

Data Protection Policy

Document details

Reference	POL03
Author	Bill Wilson
Reviewer	Carolyn Young
Sensitivity	Public Domain
Version	Latest entry in Version history table
Next review date	30 August 2026
Offices relevant	Data Protection Lead
Location of training materials	TBC

Version history

Version	Details	Initials	Date
0.1	Initial draft for internal review	BW	6 December 2023
1.0	Incorporated feedback	BW	9 December 2023
1.1	Updated church address	BW	

Minor drafts are 'point' releases e.g. 1.2, 1.3. Major revisions are integer releases e.g. 2.0, 3.0.

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Data Controller details

Data Controller: Grace Church Wrecclesham

Charity number: 1204551

Church address: 9 Grove Close, Wrecclesham, Farnham, Surrey, GU10 4BF

Data Protection Lead: Bill Wilson

Email: systemsadministrator@gracechurchwrecclesham.org.uk

Phone: +44 7767 990607

For those outside the church, this person can also be contacted via info@gracechurchwrecclesham.org.uk

This policy first adopted / last reviewed: 9 December 2023

This policy due for review: 30 August 2026

THE REMAINDER OF THIS POLICY IS PUBLISHED ON THE CHURCH WEBSITE

This is the privacy statement and data protection policy for Grace Church Wrecclesham. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data.

This policy covers our use of personal data, which is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or postal address). Identification can be by the information alone or in conjunction with any other information.

Our processing of personal data is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998).

Whose data is processed?

We may store and process data on:

- Employees (and former employees)
- Church Members
- Donors (for the purposes of Gift Aid)
- Volunteers
- Those who attend regularly
- Those who attend events or make enquiries / complaints about the church

- People we care for and support
- Suppliers and other third parties

How is your data used and processed?

Grace Church Wrecclesham processes data including:

- Names, titles, and aliases.
- Contact information including telephone numbers, postal /residential addresses, and email addresses.
- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have added them to our database or provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, and dependants.
- Where you give financially in support of Grace Church Wrecclesham or pay for church activities (event bookings, etc.).
- As a church (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs. We record whether you have been baptised into the Christian faith if you have shared this information with us.. Where you provide this information, we may also process other categories of sensitive personal data: mental and physical health (including allergies and special educational needs), details of injuries, medication/treatment received, data concerning criminal records, fines, and other similar judicial records.
- Recorded information including any recorded telephone conversations, emails or still / moving images.
- For employees, National Insurance Number and other identifiers necessary for the purposes of employment.

Processing includes obtaining, holding, maintaining, storing, erasing, blocking and destroying data.

As a Data Controller, our staff and volunteers 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. Our IT and Data Security policy includes a number of measures to ensure personal data remains within these systems and anyone reading this policy is encouraged to help by only using @gracechurchwrecclesham email addresses for church correspondence, rather than the personal email addresses of individual office holders.

If you have any concerns about how your data is being used - or if you are a member of staff or volunteer who believes that a breach of this policy has occurred - please speak with our Data Protection Lead.

What are we doing with your data?

We only hold data that either we are legally obliged to or that 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.

Therefore, we will hold and process data to:

- Enable us to meet all legal and statutory obligations.
- Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- Deliver our Church's mission and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our church.
- Undertake pastoral support of members and those connected with the church
- Administer our membership records.
- Enable us to follow up membership, course and event enquiries.
- Maintain our own accounts and records, including those relating to members of staff
- Process and record financial donations that you have made (including Gift Aid information).
- Communicate with you about our services, events, meetings, mission and other matters which are relevant to you as part of our church community.

What is our legal basis for processing your personal data?

Our legal basis is as follows:

- 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 children and adults at risk of abuse, recording our financial donations, and operating team rotas for the effective function of Sunday services or other groups.
- 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 with you, or to provide a direct service to you. For example, if you purchase tickets for a church event.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer our membership.
- Some data is processed by consent - for example anyone supplying their name to register for one of our free events will be asked to consent to our processing it.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use. For example, if you are a regular attender and request to receive our weekly news.

Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential.

The main church database is held on ChurchSuite and is only accessible in its entirety by:

- The Church Systems Administrator
- The Church Secretary
- The Pastor
- The Church Treasurer

As a minimum all Church Members (full and honorary) will be recorded on ChurchSuite and and in addition non-members who:

- Are parents of children in our youth groups

The names of Church Members recorded in ChurchSuite will be visible to all other users. Each person is in control of other personal details that are shared.

Data will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, servants and contractors. For example, if we utilise commercial providers to send out newsletters on our behalf, or to maintain our database software.
- On occasion, other churches with which we are carrying out joint events or activities.

Our financial records are stored on Xero, which stores details of giving for the purposes of GiftAid declarations. In addition, some data may be held by individual staff on church email accounts or documents hosted by Google but administered by Grace Church Wrecclesham (which may transport personal data to the US under the Privacy Shield framework). We are obliged to keep safeguarding records for 70 years, which means for practical purposes they are kept on paper. Data (e.g. text messages, voice messages) may also be stored on the church's own mobile phone.

How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review, by which we assess who is actively engaging in church life, and where this is not the case, we will remove your data.

Our general email group is maintained until you ask to be removed. Anyone on the list can email everyone on the list via Google Groups but email addresses are not shared. The email group is administered by the Church Systems Administrator.

Additionally:

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

What are your rights regarding your personal data?

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- **The right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond 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.
- **The right to correct and update the information we hold on you.** If the data we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated. You can update your own information on ChurchSuite, which is the main place where personal data is held..
- **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm 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 purposes). You can erase your own record on ChurchSuite.
- **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post.

- **The right to lodge a complaint with the Information Commissioner’s Office.** You can contact the Information Commissioner’s Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner’s Office Wilcliffe House Water Lane Wilmslow Cheshire SK9 5AF.

To exercise any of these rights, please contact info@grachurchwrecclesham.org.uk.

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 accessible from overseas, however it is our general practice not to publish any personal data on our website, except for the names of our leaders.

Further processing

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

You are very welcome to get in contact with us...

If you have any queries or concerns about how we use your data, please do get in contact with us at info@gracechurchwrecclesham.org.uk

Appendix 1: Definitions and appointed persons

Role	Definition	Appointed person/organisation
Data Controller	An individual or organisation who collects, stores and processes (uses) data.	Grace Church Wrecclesham

<p>Data Protection Lead</p>	<p>The Data Protection Lead is responsible for the day-to-day organisational management of protection and is the go-to person for responding to any issues around data, dealing with subject access request and completing an annual data review.</p>	<p>Bill Wilson</p>
<p>Senior Information Risk Owner (trustee role)</p>	<p>The Senior Information Risk Owner (SIRO) is a trustee who works with the Data Protection Lead to provide the trustees with assurance that information risk is being managed appropriately and effectively across the organisation.</p>	<p>David Brice</p>