

Watford Christadelphian Ecclesia

DATA PROTECTION POLICY

2018

Introduction

1. The ecclesia will use and protect information it gathers or holds in accordance with the law, and will respect people's rights about how their data is handled.
2. We are committed to protecting personal data and respecting the rights of our data subjects - the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice.
3. We process personal data to help us:
 - maintain our list of members and their contact details;
 - provide pastoral support for our own members and others;
 - provide services to the community including, especially through preaching activities;
 - safeguard children and vulnerable adults;
 - liaise with other ecclesias and the Editor of the Christadelphian Magazine on membership and welfare issues;
 - maintain our accounts and records;
 - respond effectively to enquirers and handle any complaints;
 - manage the affairs of the ecclesia effectively
4. The Arranging Brethren, as Trustees, are responsible for ensuring that we

comply with all our legal obligations. Overall responsibility lies with the Data Controller (the Ecclesial Secretary).

5. The ecclesia is registered with the Information Commissioner's Office¹ and has paid the appropriate fee.

6. This policy was agreed at the ecclesial business meeting held on 21 November 2018

Principles

7. The ecclesia must ensure that personal information is

used lawfully, fairly and in a transparent manner;

used for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;

adequate, relevant and limited to what is necessary for the purposes for which it is being used;

accurate and, where necessary, up to date;

kept securely and not kept longer than is needed for the purposes for which it is being used;

used in keeping with the rights of data subjects.

Practice

8. *All members* should be aware that personal data about living individuals is protected by law. In general, personal data is information that relates to an identified or identifiable individual. What identifies an individual could be as simple as a name, address or a number.

9. *Members who handle personal data connected with the ecclesia* should read this policy carefully to understand what is required of them and the ecclesia as a whole. For example if you have access to contact details of members or others, you should use them only for the purpose for which they

were collected, and not disclose them to others without specific permission of the data subject.

10. *The Arranging Brethren, Registrar, Safeguarding Officers and other appointees to roles which handle personal data* should

- use personal information only for the purposes for which it is held
- keep personal information securely
- retain it only for so long as it is needed in accordance with this policy
- disclose it to others only as far as is permitted under this policy
- ensure that data subjects are aware of how their data is being used and (where necessary) have consented to that use

Lawful use of personal information

11. The ecclesia can use personal information only if its use is necessary:

- for a contract with the data subject;
- for us to comply with a legal obligation;
- to protect someone's life (this is called "vital interests");
- for us to perform a task in the public interest, and the task has a clear basis in law;
- for legitimate interests pursued by the ecclesia or another organisation (eg another ecclesia, CALS or Christadelphian Care Homes), unless these are overridden by the interests, rights and freedoms of the data subject.

12. If none of these conditions applies, the use of personal information will be lawful only if (f) the data subject has given their clear consent.

13. Some personal information attracts greater protection under the law. This is called "special category" information, and includes information about a person's: racial or ethnic origin; political opinions; religious or similar beliefs; trade union membership; health (including physical and mental health, and the provision of health care services); genetic data; biometric data; sexual life and sexual orientation. For the ecclesia to use special category information, it has

to meet **both** one of the conditions in (a) to (f) above **and** one of conditions (i) to (v) below:

The use of the personal information is:

necessary for carrying out our obligations under employment and social security and social protection law;

necessary for safeguarding the vital interests (in emergency, life or death situations) of an individual and the data subject is incapable of giving consent;

carried out in the course of our legitimate activities and only relates to our members or persons we are in regular contact with in connection with our purposes);

necessary for pursuing legal claims.

14. If none of these conditions applies, the use of personal information will be lawful only if (v) the data subject has given their explicit consent

15. ***Although these rules about the different kinds of personal information are complicated, it is important for us to be aware of them because, as a religious institution we may in particular receive, generate and hold information about people's religious beliefs, which is classified as "special category" information.***

16. There is one other kind of personal information not covered above. This is *criminal information*. We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is a clear lawful basis to hold or use this information, eg in relation to safeguarding. In such a case the Ecclesial Secretary or Safeguarding Officer (or, if they are unavailable, their deputy) may need to obtain additional legal guidance.

