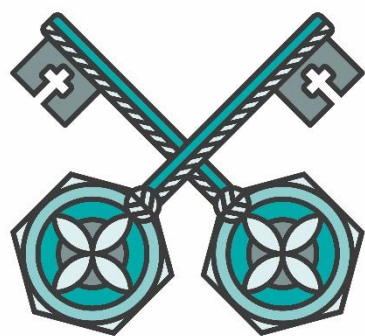




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Toolkit 6

General Data Protection Regulations (GDPR)

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What is GDPR and what does it mean for us?

- As a Mission Area Trustee Board (MAC)
- As a Church Committee
- As an individual

The Trustee Board (MAC)

The Trustee Board (MAC) is the charity and the members of the Trustee Board are the charity trustees. They are responsible for all the activities of the charity, including ensuring that the charity meets the responsibilities of the new General Data Protection Regulations (GDPR) that come into force on 25th May 2018.

The Mission Area may be exempt from registration. To check this take a simple test here <https://ico.org.uk/for-organisations/register/self-assessment/> .

Church Committees

Each Church Committee is a sub-committee of the Trustee Board and has powers which are delegated to it from the Trustee Board. It will be the responsibility of the church committee to ensure that information gathered to enable the smooth running of the church is dealt with in line with the guidelines laid down by the Trustee Board.

As an Individual

GDPR builds on the current 1998 Data Protection Act and will strengthen the legislation, giving you more rights and protection. The rights that are most likely to affect you in relation to church are listed here – but there are others.

- Your consent will need to be positive. Soon you will be seeing a lot fewer of those pre-ticked boxes signing you up for stuff that you may not want unless you take the time to untick them. Under GDPR it will be down to you to make a positive choice to agree to further direct marketing communications, such as ticking a box or agreeing over the phone. Marketing can be based on the legitimate interest of the organisation too – not just your consent – but the organisation will have to provide you with the option to opt out at the time your data is collected and in all future communications if they don't have your explicit consent.
- It must be clear what you're signing up to. Organisations must tell you specifically what you are signing up for or opting in to – vague or blanket consent is no longer good enough.
- Serious data breaches. If there is a serious breach of your data, you must be told right away.

- Fines for organisations who break the rules. In the most severe cases, the ICO can fine an organisation up to £17m.
- It will be free to find out what an organisation knows about you. You have always been able to make a subject access request, which allows you to act on your right to obtain access to your personal data held by an organisation. But now it will be free, so long as your request is not unfounded or excessive.

What is Personal Data?

Personal data is information about people that can be used to identify someone, such as their:

- Name
- Phone number
- Email address
- Twitter handle
- Date of birth
- Photograph
- 'Special category data' – this is particularly sensitive information about things like a person's religious or philosophical beliefs, their racial or ethnic origin, their health, and their criminal record.

Personal data is collected usually

- Via paper forms
- Via phone or email
- As photographs and video

In a church context, the people we are likely to hold personal data for may include the following

- Members
- Communicants
- Clergy
- Office holders (Wardens, Treasurers, Secretaries etc.)
- Volunteers
- Donors
- Employees
- Baptism/Wedding/Funeral families

You should give careful consideration as to whether you can consider 'Legitimate Activities' as a basis for processing before rushing to get explicit consent.

Explicit consent is the legal basis of last resort as it requires a high level of administration. We need to consider who is a member or former member of our faith community. It is not unreasonable to say that anyone who attends services, is on the electoral roll or has requested a Christian baptism, wedding or funeral could legitimately be considered either a member or former member of the faith community, and therefore legitimate activities can be a basis for data processing.

The sharing of Special Category data outside the faith community always needs explicit consent.

Where you store it and who you share it with

The GDPR does not define the security measures that you should have in place. It requires you to have a level of security that is 'appropriate' to the risks presented by your processing. You should review the personal data you hold and the way you use it to assess how valuable, sensitive or confidential it is – as well as the damage or distress that may be caused if the data was compromised.

The sharing of Special Category data outside the faith community always needs explicit consent.

Security measures for paperwork might include a locked filing cabinet or office. For digital data it might include password protecting the document, password protecting the computer, storing on an encrypted device or use of an encrypted cloud.

