



General Data Protection - What this means in practice

Why we hold data:

As a parish, we provide a 'voluntary service for the benefit of the public'. Some data we are required to keep, such as registers of baptisms and marriage, employment records, accident reports and data relating to safeguarding. Other data we need to keep in order to communicate effectively with our church members and wider congregation and to run the church activities. We are a religious organisation and as such, the data we hold, or are required to hold, is sensitive and under GDPR classified as 'special category person personal data'. We can hold this data because we have your explicit consent or because what we are doing is a 'legitimate activity' which relates to members or former members or to individuals with whom there is regular contact **and** the data is **not** disclosed to third parties.

What we hold

We already hold personal data on every member of our electoral roll. This is held under the GDPR category of 'legitimate activity', although every member on the electoral roll has also given their consent. We also hold personal data on some people who attend St Paul's, but who are not on the electoral roll and we do so also because this relates to 'legitimate activity' which is necessary to run our various activities and fulfil our obligations. This includes the operation of CCTV on the premises. CCTV recordings are used solely for purposes of aiding the general security and safety of our premises, for preventing criminal acts on the premises and for aiding statutory law enforcement agencies should criminal acts occur. Data captured by CCTV is not used or accessed for other purposes.

However, in these instances, consent has also been given. They are:-

- Volunteers in various ministries and/or on rotas who have provided their contact details
- Members of groups
- Parents of children involved in children's activities
- Children and young people involved in junior church and other activities who have been registered by their parents

In addition, we hold personal data in accordance with statutory requirements to register baptisms and marriages, to manage HMRC gift aid claims, to record and report accidents and to comply with safe recruitment requirements.

How we process your data:

We will use ChurchSuite as the primary means of communicating with members of our congregation and managing our church activities. All communication from ChurchSuite will be personal to you and will be about church activities which you are involved in – email communication to groups and groups of individuals, management of rotas, annual stewardship letters, distribution of newsletters from mission partners, prayer updates etc. Occasionally a whole church email may be sent about a specific matter, but this will not be frequent. General news updates will be administered through 'Inside St Paul's', administered via Mailchimp, and you will be able to unsubscribe to this without affecting your communications via, or data held on ChurchSuite. Opting out of email on ChurchSuite, however, will mean that you will not receive emails from the church about the activities you are involved in.

ChurchSuite will also be the primary tool for managing church business for a number of reasons. This is because it is the most secure means of holding your personal data. It provides us with a simple mechanism of recording and storing your consent. It also provides you with as much control as

possible over what personal data we hold, ensuring that it remains accurate and also giving you options about how we communicate with you and what data you share with others.

When exercising your choice as to what others can see and how that data is used, we ask that you take into account the following:-

- We will only process your data for our legitimate activities or the areas of church life for which we have your consent. If we wish to use your data for another purpose at some date in the future, we will not do so without seeking your consent or informing you that a new area of *legitimate activity* has arisen.
- You can set your own privacy settings for personal data using My ChurchSuite, should you wish to do so with help available if needed, or you can ask for your privacy settings to be set for you according to your consent. This means that you choose what is shared with other church members;
- Email addresses within ChurchSuite will be the primary means of email communication to administer church business and therefore individuals are encouraged to set the 'enable' function for email communication, which is vital to support the smooth administration of church activities and communication to those involved. Opting out of email entirely may result in you missing out on some important information or not being able to fulfil a specific ministry for which you have volunteered.
- For people on rotas, we ask that where possible, two methods of communication – email and a phone number are made visible to others on the rota so that swaps and other changes to arrangements can be easily communicated.
- Within ChurchSuite, we will set up 'flows' to alert administrators to when safeguarding training, DBS checks and other such Church of England policy requirements must be fulfilled. Anonymous statistical reports on these mandatory requirements may be used to complete annual returns to the diocese and the requirements of the archdeacon's inspection.
- Personal data will enable church leaders to oversee their rotas and group membership and communicate with members.
- Children's data is kept in a separate part of the database with access restricted to those responsible for children's ministry. Parents are able to manage their children's data through My ChurchSuite or specific registration and consent forms administered by the children and families or youth workers or others who are working under their leadership.

What we share with others

We will not share your personal data with any third party without your consent, and the need to do so is likely to be exceptional. What we share with other church members depends entirely on the privacy settings that you choose.

We will share names of those people who are First Aid trained or who have undertaken safeguarding training, for example, with church leaders planning events so that they can seek volunteers with the relevant training to put appropriate arrangements in place.

We may share your data with UK statutory law enforcement agencies without seeking your consent if this is requested by them for the purposes of crime prevention or investigation.

Your personal data will contribute to anonymous statistical reports which are generated from the personal data held on the database. Recently, we have been required to report on numbers who are DBS checked and who have undertaken safeguarding training.

How long will we keep your data?

We will not keep your data any longer than is required for the purpose you have specified. If you move away or cease to come to St Paul's, we will delete your data once we have established that with you. We are required to keep certain data for longer to comply with national policy and this is set out in a national document. The ChurchSuite archive keeps electronic data encrypted for as long as we are required to keep it. Paper records are archived at County Hall, Hertford.