

Privacy Statement Policy

Introduction

This is the privacy statement and data protection policy for Holy Trinity Boston. It covers how we will process (use and store) personal data, what data we hold, an individual's rights and how individuals can interact with Holy Trinity about their data. If individuals need any advice they should be directed to get in touch with Holy Trinity's Data Protection Leads, The Church Wardens

2. Aims

This policy covers our use of Personal data, which 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.

3. Scope.

This policy is applicable to all employees and voluntary helpers and, where appropriate, contractors. The policy applies to all situations involving the use of personal data.

4. How is personal data used and processed by Holy Trinity?

The processing of personal data is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998).

This policy is provided by Holy Trinity Boston/Charity Number 1132300 which is the Data Controller for an individual's personal data. Holy Trinity has appointed a number of responsible people for the control and processing of personal data that it holds. These post-holders have been trained in GDPR requirements and a list of the individuals can be inspected at the Church Office by request. For clarity, the term Data Controller covers all employed staff members, office holders and trustees for Holy Trinity.

Note - as Holy Trinity is a Church of England/Anglican Church, the Incumbent is also a separate Data Controller and together with the PCC and Incumbent are Joint Data Controllers

Holy Trinity only holds data that either it is legally obliged to, or that helps it fulfil its missional and charitable aims as a church. It is a membership organisation, and good communication with our membership is an essential part of being church.

Holy Trinity processes data containing:

- names, titles, and aliases;
- photographs;
- contact information, including telephone numbers, postal/residential addresses, and email addresses;
- demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, hobbies, family composition, and dependents, where there is a legitimate interest, in order to facilitate the charitable aims and activities;

- financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers, where an individual gives financially in support of Holy Trinity, or pay for church activities (e.g. event bookings etc.)

Holy Trinity will use such data to:

- enable it to meet all legal and statutory obligations which include maintaining and publishing an electoral roll in accordance with the Church Representation Rules, and under Canon Law to announce forthcoming weddings by means of the publication of banns
- comply with, and facilitate, comprehensive 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 environments (please see our safeguarding policy);
- help individuals grow as a disciple, and to provide pastoral and spiritual care (such as visiting when ill or bereaved) and to organise and perform ecclesiastical services, such as baptisms, confirmations, weddings and funerals;
- deliver the Church's mission to the 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 the charitable organisation;
- administer membership records of adult and child members;
- enable to follow up membership, course and event enquiries
- fundraise and promote the interests of the Church and charity;
- maintain the churches accounts and records;
- process and record financial donations that have been made (including Gift Aid information);
- communicate about views or comments made to the church;
- update individuals, role holders and operating Team Rota members, about changes to services and events, for the effective function of Sunday services, weekly groups and any other matters of interest related to the church community;
- send communications which individuals have requested. These may include information about campaigns, appeals, or other fundraising activities;
- process a grant or application for a role;
- enable the church to provide a voluntary service for the benefit of the public in a particular geographical area as specified in its constitution;

Where personal information is used other than in accordance with one of the above, the church will first obtain that individual's consent to that use.

As a church (religious organisation), the data that is processed is likely to constitute sensitive personal data, because the very fact that the church processes data at all may be suggestive of an individual's

religious beliefs. Where an individual provides this information, Holy Trinity may also process other categories of sensitive personal data: racial or ethnic origin, sex life, mental and physical health, details of injuries, medication/treatment received, political beliefs, data concerning sexual orientation and criminal records, fines and other similar judicial records.

As a Data Controller, all the appointed persons will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not 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. If you have any concerns about how your data is being used, please speak with our Data Protection Leads: The Church Wardens.

5. Responsibilities

Holy Trinity will treat personal data as strictly confidential. It will only be shared with third parties where it is necessary for the performance of church tasks, or where the individual first gives prior consent. It is likely that Holy Trinity will need to share your data with some, or all, of the following (but only where necessary):

- appropriate bodies within our denominational/synodical structure. All of these bodies will be part of the church setup and have their own privacy policies.
- our agents, servants and contractors. For example, the church utilises commercial providers to send out newsletters on its behalf, and to maintain its database software;
- on occasion, other churches where joint events or activities are being carried out.

6. How long will Holy Trinity keep personal data?

NB - We will be guided by our 'Bin and Keep Policy 2009'

Holy Trinity will only keep data no longer than necessary. Where an individual continues to actively engage with the church and its activities and events, it will retain the appropriate membership data so that it can best serve their involvement. Holy Trinity operates to an annual process of review, by which it assesses who is actively engaging in church membership, and where this is not the case we will remove that data.

Additionally;

- The church will keep some records permanently if it is legally required to do so. For example, this covers service, wedding, baptism registers and some safeguarding records.
- The church may keep some other records 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.

7. What are the rights of the individual with regard to their personal data?

A person has the following rights with respect to their personal data: When exercising any of the rights listed below, the church may need to verify the identity of the individual, for their security. In such cases the church may need proof of identity before the individual can exercise these rights.

- The right to access personal information the church holds.

At any point a person can contact the church to request the information it holds on them, as well as why it has that information, who has access to the information and where the church obtained the information from. Once the church has received the request it 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.

- The right to correct and update the information it holds.