When you delete it

Data should only be stored for as long as it is needed. This will vary depending on legal requirements and/or the purpose of the data. The Church in Wales website gives guidance on how long to keep records. (go to <https://www.churchinwales.org.uk/structure/representative-body/publications/downloads/keep-or-bin/>)

Safe ways to delete data held on paper is to shred, burn or send to a confidential waste company. Digital data should be removed from any drive on the computer, including memory sticks or external drives. Empty the waste bin to completely delete these files.

Agree a privacy notice

We have produced a template Privacy Notice for the Trustee Board to use. It should be amended to reflect your local context and be formally approved by the Trustee Board. You should publish your Privacy Notice where anyone can access it e.g. on your Mission Area website. [see Template Privacy Notice]



What you need to know about sending emails

Alongside GDPR is another piece of legislation which relates to how you communicate by electronic means - **the Privacy and Electronic Communications Legislation (PECR)**.

As soon as you send an email or text for **marketing purposes**, an organisation must have the recipient's consent and, crucially, there is no "legitimate interest" or "legitimate activity" alternative justification.

You must decide whether the email you are sending contains anything likely to be construed as marketing – such as an invitation to an event for which you must buy a ticket. Even if you send a one-line covering email for a pdf newsletter which contains events or adverts, you attract the provisions of the PECR and must have consent.

We have produced two consent forms which you can use. They should be adapted for your local context. [see Template Consent Form simple or detailed in Part 2]

You don't need consent for everyday activities such as arranging rotas, sending out service sheets (unless you include advertising of paid-for events in these), or asking the treasurer to pay an invoice etc. These are all legitimate activities.

What you may need to do is to protect the email addresses of those receiving the emails. To do this, you can use the Blind Copy option in Outlook which appears when you click on either the To: or CC: button. This means that recipients cannot see who else has received the email, so you may need to tell people who has been included in the body of the email, e.g. To All Members of the Mother's Union.



What does the Church Committee Need to Do?

Data Audit

The Mission Area Trustee Board may ask churches to carry out an audit to explain:

- h. What data you store
- i. Where the data came from
- j. Why you need it
- k. How you use it
- l. On what legal basis you use it
- m. Where you store it
- n. Who can access it
- o. How secure it is
- p. When you delete it

We have produced an example of a data audit and would encourage you to use it as a basis for your audit. It is a very comprehensive list, so you will need to delete items which do not apply and add any that are not included. The section **Things you might be doing as a church and how GDPR impacts** may help you through the process.

Sending Emails

If your church sends out emails to people, then you may need their consent. We have produced a simple consent form (useful for people attending a baptism or carol service for example) and a more detailed one for regular attenders at church.

[see Consent Form simple or detailed in Part 2]



Things we do as a church and the impact of GDPR

This document tries to anticipate some of the things you will be doing as a Mission Area or church, and to help you understand the basis on which you will be processing the data. It has been grouped into issues around marketing, baptisms, weddings, funerals, church life and governance. It may be helpful to read this before you begin your data audit.

Marketing

- A. We send out an anonymous 'flier' via pupil school bags at school advertising services.
- B. We send an anonymous 'dear resident' church magazine out to everyone in our community.
- C. The church puts fliers around the village/community advertising anything happening at the church, that's ok isn't it?

In all these cases, there is no personal data involved so GDPR does not apply.

- D. We use the electoral roll for letting people know about services or other events/fundraising that is going on in the church.

The Electoral Roll is Special Category Data required to enable elections, so the data is processed on the basis of 'Legitimate Activity'.

If used to advertise services, then this would also be a 'Legitimate Activity'.

However, if you **email** people on the electoral roll to advertise any paid-for activity then this would be marketing and would need **Explicit Consent**. You may need to send the members of your electoral roll a detailed consent form. A template consent form is provided in this toolkit.

Full guidance and electoral roll forms are available at <https://www.churchinwales.org.uk/en/clergy-and-members/membership-and-finance/electoral-roll/>

- E. Do we need consent for sending out marketing communications?

You can send any marketing information through the post under 'Legitimate Interest'. However, if you use **email** to send details of paid-for events then this comes under the Privacy and Electronic Communications Regulations (PECR) and requires **consent**. A template consent form is included in this toolkit.

- F. Currently our parish magazine publishes lists of those married/ baptised in church and of funerals conducted. Can this continue?



You would need Explicit Consent for this as you are sharing Special Category data beyond the faith organisation. A template for explicit consent is included in the toolkit.

- G. We put the details of churchwardens, secretary/treasurer, hall hirer and other clergy in the church magazine with their phone numbers for people to contact them, is this still ok to do?

