

## DATA PROTECTION POLICY – PRIVACY STATEMENT

*Winchester Baptist Church is committed to protecting all information that we handle about people we support and work with, and to respecting people's rights around how their information is handled. This policy and associated documents explains our responsibilities and how we will meet them.*

### 1. Policy Statement

- 1.1 Winchester Baptist Church is committed to protecting personal data and respecting the rights of our data subjects; the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.

We process personal data to help us:

- a) maintain our list of church members and regular attenders;
- b) provide pastoral support for members and others connected with our church;
- c) provide services to the community;
- d) safeguard children, young people and adults at risk;
- e) recruit, support and manage staff and volunteers;
- f) maintain our accounts and records;
- g) promote our services;
- h) maintain the security of property and premises;
- i) respond effectively to enquirers and handle any complaints

- 1.2 This policy has been approved by the Church's Charity Trustees who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

- 1.3 We are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate, as we are aware that people can be upset or harmed if any of these things happen.

- 1.4 We will make sure that all personal data is:

- a) processed **lawfully, fairly and in a transparent manner**;
- b) processed for **specified, explicit and legitimate purposes** and not in a manner that is incompatible with those purposes;
- c) **adequate, relevant and limited to what is necessary** for the purposes for which it is being processed;

- d) **accurate** and, where necessary, up to date;
- e) **not kept longer than necessary** for the purposes for which it is being processed;
- f) processed in a **secure** manner, by using appropriate technical and organisational means;
- g) processed in keeping with the **rights of data subjects** regarding their personal data.

## **2. Policy Application**

- 2.1 Each employee, trustee or volunteer processing personal information on behalf of the church, is required to comply with this policy. Making sure that any procedures that involve personal data, in the area that individual is responsible for and the rules set out in this Data Protection Policy are followed.
- 2.2 As a data subject of Winchester Baptist Church, we will handle your personal information in line with this policy.
- 2.3 Our Data Protection Designated Person is responsible for advising Winchester Baptist Church and its staff and members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to them.
- 2.4 Our procedures will be in line with the requirements of this policy, but if any individual is unsure about any planned or current activity that might breach this policy they must first speak to the Data Protection Designated Person.

## **3. Personal Data Collection**

- 3.1 We may collect and process information (personal data) about many different people (data subjects). This includes data we receive straight from the person it is about, and or receive information about data subjects from other sources.
- 3.2 We process personal data in both electronic and paper form and all this data is protected under data protection law.
- 3.3 In some cases, we may hold types of information that are called "special categories" of data in the General Data Protection Regulations (GDPR).
- 3.4 We commit to lawful processing of personal data, ie if at least one of the legal conditions, as listed in Article 6 of the GDPR, is met.
- 3.5 We will process 'special categories' of personal data only when, in addition to the conditions in Article 6, one of the extra conditions, as listed in Article 9 of the GDPR, is met.

- 3.6 When personal data is collected directly from the individual, we will inform them ~~in writing~~ about; our identity/contact details, the reasons for processing, and the legal bases, explaining our legitimate interests, and explaining, where relevant, the consequences of not providing data needed for a contract or statutory requirement; who we will share the data with; how long the data will be stored and the data subjects' rights.

This information is commonly referred to as a 'Privacy Notice'.

This information will be given at the time when the personal data is collected.

- 3.7 When data is collected from another source, rather than directly from the data subject, we will provide the data subject with the information described in section 3.6 as well as the categories of the data concerned; and the source of the data.

This information will be provided to the individual in writing within 1 month after we receive the data, unless a legal exemption under the GDPR applies. If we use the data to communicate with the data subject, we will at the latest give them this information at the time of the first communication.

#### **4. Consent Notice**

- 4.1 Where none of the other legal conditions apply to the processing, and we are required to get consent from the data subject, we will clearly set out what we are asking consent for, including why we are collecting the data and how we plan to use it. Consent will be specific to each process we are requesting consent for and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data.
- 4.2 Consent can however be withdrawn at any time and if withdrawn, the processing will stop. Data subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent.
- 4.3 We will only process personal data for the specific purposes explained in our privacy notices (as described above in section 3.6) or for other purposes specifically permitted by law. We will explain those other purposes to data subjects in the way described in section 3, unless there are lawful reasons for not doing so.

