

ST PAUL'S TERVUREN DATA PROTECTION POLICY

1. POLICY

St Paul's Tervuren and its Chaplaincy Council (CC) recognises its responsibility and is committed to a policy of protecting and preserving the confidentiality of personal data as required by European data protection legislation.

St Paul's Tervuren, including its legal entities (Friends of St Paul's Church Tervuren VZW, Anglicaanse Kerkfabriek Saint Paul's Church, and St Paul's Church Trust) retains and processes information including personal data about staff, volunteers, congregation members, electoral roll members, and other regular users, supporters and contacts of the church in order to carry out the duties, functions and activities of the church. In line with legal requirements, personal data is collected and used fairly and lawfully, stored safely and securely, and is not disclosed to any third person except as provided for by law.

All personal data protected by law is covered by this Policy, irrespective of whether it is recorded in a paper file or on a computer. Personal data are all data that identify or can identify an individual directly or indirectly.

The lawful and correct treatment of personal data is regarded as very important to the successful operation of all St Paul's Tervuren activities and to maintaining confidence with all individuals and organisations with whom the Church has contact. St Paul's Tervuren fully endorses and adheres to applicable data protection legislation.

Specifically, legislation requires that personal data:

- is processed fairly, lawfully and transparently;
- is collected for specified, explicit and legitimate purposes, taking into account all relevant factors, especially the reasonable expectations of the data subject and the applicable legal and regulatory provisions, and is not further processed in a way incompatible with those purposes;
- is adequate, relevant and not excessive in relation to the purposes for which it is collected or further processed;
- is accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that data which is inaccurate or incomplete with respect to the purposes for which it is collected, or for which it is further processed, is erased or rectified;
- is kept in a form that allows for the identification of data subjects for no longer than necessary with a view to the purposes for which the data is collected or further processed.

St Paul's Tervuren will therefore, through appropriate management, strict application of criteria and controls:

- fully observe the conditions regarding fair and lawful collection, use and storage of personal data;
- collect and process personal data only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- ensure that individuals are able to exercise their rights concerning personal data provided for in legislation. These include the right to be informed that processing is being undertaken, the right of access to one's own personal data, the right to object to

processing in certain circumstances, and the right to rectification, erasure or blocking of data that is incomplete or inaccurate;

- take appropriate technical and organisational measures to safeguard personal data;
- ensure that personal data is not transferred to third parties except as provided by law, nor transferred abroad without appropriate safeguards.

2. RESPONSIBILITIES

All employees and volunteers processing personal data are appropriately informed to ensure that they are aware of their obligations. All enquiries about the handling of personal data will be dealt with promptly and courteously.

Staff members are responsible for ensuring that any personal data supplied to St Paul's Tervuren is accurate and up to date. The Church Office should be informed in a timely manner of any changes to the personal data which individuals have provided, including where keeping personal data is no longer necessary.

3. DATA SECURITY

Personal data supplied to St Paul's Tervuren is used by the clergy, employed staff and ministry teams in order to facilitate the administration and day-to-day ministry of the church. From 2020, St Paul's Tervuren uses ChurchSuite as a data processor, a GDPR-compliant cloud-based database management product, with whom it holds a data processing agreement. St Paul's Tervuren uses Partena for the processing of social security information in relation to employees.

With individuals' specific permission (see below), St Paul's Tervuren may supply names and vehicle registration numbers of church members and guests to the British School of Brussels (BSB) in order to facilitate access to their premises when services are held there; BSB operate a GDPR-compliant data protection policy.

Data is not accessed by nor disclosed to anyone that does not have a genuine need for access.

Personal data will not be sold, given or otherwise disclosed to any other person, company, church or organisation, apart from in exceptional circumstances as provided by law, such as:

- in the event of an insurance claim, for example for an accident on church premises
- where we are legally compelled to do so
- where there is a duty to the public to disclose
- where disclosure is necessary to protect the vital interests of the data subject or those of another person (including contact with the Diocesan safeguarding team or the police)
- where disclosure is made at the request of the data subject or with his/her consent

All employed staff are required to sign a confidentiality clause and all clergy, staff and volunteers who have access to personal data are required to adhere to this Policy. The Church Office operates appropriate security procedures approved by the CC to ensure that personal data is stored safely and securely. In the past this has included, where appropriate, the use of professional secure archiving services.

