



DATA PROTECTION POLICY

1. INTRODUCTION

Christ Church Manchester uses personal data about living individuals for the purpose of general church administration and communication.

Christ Church Manchester recognises the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation (GDPR) 2018.

Christ Church Manchester fully endorses and adheres to the eight principles of the GDPR. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Christ Church Manchester must adhere to these principles.

These principles require that personal data shall:

- Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specific and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate, and where necessary, kept up to date.

- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept secure from unauthorised or unlawful processing and protected against accidental loss, destruction or damage by using the appropriate technical and organisational measures.
- 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.

Christ Church Manchester is registered on the Data Protection Register held by the Information Commissioner's Office (registration number Z1784428).

2. CONFIDENTIALITY

Christ Church Manchester will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the leadership and ministry overseers/coordinators of the church in order to facilitate the administration and day-to-day ministry of the church.

All Christ Church Manchester staff and volunteers who have access to Personal Data will be required to agree to sign a copy of this Data Protection Policy.

There are four exceptional circumstances to the above permitted by law:

- Where we are legally compelled to do so.
- Where there is a duty to the public to disclose.
- Where disclosure is required to protect your interest.
- Where disclosure is made at your request or with your consent.

3. ROLES & RESPONSIBILITIES

Christ Church Manchester recognises that the implementation of this policy is the responsibility of all staff and volunteers who have access to personal data.

Christ Church Manchester also recognises the additional responsibility carried by the people in the following role.

a) Data Controller

The Data Controller has responsibility for initiating an annual review of data protection with the trustees to ensure all sites of the church are compliant with this policy.

The Data Controller also has responsibility for overseeing the day-to-day management of personal data, including (but not limited to) ensuring all staff and volunteers who have access to personal data are trained in accordance with this policy, and have signed a Confidentiality Policy and a Data Protection Policy.

c) Deputy Leader

The Deputy Leader has responsibility for supporting the Data Controller in their role pertaining to the data protection policy.

4. THE DATABASE

Information contained on the database will not be used for any other purposes than those set out in this document. The database is accessed through the cloud and therefore can be accessed through any computer or smart device with internet access. The server for the database is in the UK and hosted by ChurchSuite.

The ChurchSuite database is integrated to a Mailchimp mailing list.

a) Access to Data

Access to the data is limited to those who need to have access to the data for the purposes laid out in section 4c of this document (below).

Those authorised to use the database will have access only to their specific area of use within the database. This is controlled by the Data Controller and Deputy Leader of CCM. The Data Controller and Deputy Leader are the only people who can access and set these security parameters.

Those with access are:

- *Data Controller* – Admin access to all CCM sites.
- *Deputy Leader* – Admin access to all CCM sites.
- *Church Administrator* – Access to all CCM sites.
- *Site Leaders* – Access to data for their own site.
- *Specified members of site leadership teams* – Access to data for their own site.

Access to the data is strictly controlled through the use of name specific passwords that are selected by the individual.

Any individuals who have the 'ChurchSuite' application installed on a smart device will set up a four-digit PIN that will be required to access the app.

The database will NOT be accessed by any authorised users outside of the EU, in accordance with the Data Protection Act, unless prior consent has been obtained from the individual whose data is to be viewed.

Personal information will not be passed on to any third parties, within or outside of Christ Church Manchester, without the express consent of the individual to whom the information pertains.

All access and activity on the database is logged and can be viewed by the Operations Manager and Data Co-ordinator.

b) Addition of Data

Personal data will only be added to the database with the explicit consent of the individual to whom the data pertains. This is the legal basis for holding this data.

This consent will usually take one of two forms:

- The individual completes a 'Find Me' card at a CCM meeting.
- The individual asks in writing to be added to the church database.

Evidence of consent will be kept, by means of a photograph of the request being forwarded to data@ccm.org.uk. The photo must be deleted once it has been sent.

No personal data will be held on the database beyond that which is necessary for church administration and communication. This may include:

- Name
- Address
- Telephone number
- Email address
- CCM site
- Spouse
- Gender

Find me cards that are available at CCM meetings will include the following text:

LEGAL STUFF

- All data given is confidential and will not be given to a third party.
- The data will be stored for as long as you attend CCM and you have the right to withdraw consent at any time.
- The data will be stored on ChurchSuite for the purpose of administration and communication by CCM staff and volunteers.
- The data is controlled by you and can be edited, hidden or deleted at your request.
- For more information you can contact our data controller (Tom O'Toole) by email at tom@ccm.org.uk
- Any complaints can be made to the Information Commissioner's Office.

c) Use of Data

Christ Church Manchester will use personal data for three main purposes:

- The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes.
- Contacting individuals to keep them informed of church activities and events.
- Statistical analysis; gaining a better understanding of church demographics.

d) Removal of Data

An individual's personal data will be removed from the church database when either of the following conditions is met:

- The individual leaves the church.
- The individual requests that their data be removed from the database.

When an individual leaves the church, their data may be archived for a period of up to six months. Once this period is completed, their data will be deleted.

When an individual requests that their data be removed from the database, their data will be deleted from the database. Such a request may be made to anybody who has access to the database (see section 4a of this policy) and is to be actioned immediately.