It is useful and helpful to put details of certain individuals in the church magazine or diocesan directory. Those individuals should understand that that is how their personal information is going to be used (and this is explained in the Privacy Notice). If an individual requests that this information is not put into the magazine or directory then this request should be considered as having considerable weight. As always, sensitivity and judgement are required.

- H. Do we need permission to publish photographs of group of adults at a church event which we put in our church magazine or on our website?

Photographs (insofar as they enable an individual to be identified) do constitute personal data. The first issue which needs to be considered is how 'privacy intrusive' the photograph is (e.g. is it in any way personally embarrassing, or does it reveal information about the health of a person). The next issue to be considered is where the photograph is to be displayed. The legal basis will be either

- a. "legitimate interests" - for example a photograph of a large group of people attending an event which does not reveal information about religious beliefs (such as the summer fair)
- b. "consent" - for example if a photograph of a particular individual is to be on the front of the church magazine or if the photograph is privacy intrusive or if they are attending an event which reveals information about religious belief, for example an Alpha course.

Baptism

- I. We currently email baptism families to remind them of church time for their baptism service

It is assumed that having requested a Christian baptism, the family consider themselves to be members of the church. The processing of this Special Category Data is a Legitimate Activity and does not require consent.

- J. The church sends an anniversary card to baptism families, can we still do this without consent

It is assumed that having requested a Christian baptism, the family consider themselves to be members of the church whether they attend worship regularly or not. The processing of this Special Category Data is a



Church Life

Q. Do we need permission to put someone's name on the intercession list if they are sick?

Religious beliefs and physical or mental health are both Special Category Data and great care needs to be taken when processing this data. For church members you could argue that this is also a 'legitimate activity'. You may need to exercise your judgement on whether church members would want their illness or hospital stay to be broadcast. Consider carefully whether an intercession list at the back of church provides adequate protection for Special Category Data.

R. We email people the church pew sheet where they have given their email to be on an email circulation list.

This is Special Category Data and is processed under 'Legitimate Activity'. There is no need for consent unless advertising appears on the pew sheet.

S. Can we send emails to multiple recipients e.g. on the roof repair group with details of a donor who has just given £10,000 to the church roof appeal?

A donation to the church roof appeal does not imply a religious belief so this is not Special Category Data, however consent will be needed from the donor to send details of the donor and their financial contribution to the working group.

T. We send details of several contractors to the church wardens as a group of people who might be useful for a specific project

If the contractors are a limited company, then GDPR does not apply. If they are a sole trader, then unless they have specifically said they do not want their contact details passed on, you can process this data under Legitimate Interest.

Governance

U. Do we need a privacy notice now for information held?

Yes – each Mission Area will need to have a Privacy Notice agreed by the Mission Area Trustee Board. A template for a Privacy Notice is included in this toolkit.

V. An email is sent to people on the Trustee Board or Church Committee letting them know about changes to a meeting/sending paperwork



Members of the Trustee Board are charity trustees and they delegate powers to the Church Committee. There is a legal obligation to process data to ensure the smooth running of the charity, and this is in the Privacy Notice. No consent is needed.

W. Structured filing systems are covered, random bits of paper are not. What about telephone logs? – if someone records in-coming phone messages and numbers to return a call in a notebook does that count as a structured filing system?

Unless your telephone log is in alphabetical order (which would make it easy for someone to find someone's phone number) then GDPR does not apply. However, it would make sense not to leave this log book open on a desk in an office that is open to the public.

X. I've been asked to send an email to someone who I think would be a helpful co-opted member of the Trustee Board. Can I do this?

You can do this under 'Legitimate Interest'. If you are emailing them with such an invitation, make sure that it is clear that if the person doesn't wish to become involved or doesn't respond to your email that you simply delete their email address and don't use it again. If they say yes, then that information falls within your privacy notice, so you can be in touch with papers, minutes, details of meetings etc.

Y. What do we do about DBS records/dates for renewal?

Processing this data is 'Compliance with a legal obligation' and also 'Legitimate Interest'.

Z. What happens about personnel file information from a GDPR point of view?

The legal basis for processing the employment data is "contract". There may be other processing where the legal basis is "legal obligation" for example supplying certain information to HMRC. Special Category Data includes information about a person's religion or their health. Being an employee within the church does not constitute information about a person's religion. If the personnel file contains information about a person's health, then you will be 'Complying with or exercising rights in the field of employment law'.

