General Data Protection Regulation

Holy Innocents' Gt Barton, and St Peter's Thurston Parochial Church Councils (Benefice PCCs)

Data Protection Policy

Our Benefice Data Protection Co-ordinator is responsible for ensuring compliance with the Act. Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with Data Protection Co-ordinator.

Data Co-ordinator Contact details:
Name: Peter Robinson:
Phone: 07814 946841:
Email: admichurch64@gmail.com

1. Introduction

As a charity, Benefice Parochial Church Councils (Benefice PCCs) are not required to register under the 2018 General Data Protection Regulation (GDPR), but, as we process personal data, we are required to follow and abide by the eight Data Protection Principles which state that personal data must be:

- Processed fairly and lawfully
- Processed for limited purposes and in an appropriate way
- Adequate, relevant and not excessive for the purpose
- Accurate
- Not kept longer than necessary for the purpose
- Processed in line with data subjects' rights
- Secure
- Not transferred to people or organisations situated in other countries without adequate protection.

This policy sets out how we ensure that this happens for all activities involving the Benefice PCCs. It applies to all volunteers of the Benefice PCCs.

This policy is not part of any contract of employment but it is a condition of volunteers for the Benefice PCCs and others who process personal data will adhere to the rules of the policy. Any breach of the policy will be taken seriously. Any person who considers that the policy has not been followed in respect of personal data about themselves or others should raise the matter with the Benefice Data Protection Co-ordinator in the first instance. Contact details as above.

2. Definitions in the Act

The Act defines personal data and its processing in the following terms:

Data is recorded information whether stored electronically on a computer, in paper based filing systems or other media.

Data subjects include all living individuals about whom we hold personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data.

Personal data means data relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal). It can even include a simple email address or photograph. It is important that the information has the data subject as its focus and affects the individual's privacy in some way. Mere mention of someone's name in a document does not necessarily constitute personal data, but personal details such as someone's contact details would fall within the scope of the Act.

The types of personal data that the Benefice PCCs may be required to handle include information about current, past and prospective parishioners, volunteers, suppliers, course attendees, and those running or leading courses and others with whom we communicate.

Data controllers are the people or organisations that determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the GDPR Act. The Benefice PCCs are the data controllers under the terms of the GDPR Act.

Data users The Incumbent and volunteers of the Benefice PCCs, whose work involves using personal data held by the church. Data users have a duty to protect the information they handle by following our data protection and security policies at all times.

Data processors include any person who processes personal data on behalf of a data controller. This includes the Incumbent and volunteers of the Benefice PCCs (who are also data users)

Processing is any activity that involves use of the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties. **We would not transfer personal data to a third party without the specific consent of "The Data Subject".**

Sensitive personal data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive personal data can only be processed under strict conditions, including a condition requiring the express permission of the person concerned.

3. The Data Protection Principles in Practice

Fair and lawful Processing

The Act is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

For personal data to be processed lawfully, certain specific conditions have to be met. These include, among other things, requirements that the data subject has consented to the processing, or that the processing is necessary for the legitimate interest of the data controller or the party to whom the data is disclosed. The data subject must be told who the data controller is, the purpose for which the data is to be processed and the identities of anyone to whom the data may be disclosed or transferred.

We shall ensure that when personal data is collected, data subjects will be informed that the data will be held in accordance with the requirements of the 2018 General Data Protection Regulation (GDPR) and in compliance with this policy, a copy of which can be obtained from the Benefice PCCs and that their consent to the processing of data is assumed.

When sensitive personal data is being processed, additional conditions must be met. In most cases the data subject's explicit consent to the processing of such data will be required and processing will not be carried out until that has been obtained. All instances involving sensitive personal data will be referred to the Benefice Data Protection Co-ordinator who will ensure that the requirements of the Act are followed.

Processing for Limited Purposes

Personal data may only be processed for the specific purposes notified to the data subject when the data is first collected or for any other purposes specifically permitted by the Act, such as complying with requests from the police or other authorities. We shall ensure that personal data is only collected for the legitimate purposes of the Benefice PCCs and that it is not subsequently used for any other purpose. If it becomes necessary to change the purpose for which the data is processed, the data subject will be informed of the new purpose and consent confirmed, before any processing occurs.

Adequate, Relevant and Non-excessive processing

Personal data should only be collected to the extent that it is required for the specific purpose notified to the data subject. We shall ensure that only necessary data is collected and that any data, which later becomes irrelevant, will be destroyed.

Accurate Data

Personal data must be accurate and kept up to date. We shall take steps to check the accuracy of any personal data at the point of collection and at regular intervals afterwards. Inaccurate or out-of-date data will be destroyed.

Timely Processing

Personal data should not be kept longer than is necessary for the purpose for which it was collected. We shall ensure that data is destroyed or erased from our systems when it is no longer required.

Processing in line with Data subject's rights

Data must be processed in line with data subjects' rights. We shall ensure that data subjects have a right to the following:

- To request access to any data held about them (known as a subject access request)
- To prevent the processing of their data for direct-marketing purposes
- To ask to have inaccurate data amended
- To prevent processing that is likely to cause damage or distress to themselves or anyone else

Security and Disclosure of Personal Data

The Act requires us to put in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We shall ensure that appropriate security measures are taken to prevent unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data.

