

Whitchester Christian Centre

Data Protection Policy

1. Introduction

The Data Protection Act 1998 and the European Union's General Data Protection Regulations 2018 regulate the way in which information about living individuals (referred to as 'data subjects') is collected, stored or transferred. Compliance with the Act and regulations is important, because a failure to adhere its terms will potentially expose Whitchester Christian Centre or indeed in exceptional circumstances, the Charity Directors and employees to complaints, large fines and/or bad publicity.

This policy therefore sets out what Directors and employees must do when any personal data belonging to or provided by data subjects, are collected, stored or transmitted onwards.

Whitchester Christian Centre requires its Directors and employees to comply with this policy when handling any personal data. A serious or persistent failure to do so may be regarded as misconduct and may be dealt with in accordance with the disciplinary policy applicable to them

2. Data Protection General Responsibilities

Personal Data: Personal data are data which relate to a living individual who can be identified from those data, and is in electronic form or held manually in a relevant filing system.

Personal data must:

1. Be processed fairly and lawfully;
2. Be obtained for specific and lawful purposes;
3. Be kept accurate and up to date;
4. Be adequate, relevant and not excessive in relation to the purpose for which it is used;
5. Not be kept for longer than is necessary for the purpose for which it is used;
6. Be processed in accordance with the rights of data subjects;
7. Be kept secure to prevent unauthorised processing and accidental loss, damage or destruction; and
8. Not be transferred to any country outside the EEA (unless an exception applies).

Special Category Data (formerly termed Sensitive Personal Data under the 1998 Act) are personal data revealing a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a person, or data concerning health or sex life and sexual orientation. These data can only be processed with the individual has given explicit consent to the processing of those personal data for one or more specified purposes, or if processing is carried out in the course of its legitimate activities with

appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

Type of Personal Data

The types of data processed by Whitchester Christian Centre are likely to fall into one of the following categories:

1. personal data about guests;
2. personal data relating to Directors, employees and volunteers.

3. **Personal Data**

Data will be obtained for a specific use and be kept accurate and up to date

People will be informed that we are holding the information, what is held, why it is held and how it will be used. Where possible, when obtaining new contact information or other personal data or communicating with a contact for the first time, we will:

- Refer them to the Privacy Policy.
- If this is not possible, the next communication to the data subject concerned should include a paragraph in relation to contact details.
- A check will be made to see if Whitchester's database already holds that person's details and, if so, whether these are up to date. As appropriate, the details should then be recorded or updated.

Data will be held for no longer than necessary

Data will be held for the periods given in the Data Retention Policy.

If someone specifies that they do not wish a particular form of contact with them or that there is to be no contact with them at all, then the instruction will be complied with this at once and all databases updated.

Disclosures

Personal data will not normally be disclosed to third parties. Exceptionally, data may be disclosed to those organisations and individuals who the individual has agreed may receive their data, or to organisations that have a legal right to receive the data without consent being given.

Information Security

Electronic data will be protected by standard password procedures with the 'computer lock' facility in place when office bearers or employees are away from the desk/workstation where information is held.

Personal data stored in manual form, e.g. in files, will be held where they are not readily accessible to those who do not have a legitimate reason to see them and (especially for sensitive personal data) should be in lockable storage, where appropriate;

Personal data should never be sent to a work email address.

Action to be taken if data goes missing

The Directors must be informed immediately if any confidential or sensitive data goes missing. Depending on the circumstances, consideration will be given to making a report to the Information Commissioner.

Subject Access

Upon receipt of a written request from a data subject to see any personal data held which relates to them, for a response will be made within the statutory 30 day deadline.

4. Personal Data about Employees

Good employment practice dictates that Whitchester Christian Centre, as an employer, will need to keep information for purposes connected with an employee's employment during employment and for as long as is necessary following the termination of that employment.

The data recorded may include:

- information gathered about an employee and any references obtained during recruitment;
- details of terms of employment;
- salary and payroll information, tax, National Insurance and pension details;
- annual review information;
- health records;
- absence records, including holiday records and self-certification forms;
- details of any disciplinary investigations, warnings and proceedings and grievances;
- training and development records;
- contact names and addresses and next of kin information;
- all core and flexible benefits;
- correspondence with Whitchester Christian Centre as Employer and other information provided to the Employer.

Whitchester Christian Centre values the privacy of its staff and will process any personal information relating to staff fairly and lawfully and shall endeavour to comply with the Information Commissioner's code of practice on the use of personal data in employer/employee relationships.

The information held will be for the Whitchester Christian Centre's management and administrative use only, but from time to time Whitchester Christian Centre may need to disclose some information held about employees to relevant third parties or to another organisation, solely for purposes connected with an employee's career or the management of the organisation.

6. Review

The Directors and Wardens will review this policy on an on-going basis to ensure its continuing relevance and effectiveness in the light of any legislative or other developments. Data Protection will be a standing item on the agenda of Directors' meetings, especially in the planning of new developments in the ministry of Whitchester Christian Centre.

Reviewed April 2018