES**

The principles require that personal data shall be:

* Used fairly, lawfully and transparently
* Used for specific, explicit purposes
* Used in a way that is adequate, relevant and limited to only what is necessary
* Accurate and, where necessary, kept up to date
* Kept for no longer than is necessary
* Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

There is stronger legal protection for more sensitive information such as:

* Race
* Ethnic background
* Political opinions
* Religious beliefs
* Trade union membership
* Genetics
* Biometrics (where used for identification)
* Health
* Sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences

**3. MAINTAINING CONFIDENTIALITY**

Harnham Parish Churches will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the clergy, employed staff and authorised leadership and ministry overseers/co-ordinators of the church in order to facilitate the administration and day-to-day ministry of the church.

Information and data stored by the Church Office will not be distributed in any form such as digital, hard copy or any other form which might breach the Data Protection Act.

Your personal information will not be given or sold to any other person, company or church.

All employed staff are required to sign a confidentiality clause written into their contract of employment

All clergy, employed staff and authorised leadership and ministry overseers/co-ordinators e.g. church wardens, treasurer, electoral roll co-ordinator, who have access to personal data obtained under this policy will be required to agree to and sign this Data Protection Policy. (See Appendix 1)

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

• Where we are legally compelled to do so

• Where there is a duty to the public to disclose

• Where disclosure is required to protect our interest

• Where disclosure is made at your request or with your consent

**4. USE OF PERSONAL INFORMATION**

Harnham Parish Churches will use your data for four main purposes:

1. The day-to-day administration of the Church including pastoral care and oversight, calls, emails and visits, preparation of ministry rotas, maintaining financial / giving records for audit and tax purposes

2. Contacting you to keep you informed of church news, activities and events

3. Statistical analysis to gain a better understanding of church demographics

4. With your specific permission, for the production of a church contact list which will be made available to other members of Harnham Parish. This includes co-ordinators of baptism visits, home communion visits, bereavement visiting, church committee groups and rotas.

**5. MEMBERSHIP and other DATABASES**

a) Membership information is held on the Electoral Roll database by the employed staff of the Parish and the electoral roll officer; and

b) Membership information of Messy Church is held by the Messy Church co-ordinator, and employed staff of the Parish.

c) Christening, Wedding and Funeral database is held by employed staff of the church, and those in trained volunteer roles such as Baptism visitors, bereavement visitors, marriage preparation visitors and the Church Links coordinator.

The databases are stored on the staff computers which are protected by passwords. They cannot be accessed via the internet.

**To reiterate - The databases can only be accessed by users who have specific permission to do so**.

Information collected by the Church Office will be stored onto either databases and will not be used for any other purposes than set out in this section.

1. Access to each database is strictly controlled through the use of name specific passwords, which are setup and authorised by the Data Controller.

2. Those authorised to use each database may only have access to a limited area within the database.

3. Only the clergy and church staff and authorised leadership and ministry overseers/coordinators have access to these databases.

4. These databases will NOT be accessed by any authorised users outside of the UK, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.

5. Personal information will not be passed onto any third parties outside of the church environment.

6. Personal information may be made available to others within the church environment via the password protected members area of the church website with the express permission of the data subject who will be given the opportunity to ‘opt in’ to this. This information may also be published in a church contact list which will be made available in paper form to church members without website access.

7. The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example information about health, race or gender, express consent to process the data must be obtained.

**6. STORAGE OF DATA ON OTHER ELECTRONIC MEDIA**

All clergy, employed staff and authorised leadership and ministry overseers/co-ordinators who store personal information obtained under this policy on any electronic system not connected to the Harnham Parish computer network or part of the Harnham Parish Churches website are required to do so in accordance with the principles of the Data Protection Act and to take due care to ensure that the information remains secure through the use of passwords and encryption where appropriate. This includes:

• email / telephone / address books held on personal computers, mobile phones, PDA’s etc.

• Data stored on memory sticks and/or portable hard drives

**7. RIGHTS TO ACCESS INFORMATION**

Employees and other subjects of personal data held by Harnham Parish have the right (with some legal exceptions) to access any personal data that is being kept about them either electronically or in paper-based filing systems. This right may be withheld if the personal information also relates to another individual.

Specifically, all individuals who are the subject of personal data held by Harnham Parish Churches are entitled to:

• Ask what information the church holds about them and why.

• Ask how to gain access to it.

• Be informed how to keep it up to date.

• Be informed what the Church is doing to comply with its obligations under the 2018 Data Protection Act.

Any person who wishes to exercise this right should make the request in writing to the Data Controller.