Retention and security of information

17. As set out above, personal information can be retained only for so long as

it is required for lawful purposes. Annex 1 sets out the retention periods for different kinds of personal information. At the end of the retention period, the information (whether held in hard copy or electronically) will be securely destroyed, unless there is a requirement to retain it for longer (eg because of an ongoing police investigation).

18. The main ecclesial records are held by the Ecclesial Secretary. Hard copy records are kept in a locked cabinet at the Hall. A duplicate set of keys are kept by the Assistant Secretary in a sealed envelope, which he is authorised to open only with the Ecclesial Secretary's specific permission, or - in an emergency - when the Recording Brother is unavailable, eg through incapacity. The Ecclesial Secretary's electronic records are held on removable electronic media or in a secure remote file store. A secure backup is taken from time to time.

19. The same principles apply to other officers of the ecclesia, both in respect of hard copy and electronic personal data. This includes the Registrar and Deputy Registrars, the Safeguarding Officer and Deputy Safeguarding Officer, the Treasurer, the holders of preaching contact information, and those holding information about the welfare of ecclesial members and others. They should ensure that personal information for which they are responsible is not disclosed improperly to others, is kept securely, and is destroyed securely in line with the schedule at Annex 1 when it is no longer required. In cases of doubt or uncertainty, the Data Controller (Secretary) should be consulted.

20. If required by proper legal authorities such as the police, the ecclesia may disclose personal information about members or others. It may not be appropriate or lawful to inform the individual concerned in such a case.

Policy Statement

21. We will collect and use personal data that is needed only for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data "just in case" we want to

process it later.

22. We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

23. We will ensure that personal information is held securely.

24. We will keep personal data only for so long as is necessary to fulfil the purpose(s) for which it was collected.

25. We will share personal data with other organisations or people only when we have a legal basis to do so and if we have informed the data subject about the possibility of the data being shared, unless legal exemptions apply to informing data subjects about the sharing. Only authorised and properly instructed members are allowed to share personal data concerning other members and contacts.

26. We will issue privacy notices² to individuals who give us personal information telling them how we will deal with their information.

27. If you think that this policy has not been followed, or data might have been breached or lost, please tell the Ecclesial Secretary straight away. We will keep records of personal data breaches. We will report all data breaches which are likely to result in a risk to any person to the Information Commissioner within three days of the issue coming to light³.

Data retention and disposal schedule

1	Information type	Retention period	Responsible person
2	Personal membership information (Full name, date of birth, date of baptism, date of transfer, etc)	During membership and for one year after membership ceases (eg by transfer)	Ecclesial Secretary
3	Inter-ecclesial correspondence about individuals (eg on fellowship or membership matters) Correspondence with Editor of the Christadelphian Magazine about individuals	If about Watford members, during membership and for one year after membership ceases. If not about Watford members, retain for one year after correspondence ends	Ecclesial Secretary

4	Home address, phone numbers, email address	During membership and for one year after membership ceases	Assistant Secretary
5	Attendance records	In perpetuity	Registrar
6	Safeguarding records	During membership and for one year after membership ceases	Safeguarding officer & deputy
7	Individual gift aid pledges	During membership and for 6 years after relevant tax year	Treasurer
8	Preaching contact lists (names & contact details)	Continuing for so long as contact lasts (and in accordance with terms of privacy notice). Renew triennially if no intervening message from contact. If no response, destroy.	Bro John Jones
9	Welfare information	Retain while welfare issue persists, then destroy	Ecclesial Secretary
10	Other personal ecclesial data	Consult Secretary	All members

A formal note of each disposal should be made by the responsible person, and given to the Ecclesial Secretary to add to the ecclesial records. If there is a need to retain records for a longer period than set out above (eg if there is an ongoing issue about fellowship of a member or ex-member, or if there are police investigations or judicial processes in hand), the Data Controller should be consulted.