

Data Protection Policy (20211107)

Emmanuel Christian Centre uses personal data about living individuals for the purpose of general church administration and communication. In doing so, Emmanuel Christian Centre recognises the importance of the careful and lawful treatment of an individual's personal data. Whether it is held on written records, notes, on computer or other digital media, any data held by Emmanuel Christian Centre will be subject to the legal safeguards described in the Data Protection Act 2018 (Now DPA, formerly the UK GDPR).

Emmanuel Christian Centre is committed to upholding the principles of the DPA relating to personal information. These principles state the legal conditions in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for Emmanuel Christian Centre must understand and commit to these principles.

The Principles

The principles require that personal data is to be:

1. used fairly, lawfully and transparently.
2. used for a specified and explicit purposes.
3. used in ways that are adequate, relevant and which is necessary.
4. accurate and where necessary, kept up to date.
5. kept no longer than is necessary.
6. handled in a way that ensures appropriate security.
7. protected against unlawful or unauthorised processing, access, loss, destruction or damage

Maintaining Confidentiality

Emmanuel Christian Centre will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the leadership and ministry of the church in order to facilitate the administration and day-to-day ministry of the church and Emmanuel Christian Centre as a charity. For church members only, personal information may occasionally be shared with external pastoral support for discipleship or your wellbeing.

All Emmanuel Christian Centre staff and volunteers who have access to personal data will be required to understand this document and act in accordance.

There are four exceptional circumstances to the above permitted by law:

1. Where we are legally compelled to do so.
2. Where there is a duty to the public to disclose.
3. Where disclosure is required to protect your interest.
4. Where disclosure is made at your request or with your consent.

Use of Personal Information

Emmanuel Christian Centre may use your data for the following purposes subject to your role and the necessity of such:

1. The day-to-day administration of the church; e.g. preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes, sharing contact details with group leaders or department leaders.
2. To maintain our own accounts and records and to process financial information including Gift Aid.
3. Contacting you to keep you informed of church activities and events.
4. Statistical analysis; gaining a better understanding of church demographics.
5. To enable us to meet all legal and statutory obligations.
6. To carry out comprehensive safeguarding procedures (including due diligence and 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.
7. To minister to you and provide you with pastoral and spiritual care; such as pastoral visits, communication on pastoral issues, help in times of illness or need, arranging training, discipleship, marriage and baptisms.
8. To deliver Emmanuel Christian Centre's charitable objectives and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the Constitution.
9. To administer Emmanuel Christian Centre's membership records as detailed in the governing document.
10. To fundraise and promote the interests of the church and charity, including the recording and publication of photographs and videos for marketing, social media, the website or news.
11. To seek your ideas, views or comments which would help us to improve or to make leadership decisions.
12. To notify you of changes to our services, events, practices, church staff and leadership.
13. To send you communications which may be of interest to you in a Christian context such as information about missions, campaigns, appeals, devotionals, encouragement, church news or fundraising activities.
14. To process a grant, an application for a voluntary role, an application for training or employment through Emmanuel Christian Centre.

15. To use Emmanuel Christian Centre's CCTV systems for the prevention and prosecution of crime, to monitor adherence to procedures, or other reasons when there is a duty to the public.
16. To use medical and health information that you provide for your safety, welfare and wellbeing.

Subject Access

All individuals who are the subject of personal data held by Emmanuel Christian Centre are entitled to:

1. be informed about how your data is being used.
2. access personal data.
3. have incorrect data updated.
4. have data erased.
5. stop or restrict the processing of your data.
6. data portability.
7. object to how your data is processed in certain circumstances.

Personal information will not be passed onto any third parties outside of Emmanuel Christian Centre except where allowed by points 1 to 16 in 'Use of Personal Information'. The best way to ensure personal data is up to date is to send an update in writing or by email to an Administrator, the Centre Manager or the Senior Minister.

Subject Consent

The need to process data for normal purposes has been communicated and subjects of data are required to sign an Emmanuel Christian Centre consent form. If the data is exceptional or sensitive, for example your ethnicity or gender, further express consent to process the data must be obtained by Emmanuel Christian Centre.

Individuals have the right to withdraw consent to the processing or holding of personal data at any time. This can be done by a letter or email to an Administrator, the Centre Manager or the Senior Minister. In some cases, such as for HMRC audits or legal requirements, Emmanuel Christian Centre may need to retain some information for an extended period.

Rights to Access Information

Employees and other subjects of personal data held by Emmanuel Christian Centre have the right to access any personal data that is being held in certain manual filing systems. This right is subject to certain exemptions: Personal Information may be withheld if the information relates to another individual or item 3 of 'The Principles' is not met.

Any person who wishes to exercise this right should make the request in writing to the Centre Manager of Emmanuel Christian Centre using the standard form which is available online from www.ico.gov.uk.

If personal details are inaccurate, they can be amended upon request.

Emmanuel Christian Centre aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days of receipt of a completed ICO form 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.

Types of Data

For the avoidance of doubt, personal data used or stored by Emmanuel Christian Centre could include:

1. Names, titles, aliases, social media usernames, photographs and videos.
2. Contact details such as telephone numbers, addresses, and email addresses.
3. Only where they are relevant to our administration as a church and charity, or in your best interests, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependants.
4. Where you make donations, financial gifts, tithe or pay for activities such as use of a church hall or weekends away, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, receipts, usernames, policy numbers, and claim numbers.
5. Your religious beliefs; 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.

Deletion of Data

If personal data is deleted by Emmanuel Christian Centre, at the request of the subject or otherwise, we will destroy paper records by shredding to a minimum of DIN 2 (DIN 32757-1) and digital data by data file shredding (DoD 5220-22M).

If you require a copy with larger font or would prefer this document to be read aloud, please contact us through the Emmanuel Christian Centre office or one of the trustees.