



**BLANDFORD  
EVANGELICAL  
CHURCH**

# **Data Protection Policy**

Date Policy Agreed by Trustees: 31st March 2022

Next review Date: One Year

BEC Data Protection Policy 2022

## Contents

1.	Aims of this Policy	3
2.	Principles of Data Protection	3
3.	Notification	4
4.	Responsibilities	4
5.	Type of Information Processed	4
6.	Collection and Processing of Personal Data	5
7.	Rights of Individuals	6
8.	Subject Access Requests	6
9.	Training	7
10.	Data Security	7
11.	Review	8
12.	Appendix – Definitions	9
13.	Declaration	11

## **1. Aims of this policy**

- 1.1 Blandford Evangelical Church needs to keep certain information on its members, employees, volunteers, service users and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.
- 1.2 The organisation is committed to ensuring any personal data will be dealt with in line with the Data Protection Act 2018 ("DPA 2018") and the UK General Data Protection Regulation ("UK GDPR"). DPA 2018 came into force in the UK on 25th May 2018 and was amended on 01 January 2021 by regulations under the European Union (Withdrawal) Act 2018, to reflect the UK's status outside the EU. The UK GDPR is the UK General Data Protection Regulation. It is a UK law which came into effect on 01 January 2021. To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- 1.3 The aim of this policy is to ensure that everyone handling personal data is fully aware of the requirements and acts in accordance with data protection procedures. This document also highlights key data protection procedures within the organization.
- 1.4 This policy covers employed staff, trustees and volunteers.

## **2. Principles of Data Protection**

- 2.1 In line with the Data Protection Act 2018 principles, Blandford Evangelical Church will ensure that personal data will:
  - Be obtained fairly and lawfully and shall not be processed unless certain conditions are met
  - Be obtained for a specific and lawful purpose
  - Be adequate, relevant but not excessive
  - Be accurate and kept up to date
  - Not be held longer than necessary
  - Be processed in accordance with the rights of data subjects
  - Be subject to appropriate security measures
  - Not be transferred outside the UK, except as permitted under the UK GDPR

### **3. Notification**

- 3.1 Currently Blandford Evangelical Church is not required to register with the Information Commissioner. This will be reviewed annually, or sooner if circumstances change.

### **4. Responsibilities**

- 4.1 In Blandford Evangelical Church overall responsibility for personal data rests with the Trustees. On behalf of Blandford Evangelical Church, the Trustees are responsible for:
- understanding and communicating obligations under the Act
  - identifying potential problem areas or risks
  - producing clear and effective procedures
  - (if applicable) notifying and annually renewing notification to the Information Commissioner, plus notifying of any relevant interim changes
- 4.2 All employees, trustees and volunteers who process personal information must ensure they not only understand but also act in line with this policy and the data protection principles.
- 4.3 Breach of this policy by an employee will result in disciplinary proceedings. Breach of this policy by a volunteer may result in termination of their volunteer agreement.
- 4.4 The trustees are accountable for compliance of this policy. A trustee could be personally liable for any penalty arising from a breach that they have made.

### **5. Type of Information processed**

- 5.1 Blandford Evangelical Church processes the following personal information:
- Contact details of employees, church members, church attenders and other users;
  - Bank account details of employees and volunteers;
  - Information relating to church activities that members, attenders or other users may participate in;
- 5.2 Personal information is kept in the following forms:
- Paper based systems
  - Computer based systems
- 5.3 Groups of people who will process personal information are:

- Employed staff
- Trustees
- Volunteers (who have been authorized to do so by staff or trustees)

## **6. Collection and Processing of Personal Data**

- 6.1 Before personal information is collected, Blandford Evangelical Church will consider what information is necessary for our purposes.
- 6.2 Where appropriate we will carry out Privacy Impact Assessments in order to ensure the personal data we collect is justified, necessary and proportionate.
- 6.3 Blandford Evangelical Church will identify a legal basis before processing personal data. This will usually be done by obtaining explicit consent from the individual. Exceptions to this may exist where processing is necessary for the performance of a contract (e.g. employee); or where required in order to comply with other legal obligations or is necessary to protect the vital interest of a data subject or another person.
- 6.4 Blandford Evangelical Church will keep a record of data processing activities as required by the law.
- 6.5 When collecting, processing or storing personal data the employees, trustees and volunteers of Blandford Evangelical Church will:
- Ensure any personal data is collected in a fair and lawful way;
  - Inform people why the information is being collected, what the information will be used for and who will have access to it;
  - Give information in a way that is concise, transparent, intelligible and easily accessible, written in clear and plain language, and is free of charge.
  - Obtain the data subject's consent ensuring it is freely given, specific, informed and unambiguous;
  - Keep a record of those who have given their consent;
  - Ensure the information is up to date and accurate by reminding people at least annually;
  - Ensure it is kept safely;
  - Delete or dispose of personal data safely when it is no longer required;
  - Ensure that personal sensitive information is only used for the exact purpose for which permission was given;
  - Ensure the rights people have in relation to their personal data can be exercised.

