

St Michael & All Angels London Fields: Data Privacy Notice

Your personal data: What is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be by the information alone or in conjunction with any other information.

The processing of personal data is governed by:

- The General Data Protection Regulation (*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data the “GDPR”, see <https://publications.europa.eu/en/publication-detail/-/publication/3e485e15-11bd-11e6-ba9a-01aa75ed71a1/language-en>*)
- The Data Protection Act 2018 (see <http://www.legislation.gov.uk/ukpga/2018/12/contents>)
- other legislation relating to personal data and rights, such as the Human Rights Act 1998.

Who are we?

This Privacy Notice is provided to you by the Parochial Church Council (PCC) of the Ecclesiastical Parish of St Michael and All Angels London Fields with St Paul's Haggerston, a registered charity,¹ and by the Incumbent of the Parish (that is, our Vicar, the Revd Daniel Gerrans), who are the data controllers for your data.

The Church of England is made up of several different organisations and office-holders who work together to deliver the Church’s mission in each community. The PCC and the Vicar work with:

- the Bishops of the Diocese of London; and
- the London Diocesan Fund (LDF), which is responsible for the financial and administrative arrangements for the Diocese of London.

As the Church is made up of all these persons and organisations working together, we sometimes need to share personal data we hold with them, so they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

Each of the data controllers has their own tasks within the Church. This Privacy Notice explains **what** data is processed, **how** and **why**. It is given by the PCC and the Vicar on our own behalf and on behalf of each of these data controllers. In the rest of this Privacy Notice, we use the word “we” to refer to each data controller, as appropriate.

What data do the data controllers listed above process?

They will process some or all of the following where necessary to perform their tasks:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our mission, or where you provide them to us, information such as gender, age, date of birth, marital status, nationality, life/education/work histories, academic/professional qualifications, hobbies, family composition, and dependants;
- Where you make donations or pay for activities such as use of a church hall, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers.

Some of the data we process is 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, sexual orientation, mental and physical health, details of injuries, medication/treatment received, political beliefs, labour union affiliation, genetic data, biometric data, and criminal records, fines and other similar judicial records.

¹ You can find more information about us on the Charity Commission website <http://www.charitycommission.gov.uk/find-charities/> by entering our registration number 1130974.

How do we process your personal data?

The data controllers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; not to collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure; and to ensure that appropriate technical measures are in place to protect personal data.

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

- In furtherance of the Church's mission,² including for example
 - To provide pastoral and spiritual care (such as visiting you, for example when you are ill or bereaved, or organise and perform ecclesiastical services, such as baptisms, confirmations, weddings and funerals)
 - To communicate with you, for example with information about services, events and campaigns, or to seek your views or comments
 - To fundraise
 - To process donations (for example by providing information to HMRC in order to reclaim tax for gifts under Gift Aid)
 - To publicise our activities, for example by photographs on our website or social media (though no photograph will be used in a way which identifies any individual by name, and no photograph of a child will be used without the consent of a parent/carer)
 - To carry out any other charitable activities or services for the benefit of the public which can properly be undertaken by each data controller
- To enable us to meet our legal duties, including for example
 - maintaining and publishing our electoral roll in accordance with the Church Representation Rules
 - maintaining proper financial records and publishing financial statements as required by the Church Representation Rules and the Charities Act
 - in the case of members of the PCC, maintaining a list of their names and addresses available for inspection by residents of the Parish and members of the electoral roll, in accordance with the Church Representation Rules, and compliance with the disclosure requirements under the Charities Act
- To carry out safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time, with the aim of ensuring that all children and adults-at-risk are provided with safe environments³
- To process data about Role Holders in the Parish (that is, individuals licensed or commissioned by the Bishop to ordained or lay roles, Churchwardens, PCC members, the PCC Treasurer, volunteers and employees) for legal, personnel, administrative and management purposes and to enable Role Holders to fulfil their roles. For example, we may process Role Holders' personal data
 - In connection with applications for, and to monitor performance and provide support and supervision in relation to, paid or volunteer roles, including where necessary for safe recruitment in accordance with our Parish Safeguarding Policy, seeking and obtaining references and Disclosure and Barring Service disclosures
 - In the case of Role Holders volunteering on a rota, to share the contact details of all members for mutual support and to arrange swaps or cover where needed

We may also process sensitive personal data about Role Holders in the Parish including, as appropriate:

- about their physical or mental health or condition in order to monitor sick leave and take decisions as to the Role Holder's fitness for work

² The PCC's primary charitable purpose is the advancement of the Christian religion within the Parish, and it includes co-operating with the Vicar in promoting in the parish the whole mission of the Church, pastoral, evangelistic, social and ecumenical. The PCC's activities include:

- Regular public worship open to all.
- The provision of sacred space for personal prayer and contemplation.
- Pastoral work, including visiting the sick and bereaved.
- Teaching of Christianity through sermons, courses and small study groups.
- Taking religious assemblies in schools.
- Providing services to the community, especially through the church hall.

³ Our Parish Safeguarding Policy is published as a link on the Homepage of our Parish website <http://www.stmichaelslondonfields.org.uk/>.

- about their racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation
- to comply with legal requirements and obligations to third parties
- To administer the Parish, Deanery, Archdeaconry and Diocesan membership and other records.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England).

An example of this would be our statutory duty to further the Church's mission (as explained above) or 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
- Canon Law and/or the Marriage Acts to announce forthcoming weddings by means of the publication of banns and to record personal data in the Marriage Registers

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

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 private. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. For example, in appropriate cases it may be necessary to share your data with some or all of the following:

- The appropriate bodies of the Church of England including the other data controllers
- Other persons or organisations operating within the Diocese of London including, where relevant, the London Diocesan Board for Schools and Subsidiary Bodies
- Employees, agents/or and contractors. For example, if we employ or appoint a Children and Youth Worker, we will need to share with them contact details of parents of children and young people with whom we have contact, and if we purchase a licence to use specialist database software we may enter into a contract with a commercial provider to maintain it
- Other clergy or lay persons licensed or commissioned by the Bishops of the Diocese of London to support the mission of the Church in our Parish. For example, for the purpose of providing pastoral care, our incumbent may share personal data with assistant or temporary ministers, including curates, licensed lay ministers, commissioned Pastoral Assistants or other lay ministers; and our clergy are supported by our Area Bishop, Archdeacon and Area Dean, who may provide confidential mentoring and pastoral support
- HMRC, in relation to donations under Gift Aid
- On occasion, other churches with which we are carrying out joint events or activities.

How long do we keep your personal data?

Our policy is to keep records in accordance with guidance from the National Church.⁴ This will mean retaining it permanently in some cases if we are legally required to do so, and in other situations retaining it for an extended period of time. 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. This means that we may delete it when it is no longer needed.

⁴ Currently contained in *Keep or Bin...? The Care of Your Parish Records*, see https://www.churchofengland.org/sites/default/files/2017-11/care_of_parity_records_keep_or_bin_-_2009_edition.pdf

Your rights and your personal data

You have the following rights with respect to your personal data:

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.

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 can inform us 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 ask us to 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 ask us to 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 ask us to 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.
7. *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 easily by telephone, email, or by post (see Contact Details below).
8. *The right to lodge a complaint with the Information Commissioner's Office.*

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this 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.

Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates as a link on our Parish website at <http://www.stmichaelslondonfields.org.uk/>. This Notice was last updated in September 2018.

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:

The Data Controller, St Michael & All Angels London Fields
c/o The Vicarage
97 Lavender Grove
London
E8 3LR

Email: vicar@stmichaelslondonfields.org.uk

You can contact the Information Commissioner's 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.