If the data the church holds on an individual is out of date, incomplete or incorrect, that individual can inform the church and the data will be updated.

- The right to have personal information erased.

If a person feels that the church should no longer be using their data or that it is illegally using their data, they can request that the church erases the data it holds. When the church receives this request, it will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because it is needed for legitimate interests or regulatory purpose(s)).

- The right to object to processing of personal data.

An individual has the right to request that the church stops processing personal data. Upon receiving the request, the church will contact that individual and let them know if it is able to comply or if it has legitimate grounds to continue to process that data. Even after a person exercises their right to object, the church may continue to hold the data to comply with the other rights of the individual, or to bring or defend legal claims.

- The right to data portability.

A person has the right to request that the church transfer some of their data to another controller. The church will comply with that request, where it is feasible to do so, within one month of receiving the request.

- The right to withdraw consent to the processing of data at any time for any processing of data to which consent was sought.

A person can withdraw their consent easily by telephone, email, or by post (see Contact Details below).

- The right to lodge a complaint with the Information Commissioner's Office.

If a person wishes to make a complaint regarding how their data is held, or used, they 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.

8. 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, however it is our general practice not to publish any personal data on our website or in our printed newsheets. See Appendix 2 for more information

9. Further processing of data

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

10 Privacy on our website: A privacy statement can be found on our website

11 Questions or concerns:

If someone has any queries or concerns about how Holy Trinity uses their data, they can contact the church via the Data Protection leads (Our Church Wardens) at:

Holy Trinity, Church Office, Spilsby Road, Boston, PE21 9NX

Tel: 01205310221

Email: churchoffice@holytrinityboston.org.uk

12.Live Streaming (Including Zoom services and YouTube) – Privacy Notice Guidance

Purpose

Recording or live-streaming services from our church in order to reach out to those who are unable to attend in person, or who wish to participate in our services remotely.

The categories of personal data we collect:

· Image

We also process “special categories” of information that may include

· Religious belief

The lawful basis for using your information

We collect and use personal data under the following lawful bases:

Explicit consent. By giving your consent, you are consenting to us using your data for the purposes set out above.

Consent can be withdrawn at any time, by contacting the Parish Administrator The Church Office, Holy Trinity Church, Spilsby Road, Boston PE21 9NS e mail: churchoffice@holytrinityboston.org.uk. Tel 01205 310221.

Who we share your information with:

We will keep your data for 3 years, after which time we may renew your consent, and may remove the video.

13. Implementation, Monitoring and Review

- The current policy will be stored, and accessed via the Church Office
- This policy will be reviewed at least bi-annually and ratified by the PCC.
- Any comments about this policy can be sent to Church Office
- This policy shall be monitored via the PCC and its representatives

Names of committees required to approve the document:	Approved on
HR Committee	11 July 2023
PCC	11 July 2023

Appendix 1
Consent Form

If you are aged 16 or over and live at the same address you are entitled to a separate entry.

Person One

Name
Address
.....
.....
Signature
Date

If you are aged 16 or over and live at the same address you are entitled to a separate entry.

Person Two

Name
Address
.....
.....
Signature
Date

How long will we keep your personal data?

(We will be guided by our 'Bin and Keep Policy 2009') Please refer to our privacy policy if you would like more details. We will keep some records permanently if we are legally required to do so. For example, this covers service, wedding, baptism registers and some safeguarding records.

Please confirm your consent to one or more of the following^[1]:

<input type="checkbox"/>	Newsletters and other communications
	We may contact you to keep you informed about what is going on in the local or neighbouring parishes, other churches and the work of the Diocese including news, events, meetings, clubs, groups and activities. These communications may also sometimes appear on our website, the Diocese website or in printed or electronic form (including social media).
<input type="checkbox"/>	Activities and groups
	We may contact you about groups and activities you may be interested in participating in. We sometimes work with similar groups in other churches within or outside the Diocese or with the Diocese itself. Occasionally names and photos may appear in newsletters, bulletins or on websites, or social media.
<input type="checkbox"/>	[Optional Additional Activities for parishes to add if not included above.]

Keeping in touch:

- Yes please, I would like to receive communications by email
- Yes please, I would like to receive communications by telephone
- Yes please, I would like to receive communications by mobile phone including text message
- Yes please, I would like to receive communications by social media

[1] You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent, we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or protect members of the public from serious harm. You can find out more about how we use your data from our "Privacy Notice" which is available from our website or from the Parish Office or at churchoffice@holytrinityboston.org.uk. You can withdraw or change your consent at any time by contacting the Parish office.

Signature Sheet

Privacy Statement Policy

Holy Trinity Parochial Church Council

Review Date

Approved on

11th July 2023

July 2025

Appendix 2

Transfer of data abroad

As at 19th February 2021

Statement

The European Commission has today published its draft UK adequacy decisions. If adopted these decisions will allow for continued free flow of personal data from the EU into the UK.

As well as its decision under the General Data Protection Regulation (GDPR), the EU also published another draft decision for personal data related to law enforcement.

The adequacy decisions are now with the European Data Protection Board (EDPB) who will deliver an opinion to the European Commission and representatives from the EU member states.

During this process, UK businesses and public authorities will continue to be able to receive data from the EU under the adequacy bridge agreed in the 2020 trade and cooperation agreement