



CHRISTCHURCH
— C A M B O U R N E —

Christ Church Cambourne

Data Protection (GDPR) Policy

Policy last reviewed February 2024	Policy due for review February 2025	Last review conducted by: Stephen Robinson
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This policy was created using a template policy provided by Edward Conor Solicitors.

1. Definitions

“Data Protection Legislation”	means the Data Protection Act 2018, 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.
Data Protection Officer	The person with responsibility for ensuring compliance with the legislation and with this policy.

2. Responsibility

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 Christ Church Cambourne (“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 Officer is responsible for ensuring compliance with the Legislation and with this policy. The post is held by **Stephen Robinson** stephen@christchurchcambourne.org.uk

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 Officer.

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 volunteers 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 Officer before processing personal data.

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4. Compliance with the Legislation

While many of the church's uses of personal data fall within the exemptions of paying a fee to the Information Commissioner's Office, the church commits to paying this fee to cover non-exempt areas, such as the personal data of infrequent visitors and guests, such as holiday club.

Employees and volunteers 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.

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 and volunteers who handle personal data on a regular basis or who process sensitive or other confidential personal data will receive regular training;
- All employees and volunteers 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;
- Employees or volunteers handling personal data should be diligent in the sharing of data. Information should be redacted so no sensitive personal data (see section below) or personally identifying data is shared.
- An annual report on the level of compliance with or variance from good data protection practices will be produced by the Data Protection Officer.
- Data breaches will be recorded and investigated to see what improvements can be made to prevent recurrences.
- Where a report to the Information Commissioner's Office is required, this should take place within 72 hours of the breach being reported.

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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 staff will be kept secure in locked cabinets. Access to such records will be restricted. Computer files should be password protected.

We will ensure that staff and members who handle personal data are adequately trained (at least annually) 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 should be password protected.

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 **Stephen Robinson** stephen@christchurchcambourne.org.uk 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.

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

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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.

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.