

Data Protection Policy

Definitions

Charity	means Churches in Croxley Green CIO, a registered charity, number 1179287, (“we”, “us” and “our”). We are a Data Controller (see below) for the purposes of the GDPR (see below).
Data Controller	means us, as we determine the purposes, conditions and means of the processing of personal data.
Data Processor	means an entity that processes data on behalf of the Data Controller
GDPR	means the General Data Protection Regulation 2016/279. This, together with the Data Protection Act 2018, forms part of the data protection regime in the UK. The GDPR applies to Data Controllers and Data Processors.
Personal data	means any information related to a natural person that can be used directly or indirectly to identify the person (referred to from here as an individual)
Register of Systems	means a register of all systems and software to enable us to know what personal data is held by us on which systems/software.

1. Data protection principles

We are committed to processing data in accordance with its responsibilities under the GDPR.

The GDPR sets out six key principles which lie at the heart of the general data protection regime and requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions

- a. This policy applies to all personal data processed by us.
- b. All Trustees, staff or volunteers who obtain, handle, process or store personal data for us must adhere to these principles.
- c. This policy shall be reviewed at least annually.
- d. As a not for profit organisation, and based on the self-assessment tool on the ICO website, we are exempt from the need to register with the Information Commissioners Office as an organisation that processes personal data. Specifically, our responses in relation to Question 6 are:
 - we only process information necessary to establish or maintain membership or support as the data in question relates to potential and actual donors;
 - we only process information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it as the data in question relates to potential and actual donors;
 - we only hold information about individuals whose data we need to process for this exempt purpose as the data in question relates to potential or actual recipients of the Parish Nurse service and potential and actual trustees, employees and volunteers who are involved in providing that service; and
 - the personal data we process is restricted to personal information that is necessary for this exempt purpose as the data in question relates to potential or actual recipients of the Parish Nurse service and potential and actual trustees, employees and volunteers who are involved in providing that service

3. Lawful, fair and transparent processing

- a. To ensure our processing of data is lawful, fair and transparent, we shall maintain a Register of Systems. See attached draft - in progress
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to us shall be dealt with in a timely manner.

4. Lawful purposes

- a. We must process personal data lawfully, fairly and in a transparent manner. Processing data is lawful only if we are able to demonstrate that at least one lawful basis applies. The six lawful bases are:
 - i. Consent: the individual has given clear consent for us to process their personal data for a specific purpose.
 - ii. Contract: the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
 - iii. Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
 - iv. Vital interests: the processing is necessary to protect someone's life.
 - v. Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
 - vi. Legitimate interests: the processing is necessary for our legitimate interests of advancing our charitable objects or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- b. We shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent as an adult or on behalf of a child is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent or that given on behalf of the individual, the option for the individual or the person giving consent to revoke their consent should be clearly available and systems will be put in place to ensure such revocation is reflected accurately in our systems.

5. Data minimisation

- a. We shall ensure that any personal data held is adequate, relevant and limited to what is necessary in relation to the purposes for which it processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, we shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. We shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, we shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

Methods of distribution.

Copies should be made available to all those working in any capacity on behalf of the charity

Review dates: May 2018, April 2019
