

Holy Trinity Redhill Data Protection Policy & Privacy Statement

Policy Review:	Tim Menary
Responsible for Policy:	PCC & Leadership Team
Review due	03-2025

1. Purpose:

Holy Trinity Redhill recognises its responsibilities as a Data Controller. The church takes seriously the use and storage of personal data and will aim to ensure that all personal data collected about church members, visitors, trustees, employees and other individuals is collected, stored and processed in accordance with UK data protection law.

The storage and use of personal data represents a relationship of trust between the individual and the church. This policy and its associated procedures are designed to help us live up to this trust and the corresponding expectations of the parties concerned.

Any concerns, requests for clarification or comments should be directed to the Operations Director, who for the purpose of Data Protection will act as the church's Data Protection Lead.

2. Legislation / Compliance:

Holy Trinity Redhill is governed by the laws of England and Wales and the requirements of the Charity Commission for England and Wales.

This policy seeks to comply with such requirements, and specifically with:

- UK Data Protection Act 2018 and UK General Data Protection Regulations
- Data Protection, Privacy & Electronic Communications Regulations 2020
- Guidance from the Information Commissioner's Office (ICO)

Holy Trinity Redhill recognises that Data legislation is under review from the UK government and will seek to keep up-to-date with any future requirements.

3. Roles and Responsibilities:

- This policy is the responsibility of the Trustees of Holy Trinity Redhill . The trustees will appoint a Senior Responsible Individual as the lead Trustee on matters relating to Data Protection and Privacy. The SRI is currently [name].
- Implementation of the policy and procedures herein will be managed by the Operations Director, who will act the church's Data Protection Lead.
- The policy applies to all office holders, trustees, employees and volunteers of Holy Trinity Redhill .
- Holy Trinity Redhill will register with the ICO as a data controller.

4. Policy Statement:

4.1 Holy Trinity Redhill processes personal data where necessary to help us fulfil our charitable aims and purposes, and to administer our activities, events and the general operation of church life.

4.2 We are committed to processing data in accordance with UK law, the principles of GDPR and the rights of the individuals concerned (subject of personal data) specified in this legislation. The principles state that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes for which it is processed.
- Processed in a way that ensures it is appropriately secure.

4.3 We will only process and store personal data where lawful to do so. Please see sections 4.5 and 4.7 below.

4.4 In addition to our commitment to lawful processing of data, we are also committed to minimising our collection of data where possible. We will carefully consider the basis on which data is collected and will aim to only collect and store data where necessary or beneficial to our operation.

4.5 Types of Data and Purpose

Holy Trinity Redhill aims to only collect and process data where we are legally obliged to or where it helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership is an essential part of being church. The use of personal data helps us provide information to church members and consult with them on their views. On this basis, Holy Trinity Redhill anticipates collecting and processing the following data:

- **Data for Safeguarding.** To help us comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time, with the aim of ensuring that all under 18s and vulnerable adults are provided with safe environments (please see our safeguarding policy and procedures);
- **Data relating to church participation.** Names, titles, and aliases, photographs, video imagery captured during the live stream; of church members, attendees at church events / services and visitors to the church premises. Data will be collected to help us follow-up to events, course, membership and general enquiries.
- **Church Membership Data.** Contact information including telephone numbers, postal /residential addresses, and email addresses to help us administer the membership of our organisation, to promote church activity and for the purposes of fundraising.
- **Demographic Information.** Where there is a legitimate interest to facilitate our charitable aims and activities, and where the data has been provided to the church, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants.
- **Financial Information.** Where you give financially in support of Holy Trinity Redhill, or pay for church activities (event bookings etc.), financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers, for the purposes of Gift Aid administration and financial accounting.
- **Limited Sensitive Personal Data.** As a church (religious organisation), the data we process is likely to constitute sensitive personal data. The very fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual orientation and criminal records, fines and other similar judicial records.

4.6 As a Data Controller, all our appointed persons will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. Any concerns about how data is being used, should be directed towards the church's Data Protection Lead: Operations Director

4.7 Lawful Basis for processing data.

- Most of our data is processed because it is necessary for our **legitimate interests to enable our charitable and missional aims**. For example, maintaining membership records, safeguarding our children, recording our financial donations, and operating team rotas for the effective function of Sunday services.
- Some of our processing is necessary for **compliance with a legal obligation**. Retaining safeguarding records and gift aid declarations are examples of this.
- We may also process data if it is necessary for the **performance of a contract**, or to provide a direct service. For example, supplying tickets for a church event.
- As a religious organisation, we are permitted to process information about religious beliefs to administer membership or contact details.
- Where personal data is collected and used other than in accordance with one of these legal basis, we will **first obtain the consent of the data subject**.