4. USE OF PERSONAL DATA

St Paul's Tervuren uses personal data for the following purposes:

- the day-to-day administration of St Paul's Tervuren; calls, emails and visits; preparation of ministry rotas; maintaining financial / giving records for accounting, audit and tax purposes; maintaining records of baptisms, confirmations, weddings and funerals; prayer diary;
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- contacting individuals to keep them informed of church news, activities (including fundraising) and local or community events;
- statistical analysis to gain a better understanding of church demographics;
- compiling attendance records for children's and youth activities and ensuring compliance with Diocesan safeguarding and child protection policies;
- with individuals' specific permission, names, addresses, telephone numbers and email addresses may be used for the production of contact lists, for example through ChurchSuite, to be made available to other members of St Paul's Tervuren for the purpose of church activities;
- with individuals' specific permission, providing names and vehicle registration numbers to the BSB in order to obtain access cards and vehicle stickers for church members and guests to access the BSB during periods when services are held there.
- with individuals' specific permission, St Paul's Tervuren may use photographs or video featuring members of the church on its website, Facebook page or other social media, or in flyers or other promotional material.

5. DATA RETENTION

St Paul's Tervuren retains personal data only for as long as is strictly necessary and carries out periodic reviews to ensure that personal data that is no longer necessary is deleted.

Data relating to the safeguarding of children, young people and vulnerable adults is retained in accordance with Diocesan and Church of England safeguarding requirements:

- attendance records for participation in children and youth activities may be retained for up to 50 years;
- data relating to a safeguarding incident may be archived for up to 100 years, where it is strictly necessary and proportionate to do so, such a determination being made on a case-by-case basis, either by St Paul's Tervuren, or by the Diocesan safeguarding team.

Records of baptisms, confirmations, weddings and funerals are permanent records.

6. NOTIFICATION

St Paul's Tervuren informs individuals whose personal data are processed about this Policy through publication of the Policy on the church website. In addition, when individuals supply personal data to St Paul's Tervuren by completing a form (paper or electronic, including via ChurchSuite), that form notifies individuals that their personal data is processed in

accordance with this Policy. Individual consent is requested for the inclusion of personal data in contact lists, for disclosure to BSB and for the use of photographs as set out above.

7. DATA SUBJECT ACCESS REQUESTS

Data protection law provides an individual with the right to access personal data relating to him or her which is held by St Paul's Tervuren. Individuals also have the right to object to processing in certain circumstances, as well as the right to rectification, erasure or blocking of data including where that data is incomplete or inaccurate. Any individual who wishes to exercise these rights should make their request in writing to the Church Office in writing, by email, or by using the email facility provided in ChurchSuite. Any individual who makes a request orally or using social media will be asked to confirm the details of their request by email for the sake of clarity.

The Church Office will respond as quickly as possible upon receipt of a clear and precise request, supported by proof of identity where necessary. Within one month of the date of the request, the Church Office will provide information on action taken in relation to the request. If the request is particularly complex or there are numerous requests, the Church Office may advise that a further two months may be necessary in order to provide a full response to the request. Should the request be manifestly unfounded or excessive, for example repetitive requests, St Paul's Tervuren may advise either that a fee corresponding to the actual costs of dealing with the request will be charged, or, that the request will not be acted upon.

Certain information (for example confidential references given by a third party or information including personal data relating to another person) will not be disclosed without obtaining the third party's consent to disclose the information.

8. STATUS OF POLICY

The CC of St Paul's Tervuren has approved this policy. Any person who considers that this policy has not been adhered to with respect to their own personal data should raise the matter with the Chaplain or a Churchwarden.

This Policy was approved by the CC: 23 April 2020

Date of next review: September 2024

ANNEX I: DATA PROTECTION STATEMENTS FOR FORMS

1. Standard version for contact sheet, electoral roll, etc

Data Protection: St Paul's Tervuren protects your personal data in accordance with our data protection policy available from our church office or found on our website. We will use data provided by you for administrative purposes including sending you information about church activities.

With your permission, St Paul's Tervuren may use your name, address, telephone number and/or email addresses for inclusion in contact lists to be made available to other members of St Paul's Tervuren for the purpose of church activities. If you are happy for your details to be included on such a list please tick the box.

St Paul's Tervuren may use photographs or video featuring church members on its website, Facebook page or other social media, or in flyers or other promotional material. If you are happy for photographs featuring you [and your family] to be used please tick the box.

2. Splash enrolment

Data Protection: St Paul's Tervuren protects your personal data and that of your family, including attendance records for children's and youth activities, in accordance with our data protection policy and safeguarding policy available from our church office or found on our website.

St Paul's Tervuren may use photographs or video featuring church members on its website, Facebook page or other social media, or in flyers or other promotional material. If you are happy for photographs or video featuring your children to be used please tick the box.

3. Collection of personal data for safeguarding purposes

Data Protection: St Paul's Tervuren protects your personal data in accordance with our data protection policy available from our church office or found on our website. Your personal data will be stored securely and in accordance with Diocesan safeguarding requirements.

4. Abbreviated version to add to ministry rotas

Data Protection: St Paul's Tervuren protects personal data in accordance with our data protection policy available from our church office or found on our website. Please do not use this email distribution list or other personal data included in this rota for other purposes.

5. Abbreviated version for occasional forms

Data Protection: St Paul's Tervuren protects personal data in accordance with our data protection policy available from our church office or found on our website.