Harnham Parish Churched reserve the right to charge the maximum fee payable for each subject access request.

Harnham Parish Churches aim to comply with requests for access to personal information as quickly as possible, but will ensure that it 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.

If personal details are found to be inaccurate, they can be amended upon request.

**8. PHOTOGRAPHS**

Photographs taken within the Church building or at Church events may include individuals or groups of individuals attending these events. These photographs will be used solely for the purpose of Harnham Parish Churches’ advertising, marketing and public relations, and may thus appear in any advertising internal and or external, website or other publicity material.

The Data Protection Act DOES apply where photographs are taken for official use, such as for identity passes, and these images are stored with personal details such as names. Where the Act does apply, it will usually be enough for the photographer to ask for permission to ensure compliance with the Act.

Photographs taken at Harnham Parish Churches purely for personal use are exempt from the Data Protection Act. This means that parents, friends and family members can take photographs for the family album of their children and friends participating in church events.

**9. WEBSITE PRIVACY STATEMENT (See also Harnham Parish E-Policy)**

The following statement is provided for users of the Harnham Parish Website:

At Harnham Parish we collect different types of information about our users for the following main reasons:

1. To provide an interactive web site where email is used to communicate with the users.

2. To provide a security mechanism whereby we can restrict content to certain groups of users.

3. To help us to improve the service we offer.

**10. Non UK GDPR**

In the rare circumstance that we receive an application for Pastoral services from outside of the UK - e.g. Baptism, Wedding or Funeral for which at least one of the applicants is a non UK resident, we will refer to the data protection law for that country.

**Our Principles**

We are absolutely committed to protecting your privacy. Our policy can be summarised in one sentence: **We will not share your information with others without your consent**.

We have established the following two principles:

1. We will respect your email privacy. You will only receive email from Harnham Parish in relation to areas you have signed up for.

2. We will not share any individual user details (including your email address) to any third party without your consent.

**What else you should know about privacy?**

• Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an individual are responsible for the security of, and access to, your own computer.

• Please be aware that whenever you voluntarily disclose personal information over the Internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the secrecy of your usernames and passwords and any account information. Please be careful and responsible whenever you are using the Internet.

• Our pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.

**10. DECLARATION**

Name ............................................................................................

Position .........................................................................................

Status *(Delete as appropriate)* Clergy / Employee / Volunteer

I confirm that I have read the Data Protection Policy for Harnham Parish Churches and as someone who has access to personal data obtained under this Policy, I agree to adhere to it.

Signed............................................................ Date ....................

Position…………………………………………………………………

**Appendix 1**

Names of authorised post holders and ministry leaders linked to data collection. Clergy and the Data controller have access to all data.

This appendix is reviewed annually.

* Electoral Roll - Churchwardens, Clergy, Administrator, David Curzon as Electoral Roll Officer, Jacqui Brown as Parish Safeguarding Officer
* Baptism visitors - Jacqui Brown, Katharine Callard
* Home communion visitors - Jean Mercer as LPA, Debbie Mussellwhite as LPA, Revd Mike Badger as curate
* Bereavement visitors - Jean Mercer as LPA, Debbie Mussellwhite as LPA, Katy Carter, Sue Reeder and Annette Philips as the Bereavement Journey team
* Historical Research in Parish records - William Alexander as archivist, Churchwardens, Data controller, Vergers of funerals and burial of Ashes, Parish administrator
* St George’s Toddler Group partnership with parish – Paula Price
* Messy Church - Jean Mercer, Linda Baker as administrator
* Hall Users - Linda Baker as Parish administrator
* Magazine - Ian Davidson as editor, Pam Ashley as delivery co-ordinator, Simon Jackson as advertising co-ordinator
* Church Links - Charles Woodd as co-ordinator, Linda Baker as administrator
* Mother’s Union - Katharine Callard as co-ordinator of the MU committee
* Welcome card information - Churchwardens and Church Links co-ordinator
* Organist contact details shared with one another and Churchwardens
* Rotas - Jane Greenaway, Charles Woodd (service rota), Margaret Jackson (All Saints flowers), Suzanne Davies (St Georges’ flowers), Robert Salkeld, (All Saints cleaners), Katharine Callard (St Georges’ cleaners and coffee), Inas Miles (Lift co-ordinator), Pam Ashley (magazine distribution co-ordinator).

All those who are listed on the following rotas can have access to each other’s contact information with permission of the group.

* House groups including Pause for… / social groups
* Cleaning rota, Flower rota, Lifts to church rota, St Georges’ coffee rota
* Sunday Wardens, Readers and Intercessors
* Opening and Closing churches rota coordinators and participants

Updated November 2023