4.8 Data Storage

Holy Trinity Redhill will only store personal data in the locked church office and securely online (Google Drive and ChurchSuite). All personal data stored in physical / hard copy will be located at the church premises and will be stored securely and confidentially. All personal data stored digitally will be located on secure cloud systems with UK servers, or church owned ICT devices, where the data will be password protected and encrypted.

4.9 Sharing Data

Holy Trinity Redhill will not share personal data without the consent of the data subject, unless legally required to do so.

4.10 Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the UK. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter, blog post, bulletin) may be accessed from overseas, however it is our general practice not to publish any personal data on our website or in our printed literature.

4.11 Data Retention.

Holy Trinity Redhill aims to keep data no longer than necessary. Where an individual continues to actively engage with our church services, activities and events, we will retain the appropriate membership data so that we can best serve their involvement. We operate an annual process of review, by which we assess who is actively engaging in church membership, and where this is not the case we will remove corresponding data.

Additionally;

- We will keep some records permanently if we are legally required to do so. For example, this covers some safeguarding records.
- We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits.

4.12 Individuals Rights

Holy Trinity Redhill recognises the following rights of individuals in respect to the use of their personal data. In accordance with UK law, Holy Trinity Redhill will aim to accommodate requests relating to these rights in a timely manner. In order to process specific requests, the church may need to verify the identity of the data subject for their own security, prior to acting on the request.

- **The right to access information held on a subject (Subject Access Request).** At any point an individual can contact us to request the information we hold on them, as well as an explanation as to why we have that information, who has access to the information and where we obtained the information from the church we will respond to SARs within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee. Holy Trinity Redhill's SAR procedure is outlined under reference D05.
- **The right to correct and update the information we hold on you.** Data subjects have the right to request that the data held on them is accurate and up to date. The church will respond to all such requests in a timely manner. Church members will also be given access to update aspects of their personal data directly via our *MyChurchSuite* members' portal.
- **The right to have information erased.** If a data subject feels that the church should no longer be using their data or that we are illegally using their data, they can request that we erase the data we hold. When we receive this request, we will confirm to the subject whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- **The right to object to processing of data.** Data subjects have the right to request that we stop processing their data. Upon receiving the request, we will contact the data subject to confirm if we are able to comply or if we have legitimate grounds to continue to process their data. Even after the data subject exercises their right to object, we may continue to hold their data to comply with other processing rights or to bring or defend legal claims.
- **The right to data portability.** Data subjects have the right to request that we transfer some of their data to another controller. We will comply with their request, where it is feasible to do so, within one month of receiving the request.
- **The right to withdraw consent at any time for any processing of data to which consent was sought.** Consent can be easily withdrawn by telephone, email, or by post to the contact details provided on the church's privacy statement.
- **The right to lodge a complaint with the Information Commissioner's Office.** Data Subjects 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.

4.13 Further processing

If the church wishes to use personal data for a new purpose, not covered by this policy or our privacy notice, we will provide the data subject 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 prior consent to the new processing.

4.14 Photographs and Video Imagery

As part of church activities, Holy Trinity Redhill may take photographs and record images of individuals whilst participating in church activities and services. We recognise that these images constitute personal data.

Where photographs and videos are being taken, Holy Trinity Redhill will:

- Seek consent from the parent of any under 18 in accordance with our safeguarding policy. The consent obtained will be specific to the intended use of the image (for example in printed literature, on social media, website, on signage etc.)
- Make it known when photographs or videos are being taken at events, providing attendees with the opportunity to opt out and not be included in the footage.
- Provide a clear and easy process for consent to be refused or withdrawn.
- Only identify subjects within the footage by first name. We will not include any other personal information or data with the image.

4.15 Internet Cookies

Cookies are small pieces of text sent to a web browser when visiting a website. They help that website remember information about your visit, which can both make it easier to visit the site again and make the site more useful to the user.

Holy Trinity Redhill aims to minimise the use of cookies within our website. Necessary cookies are used to keep the website functioning. The only data gathered by these cookies will be a user's unique session ID to manage user sessions on the website. The cookie is a session cookie and will be deleted when all the browser windows are closed. No marketing or analytical cookies are used and no personal data is retained or shared.

5. Procedures

The following procedures apply to the implementation of our data protection policy.

