

The practicalities (see consent letter on back page)

- Gift aid consent does not need to be renewed
- Sunday attenders will be invited to sign a consent form
- Non-attenders, who are already on our records. will be considered as falling within our “legitimate interest”.
- All forms (wedding, baptism, envelopes) in the future will have a consent clause included
- Hospital contacts will be assumed to have given their consent to the chaplain who contacts us with their name and address
- Opt out is possible at any time – this will be offered on publications and website

All consent forms will be retained safely.

#### **Safety of data:**

Paper records (consent forms, historical registers will be kept under lock and key)

Digital records will be kept on office hard drive and/or cloud – under password protection

#### **Children’s data:**

Parent/guardian permission slips will contain a consent option for names and (emergency) means of contact with parents.

Leaders of teenage groups may keep mobile phone numbers of teenagers entrusted into their care. These numbers may only be retained for the duration of the organised programme.

#### **Right to restriction and/or deletion of data:**

- Everyone has the right to have data removed or not added

#### **Special Conditions for religious not-for-profit bodies**

While you will rely on consent for most of your communications, there will be some data processing you will want to do as part of normal church management for which you will not need to gain specific consent for that particular action – holding lists of group members, for example. This is covered by a special condition under the GDPR for religious not-for-profit bodies, provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent.

#### **Annual review of data processing – questions to be asked and appropriate action to be taken**

Is personal data only used for the purposes for which it was originally collected?

Is the personal data collected limited to what is necessary for the purposes of which it is processed?

Have all deletions been processed?

Has data retention been exceeded?

Record dates and actions from review.

Develop a cyclical review process as part of the annual programme of the Trustees

#### **Data security and breach:**

All data will be kept in office laptop and on cloud, password protected.

Lap top under lock and key.

If breached, back up will be used to inform everyone on it.

Staff will connect with data through software and applications on phones and laptops (church suite software).

The best security against a breach is we won’t keep confidential, personal or sensitive data at all.

Communicate any breach to Trustees.

#### **A Subject Access Request**

is a right conferred on a data subject (individual) by law to request a copy of the data held

about them by an organisation.

Secretary of Select Vestry, Data Controller and staff should all be familiar with the protocols as described on the RCB website on this subject.

<https://www.ireland.anglican.org/cmsfiles/pdf/Resources/ParishResources/SelectVestry/GDPR/SubjectAccessRequest.pdf>

**Belvoir Parish Church,**

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## Belvoir Parish GDPR Policy

Your privacy is important to us, and we want to communicate with our members in a way which has their consent, and which is in line with European Law on Data Protection. As a result of a change in Data Protection regulation, we now need your consent as to how we contact you. Please fill in the contact details you want us to use to communicate with you:

|                             |  |
|-----------------------------|--|
| <b>Name</b>                 |  |
| <b>Address</b>              |  |
| <b>Email Address</b>        |  |
| <b>P h o n e<br/>Number</b> |  |

By signing this form you are confirming that you are consenting to Belvoir Parish holding your personal data for the purpose of communicating with you (please tick the boxes where you grant consent):-

I consent to the parish contacting me by  post  phone or  email.

to keep me informed about news, events, activities and services at Belvoir Parish Church;

Signed: \_\_\_\_\_ Dated: \_\_\_\_\_

*Where you do not grant consent we will not be able to use your personal data. You can find out more about how we use your data from our "Data Privacy Notice" which is available from our website/facebook group or from the Office. You can withdraw or change your consent at any time by contacting the office above. Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law, but this will not affect any personal data that has already been processed prior to this point.*

### Data we will hold:

1. Names addresses, phone numbers, email addresses, birthdays of children?
2. We will Identify with each person's name how we got it (eg gift aid, hospital chaplain passed it to us) and why we keep it (eg Safeguarding Trust checked and trained)
3. Historic data – baptisms, marriages, deaths/funerals

### Why we have the data:

Primarily "legitimate interest":

We will use data to –

- Provide care, safety, supervision
- Provide information on events that may be beneficial
- Inform about changes and/or needs (including financial) in the organisation

We will not pass data to any other organisation

We will not pass data to any other individual without permission

We will not use data to advertise for commercial gain

### Retention times

1. We will keep data for our members for the duration of life, since care is lifelong or until we are told it is no longer required (example: moving house/church/death)
2. Financial data will be kept for six years after the last recorded donation
3. Medical data for children/young people on trips or programmes will be deleted when no longer needed.

### The process we have undertaken to become GDPR compliant:

- We will inform everyone of the data we will be keeping (names, addresses and phone numbers come under legitimate interest)
- We will pursue consent to make contact (except when it comes under legitimate interest)
- We will give everyone the opportunity to choose the means of contact