Care must be taken that the personnel file only contains information which is relevant to the employment contract. If it contains other information, then consideration must be given as to the legal basis of processing this data and about whether some data has expired.

And finally, are you holding personal data which you cannot justify retaining? If there is no legal basis for you storing the data, then it needs to be destroyed.



Part Two - Supporting Documents

- A. Data Audit grid template
- B. Data Audit grid (completed example)
- C. Mission Area Privacy Notice template
- D. Consent Form template (simple)
- E. Consent Form template (detailed)

CHURCH DATA AUDIT

Getting ready for GDPR

Completed by:

Church:

Mission Area:

Review all your databases, email lists, spreadsheets, paper documents and other lists of personal data.

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
Example: <i>Gift Aid Declarations</i>	<i>Donor</i>	<i>For claiming Gift Aid</i>	<i>Legal obligation</i>	<i>Held by Gift Aid Officer. Also accessed by treasurer</i>	<i>Paper declarations kept in a filing cabinet. Spreadsheet on PC.</i>	<i>Six complete calendar years after last gift claimed on the declaration</i>

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?

Completed by:

Church name:

Mission Area:

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?

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Example: Gift Aid Declarations	Donor	For claiming Gift Aid	Legal obligation	Held by Gift Aid Officer. Also accessed by treasurer	Paper declarations kept in a filing cabinet.	Six complete calendar years after last gift claimed on the declaration

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
					<i>Spreadsheet on PC.</i>	
Church Family Information Sheet -names -address -emails -telephone -groups interested in being part of /further information -other need to know info (e.g. paper colour) -name of children -DOB of children under 18	adults who attend church / church groups regularly	Regular Pastoral Contact (ego praying for you this month) Contact lists for events & Activities Ability to meet individual needs Birthday cards for children and invitations to specific events / services	Legitimate Interest	Clergy Readers/ Licensed ministers Church Wardens Assigned Pastoral Assistants	Paper copies kept in a file in filing cabinet Spreadsheet on PC.	Opportunity to annual update complete revision every 5 years with electoral roll
Electoral Roll -full name -address -email -signature	adults and young people 16+ who attend church regularly or live in the Mission Area and consider themselves members.	required by Church in Wales to show membership	Legal Obligation	Clergy Church Electoral Roll Officer	Paper copies kept in a file in filing cabinet Spreadsheet on PC.	Opportunity to annual update complete revision of full electoral roll every 5 years

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
	This include vulnerable adults					
Magazine Subscription -name -address -telephone -email -specific requests	adults in the church and community who want to receive the monthly church magazine	send out the magazine	Contract	Clergy Magazine Editor Those whom people have asked their magazine to be delivered by	Paper copies kept in a file in filing cabinet Spreadsheet on PC.	1 Year
Specific Courses or Activities e.g. Alpha / Bible study -names -address -emails -telephones -other need to know info (ego allergic to mushrooms)	adults interested in/ attending the course	Contact lists Ability to meet individual needs Pastoral support during the course/ activity	Legitimate Activity	Course leader	Paper copies kept in a file in filing cabinet Spreadsheet on PC.	Duration of course / activity
Messy Church members	Parents attending Messy Church	Regular Pastoral Contact (e.g. praying for you this month)	Legitimate Activity	Clergy Messy Church Leader	Paper copies kept in a file in filing cabinet	Opportunity to annual update complete revision every 3 years

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
-Adult & children's names -address -parent emails -parent telephones -children dob -children school/ year -other need to know info -groups interested in being part of		Contact lists for events & Activities Ability to meet individual needs Birthday cards for children and invitations to specific events /services To know how photos can be used			Spreadsheet on PC.	
Children/ Youth one off trip/ activity -Full name -name known as -dob -school/ year -address -parent emails -parent telephones -medical info	A parent or guardian of child able to give parental consent	Show parental permission has been given Ability to contact parents if needed Ability to meet individual needs To show if medical intervention is needed	Consent		Paper copies in folder kept with group leader taking activity (taken to that activity) Contact list with senior church adult who is not connected with anyone on the trip/ activity	kept for duration of activity or Till advised no longer needed if any first aid administered or safeguarding concern