5.1 Annual Review of Data. On an annual basis, the church staff team will:

- Review and update our data asset register, ensuring the register remains an accurate record of what data we hold, why and where we hold it.
- Review the retention of data against our retention guidelines, deleting data where appropriate.
- Complete a review of church membership data held on the basis of legitimate interest. The staff team will assess whether the church member in question still has active involvement with the church, and where this is not the case the data will be deleted unless another lawful basis for processing data exists.
- This review of data will be audited by the Senior Responsible Individual (Trustee Representative).

5.2 Subject Access Request. Please see our SAR procedure (D02) for details of how Holy Trinity Redhill will respond to a request to clarify the data, purpose of the data and source of the data held on any individual.

5.3 Data Breach Procedure. Please see our Data Breach policy (D04) for details of how Holy Trinity Redhill will respond to any known breach of personal data. Holy Trinity Redhill will maintain a record of all breaches and will meet its obligation to notify the ICO of any significant or material breaches.

6. Privacy Statement

The following privacy statement will be published on the church website, and linked to from any electronic communication or means of data collection.

Data Controller: Holy Trinity Redhill . Charity Number: 1130733

Data Protection Lead: Operations Director

Contact:

Holy Trinity Redhill is committed to protecting and respecting your privacy. This Privacy Statement should be read in conjunction with our Data Protection Policy (D01). Our Data Protection policy [insert link] sets out in detail what personal data we may collect from you, or that you may provide to us, and how it will be used. It can be viewed via this web link or you can request a copy by emailing [email address]. Please read it through carefully and if you have any queries, please email [email address].

WHERE WE COLLECT INFORMATION FROM

Generally, we will only collect your data when you give it to us directly, for example when you:

- Sign up to our mailing list
- Give us your details at one of our events or activities
- Register your children for one of our events
- Apply for or attend one of our events or activities (paid or free)
- Contact us on one of our online platforms such as (but not exclusively) our website, Twitter, Facebook or Instagram
- Contact us directly by telephone, electronically, post or in person
- Purchase a ticket for an event or activity
- Make a donation to the church
- Apply for a position, paid or voluntary

Sometimes we may also receive your data indirectly because you have given permission to other organisations to share your data, or it is publicly available. For example:

- Your likes and preferences on social media and some websites (depending on your privacy settings on those platforms)
- Information from public sources such as Companies House, the internet or published in newspapers and magazines

WHAT WE COLLECT AND HOW IT IS USED

Personal data may include your contact details, date of birth, your contact preferences, details of communications with you, images of you taken at participatory and public events, details of your transactions and your access or other requirements. We may also keep information such as which groups you are part of, what courses and events or activities you have attended. We also collect data to help us comply with and facilitate our comprehensive safeguarding procedures, and to enable us to maintain our financial accounting and gift aid records.

We use this information to effectively manage the church, to provide you with the best service for your needs, and to keep you informed about Holy Trinity Redhill .

Holy Trinity Redhill relies on the following lawful bases for processing data:

- Where you have **provided us with your consent**. You are able to remove your consent at any time.
- Where we have a **contractual obligation**
- Where we have a **legal obligation**
- Where we have a **legitimate interest**

HOW WE KEEP YOUR DATA SAFE AND WHO HAS ACCESS

We will store your personal data securely.

We have processes in place and carry out regular reviews of who has access to data to ensure that your information is only accessible to appropriately trained and identified people. Special Category Data is only accessible to the people for whom it is deemed absolutely necessary.

WHO DO WE SHARE YOUR INFORMATION WITH?

If legally required we may disclose your information to the police, regulatory bodies or legal advisors. We will only share your data in other circumstances with your consent.

We do not share your information with anyone outside the church except as described in our Data Protection policy.

KEEPING YOUR INFORMATION UP TO DATE

Please let us know when your details change so we can make sure that our information is current.

YOUR RIGHTS

If you wish to amend your data, ask us to stop using your Personal and Special Category Data for reasons other than processing your transaction, or erase your Personal and/or Special Category Data please contact us.

You have a right to ask for a copy of the information we hold about you. To request this please send an email to [email address]. We do not make a charge for this, but may charge a reasonable administrative fee if we deem the request to be unfounded or excessive. We endeavour to respond to requests within 30 days.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress,
- Prevent processing for the purpose of direct marketing,
- Object to decisions being taken by automated means,
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Data Protection regulations.

HOW TO COMPLAIN

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by emailing [email address].

You can also complain directly to the Information Commissioner's Office using the following details:

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

7. Training and staff responsibilities

Holy Trinity Redhill is committed to ensuring that all staff and volunteers are adequately trained to meet our Data Protection obligations.

All employees (or volunteers where appropriate to their role) will be provided with a copy of this policy.

The church's Senior Responsible Individual and Data Protection Lead will be provided with specific training to ensure they can adequately and confidently discharge their duties.