#### **5. Use of Personal Data**

- 5.1 We will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data "just in case" we want to process it later.
- 5.2 We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

5.3 We will not keep personal data longer than is necessary for the purposes that it was collected for. We will comply with official guidance issued to our sector about retention periods for specific records.

5.4 Information about how long we will keep records for can be found in our Data Retention Schedule.

## **6. Personal Data Security and Record Keeping**

6.1 We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.

6.2 We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing.

6.3 We will keep clear records of our processing activities and of the decisions we make concerning personal data (setting out our reasons for those decisions).

## **7. Data Subject Rights**

7.1 We will process personal data in line with data subjects' rights.

7.2 If a colleague receives any request from a data subject that relates or could relate to their data protection rights, this will be forwarded to our Data Protection Designated Person immediately.

7.3 We will act on all valid requests as soon as possible, and at the latest within one calendar month, unless we have reason to, and can lawfully extend the timescale.

7.4 All data subjects' rights are provided free of charge.

## **8. Use and Sharing of Personal Data**

8.1 We will comply with the rules set out in the GDPR, the Privacy and Electronic Communications Regulations (PECR) and any laws which may amend or replace the regulations around direct marketing. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, and telephone.

8.2 We will only share personal data with other organisations or people when we have a legal basis to do so and if we have informed the data subject about the possibility of the data being shared (in a privacy notice), unless legal exemptions apply to informing data subjects about the sharing. Only authorised and properly instructed are allowed to share personal data.

- 8.3 We will keep records of information shared with a third party, which will include recording any exemptions which have been applied, and why they have been applied. We will follow the Information Commissioner's Office's (ICO) statutory Data Sharing Code of Practice (or any replacement code of practice) when sharing personal data with other data controllers.

## **9. Personal Data Protection**

- 9.1 When we are planning to carry out any data processing which is likely to result in a high risk we will carry out a Data Protection Impact Assessment (DPIA).
- 9.2 Where staff or volunteers think that this policy has not been followed, or data might have been breached or lost, this will be reported immediately to the Data Protection Designated Person.
- 9.3 We will keep records of personal data breaches, even if we do not report them to the ICO.
- 9.4 We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when someone in the church becomes aware of the breach.

## **10. Website**

Where we collect personal data via our website, we will be upfront about it and it will be obvious to you that you're providing personal data and how we will be using it.

- 10.1 Google Analytics. When someone visits our website [www.winbap.org.uk](http://www.winbap.org.uk) we make use of the Google Analytics service to collect standard information about visitors to the sites and their behaviour (e.g. what pages they viewed). The data provided by Google Analytics is anonymised and in no way enables us to identify individual visitors. However, Google Analytics will place a cookie on your device to enable the service. For more information about how Google Analytics cookies work on websites visit: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
- 10.2 Cookies. Our website uses Squarespace as the content management system (CMS). Squarespace uses a number of cookies for the functionality of the site. Details about what cookies Squarespace may place on your device can be found here: <https://support.squarespace.com/hc/en-us/articles/360001264507>. If you wish to not allow cookies, most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).
- 10.3 Online Forms. If you fill out one of our website forms a notification email is sent to the relevant team within the church. No copy of the data you submit is stored anywhere. As our site uses secure access (SSL and https) the data you submit using the contact form will be encrypted once you press the "Submit" button.

- 10.4 Website Hosting. We use a third-party supplier (Squarespace) to host our website. Whilst generally they would have no need to access our website content or database, it is possible they may from time to time mainly for support queries. We are assured the hosting provider is GDPR compliant.

This policy and its procedures will be reviewed every two years.

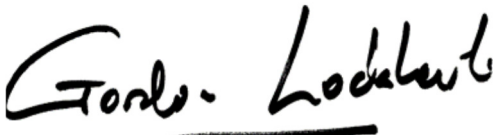
**Signed**



**Date** 17<sup>th</sup> June 2021

**David White, Data Protection Designated Person**

**Signed**



**Date** 17<sup>th</sup> June 2021

**Gordon Lockhart, Church Secretary**

## **APPENDICES**

1. Guidance Note
2. Privacy Notice and Consent Form
3. Additional Personal Information Form
4. Consent Form for Filming and Photography
5. Retention Schedule

Revision Version 1.3. Section 10 added