

ST FAITH'S, HAVANT with ST NICHOLAS, LANGSTONE DATA PROTECTION POLICY

St Faith's Church Havant with St Nicholas, Langstone (which also includes the Pallant Centre) uses personal data about living individuals. St Faith's recognises the importance of the correct and lawful treatment of this data. All personal data, whether it is held on paper, computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998 and the additional requirements under the future GDPR legislation.

St Faith's fully endorses and adheres to the eight 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 St Faith's must adhere to these principals.

THE PRINCIPLES

The principles require that personal data shall give individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

MAINTAINING CONFIDENTIALITY

All personal data is to be treated as private and confidential and is not to be disclosed to anyone other than those who need access. This may include personnel who require access in order to facilitate pastoral care and staff administration or in the day-to-day ministry of the church.

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

USE OF PERSONAL INFORMATION

Use of personal data is for the purpose of pastoral care and staff administration which includes:

- The day-to-day administration of the church: e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes, electoral roll, membership of groups and committees.
- Contacting you to keep you informed of church activities

THE DATA:

Data held by and on behalf of St Faith's will not be used for any other purposes than set out in this section.

Data is distributed among a number of computers (both Church and privately owned) and in paper format by those who have a need to either maintain, process or use the data.

A record of where data is located, what the data is, what it is to be used for and who maintains, processes or uses the data, is to be maintained by the Church office under the authority of the Data Compliance Officer. Due to the distributed nature of the data there is no obvious master data set, therefore, data which is master data is to be declared in the data record held by the Church office and is to be used to maintain subsidiary data sets. When the circumstances surrounding the holding of data change then the Church office is to be notified of the changes.

The Rector will act on behalf of the Bishop of Portsmouth as the Data Compliance Officer for St Faith's and will appoint a Data Compliance Officer to act on behalf of the PCC.

Where data is stored electronically it is to be stored on a machine which is adequately protected physically and electronically with the latest updates to the operating system, antivirus, firewall and any other technical measures which are necessary.

Electronic data is to be password protected. On computers which are dedicated to Church use, logon passwords with appropriate inactivity time shall be the minimum protection. For other machines, file and/or programme passwords must be used to protect the data. This includes the use of CCTV in Church buildings.

When data is no longer required, electronically held data is to be erased, ensuring that temporary files and backups are also erased, and paper records are to be shredded. This excludes data or images captured by CCTV of criminal activity, which may be forwarded and held by the Police as part of their criminal investigation.

Personal information will not be passed onto any third parties outside of the church environment without consent unless we are legally obliged to do so.

Subject Consent: 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 will be obtained.

RIGHT TO ACCESS INFORMATION

Employees and other subjects of personal data held by St Faith's have the right to access any personal data that is being kept about them on computer and also have access to paper-based data held in certain manual filing systems. This right is subject to certain exemptions e.g. personal information may be withheld if the information relates to another individual.

Subject Access: All individuals who are the subject of personal data held by St Faith's are entitled to:

- Ask what information that St Faith's holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed what St Faith's is doing to comply with its obligations under the 1998 Data Protection Act.

Any person who wishes to exercise this right should make the request in writing to the Data Compliance Officer, using the standard letter which is available on line from www.ico.gov.uk If personal details are inaccurate, they can be amended upon request.

St Faith's aims to comply with requests for access to personal information as quickly as possible but will ensure that it is provided within 1 month 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 within the original 1 month.

A data audit will be carried out annually by the compliance officer. The data protection policy will be reviewed on an annual basis by the standing committee of St Faiths PCC

SIGNED AND AGREED:

Incumbant: _____ Rev'd Canon Tom Kennar

Churchwarden/s: _____ Sandra Haggan

_____ Colin Hedley

Data Compliance Officer for PCC: _____ Mrs Pauline West
(Parish Administrator)

Date: _____