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
-other need to know info -emergency permission for treatment -photo permission		To know how photos can be used			Spreadsheet on PC.	
Children/ Youth regular groups -Full name -name known as -dob -school/ year -address -parent emails -parent telephones -medical info -other need to know info -emergency permission for treatment -photo permission	A parent or guardian of child able to give parental consent	Ability to contact parents if needed Show parental permission has been given Ability to meet individual needs Birthday cards for children and invitations to specific events /services To show if medical intervention is needed To know how photos can be used	Legal Obligation	Clergy Group Leaders	Paper copies in folder kept with group leader taking activity (taken to that activity) One set of copies kept in a file in filing cabinet in Vicarage Spreadsheet on PC.	Kept for 1 year. or Till advised no longer needed if any first aid administered or safeguarding concern

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
		To plan around specific school events/ holidays				
Prayer Requests -name -prayer request -level of confidentiality -optional contact details	Person making that request. (from an email, text, telephone or verbal request)	Ability to pray for that person and the situation Additional Pastoral Contact if requested	Consent	Clergy Readers/ Licensed ministers (as appropriate) Prayer co-ordinators Prayer chain co-ordinator and members (if appropriate)	-requested noted in note book -email/ text deleted -request destroyed after 2 weeks unless follow up asked for	Kept for 2 weeks unless continuing prayer is requested
Pastoral Visiting -name(s) -address -telephone -type of visit -date & time of visits -any specific requests -any follow up needed	Adult / family member / social services/ nursing home/ community individual (from an email, text, telephone or verbal request)	Regular Pastoral Contact Ability to meet individual needs	Legitimate Interest	Clergy Readers/ Licensed ministers (as appropriate) Assigned Pastoral Assistants/ Visitors	-requested noted in notebook (by assigned visitor) Spreadsheet on PC.	Kept until visiting no longer required

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
-other need to know info (e.g. gluten free wafer)						
Hospital Visiting -Full name of patient -address -ward -why in -date & time of visits -any specific requests -level of confidentiality	Adult / family member / social services/ nursing home/ community individual (from an email, text, telephone or verbal request)	Pastoral Contact Ability to meet individual needs	Legitimate Interest	Clergy Readers/ Licensed ministers (as appropriate) Specific Pastoral Assistants	-request noted in notebook (by assigned visitor)	Kept until person is out of hospital
School Contacts -names - personal email addresses -personal contact numbers	Adult in school making contact	Organising a specific activity / event Work as a school governor	Legitimate Interest or Legal Obligation if school governor	Clergy / person involved in running activity	-info on sheet in filing cabinet	Kept until activity/ event completed
Other Churches -names	Adults from church making specific contact	Organising specific activities / event	Legitimate Interest	Clergy / person involved in running activity	-info on sheet in filing cabinet	Kept until activity/ event completed Kept until contact moves on

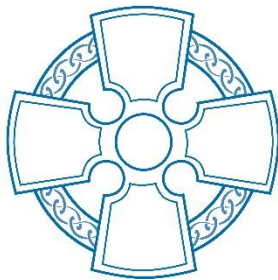
Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
-email addresses -phone numbers -addresses	Church websites/ lists	Pastoral work CYTUN Contacts			- Spreadsheet on PC.	

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
Community Council -names -email addresses -agenda -minutes	Clerk of Community Council	Information about what is happening locally Prayer Pastoral support	Legitimate Interest	Clergy Minutes. Agendas available to public on Community Council Website	-Names contact details of community Councils available publicly	Kept until contact no longer relevant
Local Guiding/Scouting Adult Leaders -names -email addresses -phone numbers -addresses	Adult Leaders	Regular Pastoral support Organising specific activities / event	Legitimate Interest	Clergy / person involved in running activity	- Spreadsheet on PC.	Until Leader moves on.

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
Local Businesses -names -email addresses -phone numbers -addresses	Specific Adult contact	Regular Pastoral support Organising specific activities / event	Legitimate Interest if involved in church, otherwise Consent	Clergy / person involved in running activity	- Spreadsheet on PC.	Until contact moves on.
Church Accident Book -names -contact details -details of accident /near miss -action taken	Those involved in or witnessing accident/ near miss	comply with the law Make necessary changes to avoid reoccurrence of accident	Legal Obligation	Accessible by Clergy/ Wardens Health & safety officer	- in locked church vestry.	3 years after last recorded accident
DBS Checks -Name -Letter from Province detailing check has passed -Reference number Safeguarding Concerns -names -note + date of any concerns that may need to be acted on/ reported in the future -details of any concerns/ disclosures which	Church in Wales Person who had concern	Prove that person has got a Church in Wales DBS check To be able to pass on information to appropriate safeguarding authority Show build-up of concern	Legal Obligation Legal Obligation	Clergy Safeguarding officer Person who has noted concern	Filing Cabinet Filing Cabinet	Until DBS Check is renewed or person leaves Until needed

