

# Privacy Notice

## Introduction

Our church values everyone who engages with us by whatever means, and we do all that we can to protect your privacy and to make sure that any personal data you provide to us is kept safe and secure. This policy explains how we collect data, how we use and store information, and what it means for you, as a friend and as a member of our church family.

## Personal data

'Personal data' is any information about a living individual which allows them to be identified from that data (e.g. name, photograph, video, phone number, postal address, email address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Act (DPA), the General Data Protection Regulation (GDPR) and other legislation relating to personal data and rights such as the Human Rights Act.

## Who we are

We are the Parochial Church Council (PCC) of the Church of the Good Shepherd, Carshalton Beeches, and we are the Data Controller (contact details are provided at the end of this policy) for your data.

The Church of England comprises a number of different organisations and office-holders who work together to deliver the Church's mission in each community.

We work together with:

- ❖ the incumbent of the parish, our Vicar,
- ❖ the bishops of the Diocese of Southwark, and
- ❖ the Diocese of Southwark administration team, who are responsible for the financial and administrative arrangements for the Diocese to which our church belongs.

Because all these people and organisations work together to govern the Church, we may need to share personal data that we hold with them so that they can carry out their responsibilities to the wider Church and our community. The organisations referred to above are therefore 'Joint' Data Controllers. Each of these 'Joint' Data Controllers have their own tasks within the Church and a description of what data is processed and for what purpose is set out in this Privacy Notice.

This means that all the 'Joint' Data Controllers are responsible to you for how your data is processed and for what purposes. Hereinafter we use the word "we" to refer to each Data Controller as may be appropriate.

## The personal data that we may collect from you.

We may collect and process any of the following types of personal data. We will process such information as considered necessary and appropriate to perform our tasks and to comply with our legal and contractual obligations:

- ✓ Names, titles, aliases, nicknames, photographs, images
- ✓ Contact details including landline home, work and personal mobile telephone numbers, postal and email addresses, social media contact details.
- ✓ Where they are relevant to our mission, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education and work histories, academic and professional qualifications, employment details, hobbies, family composition, and dependants.
- ✓ Non-financial identifiers such as passport numbers, driving license numbers, vehicle registration numbers, taxpayer identification numbers, employee identification numbers, tax reference codes, and national insurance numbers.
- ✓ Financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.
- ✓ Financial information such as salary, bonus, record of earnings, tax code, tax and benefits contributions, expenses claimed, creditworthiness, car allowance (if applicable), amounts insured, and amounts claimed.

- ✓ Additional operational personal data created, obtained, or otherwise processed in the course of carrying out our activities, including but not limited to, CCTV footage, recordings of telephone conversations, IP addresses and website visit histories, visitor records, logs of accidents, injuries and insurance claims.
- ✓ Additional data relating those persons employed by the Church including emergency contact information, gender, birth date, referral source (e.g. agency, employee referral), level, performance management information, languages and proficiency, licences and certificates, citizenship, immigration status, employment status, retirement date, billing rates, office location, practice and speciality, publication and awards for articles, books and the like, previous job history, employment references and personal biographies.
- ✓ The data we process is likely to constitute sensitive personal data because, as a church, the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication and treatment received, political beliefs, labour union affiliation, genetic data, allergies and food or other intolerances, biometric data, data concerning sexual orientation, Disclosure and Barring Service (DBS) checks, criminal records, fines and other similar judicial records.

### *Ways we collect your personal data*

We may collect or be provided with information by any of the following:

- ✓ In person with us – every time you deal with us, for example when you provide contact details in writing to church staff or volunteers, request materials or information, sign up for an event, donate, register into a group or at a church event, book venue use, or otherwise provide your personal details.
- ✓ Electronically with us – every time you send staff or volunteers communications (e.g. e-mail, SMS, MMS), interact with our website, or interact with our Data Processor using ChurchSuite or associated resource. We may collect non-personal data such as IP addresses, details of pages visited, and files downloaded. Website usage information may be collected using cookies, see the section on Cookies below.
- ✓ Through third parties including:
  - Charities, where you have agreed to support either them, our Church or our mission.
  - Customers, contractors, tradesmen, suppliers, professionals, companies, organisations, advisors, individuals.
  - Available on social media.

You may wish to check third party privacy policy to find out more information on how they will process your data.