In particular, we shall ensure that personal data is only disclosed in accordance with our policy. This includes the disclosure of contact details only to individual members of the Benefice PCCs upon request for information.

We shall also take the following steps to secure personal data:

- Only those volunteers who are authorised to use the data will be able to access it and process it
- Personal data will only be stored on authorised PC/Laptops as registered with the Benefice Data Protection Co-ordinator and the Benefice PCCs (Data Controllers).
- Where personal data is stored as paper documents, these will be kept in a secure manner and will only be shared/viewed by authorised individuals.
- When destroying personal data, paper documents will be shredded and CD-ROMs will be physically destroyed and USB's will be formatted to remove all data.
- Data users will be required to ensure that individual PC/Laptops do not show confidential information to passers-by and that they log off from their PC/Laptop and it is locked when it is left unattended.

When receiving telephone or email enquiries, volunteers will be required to be careful about disclosing any personal data held on our systems. In particular they will:

- Check the caller's identity to make sure that data is only given to a person who is entitled to it
- Ensure that the caller put their request in writing to the Benefice Data Protection Co-ordinator. The Benefice PCCs hold the address for the Benefice Data Protection Co-ordinator.
- Refer to the Benefice Data Protection Co-ordinator for assistance in difficult situations

The Benefice PCCs will only transfer personal data to a third-party data processor, if they agree to comply with these procedures and policies, and they put in place adequate measures, which satisfy us that they will comply with the Act. The Benefice PCCs will not transfer any personal data without the specific consent of "The Data Subject"

Dealing with subject access requests
A formal request from a data subject for information we hold about them must be made in writing or by email to the Benefice Data Protection Co-ordinator. A fee may be charged for each disclosure. Volunteers who receive a subject access request will forward it to the Benefice Data Protection Co-ordinator immediately who will take appropriate action in accordance with the Act.

Contact details:
Benefice Data Protection Co-Ordinator
Peter Robinson:
Phone: 07814 946841
Email; admichurch64@gmail.com

Data Protection Complaints Policy & Procedure
Benefice of Holy Innocents Church, Great Barton and St Peter's Church, Thurston

1. Purpose

This policy sets out the procedure for individuals (Data Subjects) to raise concerns or complaints about how the Benefice of Holy Innocents and St Peter's churches, processes their personal data. This ensures compliance with the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act.

2. Scope

This applies to any individual whose personal data is processed by the organisation, including employees, clients, and customers. It covers complaints about:

- Mishandling of personal data
- Breaches of data protection rights (e.g., Subject Access Requests)
- Inaccurate or unlawful use of personal data

3. How to Make a Complaint

Complaints can be submitted in writing via email or post to our Data Protection Team:

- **Email:** admichurch64@gmail.com
- **Post:** 18 Blackbird Close
  Thurston
  Bury St Edmunds
  Suffolk IP31 3PF

To help us investigate effectively, please provide:

- Your full name and contact information
- A clear description of your concerns
- Relevant dates, evidence, or previous correspondence
- Complete Benefice Compliant form

Note: If you are complaining on behalf of someone else, we will require proof of authority to act (e.g., signed written consent).

4. Complaint Handling & Timeline

We operate a fair, impartial, and accessible complaints process:

1. **Acknowledgement:** We will acknowledge your complaint in writing within 30 days of receipt.
2. **Investigation:** Our Data Protection Officer (DPO) or Data Protection Lead will review the complaint and consult relevant departments. The investigation will begin without undue delay.
3. **Response:** We will issue a written outcome explaining the findings and any corrective actions taken.

5. Escalation

If you remain dissatisfied with our internal handling of your data protection complaint, you have the right to escalate your concerns to the UK regulator:

Information Commissioner's Office (ICO)

- **Website:** ICO Make a Complaint
- **Helpline:** 0303 123 1113

6. Record Keeping

All complaints, investigation notes, and outcomes will be logged securely and retained in accordance with our data retention schedule and accountability principles under the UK GDPR.

Data Protection Complaints Form
Data Protection Complaints Policy & Procedure
Benefice of Holy Innocents Church, Great Barton and
St Peter's Church, Thurston

[The date]

Send to: Benefice of Holy Innocents and Great Barton
18 Blackbird Close, Thurston, bury St Edmunds IP31 3PF
[Reference number (if applicable)]

Or email to: admichurch64@gmail.com

Dear [name of team, department or person you've been in contact with],

Data protection complaint

[Your name and any other details to help identify you]

I'm concerned that you haven't handled my personal information properly.

[Give details of the complaint, and what you'd like the organisation to do to put things right]
If I still want to complain to the ICO after receiving your response, I'll share a copy of the complaint letter and your response with them.

You can find guidance on your obligations to handle complaints, as well as guidance on your obligations under data protection law, on the ICO's website.
If there's anything you'd like to discuss, please contact me on [give preferred contact method].

Yours sincerely
[Signature]