When an individual's data is deleted from the database, the following people should be notified: Data Controller, Site Leader, and Members of site leadership team that have access to the database.

The Data Controller will be responsible for ensuring the individual's data is also removed from the Mailchimp mailing list.

At least once a year, individuals whose data is held on the church database will be given the chance to update their personal data or have their data removed from the database.

e) My ChurchSuite

When an individual is added to the church database they will be sent an invitation to use 'MyChurchSuite'.

MyChurchSuite is a platform accessible through computers or smart devices on which individuals have access to their own personal data, church communications, upcoming events and rotas.

Within MyChurchSuite users have the option of making their data publicly visible or not.

If the data is not made visible it can only be viewed by individuals with access to the church database (see section 4a of this policy, above).

If the data is made visible, in addition to the people outlined in section 4a of this policy, that data will also be visible in 'MyChurchSuite' to anybody on the same rota as the individual.

The default setting for personal data in MyChurchSuite is 'invisible', so users must opt-in in order for their data to be viewed by anybody other than those outlined in section 4a of this policy.

5. ADDITIONAL PERSONAL DATA

In addition to the personal data held on the church database, Christ Church Manchester holds three further categories of personal information.

a) Employment Data

Christ Church Manchester holds the following data on individuals employed by the church:

- Phone number
- Email address
- Address
- Bank details
- Pay information
- Pension details
- Performance reviews

All of this data is held securely in the cloud and is password-protected. The data is only accessible by the following individuals:

- Deputy Leader
- Treasurer
- Trustees
- Administrator

b) Pastoral Data

In the regular course of church life, personal pastoral data will not be held on individuals. However, in the specific situations outlined below, the church may hold the data outlined:

- **Correspondence** – When an individual corresponds with the church or a church leader through written or digital means, a copy of this correspondence may be kept by the recipient.
- **Church Discipline** – As part of a church discipline process, church leaders may record notes from meetings with individuals for reference at later stages in the process. These notes may be shared with other CCM elders, and the individual(s) concerned in the process will be notified that these notes will be made.
- **Safeguarding** – As part of the CCM safeguarding policy, Christ Church Manchester keeps names, DBS certificate numbers and dates and sites for people, and a note that the check has shown no issues for individuals who have undergone a DBS check for serving in youth and childrens' ministries. This data is held securely in the cloud and is accessible to the Children's Advocate and the DBS co-ordinator and deputy for each site. This data is held indefinitely.

c) Financial Data

For accounting purposes, CCM holds data on individuals who have donated financially to the church. Data is held in the following locations:

- **CAF Bank** – Bank statements contain dates, amounts and (usually) names of donors, plus bank details of individuals to whom Christ Church Manchester has made payment. This is reviewed periodically and data is removed for individuals for who it is unlikely that further payments will be made. This data is accessible only to the small group of individuals who have access to the bank account (currently Jamie Semple, Tim Simmonds, Mary Baron, Michelle Wilson, Graham Harrop and Emma O'Toole).
- **Stewardship Giving** – Names, dates of donation, amount of donation and email addresses of donors are held for people giving through this platform. This data is only accessible to the church treasurer.
- **MyDonate** – Names, dates of donation, amount of donation, physical addresses and email addresses of donors are held for people giving through this platform. This data is accessible to the church treasurer and Deputy Leader.
- **QuickBooks Online** – All transactional financial data is held in this system (including names of donors, amounts and dates of donation). This data is accessible to the CCM Finance Team.
- **Google Drive** – Soft copies of gift aid forms, including names and physical addresses and soft copies of gifts aid submissions to HMRC are held on Google Drive and are accessible to the CCM Finance Team and Senior Leader. Giving reports containing names of donors, amounts and dates of donation are also held on Google Drive and are accessible to the CCM Finance Team, Senior Leader and Site Leaders (who have access to only their own site).

6. RIGHT TO ACCESS PERSONAL DATA

All individuals who are the subject of personal data held by Christ Church Manchester are entitled to:

- Ask what information the church holds about them and why.

- Ask how to gain access to that data.
- Be informed how to keep their data up to date.
- Be informed what Christ Church Manchester is doing to comply with its obligations under the 2018 General Data Protection Regulation.

Employees and other subjects of personal data held by Christ Church Manchester have the right to access any personal data that is being held in certain manual filing systems.

This right is subject to certain exemptions: Personal information may be withheld if the information relates to another individual.

Any person who wishes to exercise this right should make the request in writing to the Christ Church Manchester Data Co-ordinator, using the standard letter which is available online from www.ico.gov.uk

Christ Church Manchester reserves the right to charge the maximum fee payable for each subject request. If personal details are inaccurate, they can be amended upon request.

Christ Church Manchester aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days of receipt of a completed form unless there is good reason for delay.

In such cases, the reason for delay will be explained in writing to the individual making the request.

7. DATA BREACHES

In the event of a Data Breach, the Christ Church Manchester Data Controller will be responsible for informing the Information Commissioner's Office, and where necessary the individuals to whom the data pertained.

8. AGREEMENT

I have read and agree to this policy.

I understand that the way I access and use personal data held by Christ Church Manchester must be in compliance with this policy:

SIGN:

PRINT:

DATE: