

Data Privacy Notice for the Parochial Church Council and Vicar of Crofton Parish

Summary

The Parochial Church Council [PCC] of Crofton Parish and the Vicar of Crofton Parish hold and process information (often called “data”) about members of the Parish’s congregations, its staff and volunteers and other who have had contact with the Parish.

The PCC and Vicar share a single Data Privacy Notice. They are committed to applying the highest standards to the management and use of the personal information they hold; these standards will at least meet the stringent legal requirements of the General Data Protection Regulation [GDPR].

This means that only the personal information necessary for the PCC and Vicar to operate is held and it is only held while it is still needed by the PCC and Vicar, or because there is a legal requirement to hold it longer. The information is held securely and is only seen by those who need to know or have a legal right to know the information. We recognise that, because of the pastoral and safeguarding activities of the Parish, some of the information held is what the GDPR refers to as special category data or criminal offence data; we follow the requirements to take special care of this information.

The GDPR specifies a number of allowable reasons for holding and processing personal data. With the wide variety of contacts and activities within the parish, the PCC and Vicar rely on a variety of these reasons; the ones we rely on are consent, legitimate interest, contract and legal obligation.

How we process personal data, the basis for processing it and the length of time we hold the data varies depending on your relationship with the PCC and Vicar. These are listed in the later sections of the full version of this privacy notice (available online).

In general, the principles the PCC and Vicar follow are:

1. If you have become a regular member of the Parish (indicated by joining the Congregational Database) or one of the groups run as part of the Parish, we use *legitimate interest* as the GDPR basis for using your data. This means that, although we do not tell you in advance all the ways we might use your information, we will only use it in ways you would reasonably expect and in ways which would not impact on your privacy. We may share your personal information with the Diocese, but will need a compelling reason; if we are unsure we will contact you for your consent.
2. If, however, you have only had occasional contact with the Parish through, say, just visiting for a service or two, or from attending occasional events like Alpha or have been married in the Parish or have booked a room in the Parish Centre, the PCC and Vicar will let you know all the ways we will use your information and will obtain your consent for it to be used in these ways.

The PCC and Vicar do not sell personal information. There are times when they are legally required to share some of the information with other organisations.

The PCC and Vicar will respond to reasonable requests from you to find out what information they hold about you, to correct the information if it is not correct and, unless there is a legal or safeguarding requirement to keep it, to have the information deleted. There is a considerable amount of data that the PCC and Vicar hold that cannot be deleted.

If you wish to view, update or delete the information held about yourself by the PCC and Vicar either contact the Parish Office at Holy Rood Church, Gosport Road PO14 2AS or email office@croftonparish.org.uk.

The PCC and Vicar have appointed the PCC Secretary, Simon Swindells, as the Parish's Data Compliance Officer. He can be contacted via the Parish Office.

You can contact the Information Commissioners Office on 0303 123 1113 or email via <https://ico.org.uk/global/contact-us/email/>

The most recent version of this notice along with more details can be found on the Crofton Parish website at www.croftonparish.org.uk/privacy.

The Detail

1. What is personal data?

The General Data Protection Requirement [GDPR] says personal data is information that relates to an identified or identifiable individual. The way personal data is held and used is governed by the GDPR. The GDPR classes some types of data as special category data. Special category data is personal data which the GDPR says is more sensitive, and so needs more protection. Special category data that might be held by the PCC or Vicar includes religion and health. As part of the safeguarding work in the parish the PCC and Vicar may also hold another category of special data, criminal offence data.

2. Who are we?

A Data Controller decides how your personal data is processed and for what purpose

The Parochial Church Council of the Ecclesiastical Parish of Crofton, Stubbington (referred to as the PCC) is a data controller. The Vicar of the Ecclesiastical Parish of Crofton is also a data controller (referred to as the Vicar). The Vicar and PCC work together promoting the whole mission of the Church in the parish; they are however separate entities; hence they are both identified as data controllers although the majority of the data is shared. They decide how personal data pertaining to the work of Crofton Parish is processed and for what purpose. They have agreed to this single privacy notice covering each of their roles. Throughout this document the term “the Parish” is used to refer to both the PCC and the Vicar.

Under the terms of GDPR the PCC and Vicar are also Data Processors. This means they store and use data to perform tasks specified by the Data Controller. The Parish also uses other companies as Data Processors, including Google LLC, Dropbox Inc., Microsoft Corporation and CAF Bank Limited, and are satisfied that these organisations are GDPR compliant.

3. Your rights and your personal data

Unless there are legal requirements or an exemption under the GDPR, you have the following rights with respect to your personal data held by the PCC or Vicar:

- The right to request a copy of your personal data which Crofton Parish holds about you;
- The right to request that the Parish corrects any personal data if it is found to be inaccurate or out of date;
- The right to request that the Parish deletes any personal data it holds about you (the right to be forgotten). The GDPR allows situations when the right to be forgotten does not apply. The PCC and Vicar are under legal obligations to maintain various records, for example a record of marriages and a record of income and tax and National Insurance paid to staff. The PCC and Vicar also seek to provide a safe environment for all with particular concern for children, young people and vulnerable adults. They follow the Church of England’s requirements for Safeguarding by, for example, keeping records of the children, young people and leaders’ attendance at meetings, making and recording the checks made before a volunteer starts and recording the evidence and any steps taken for any incidents. In all these cases the right to be forgotten does not apply.
- The right to lodge a complaint with the Information Commissioners Office.

4. How do the PCC and Vicar of Crofton Parish process your personal data?

The PCC and Vicar comply with their obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access

and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To enable the PCC and Vicar to fulfill its aim of “promoting in the ecclesiastical parish and beyond the whole mission of the Church, pastoral, evangelistic, social and ecumenical”.
- To administer our Congregational Database and various lists of contacts.
- To administer the groups provided for youth, children and families and others.
- To administer the provision of baptisms, marriages and funerals for those in the community.
- To raise funds to finance God’s work in the Parish and beyond.
- To manage the hiring of rooms in the Parish Centre.
- To manage our employees and volunteers.
- To maintain our own accounts and records (including the processing of gift aid applications).
- To inform you of news, events, activities and services running in the parish or in the wider church.

A detailed listing of the personal data held by the Parish, the GDPR basis for processing the data and the retention period is shown in the Appendix.

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

With the wide variety of contacts and activities within the parish we rely on a variety of the basis defined in the GDPR for allowing us to process the data; the ones we rely on are consent, legitimate interest, contract and legal obligation.

- “Legal obligations” applies, for instance, when managing Gift Aid, paying staff, making social security claims or following social protection law.
- “Contract” applies, for instance, when hiring Parish rooms or when employed by the PCC or when providing services as an individual to the PCC.
- “Legitimate interest” applies for most of the PCC and Vicar’s processing where the data subject is in regular contact with the Parish. This is allowed under the GDPR particularly as the Parish is a not-for-profit body with a religious aim. Joining the Congregational Database or becoming a member of a youth or children’s group indicates regular contact with the Parish. The PCC and Vicar will use your data and communicate with you in ways you would reasonably expect for a church and which have a minimal privacy impact. They will process the data where there is a compelling justification for the processing, for example to provide medical assistance. For information sent to a large number of people the Parish will use email or letters. If the Parish has a regular communications that will only be of interest to a limited number of people, for instance the youth group’s prayer letter, you will have the option to receive the communication or not.
- “Explicit consent” applies when you do not regularly attend Parish events (or have just started attending). The PCC and Vicar will make clear how the data will be used, including how the Parish will communicate with you, and you will be

asked to consent to this use. If the Parish wishes to process the data about you in a different way it will ask you first.

A detailed listing of the personal data held by the Parish, the GDPR basis for processing the data and the retention period is shown in the Appendix.

6. Sharing your personal data

The PCC and Vicar do not sell personal information.

Crofton Parish is part of the Diocese of Portsmouth. The PCC and Vicar will occasionally share individuals personal information with the Diocese if there is a compelling reason, for example details of candidates for confirmation.

The PCC and Vicar will only make personal information known to another organisation if permission has been given or if there is a legal requirement.

Member contact information is only provided to the staff team, senior group leaders and the Parish officers. If someone else asks for your contact details the office will seek your consent before giving it.

7. How long do we keep your personal data?

The PCC and Vicar keep data in accordance with the retention periods set out in the Church of England guide "Keep or Bin: Care of Your Parish Records"¹.

Some examples of the retention period are:

- Electoral roll data is kept while you are on the electoral roll (the roll is completely refreshed every six years).
- Congregational database data is kept until you inform the Parish that you no longer wish to be part of it or until you have had no contact with the parish for over two years.
- Gift Aid declaration forms are kept for six years after they cease to be valid.
- Accident reports are kept for 20 years unless the incident relates to a child when they are kept for 20 years after the child becomes an adult.
- Records of the Safer Recruitment process for volunteers working with children, young people or vulnerable adults are kept for 50 years.
- Attendance records at children or young peoples' groups and a record of leaders helping at the group are held for 50 years.
- Records of marriages and baptisms are held indefinitely

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

¹ Keep or Bin: Care of Your Parish Records can be retrieved from

https://www.churchofengland.org/sites/default/files/2017-11/care_of_parish_records_keep_or_bin_-_2009_edition.pdf

9. Contact Details

If you wish to query, update or delete the information held about yourself by the PCC and Vicar either contact the Parish Office at Holy Rood Church, Gosport Road PO14 2AS or email office@croftonparish.org.uk.

The PCC have appointed the PCC Secretary, Simon Swindells, as the Parish's Data Compliance Officer.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Appendix – Listing of Data Held

Data Collection	Details
<p>Parish Congregational Database</p>	<p>Reason for processing: To contact with those who are part of the Parish community both individually and as a group to enable pastoral care, communication of news and event details, parish management and other uses that may be expected in a vibrant Parish.</p> <p>When added: Completion of “Belonging” form.</p> <p>Who has access: Clergy and other licensed ministers, ministry and administrative staff, Parish officers, senior group leaders and other senior volunteers have full access. Selected parts of the details will be shared with others if required to accomplish the mission of the parish. If someone else asks for your contact details the office will pass the request on to you.</p> <p>Retention period: Until the data subject indicates they no longer wish to be included or until contact with the data subject has ceased.</p> <p>Where stored: Parish systems, contact information distributed to those allowed access.</p> <p>Basis for processing: Legitimate Interest.</p> <p>The initial form provides contact details; this will be augmented with further information that is helpful to the parish or the subject over time. Examples of this would be if the subject has a Disclosure and Barring Service [DBS] clearance, if they are a member of a home group etc. No financial information is held.</p>
<p>Alpha ID Course</p>	<p>Reason for processing: keeping in touch with those attending course.</p> <p>When added: sign up at start of course</p> <p>Who has access: course lead, catering lead (Alpha only)</p> <p>Retention period: online details deleted within six months of completion of course. A record of attendance is archived.</p> <p>Where stored: leader’s laptop and paper, backup on cloud. Archive is paper only.</p> <p>Basis for processing: Consent</p>

Data Collection	Details
<p>Little Fish</p>	<p>Reason for processing: to provide information about Little Fish and to keep an attendance record</p> <p>When added: first attendance</p> <p>Who has access: group leaders</p> <p>Retention period: online record until leave group, attendance record archived</p> <p>Where stored: leader's laptop and paper, backup on cloud. Archive is paper only.</p> <p>Basis for processing: Consent for making contact and legitimate interest for attendance record</p>
<p>Family Fun Afternoon attendees' emails</p>	<p>Reason for processing: to provide information about Crofton Kids events</p> <p>When added: on receipt of attendance form with consent ticked</p> <p>Who has access: Family Fun Afternoon planning team</p> <p>Retention period: One year after last visit</p> <p>Where stored: email address list (cloud)</p> <p>Basis for processing: consent</p>
<p>Family Fun Afternoon Register</p>	<p>Reason for processing: record of families attending to know who is regular and in case of safeguarding or other similar investigations.</p> <p>When added: on receipt of attendance form</p> <p>Who has access: Family Fun Afternoon planning team</p> <p>Retention period: One year after last visit</p> <p>Where stored: paper and electronic copy with BU</p> <p>Basis for processing: legitimate interest (in case of safeguarding or other similar issue)</p>

Data Collection	Details
<p>Baptism booking</p> <p>Marriage booking</p> <p>Thanksgiving booking</p>	<p>Reason for processing: To arrange the event and get in touch with information considered helpful before and after the event and to mark anniversaries and other milestones. To confirm legality of the event (not relevant to Thanksgiving)</p> <p>When added: Over the period the event is arranged by Occasional Office Administrator. Initial contact is made by data subject.</p> <p>Who has access: Administrator and minister taking the event. For weddings some details are given to the organist, vergers and person responsible for flowers in church.</p> <p>Retention period: Marriage and baptism records are archived and not deleted.</p> <p>Where stored: Marriage and Baptism Registers (paper), also electronically.</p> <p>Basis for processing: Legal Requirement to check eligibility and record marriage and baptism details; consent for Parish contact.</p>
<p>Cup of Tea and Company attendance list</p>	<p>Reason for processing: To know who is new to the group and to arrange further support if necessary.</p> <p>When added: when a bereaved person joins the group</p> <p>Who has access: group leaders</p> <p>Retention period: until informed of decision to leave or people stop attending for a period.</p> <p>Where stored: Paper record</p> <p>Basis for processing: legitimate interest</p>
<p>Payroll</p>	<p>Reason for processing: To arrange Staff wage, tax, NI, pension etc. payment and records</p> <p>When added: when staff join</p> <p>Who has access: the payroll processor, treasurer's assistant, treasurer, PCC agree wages.</p> <p>Retention period: 6 years</p> <p>Where stored: payroll processor's machine and government systems</p> <p>Basis for processing: legal, contract and legitimate interest for monitoring payments.</p>

Data Collection	Details
<p>Home groups FOCOC Stewards and other rotas and small groups</p>	<p>Reason for processing: making arrangements for meeting or duties</p> <p>When added: when people join the group / rota; often informal</p> <p>Who has access: Group leaders, often distribution list is seen by whole group to allow easier communication between team members</p> <p>Retention period: details are held until subject leaves group</p> <p>Where stored: group leader's computer</p> <p>Basis for processing: legitimate interest</p>
<p>Young people attending youth events</p>	<p>Reason for processing:</p> <p>When added: on joining group, renewed yearly</p> <p>Who has access: Parish Youth Worker holds medical records and contact details. Medical information is shared with group "medic" on times away.</p> <p>Retention period: information held while a group member, register of attendance is held for 50 years.</p> <p>Where stored: paper and electronic copies. Medical information is paper only.</p> <p>Basis for processing: legitimate interest, legal requirement for register.</p>
<p>Children attending Sunday children's groups</p>	<p>Reason for processing: communication with young people and parent / guardians, providing relevant groups, taking care of medical needs.</p> <p>When added: on joining group, renewed yearly</p> <p>Who has access: Children's Administrator, senior group leaders</p> <p>Retention period: information held while a group member, register of attendance is held for 50 years.</p> <p>Where stored: paper and electronic copies.</p> <p>Basis for processing: legitimate interest, legal requirement for register.</p>

Data Collection	Details
<p>Youth & children leaders</p>	<p>Reason for processing: Communicating information about Sunday groups' rotas, team meetings, special events etc.</p> <p>When added: when joining team, details are available on recruitment forms.</p> <p>Who has access: team leader maintains list, individual group contact details are known by everyone in group.</p> <p>Retention period: until leader leaves group</p> <p>Where stored: computer file or email distribution list</p> <p>Basis for processing: legitimate interest.</p> <p>Details will also be held in the Volunteer Recruitment and Training record which has a longer retention period. (See below)</p>
<p>PCC</p>	<p>Reason for processing: To efficiently operate PCC business</p> <p>When added: After election to PCC or appointment for ex-officio members</p> <p>Who has access: Names are public on website and Charities Commission site and Annual Report. Trustee details are required by banks. Emails are shared between members. Other details are known by PCC Secretary, Vicar and Churchwardens.</p> <p>Retention period: Full details are held while a member of PCC. The record of being a PCC member is public (through publication of Annual Reports)</p> <p>Where stored: PCC Secretary's laptop for contact details, paper for full details.</p> <p>Basis for processing: legitimate interest</p>
<p>Gift Aid Declarations</p>	<p>Reason for processing: claim back gift aid from government</p> <p>When added: on completion of gift aid form</p> <p>Who has access: finance team, primarily treasury assistant</p> <p>Retention period: records are kept indefinitely, bank statements for minimum 6 years</p> <p>Where stored: electronic and paper plus backup</p> <p>Basis for processing: legal obligation</p>

Data Collection	Details
Accident Book	<p>Reason for processing: record accident / injury on premises</p> <p>When added: completed after incident</p> <p>Who has access: warden's and vicar, selective information is shared if cause needs investigation.</p> <p>Retention period: twenty years after incident for adults; for children 20 years after child becomes an adult</p> <p>Where stored: paper in office file</p> <p>Basis for processing: legal obligation</p>
Room Booking	<p>Reason for processing: manage room booking and payment</p> <p>When added: starts when initial query received, then booking form</p> <p>Who has access: Office staff / volunteers</p> <p>Retention period: six years</p> <p>Where stored: computer and paper copy</p> <p>Basis for processing: contract</p>
Funeral Information	<p>Reason for processing: arranging a funeral and providing pastoral care to the bereaved.</p> <p>When added: Provided by funeral director and meetings with family or others arranging the funeral</p> <p>Who has access: minister and bereavement team, verger, organist</p> <p>Retention period: 5 years</p> <p>Where stored: paper in office</p> <p>Basis for processing: contract, legitimate interest</p>
Volunteer Recruitment	<p>Reason for processing: recruiting of volunteers who are not a risk</p> <p>When added: after volunteering for post</p> <p>Who has access: complete information, including references, is held by safeguarding team. Group leader sees application form and role description.</p> <p>Retention period: indefinite (50 years) (only if recruited?)</p> <p>Where stored: references kept in emails, application form paper and email</p> <p>Basis for processing: legitimate interest</p>

Data Collection	Details
Volunteer training record	<p>Reason for processing: to ensure required training in safeguarding issues is undertaken</p> <p>When added: when volunteering starts, ongoing over the years</p> <p>Who has access: safeguarding team</p> <p>Retention period: until volunteering ceases</p> <p>Where stored: laptop</p> <p>Basis for processing: legitimate interest</p>
Disclosure Baring Service Applications	<p>Reason for processing: keep record of DBS clearances</p> <p>When added: When clearance letter received from Diocese</p> <p>Who has access: safeguarding team</p> <p>Retention period: 50 years</p> <p>Where stored: email record</p> <p>Basis for processing: legitimate interest</p> <p>The potential volunteer completes the DBS form. This is checked by the Safeguarding Team before being sent to Diocese for processing. The form is not returned, a letter indicating clearance or otherwise is sent to the parish.</p>
Staff Records	<p>Reason for processing: Management and care of staff members</p> <p>When added: On starting role, information is added or updated over time.</p> <p>Who has access: Vicar and churchwardens and line managers. (Not all data is available to everyone.)</p> <p>Retention period: 6 years after ceasing role if not working with children, 50 year if working with children or vulnerable children.</p> <p>Where stored: paper files</p> <p>Basis for processing: contract and legitimate interest</p> <p>Staff includes people employed by the Parish, curates and others training in the parish and volunteers on the leadership team.</p>

Data Collection	Details
Finance Donations Received through standing order	<p>Reason for processing: to know level of donated income</p> <p>When added: people added when their standing order appears on statements. Information is collected monthly.</p> <p>Who has access: Treasury Assistant and Treasurer</p> <p>Retention period: bank statements are held for six hears, electronic information is not cleared.</p> <p>Where stored: CAF Bank, the Data Processor, provides WEB access to statements.</p> <p>Basis for processing: legitimate interest</p>
Finance Payments made to Individuals	<p>Reason for processing: payment for items bought for the parish and expenses and wages for staff team.</p> <p>When added: When first bank transfer made to recipient.</p> <p>Who has access: Treasury Assistant and Treasurer</p> <p>Retention period: Until it is recognised no more payments are required.</p> <p>Where stored: CAF Bank (online account management)</p> <p>Basis for processing: legitimate interest</p>