

Data Protection Policy - High Street Chapel

Introduction

High Street Chapel (HSC) holds and processes personal data about living individuals for the purpose of general church administration and communication. As a church we are committed to complying with data protection law and the rights of individuals under it. We are also committed to complying with the eight principles of the 1998 Data Protection Act as set out below. We recognise that this relates to all personal data, whether it is held on paper, on computer or other media. All church staff members or volunteers who obtain, handle, process or store personal data for HSC must adhere to these principles.

The Data Controller of HSC is defined as the Charity Trustees.

The Principles (1988 Data Protection Act)

The Act requires the Data Controller to ensure that all personal data is dealt with in accordance with the 'Eight Principles' set out in the Data Protection Act. These Eight Principles in summary form are as follows:

Personal data must be fairly and lawfully processed

Personal data must be processed for limited purposes

Personal data must be adequate, relevant and not excessive

Personal data must be accurate and up to date

Personal data must not be kept for any longer than is necessary

Personal data must be processed in line with the data subjects' rights

Personal data must be secure

Personal data must not be transferred to other countries without adequate protection

Use of personal information

HSC holds personal information about staff, regular church attendees and other individuals who have provided such information for a specific purpose. This information is used for the following purposes:

- The production of our Church Prayer Diary – copies of which are given to all those whose names appear on it.
- The day-to-day administration of the church (including preparation of rotas and maintaining financial records of giving for tax purposes).
- The day-to-day administration of church activities.
- Contacting those people whose contact details we hold to keep them informed of relevant church activities and events.

All personal information which is held by the church (other than the information included in our Church Prayer Diary) will be treated as private and confidential and not disclosed to anyone other than the Charity Trustees and Elders in order to facilitate the administration and day-to-day ministry of the church.

Personal data will only be disclosed to a third party if one of the following circumstances applies:

- We are legally compelled to do so.
- There is a public duty to disclose.
- Disclosure is required to protect the interests of the individual concerned.
- The individual concerned has requested (or given their consent to) the data being disclosed.

Applying the principles

1. The Trustees will appoint one of their number to act as the Church's Data Protection Officer. All questions and concerns in relation to this policy should be addressed to them. As of July 2016 this person is Mark Cleveland and they can be contacted via the church office.
2. When personal information is collected for use by HSC we will ensure that
 - a) this information is necessary for church purposes
 - b) the information is not kept for longer than it is needed
 - c) those people supplying the information are aware of this policy and how they can obtain a copy
3. All individuals whose names and contact details are published in the Church Prayer Diary will be asked to give explicit consent for their details to be included. We will ensure that specific information will be removed from the Prayer Diary if the individual concerned requests this.
4. Personal information (including photographs) of individuals will not be published on our website without obtaining explicit and informed consent from the individuals concerned or their parents. We will never publish the names of children and young people alongside their photographs.
5. We will ensure that all church attendees are aware of who to contact to update the information held about them by HSC.
6. A copy of this policy will be on our church website and available from the Church Administrator.
7. All personal information held by staff and volunteers on behalf of HSC will be held and processed in a sufficiently secure manner (whether in paper or electronic form) to prevent unauthorised access (whether by unauthorised church staff or third parties). This means we will:
 - Store paper based information in secure, lockable cupboards
 - Use password protection of particularly sensitive electronic documents
 - Restrict access to both paper and electronic personal data to those who need to process it

Rights to Access Information

Staff, church attendees and other individuals whose personal information is held by HSC have the right to access that information. This right is subject to certain exemptions outlined in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to the Church Administrator. We will aim to comply with such requests as quickly as possible, but will ensure that it is provided within 40 days of receipt of a written request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request. HSC reserves the right to charge the maximum fee payable for each subject request. Currently this is £10. If personal details are inaccurate, they can be amended upon request.

This Policy was agreed by the Charity Trustees of HSC on 1st March 2022.