

## **St Thomas of Canterbury Woodford (STOC) Data Protection Policy**

### **Aims of the Data Protection Act**

The Data Protection Act obliges everybody to process personal data in accordance with the law. Its aim is to balance the rights of individuals with regard to how their information is processed with the legitimate need of organisations to use information.

Certain not-for-profit organisations are exempt from registration provided that:-  
The processing of personal data is only for the following purposes

- Establishing or maintaining membership
- Providing or administering activities for individuals who are members.
- The persons about whom the data is held are current or prospective members of the organisation.
- The type of data held is only that necessary to undertake the purposes above i.e. names, addresses, identification

### **Obligations under the Act.**

Even though STOC does not need to register, we must still comply with the other requirements of the Act and remain subject to penalties if offences occur. Most importantly the processing should be in Compliance with the Eight Data Protection Principles. These determine how personal data should be processed in order to Comply with the Act and give rights to individuals regarding this processing

### **The Eight Data Protection Principles**

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any matter incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and where necessary kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or damage to personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data Subjects in relation to the processing of personal data.

## **Policy statement**

All Friars, Staff and Volunteers are required to comply with their obligations under the DPA, in relation to data/information about other parishioners. If anyone is unsure of their obligations, they should raise the matter with the Parish Office Manager

## **Types of data held**

The following types of data may be held:

- Details provided for individuals for sacramental programme purposes
- New parishioners information and any notification of change of personal details
- Emergency contact information for staff based at STOC
- Information from parishioners for standing orders, weekly offertory envelopes and gift aid.

## **Data disclosures**

STOC may be required to disclose certain data/information. The circumstances leading to such disclosures include:

- The use and storage of this data/information is consistent with the ethos of the Church and the principles of the DPA. The information is used for church related matters only.
- Information for gift aid is shared with the Diocese for HMRC purposes only.
- Relevant sacramental information such as confirmation, marriage to the Diocese and place of baptism as required

All personal data obtained and held will:

- be processed fairly, lawfully and in a transparent manner
- be collected for specific, explicit, and legitimate purposes
- be adequate, relevant and limited to what is necessary for the purposes of processing
- be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay
- not be kept for longer than is necessary for its given purpose
- be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- comply with the relevant GDPR procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- the right to be informed
- the right of access
- the right for any inaccuracies to be corrected (rectification)
- the right to have information deleted (erasure)
- the right to restrict the processing of the data
- the right to portability
- the right to object to the inclusion of any information
- the right to regulate any automated decision-making and profiling of personal data.

### **Access to data**

Relevant individuals have a right to be informed whether STOC processes personal data relating to them and to access the data. Requests for access to this data will be dealt with under the following summary guidelines:

- a form on which to make a subject access request is available from the Parish Office.
- Access to data will be provided, subject to legally permitted exemptions, within one month as a maximum. This may be extended by a further two months where requests are complex or numerous.

Relevant individuals must inform the Parish office Manager if they believe that the data is inaccurate, either as a result of a subject access request or otherwise.

### **International data transfers**

STOC does not transfer personal data to any recipients outside of the EEA.

### **Breach notification**

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Information Commissioner within 72 hours of STOC becoming aware of it and may be reported in more than one instalment.

Individuals will be informed directly in the event that the breach is likely to result in a high risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, STOC will do so without undue delay.

### **Records**

Records are kept relating to sacraments, for gift aid purposes and for parishioners to support them when visits are requested etc.

### **Data Protection Officer**

The Data Protection Officer is the Parish Office Manager.

## A QUICK 'HOW TO COMPLY' CHECKLIST

This short checklist will help you comply with the Data Protection Act (the Act). Being able to answer 'yes' to every question does not guarantee compliance, but it should mean that you are heading in the right direction. At the end is a list of guidance on particular areas where you may need more help as well as telephone helpline numbers.

- Do I really need this information about an individual?
- Do I know what I'm going to use it for?
- Do the people whose information I hold know that I've got it, and are they likely to understand what it will be used for?
- Am I satisfied the information is being held securely, whether it's on paper or on computer? And what about any website? Is it secure?
- Am I sure the personal information is accurate and up to date?
- Do I delete/destroy personal information as soon as I have no more need for it?
- Is access to personal information limited only to those with a strict need to know?
- If I want to put people's details on our website have I consulted with them about this?
- Do we have a policy for dealing with data protection issues?
- Do I need to notify the Information Commissioner?
- If I have already notified, is my notification up to date, or does it need removing or amending?
- If you need any more information about this or any other aspect of data protection, please see website [www.ico.org.uk](http://www.ico.org.uk) or contact the Parish Office who may be able to assist you in the first instance.