

# **WATH ALL SAINTS PCC**

## **DATA PROTECTION POLICY 2022**

(To be signed by PCC members, vergers and others who process data on behalf of the PCC)

### **1. Background**

Wath All Saints PCC ('WASPCC') needs to collect personal information about people with whom it deals in order to carry out its business, meet its objectives and comply with legal obligations. These people include supporters, employees, volunteers, parishioners (present, past and prospective). The information we collect may be personal and /or sensitive in nature.

No matter how it is collected, recorded and used (e.g. on a computer or other digital media, on hard copy, paper or images (including video or photographic) this information will be dealt with properly to ensure compliance with the EU General Data Protection Regulation (GDPR). As an organisation we are registered as a Data Controller with the Information Commissioner.

### **2. Aims of this Policy**

The aim of this policy is to ensure that everyone handling data is fully aware of the requirements and acts in accordance with principles set out in GDPR.

### **3. Scope**

The scope of this policy includes employees, PCC members, and those with designated roles to support the work of the PCC and, in some circumstances (e.g. accountants) contractors.

### **4. Principles**

In line with GDPR WASPCC will comply with the following principles relating to processing of personal data:

- a. Processed lawfully, fairly and in a transparent manner.
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c. Adequate and relevant
- d. Accurate and kept up-to-date
- e. Kept in a form which only identifies the data subject for no longer than is necessary for the purposes for which the personal data is required.
- f. Processed in a secure manner.
- g. The Controller shall be responsible for compliance.

### **5. PCC Member Responsibilities.**

PCC have ultimate responsibility but may delegate key tasks to individuals. The Data Controller is the vicar as a member of the PCC.

### **6. Delegated Responsibility**

The PCC with delegated responsibility must ensure they:

- a. Understand and communicate obligations under GDPR
- b. Undertake a training needs analysis and provide training on this subject where required.
- c. Provide clear lines of report and supervision for compliance.
- d. Monitor compliance

- e. Review the policy on a biennial basis.
- f. Produce clear and effective procedures.
- g. Carry out regular checks to monitor and assess new processing of personal data.
- h. Set up computer systems to allow restricted access to certain areas.

**7. Employee and PCC members responsibilities**

Those covered in the scope of this policy must ensure not only that they understand this policy but that they comply with it by:

- a. Observe all forms of guidance about data processing
- b. Understand fully the purposes for which WASPCC collects and uses personal data.
- c. Collect and process appropriate information and only in accordance with the purposes for which it is to be used by WASPCC to meet its legal/service requirements
- d. Ensure the information is destroyed when no longer required
- e. Be aware of the procedure for dealing with a Subject Access Request (SAR)
- f. Not send any information outside the UK without the authority of the Data Controller.
- g. Understand that breaches of the policy may result in penalties.

**8. Distribution Plan**

This policy will be circulated to all new and existing employees, PCC members and those with designated roles; they will be expected to read, understand and sign acceptance of this policy.

**9. Procedure**

Any personal and sensitive information will be treated as confidential, used only for the purpose it was intended, stored securely and kept up-to-date where possible.

The following measures will be taken to ensure that personal information kept is accurate:

- Explain why it is needed and how their data is processed.
- By using reminders (Parish magazine, mailings, thank you letters) to people to ask them to check their details.
- By encouraging people to tell us about changes to their details and providing a telephone number, email address and website where changes can be communicated.

Information may take the form of hard (paper) and digital (computer based) copies and includes (but not limited to):

- Registers of those involved with committees and groups
- Personnel records; PCC nomination forms
- Photographs, slides and videos
- Digital media (e.g. USB disc drives, removable memory sticks, website and other social media)
- Gift aid records and bank data
- Lists (parish newsletter, parish register)
- Computerised records

## **10. Data Security**

The organisation will take steps to ensure that personal data is kept secure at all times against unauthorised or unlawful loss or disclosure. The following measures will be taken:

- a. All paper copies covered within the scope of this policy will be stored in a locked filing cabinet or cupboard with restricted access; on no account will paper records be left in the vestry or other public places.
- b. Passwords must be kept strictly confidential.
- c. Electronic records will be stored on PCs/ laptops with appropriate virus guards. Personal data to be emailed will be password protected.
- d. If data is to be taken offsite electronically files must be transported on a password protected encrypted data stick.
- e. Use of shredder for all data to be disposed of.
- f. If leaving the computer unattended with personal data on the screen, the PC will be put in password-protected mode.
- g. Report any breaches in this policy as soon as they occur to the Data Controller who will decide on what action will be taken.

## **11. Identifying Data Breaches**

In accordance with ICO guidance data breach is defined as a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.

Personal data breaches can include:

- Access to data by an unauthorised third party
- Deliberate or accidental action (inaction) by a data controller
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost/stolen
- Alteration of personal data without permission

On notification of a possible or actual data breach the Data Controller will take steps to stop the breach if still happening, assessment of the severity of the breach and plans about rectification. The Data Controller may decide a report to the ICO is necessary. A decision should also be taken as to whether to notify the data subject of the breach.

## **12. Subject access Request**

Anyone whose personal information we process has the right to know:

What information we hold

How we process it

What we are doing to comply with GDPR

Any person wishing to exercise this right should notify the Data Protection Officer, Mr Jonathon Henthorn via email at [gdpr@wathparishchurch.co.uk](mailto:gdpr@wathparishchurch.co.uk) or by post C/o The vicarage, Church Street, Wath-upon-Dearne Rotherham South Yorkshire S63 7RD.

Further information on rights to access your data are provided through the Church of England website at National Church Institutions data protection. [National Church Institutions data protection | The Church of England](#)

A copy of this document is held with the master copy in the policy file.

The new Health and Safety policy on the Diocese of Sheffield website (January 2022) [ECC H&S Policy \(anglican.org\)](#) makes reference to ensuring that the accident report book complies with Data protection rules.

‘Recording Full details of all accidents, disease and dangerous occurrences should be recorded using the Data Protection compliant HSE Accident Book. This is necessary for monitoring purposes and is also a requirement of RIDDOR, as well as the Social Security (Claims and Payments) Regulations 1979 and Social Security Administration Act 1992.’

We will ensure that Wath PCC has, and uses, the required HSE Accident book.

Signed ..... Date .....  
Position on PCC .....

This policy has been reviewed by R. Lewis (Church Warden) against current guidance on the Church of England website and Sheffield Diocese website at 17<sup>th</sup> February 2022.

Next review date February 2023 unless changes occur in guidance or legislation before this date.