Description	Who is the data obtained from?	Why is the data held and what is it used for	Basis for processing data (e.g. consent, legal obligation etc)	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?
need immediate action -Any action taken						
Those Training for a specific ministry	St Padarns, Diocese, individual concerned		Legitimate Activity			

Y R E G L W Y S
YNG NGH YMRU



THE CHURCH
IN WALES

DATA PRIVACY NOTICE

NAME OF MISSION AREA: _____

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

The Mission Area Trustee Board is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

The Mission Area complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running within the Mission Area
- To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.

4. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about diocesan events.

- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

6. How long do we keep your personal data¹?

We keep data in accordance with the guidance set out in the guide "Keep or Bin: Care of Your Parish Records" which is available from the Church in Wales website [see footnote for link].

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the Mission Area holds about you;
- The right to request that the Mission Area corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the Mission Area to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]

¹ Details about retention periods can currently be found in the Record Management Guides located on the Church in Wales website at: - www.churchinwales.org.uk

- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

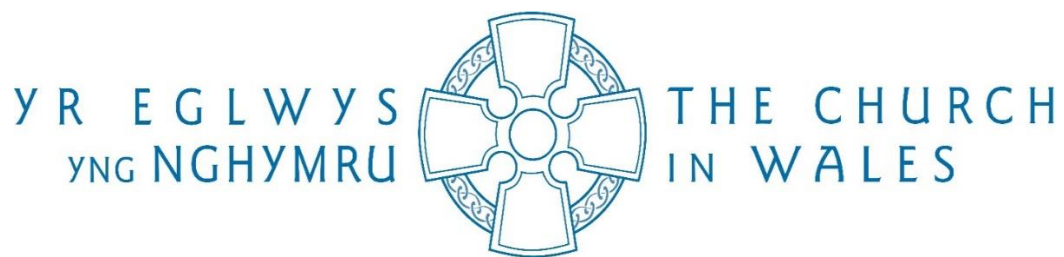
If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the **Mission Area Administrator/Mission Area Leader** at **[insert contact details]**.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Much of the content and information contained in this document has been produced by the Archbishop's Council of the Church of England and with their agreement has been used by the Church in Wales.



[NAME OF CHURCH OR LOGO]

CONSENT FORM

We hope you've enjoyed being with us and we would love to stay in touch with you. If you would like to be informed of future events and other church news please tick the box below and let us have your contact details.

☐

Name

Email Address: _____

If you tick the box, we will add you to our mailing list. You can unsubscribe at any time, by contacting us at (info@....., or ☎ 00000 000000).

St Church is in the Mission Area of

.....

Registered Charity, No

NAME OF MISSION AREA:

CONSENT FORM

Your privacy is important to us, and we want to communicate with church members in a way which has their consent, and which is in line with UK law on data protection. Because of a change in UK law, we now need your consent to how we contact you. Please fill in the contact details you want us to use to communicate with you:

Name _____

Address: _____

Email Address: _____

Phone Number: _____

By signing this form you are confirming that you are consenting to the Mission Area holding and processing your personal data for the following purposes (please tick the boxes where you grant consent):-

I consent to the church contacting me by ☐ post ☐ phone or ☐ email.

☐ To keep me informed about news, events, activities and services at St (note you can unsubscribe from the church e-bulletin at any time);

☐ To keep me informed about news, events, activities and services within the Mission Area.

☐ To including my details in the 'Church Directory' which is circulated to Church Members.

☐ To including my details in the 'Mission Area Directory' which is circulated to Church Members.

☐ To share my contact details with the Diocese of St Asaph so they can keep me informed about news, events, activities and services that will be occurring in the diocese and which are directly relevant to the role I am undertaking;

Signed: _____ Dated: _____

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm. You

can find out more about how we use your data from our "Privacy Notice" which is available from our website or from the Mission Area Administrator.

You can withdraw or change your consent at any time by contacting the MA Administrator/MA Leader. Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law, but this will not affect any personal data that has already been processed prior to this point.

..... Mission Area is a
Registered Charity, No