### *How we may process your personal data*

The Data Controllers will make every endeavour to comply with their obligations under GDPR by keeping and/or enabling personal data to be kept up-to-date, by storing it securely, by destroying it appropriately, 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.

### *Why we require and use your personal data*

We use your personal data for some or all of the following purposes:

- ✓ To enable us to meet all legal and statutory obligations (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules).
- ✓ To carry out comprehensive safeguarding procedures (including: due diligence, complaints handling) in accordance with best safeguarding practice, with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- ✓ To deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of each Data Controller.
- ✓ To administer our church, it's groups and activities, the parish, deanery, archdeaconry, and diocesan membership records.
- ✓ To minister to you and provide you with pastoral and spiritual care and to organise and perform services; baptisms, confirmations, weddings and funerals.
- ✓ To allow those who undertake pastoral care duties as appropriate.
- ✓ To fundraise and promote the interests of the church and charity.

- ✓ To manage our employees (permanent and temporary), volunteers, contractors, agents, staff, retirees, beneficiaries, workers, treasurers, and the like.
- ✓ To maintain our own accounts and records.
- ✓ To seek your views or comments.
- ✓ To process a donation that you have made (including Gift Aid information).
- ✓ To notify you of duty rotas, changes to our services, events, staff, and volunteers.
- ✓ To send you communications which you have requested and that may be of interest to you. These may include information about training, events, groups, campaigns, appeals, other fundraising activities.
- ✓ To process a grant or application for a role.
- ✓ To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution.
- ✓ To share your contact details with the Diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.
- ✓ We will process data about all employees and volunteers for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations, for example to pay staff, monitor their performance and to confer benefits to volunteers.
- ✓ To provide an interactive website.
- ✓ We may process sensitive personal data as appropriate, including but not limited to:
  - Details of physical or mental health conditions to monitor sick leave and make decisions relating to fitness for work.
  - Racial, ethnic origin, religious or similar information to monitor compliance with equal opportunities legislation.
  - To enable compliance with legal requirements and obligations to third parties.
- ✓ To enable us to prepare and sometimes publish a directory of contact details for members of our church family, thus allowing people to contact one another directly. Access to such contact details may be limited should the Data Subjects so wish. Once such information is published, we are unable to control the distribution.
- ✓ Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

#### *Where we store your personal data*

Most data that we hold locally is stored electronically, either on our Church management system (namely ChurchSuite, our primary Data Processor), on church computers and/or similar devices, and centrally at the Diocese of Southwark.

Where it is necessary for church staff and volunteers to process data away from the Church premises, data is held on personal computers and/or similar devices.

Where it is necessary and appropriate some personal data is kept in hard-copy format.

Church devices used to hold and process electronic data are password protected, backed-up and secured using anti-virus software. Hard copies of data are held within lockable storage units on our Data Controllers premises.

It will be acknowledged that we are unable to ensure that personal data held by church staff and volunteers on their own personal devices, and in pursuance of their designated church roles comply, fully with data legislation. However, we do regularly request and expect such persons to comply with the DPA and GDPR and, to abide by our other Church policies.

Data that we hold on ChurchSuite, our church management system, is processed and stored using very high levels of security and protection, and backed up remotely, all in accordance with the ChurchSuite Privacy Policy.

#### *The legal basis for our processing your personal data*

Much of the data we process is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation within the Church of England). An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.

Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Church

Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter a contract. An example of this would be processing your data in connection with the hire of church facilities.

We will also process your data to assist you in fulfilling your role in the church including pastoral and administrative support or if processing is necessary for compliance with a legal obligation.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

### *Sharing your personal data*

Your personal data will be treated as strictly confidential and will only be shared with members of the Church to carry out a service or connected purposes. It will only be shared with third parties, including other Data Controllers, where it is necessary for the performance of the Data Controllers' tasks or where you give us prior consent. It is likely that we will need to share your data with:

- ✓ The appropriate bodies of the Church of England including the other Data Controllers.
- ✓ Our agents, servants, and contractors.
- ✓ Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Southwark to support the mission of the Church in our parish. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of our regular clergy.
- ✓ There may be other legal entities we share data with within the Church of England who are also Data Controllers.
- ✓ Other persons or organisations operating within the Diocese of Southwark including, where relevant, the Southwark Diocesan Board of Education and Subsidiary Bodies
- ✓ We may need to pass on information if required by law or by a regulatory body. For example, a Gift Aid audit by the HMRC, or if asked for details by a law enforcement agency.
- ✓ We do not sell or pass any of your personal information to any other organisations and/or individuals without your express consent, with the following exception – by providing us with your details you are giving the church your express permission to transfer your data to our service providers including mailing houses, such as ChurchSuite, to enable fulfilment of the purpose for collection.

