



## DATA PRIVACY NOTICE

### Downing Place United Reformed Church, Cambridge

#### ***Introduction***

This notice sets out how personal information will be used by Downing Place URC. It was approved by the Elders' Meeting in July 2020, and will be reviewed in July 2021 (or whenever relevant legislation changes).

#### ***Definitions***

2. This notice relates to information ('personal data') held about identifiable living individuals by, or on behalf of, each church. The processing of personal data is governed by data protection law, as set out in the EU General Data Protection Regulation published on 25 May 2018. This notice is given in order to comply with that law. The expression 'sensitive personal data' covers information some people may be particularly keen to keep confidential, regarding (for instance) their religious beliefs, physical or mental health, sexual orientation or activity. Allegations of, or convictions for, criminal offences constitute a separate category of data to which special rules apply.

3. The Elders' Meeting of each church is that church's 'data controller'. This means the Minister and serving Elders are responsible for deciding how personal data will be processed in the church and for what purposes.

#### ***Summary of data controllers' obligations***

4. The Elders' Meeting complies with its obligations under data protection law

- ◆ by not collecting nor retaining more personal data than necessary; by keeping personal data up to date;
- ◆ by storing and destroying it securely;
- ◆ by protecting personal data from loss, misuse, unauthorised access or disclosure; and
- ◆ by ensuring appropriate technical measures are in place to protect it.

#### ***Reasons for the church to hold personal data***

5. We use personal data (including sensitive personal data) for the following purposes: -

- ◆ to keep and administer records of church membership, eldership, baptism, marriage, regular giving and Gift Aid;
- ◆ to record the details of charity trustees which we are required to provide to regulatory bodies;
- ◆ to record the business of councils of the church;
- ◆ to manage church employees and volunteers;
- ◆ to facilitate the giving of pastoral care;
- ◆ to administer and protect the premises serving the church, e.g. by keeping records of users, keyholders etc.;
- ◆ to enable the church to provide voluntary services for the benefit of the public in the local community;
- ◆ to provide contact details of officers and others with specific responsibilities (e.g. signatories for Disclosure & Barring Service applications) to appropriate statutory authorities, the Eastern Synod Office and URC Church House, in order to facilitate the provincial and national administration of the URC.
- ◆ to inform members, regular attenders and their children of news, events, activities and services of the local church or churches of the URC in central Cambridge, of the wider United Reformed Church and of our ecumenical partners.

### ***Legal basis for the church to hold personal data***

6. The church as an association exists for religious purposes and is not established or conducted for profit. Data protection law therefore permits us to process personal data (including sensitive personal data) if

- ◆ we do so as part of our legitimate activities;
- ◆ we do so only in respect of our members, or others who have regular contact with the church in connection with its purposes;
- ◆ we observe appropriate safeguards for the rights and freedoms of those whose data we hold, and do not disclose a person's sensitive personal data to third parties without that person's consent.

We are also entitled to process personal data when necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement. We can also process personal data in ways for which explicit consent of the data subject has been given.

### ***Sharing and security of personal data***

7. Your personal data will be treated as confidential and will only be shared with other members of the church for purposes connected with it. In the United Reformed Church pastoral care is a shared responsibility of ministers and elders. In the local churches of central Cambridge the responsibility may also be shared with pastoral assistants. Sensitive personal data relevant to members' well-being may therefore be shared where this is necessary for that responsibility to be discharged, for example in the Elders' Meeting; but it will not be minuted, nor revealed outside that context. If you disclose information to a Minister or serving Elder with the request that it should not be recorded or shared at all, that request will be respected except in situations where the law requires disclosure. Such situations apart, we will only share sensitive personal data with third parties outside the church with your consent, though we will invite you to give such consent if you ask (for example) for a character reference, a Letter of Transfer to another church, or confirmation that you are baptised or a member of the URC.

8. Church records containing sensitive personal data will be kept only (a) on computers in the church administrators' and ministers' offices or under the personal control of a minister, in all cases secured by password access, or (b) in locked containers to which only the church officers and administrators have access.

### ***Retention of personal data***

9. We will retain permanently, or lodge in local archives:

- ◆ a register of all baptisms taking place within the church;
- ◆ a historic record of when a person became or ceased to be a member of the church, its minister or an elder;
- ◆ minutes of the proceedings of any council of the church or predecessor churches which a person attended or to which that person contributed (this may be extended to minutes of church groups and committees);
- ◆ an archive copy of all printed church magazines and orders of service, which may contain pastoral news shared with the agreement of the persons concerned

Statutory marriage register books will be kept so long as the law requires.

A log book or report sheet relating to any accident taking place on church premises or during a church activity will be retained for six years from the date of the incident. If there is any potential for serious harm to show itself at a later date, the retention period will be twenty years, or if a child is injured, twenty years from the child's 18th birthday.

So long as a person is a member or regular attender and for two years afterwards, we will retain:

- ◆ any Letter of Transfer received from a former church;
- ◆ contact details including the person's address and (if supplied to us) telephone and email details;
- ◆ a record of the offices and volunteering roles held by that person in the church;

- ◆ the results of the most recent Disclosure and Barring Service enquiry (if any) obtained in respect of that person in connection with a church role.

If, at the request of a member or regular attender, a character reference is written on behalf of the church or a Letter of Transfer is issued to another church to which the person is seeking admission, we will retain a copy of the reference or letter (and any evidence upon which it was based) for six years from its date.

We will retain employee records for six years after the ending of the employment relationship.

Information obtained for pastoral care purposes regarding a person's spiritual, physical or mental health and those of any immediate family will be kept so long as the pastoral relationship between that person and the church subsists.

Gift Aid declarations will be retained for up to six years after the calendar year to which they relate.

Any written record of a safeguarding concern regarding a child or adult at risk, or regarding a church member, volunteer, office-bearer or employee (including any blemished Disclosure and Barring Service check, risk assessment, monitoring agreement and correspondence with statutory authorities or denominational Safeguarding Advisers) will be retained for fifty years after any incident is concluded, or (in the case of a church member, volunteer, office-bearer or employee) for fifty years after the person concerned ceases to have a connection with the church.

The above are maximum periods. Material may be destroyed sooner if the Elders' Meeting is satisfied there is no longer any reason to retain it.

### ***Rights in relation to personal data***

10. Unless a legal exception applies, you enjoy the following rights with respect to your personal data: -

- ◆ ·to know what personal data the church holds about you;
- ◆ ·to request that any personal data found to be inaccurate or out of date be corrected;
- ◆ ·to request that your personal data be erased if the church no longer needs to retain it;
- ◆ ·The right to lodge a complaint with the Information Commissioners Office.

### ***Additional grounds for processing data***

11. If we wish to use your personal data for a new purpose not covered by this Privacy Notice, we will provide you with a separate notice explaining the new use and setting out the relevant purposes and processing conditions. Whenever necessary, we will seek your prior consent. In particular we will ask your permission if we want either (a) to place a recognisable photograph of you on display in the church building or in an album made available to members or (b) to include your name or contact details in any printed or electronic directory of members and regular attenders. If you give such permission you will be free to withdraw it at any time, in which case your photograph will be removed from display and destroyed, or (as appropriate) your details will be deleted from the electronic directory and any subsequent printing.

### ***Points of contact***

12. To exercise any of these rights, or if you have queries or complaints please contact the Clerk to the Elders' Meeting, Owen Saxton at Downing Place URC, Downing Place, CB2 3EL ([clerk@downingplaceurc.org](mailto:clerk@downingplaceurc.org), or <https://www.downingplaceurc.org>). If necessary you can also contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (0303 123 1113 or <https://ico.org.uk>).