## **7. The Rights of Individuals**

7.1 The GDPR provides the following rights for 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.

7.2 In order to comply with the GDPR, Blandford Evangelical Church upholds these rights.

Anyone whose personal information we process has the right to:

- Know what information we hold on them;
- Know how to gain access to this information;
- Know how to keep it up to date;
- Prevent processing of their personal data in some circumstances;
- Have their personal data erased when it is no longer necessary;
- Obtain and reuse their data for their own purposes;
- Withdraw their consent;
- Have access to our Data Protection policy.

7.3 Blandford Evangelical Church does not collect or process personal data for the purposes of profiling, direct marketing or research and statistics. Automated processing is not used.

## **8. Subject Access Requests**

8.1 If an individual wishes to access their personal data, or to have their personal data rectified where it is inaccurate or requests their personal data for their own use (data portability), he/she should apply in writing or electronically to the Church Administrator.

8.2 The following information will be required before access is granted:

- Name, address and telephone number of the person making the request
- Their relationship with Blandford Evangelical Church

- Dates/timescales to be covered by the request
- Proof of identity, e.g. passport, birth certificate.

8.3 This will be provided free of charge.

8.4 We will aim to comply with requests for access to personal information as soon as possible but will ensure it is provided within one month of receiving the request. If the request is complex, this may be extended to 2 months and the person who made the request will be informed of the reason for this.

8.5 Where data portability is requested, we will provide the personal data in a structured, commonly used and machine-readable form, such as CSV files.

## 9. Training

9.1 The law requires that those handling personal data are trained to do so. Training and awareness-raising about the Data Protection laws and how it is followed in this organisation will take the following forms:

On induction: an employee, trustee or volunteer will be given this policy and other relevant policies to read and sign; he/she will also be given other relevant information regarding, e.g. the importance of using passwords on computers, keeping files and offices locked.

General training/ awareness raising: annual reminders will be given to employees, trustees and volunteers regarding this policy.

9.2 Blandford Evangelical Church will ensure that:

- Everyone managing and handling personal information is aware of our policies and procedures;
- Any disclosure of personal data will be in line with our procedures;
- Queries about handling personal information will be dealt with swiftly and politely.

## 10. Data Security

10.1 The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- Use of password protection on computers

- Lockable filing cabinets
- Key required to access offices
- Vigilance will be used when sending emails

## **11. Review**

- 11.1 This policy will be reviewed annually to ensure it remains up to date and compliant with the law.



# Appendix

## Definitions

1. **Data** means information which
  - (a) is being processed by means of equipment operating automatically in response to instructions given for that purpose,
  - (b) is recorded with the intention that it should be processed by means of such equipment,
  - (c) is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system.
2. **Personal data** means data which relate to a living individual who can be identified
  - (a) from those data, or
  - (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,
  - (c) and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.
3. **Sensitive personal data** means personal data consisting of information as to
  - (a) the racial or ethnic origin of the data subject,
  - (b) their political opinions,
  - (c) their religious beliefs or other beliefs of a similar nature,
  - (d) whether they are a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
  - (e) their physical or mental health or condition,
  - (f) their sexual life,
  - (g) the commission or alleged commission by them of any offence, or
  - (h) any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.

Extra care must be taken when processing sensitive personal data.

4. **Processing** means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including –
  - (a) organisation, adaptation or alteration of the information or data,
  - (b) retrieval, consultation or use of the information or data,
  - (c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
  - (d) alignment, combination, blocking, erasure or destruction of the information or data.
5. **Data subject** means an individual who is the subject of personal data.
6. **Data controller** means a person or organisation who determines the purposes for which and the manner in which any personal data are processed. Data controllers will usually be organisations. Even if an individual is given responsibility for data protection in an organisation, they will be acting on behalf of the organisation, which will be the data controller.
7. **Data processor** means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

## Declaration

I confirm I have read and understood Blandford Evangelical Church's Data Protection Policy and will act in accordance with it.

Date	Print Name	Position e.g. employee, trustee, volunteer	Signature