Where such details are shared, we have confidentiality agreements in place that restrict the use of your information to the purpose for which it is provided and ensure it is stored securely and kept no longer than necessary. We may employ agents to carry out tasks on our behalf, such as processing donations. These agents will be bound by contract to protect your data and we remain responsible for their actions.

We may provide third parties with general information about users of our website, but this information is both aggregate and anonymous. However, we may use IP address information to identify a user if we feel that there are or may be safety and/or security issues or to comply with legal requirements.

### *The length of time we retain your personal data*

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it.

### *Cookies*

- A cookie is a small amount of data that is sent to your browser and stored on your computer's hard drive. Our church website makes use of cookies to collect information about our visitors through Google Analytics.
- Cookies enable you to enjoy our website to the full, so we recommend that you leave cookies turned on. If you turn off cookies, then you may not be able to enter parts of the site. The cookie data that we collect may be used to

customise the content on our website and to help to understand visitor's current and future needs.

- Most browsers allow you to turn off the cookie function. To do this you can look at the help function on your browser.
- We work with several third-party suppliers who set cookies on our website to enable them to provide us with services. These are mainly used for reporting purposes so we can improve the way we communicate. We use websites such as Youtube to embed videos and you may be sent cookies from these websites. We do not control the setting of these cookies, so we suggest you check the third-party website for more information about their cookies and how to manage them.
- We also use third party suppliers such as Google Analytics and these providers may use cookies. They may also use tracking pixels, which are commonly found in advertising to track the effectiveness of adverts. As some of these services may be based outside of the UK and the European Union, they may not fall under the jurisdiction of UK courts. If you are concerned about this you can change your cookie settings.

### **Children**

Families making use of the children's facilities during our services are required to provide personal data for their children. This data is provided with the consent of the parent or guardian and is securely held and stored as above. **We require parental consent for any child under the age of 18.**

### **Your rights and your personal data**

You have several rights with respect to your personal data and these are outlined below. When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights. Some of these rights may be managed directly by you by using our on-line church management system, ChurchSuite for which access details may be obtained through the church office (details below).

1. The right to access information we hold on you
  - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond within one month.
  - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
2. The right to correct and update the information we hold on you
  - If the data we hold on you is out of date, incomplete or incorrect, you may inform us with the details and your data will be updated.
3. The right to have your information erased.
  - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
  - When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
  - You have the right to request that we stop processing your data. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability
  - You have the right to request that we transfer some of your data to another Controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
  - You can withdraw your consent in person, by telephone, email or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioner's Office (ICO).

### *Transfer of Data Abroad*

We use cloud-based systems to process data and therefore data may be processed outside of the European Economic Area (EEA). Our website is also accessible from overseas so on occasion some personal data may be accessed from overseas.

We adopt the ICO approved measures and therefore ensure that personal data is held in compliance with European data protection regulations. We take all reasonable steps to ensure that your data is stored and processed securely in accordance with this policy. By submitting your personal data you agree to this transfer, storing and processing of your information.

### *Further processing*

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

### *Changes to this notice*

We keep this Privacy Notice under regular review. Whenever we update it this will be made readily available to you via the Church website [www.goodshepherdcarshalton.org](http://www.goodshepherdcarshalton.org), in hardcopy format or by one of your consented method of communication. This Notice was last updated January 2023.

### **Contact Details**

Please contact us if you have any questions about this Privacy Notice or the information, we hold about you or to exercise all relevant rights, queries, or complaints at:

To: The Data Controller  
Postal Address: The Church of the Good Shepherd,  
Queen Mary's Avenue,  
Carshalton Beeches,  
Surrey SM5 4NP  
Email: [office@goodshepherdcarshalton.org](mailto:office@goodshepherdcarshalton.org)  
Office: 020 8643 0411  
Charity Number: 11232301

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.

THIS PRIVACY NOTICE WAS APPROVED BY THE PCC IN JULY 2022