

St Lawrence with St Swithun PCC: Privacy Statement

As set out in our Data Protection Policy, we seek to comply with the requirements of the Data Protection Act 2018 (DPA) in our approach to the collection, storage and use of any personal data given to us through contact between the parish and an individual.

If someone contacts the parish we will need to store their name, contact details and any other relevant personal data they give us, in order to administer a baptism, marriage, funeral, pastoral need, financial gift, membership of the church congregation, or other involvement they may have with us.

We will strive to hold such data once, centrally wherever possible and practical, and to allow it to be accessed and used only by persons authorised by the incumbent and churchwardens. We may use personal data to contact individuals about their contact or enquiry, including in writing, by e-mail, or by telephone. With their permission, we may also contact them about other parish matters and events.

Personal records held by us will be destroyed when they are no longer valid or required for use by us. However, baptism, marriage and funeral records are public information and may not be destroyed; other information may be required to be retained for long periods.

Types of personal data held, and their use

The following is a non-exhaustive indication of the types of personal data which the parish may hold and use to manage its business and its contacts with individuals.

- Contact details: The names and any contact details, such as postal address(es), e-mail address(es), and telephone number(s), provided to us by those who contact the parish, are held and stored to enable responses to enquiries and to administer the outcome of the contact or enquiry. These details are retained to enable us to administer any ongoing consequences of an initial enquiry, and to make subsequent contact about other parish matters and events.
- Details specific to a particular contact or enquiry: Any personal data beyond contact details which are provided as part of an enquiry to the parish will be held and used for the purposes of administering that enquiry – such as for a Baptism, Wedding, Funeral, attendance at a Service, or for a pastoral matter.
- Parish Registers: As required by law, we maintain formal written registers of Baptisms, Marriages and Funerals, which contain the personal data required by law.
- Electoral Roll: As a parish of the Church of England, we are required by law to compile annually and hold an Electoral Roll of the names of all our members who have chosen to have their names placed on the Roll. The compilation of the Electoral Roll includes the gathering of the postal addresses and, by implication, the religious affiliation of those listed on the Roll. The Roll is compiled by the Electoral Roll Officer appointed annually by the PCC. The names (only) of those on the Electoral Roll are published on the church notice boards every year in accordance with Church of England procedures. The numbers are reported to the Diocese, but the names are not shared. The Electoral Roll is subject to a special privacy statement which is published separately.
- Parish Officers: As required by law, the parish maintains details of the names and addresses and, by implication, the Christian status of its churchwardens, representatives to the Deanery Synod, members of the PCC, and certain other officers

and post-holders appointed to serve the parish. These names and limited contact details appear in the directory in the parish magazine. Fuller contact details are shared with the Diocese for administrative purposes.

- Financial information: if an individual
 - contributes financially to the mission and ministry of the parish,
 - makes a payment to us for the use of our parish building or other resources,
 - pays a statutory fee for banns of marriage, a marriage service, a funeral, etc., or
 - we make a payment to an individual for any reason,we will collect and hold such personal details as are necessary to administer the payment(s) made and maintain our banking and financial records and accounts. This is to enable us to comply with required financial best practice. Such details may include bank account details, the value of payment(s) made, and information necessary to enable us to reclaim tax on any payment made under Gift Aid provisions.
- Rotas: Members of the parish are encouraged to take an active role in the various duties and activities associated with Sunday worship and other parish activities. These are managed, and tasks allocated, via rotas which contain the names and contact details of those allocated to and undertaking each task. Copies of the rotas are communicated to all participants to inform them of the nature and dates of their involvement, and to enable them to swap duties with other participants if necessary. Participation in a rota implies consent to share personal contact details with other participants. Rota coordinators' names and telephone numbers may appear in the directory in the parish magazine.
- Health and Safety: We hold relevant information about those members of our parish and congregation who are involved in, or are qualified to contribute to, the administration of our health and safety policies and practices. With participants' consent, we also gather and hold relevant information on those participating in parish events where risks to health and safety may apply, to enable us to administer our health and safety policies and practices.
- Safeguarding: We hold relevant information about those members of our parish and congregation who are subject to the provisions of safeguarding legislation due to the nature of their roles within the parish, and to enable us to administer our safeguarding policies and practices. With participants' consent, we will also gather and hold relevant information on those participating in parish events where our safeguarding policies may apply, such as events involving children and vulnerable adults, to enable us to administer our safeguarding policies and practices.
- Lay employee and worker details: We collect and hold such information as may be legally required or necessary for the implementation of best practice in staff employment and remuneration, and for compliance with any employment or taxation legislation or regulations.
- CCTV is installed in both our churches and operates continuously, including during services. The equipment is secure and is accessed only when necessary to investigate an incident. Recordings are overwritten automatically when storage is full; the retention period is roughly three months,.

Data retention

We keep personal data for as long as it is required for use, but some data may be kept for long periods. For example, a rota may be deleted when it is no longer effective, but

financial data must be held for 7 years; safeguarding data will be kept indefinitely; baptism, marriage and funeral records are permanent public records; we may keep back issues of the parish magazine (including the directory) for many years.

Disclosure

Under section 45 of the DPA, an individual may apply to the parish for details of their personal data held by the parish. This is called a “subject access request”, which must be addressed in writing to the Parish Office. Disclosure will be subject to the provisions of the law. Disclosure of an individual’s data cannot infringe others’ rights, e.g. providing someone else’s personal data that touches the requestor’s.

Disclosure will be provided free of charge unless a request is unfounded, excessive or repetitive, in which case we are permitted, and reserve the right, to charge a reasonable fee.

We aim to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within one month of receipt of a request unless there is good reason for delay. In such cases, the reason for delay will be explained in writing to the individual making the request within the original one month.

Right to rectification

Section 46 of the DPA provides that an individual may require us to rectify inaccurate personal data concerning him or her, or (taking into account the purposes of the data processing) to complete incomplete personal data. We do not want to hold inaccurate personal data and we encourage anyone to draw the Parish Office’s attention to any inaccuracies.

Erasure of details (“right to be forgotten”)

Under section 47 of the DPA an individual may (in writing) request the parish to erase their personal data which is held by the parish. Erasure will be subject to the provisions of the law and reasonable needs for data retention (see above).

*St Lawrence with St Swithun PCC
St Lawrence Parish Office, Colebrook Street, Winchester, SO23 9LH
tel.: 01962 849434
e-mail: office@threesaints.org.uk*

19 January 2021