



DATA PROTECTION POLICY

Ref	Owner	Approval	Scope
GP_18_E2	Mark Anderson	Grace Community Church Trustees	<ul style="list-style-type: none"> The policy relates to all personal data held regardless of format. It applies to anyone to handles this personal data, including those working on behalf of the Church.

First preparation and approval

Date first approved	Risk H/M/L	Review frequency	Owner	Approved by
22 nd January 2018	M	Every two years	Mark Anderson	Trustees

Review history

Date review due	Review date	Reviewed by	Approval date	Approved by

Review in progress

DATA PROTECTION POLICY

Details of the place of worship / organisation

Registered Address

Address	229 Bedford Road, Kempston, Bedford, MK42 7DH
Telephone	(01234) 851508
Email	simon.rowell@graceinthecommunity.com

Organisation details

Membership of Denomination/ Organisation	Fellowship of Independent Evangelical Churches
Charity Number	1129169
Regulators details	Charities Commission
Insurance Company	Employers' Liability Insurance with Congregational and General Insurance PLC (Policy Number RC01014082).
Regular Premises used	Addison Centre; Balliol Lower School; Bedford Road Lower School; Kempston Youth Centre; Kempston Centenary Hall; 229 Bedford Road Kempston.

Description of activities undertaken

As a mainstream Christian organisation we hold weekly worship meetings at the Addison Centre. These are supplemented by specialist, age and need specific groups for adults, youth and children throughout the week.

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Section 1: Leadership commitment

The biblical basis for data protection

- 1.1 As a Christian Church we view the teaching of the Bible as our ultimate guide to appropriate behaviours and relationships. It has much to say regarding our care of people:
 - God confers worth and dignity on all people. This is rooted in Creation (Genesis 1:26-28) and is most clearly seen in the death and resurrection of Jesus Christ for all people as individuals in relation to God (Romans 5:8-11).
 - Jesus calls us to love God with all our heart, soul, mind and strength, and to love our neighbours as ourselves, reflecting genuine respect for all others regardless of faith, age, gender, ethnicity, disability or cultural background (Mark 12:29-31).
 - The particular focus of the Bible is on doing justice for those without power in society; the poor, the orphan, the widow, the stranger (Proverbs 31: 8-9).
- 1.2 Providing a safe environment for Grace Community Church employees, volunteers, members and visitors is therefore a duty to God, in addition to being a legal obligation.

The organisation

- 1.3 Grace Community Church is a religious charity. The Church exists to promote the Christian faith in its immediate community of Kempston and Bedford and also through the whole world through its links with other similar churches and organisation. For more information please refer to the church 'this we believe' booklet which is available on the church website¹.
- 1.4 The Grace Community Church leadership consists of the Church Elders and Deacons who are the Charity Trustees. All employees and volunteers are responsible to the Grace Community Church leadership. Employees and volunteer teams and team leaders are appointed as required, usually from the Church membership.
- 1.5 Grace Community Church provides a range of services which include acts of worship, weddings, funerals, baptisms, home groups, courses, children's activities, lunch clubs, and other external events. Many of these activities are open to the public.
- 1.6 Grace Community Church does not own any premises. Grace Community Church hires facilities to provide services and office space for their employees. Grace Community Church may run some activities within private homes.
- 1.7 The Grace Community Church leadership accepts its responsibilities for providing, so far as is reasonably practicable, a safe and healthy environment with a view to ensuring the health, safety and welfare of all those who provide and use the Grace Community Church services
- 1.8 Grace Community Church provides employees to several other Charities, in particular The NET, The Trussell Trust and Christians Against Poverty. While providing the agreed services Grace Community Church employees will conform, as appropriate, to the other organisation's policies and working practices,
- 1.9 This policy and practice guidelines are based on advice from FIEC Practical Services, 39, The Point, Market Harborough, Leicestershire. LE16 7QU

¹ The policies and the booklet 'This we believe' can be found at www.graceinthecommunity.ccbchurch.com. To access the policies or booklet: log into the member's area, select groups and then the Church membership group. Select the menu choice files and then the booklet or policy.

Section 2: Principles of the Data Protection policy

Principles

“Data Protection Legislation” means the Data Protection Act 1998, the Privacy and Electronic Communications Regulations (EC Directive) Regulations 2003 (SI 2426/2003 as amended), and all applicable laws and regulations, including any replacement UK or EU data protection legislation relating to the Processing of Personal Data, including, where applicable, the guidance and codes of practice issued by the Information Commissioner’s Office.

The Data Protection Legislation (“the Legislation”) is concerned with the protection of human rights in relation to personal data. The aim of the Legislation is to ensure that personal data is used fairly and lawfully and that where necessary the privacy of individuals is respected. During the course of the activities of Grace Community Church (“the Church”), the Church Trustees (“we”) will collect, store and process personal data about our members, people who attend our services and activities, suppliers and other third parties and we recognise that the correct and lawful treatment of this data will maintain confidence in the Church. This policy sets out the basis on which we will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources.

The Data Protection Compliance Manager is responsible for ensuring compliance with the Legislation and with this policy. The post is held by Mr. Mark Anderson, c/o 229, Bedford Road, Kempston, Bedford. MK42 8DA. Tel: 01234 851508

Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Compliance Manager.

Section 3: Processing personal data

All personal data should be processed in accordance with the Legislation and this policy. Any breach of this policy may result in disciplinary action.

Processing includes obtaining, holding, maintaining, storing, erasing, blocking and destroying data.

Personal data is data relating to a living individual. It includes employee data. It will not include data relating to a company or organisation, although any data relating to individuals within companies or organisations may be covered. Personal data can be factual (for example a name, address or date of birth) or it can be an opinion about that person, their actions and behaviour.

Examples of personal data are employee details, including employment records, names and addresses and other information relating to individuals, including supplier details, any third party data and any recorded information including any recorded telephone conversations, emails or CCTV images.

Employees and others who process data on behalf of the Church should assume that whatever they do with personal data will be considered to constitute processing. Individuals should only process data:

- If they have consent to do so; or
- If it is necessary to fulfil a contractual obligation or as part of the employer/employee relationship; for example, processing the payroll
- If neither of these conditions are satisfied, individuals should contact the Data Protection Compliance Manager before processing personal data.

Section 4: Compliance with the Legislation

Employees and others who process data on our behalf have a responsibility for processing personal data in accordance with the Legislation. Anyone who has responsibility for processing personal data must ensure that they comply with the data protection principles in the Legislation. These state that personal data must:

- be obtained and used fairly and lawfully
- be obtained for specified lawful purposes and used only for those purposes
- be adequate, relevant and not excessive for those purposes
- be accurate and kept up to date
- not be kept for any longer than required for those purposes
- be used in a way which complies with the individual's rights (this includes rights to prevent the use of personal data which will cause them damage or distress, to prevent use of personal data for direct marketing, and to have inaccurate information deleted or corrected)
- be protected by appropriate technical or organisational measures against unauthorised access, processing or accidental loss or destruction
- not be transferred outside the European Economic Area unless with the consent of the data subject or where the country is determined to have adequate systems in place to protect personal data.

Section 5: Monitoring the use of personal data

We are committed to ensuring that this data protection policy is put into practice and that appropriate working practices are being followed. To this end the following steps will be taken:

- any employees and volunteers who deal with personal data are expected to be aware of data protection issues and to work towards continuous improvement of the proper processing of personal data;
- employees who handle personal data on a regular basis or who process sensitive or other confidential personal data will be more closely monitored;
- All employees must evaluate whether the personal data they hold is being processed in accordance with this policy. Particular regard should be had to ensure inaccurate, excessive or out of date data is disposed of in accordance with this policy;
- Spot checks may be carried out;
- An annual report on the level of compliance with or variance from good data protection practices will be produced by Mr Mark Anderson. Data breaches will be recorded and investigated to see what improvements can be made to prevent recurrences.

Section 6: Handling personal data and data security

We will take appropriate technical and organisational steps to guard against unauthorised or unlawful processing. Manual records relating to church members or employees will be kept secure in locked cabinets. Access to such records will be restricted. Computer files will be password protected.

We will ensure that employees and volunteers who handle personal data are adequately trained and monitored.

We will ensure that passwords and physical security measures are in place to guard against unauthorised disclosure.

We will take particular care of sensitive data and security measures will reflect the importance of keeping sensitive data secure (definition of sensitive data is set out below).

Security policies and procedures will be regularly monitored and reviewed to ensure data is being kept secure.

Where personal data needs to be deleted or destroyed adequate measures will be taken to ensure data is properly and securely disposed of. This will include destruction of files and back up files and physical destruction of manual files. Particular care should be taken over the destruction of manual sensitive data (written records) including shredding or disposing via specialist contractors.

All data will be stored in a secure location and precautions will be taken to avoid data being accidentally disclosed. Any agent employed to process data on our behalf will be bound to comply with this data protection policy by a written contract. Personal data stored on a laptop, tablet, mobile or similar device will be password protected.

Section 7: The rights of individuals

The Legislation gives individuals certain rights to know what data is held about them and what it is used for. In principle everyone has the right to see copies of all personal data held about them. There is also a right to have any inaccuracies in data corrected or erased. Data subjects also have the right to prevent the processing of their data for direct marketing purposes.

Any request for access to data under the Legislation should be made to Mark Anderson in writing. In accordance with the Legislation we will ensure that written requests for access to personal data are complied with within 30 days of receipt of a valid request.

When a written data subject access request is received the data subject will be given a description of

- a) the personal data,
- b) the purposes for which it is being processed,
- c) those people and organisations to whom the data may be disclosed,
- d) be provided with a copy of the information in an intelligible form.

Section 8: Sensitive data

We will strive to ensure that sensitive data is accurately identified on collection so that proper safeguards can be put in place. Sensitive data means data consisting of information relating to an individual's

- Racial or ethnic origin
- Political opinions
- Religious beliefs
- Trade union membership
- Physical or mental health
- Sexual life
- Criminal offences

Sickness records are likely to include sensitive data and as such should only be held if the explicit consent of each employee is obtained or if one of the other conditions for processing sensitive data is satisfied.

Section 9: Changes to this policy

We reserve the right to change this policy at any time. Where appropriate we will notify data subjects of those changes by mail or email.

Policy adopted on 22nd January 2018
(Date of Church Trustees/Leaders meeting)



Reviewed on.....