

St Clement's Church, Oxford

Data Privacy Notice - Church

1. Who is this for?

Members and former members of St Clement's Church, Oxford; church volunteers; people who take part in activities or use services provided by the church now or in the past, including people who are not members; sole traders who do work for the church.

There are separate privacy notices for St Clement's Pre-School and for our employees.

2. What is personal data?

Personal data is information that relates to a living individual who can be identified from that data or when linked to any other data which we hold or are likely to hold. The processing of personal data is governed by the General Data Protection Regulation (GDPR). Personal data includes written records and photographs.

3. Who are we?

The Parochial Church Council (PCC) of St Clement's, Oxford is the Data Controller for St Clement's Church.

4. How do we use your personal data?

We use your personal data to:

- Provide services to our congregation, our Parish and the wider community in line with our charitable objectives
- Inform you of news, events, activities and services running at St Clement's
- Administer membership records
- Raise funds and promote the interests of the charity
- Manage our volunteers
- Maintain accounts and financial records
- Manage our relationships with contractors who are sole traders
- Comply with any legal requirements
- Comply with the policies of the Church of England, the Diocese of Oxford and the PCC

We also use personal data to:

- Manage our employees (employees have their own privacy notice)
- Run St Clement's Church Pre-School (Pre-School parents and children have their own privacy notice)

We process and protect personal data by:

- Keeping it up to date
- Not collecting or retaining excessive amounts of data
- Protecting it from loss, misuse, unauthorised access and disclosure by making sure that we have appropriate organisational and technical measures in place

St Clement's Church, Oxford
Data Privacy Notice - Church

- Making sure that anyone who processes personal data on our behalf only processes in accordance with your rights

5. What is the legal basis for processing your personal data?

- Explicit consent – e.g. to receive electronic copies of the notice sheet or news and other information from us
- Fulfilment of a contract e.g. with employees or sole traders
- Legal obligations - including safeguarding, charity law, administering gift aid, health and safety
- Legitimate interest – we need the data in order to provide our services. Our legitimate interests are:
 - Promoting the Gospel of Christ
 - Providing other services to our congregation, our Parish and the wider community in line with our charitable objects

We will always ask for your consent to use your photograph or other personal information in our publicity, on our website and in other publications. If you are under 18, we will always ask for consent from one of your parents.

Special category data

We process the following types of “special category data”

Health

We process this on the basis of legal compliance (safeguarding, health and safety) *and* that processing is necessary to meet our legal obligations in the field of employment, social security or social protection – see GDPR Article 9(2)(b).

For example, if you take part in activities like Junior Church or youth activities, we ask your parents about your health and medical needs; if you have an accident, we fill in an accident report.

Religious opinions or belief

We sometimes process this on the basis of legitimate interest *and* that you have made the data manifestly public, for example by joining St Clement's Electoral Roll or by being confirmed – see GDPR Article 9(2)(a).

We sometimes process this on the basis of legitimate interest *and* that we are a not-for-profit body with a religious aim where processing relates only to members or former members (or those who have regular contact with us in connection with those purposes) and there is no disclosure to a third party without consent - see GDPR Article 9(2)(d).

St Clement's Church, Oxford

Data Privacy Notice - Church

For example, if you sign up for an Alpha Course.

More information about “special category data”, including the full text of Article 9(2) can be found on the Information Commissioner’s website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

6. Sharing your personal data

We share data with members of the church in order to carry out a service to other church members, to support our activities or for other purposes connected with the church.

We don’t share your information with anyone else without your consent unless the law and our policies allow us or require us to.

7. How long do we keep your personal data?

If we only hold your personal data to send you news or information about activities or to do things like manage coffee or flower rotas, we will remove this from our records immediately, on request.

If we use your photograph or other personal information on our website or in our publicity or other publications, we will stop using it on request, but this will not affect anything that has already been published.

Otherwise, we decide how long to keep your data using the following guidelines issued by the Church of England’s Records Management Centre:

- *Safeguarding Records Management (2015)*
- *Keep or Bin – the Care of Church Records (2009)*

Different guidelines give different advice, especially about safeguarding records and we are seeking clarification on our legal responsibilities.

8. Your legal rights

You have the following rights with respect to your personal data, subject to any GDPR exemptions:

- The right to request a copy of the personal data which the we hold about you
- The right to ask us to correct any personal data if it is found to be inaccurate or out of date
- The right to ask us to erase your personal data where it is no longer necessary for us to retain it

St Clement's Church, Oxford
Data Privacy Notice - Church

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to ask for a restriction to be placed on further processing
- The right to lodge a complaint with the Information Commissioner's Office.

Children have the same rights as adults. If a child is not old enough to exercise their rights on their own behalf or to understand the information, a parent or guardian can do this for them.

9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will tell you what we plan to do and explain why we are doing it. If we need your consent, we will ask for this before we start using it for the new purpose.

Our contact details

If you have any queries or complaints about the personal data we hold and how we use it or if you want to see a copy of the information we hold and share about you, please contact:

St Clement's PCC

St Clement's Church Parish Office

Cross Street

Oxford

OX4 1DA

Tel: 01865 246674

Email: parish.office@stclements.org.uk

Website: <http://www.stclements.org.uk/>

Registered Charity: 1132918

Contact details for the Information Commissioner

Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate)

Website: <https://ico.org.uk/>

Approved by St Clement's PCC on 16 May 2018

Last amended 20 May 2018

Review no later than April 2019