



Parish of Stoke & Fenton

Including the churches of All Saints, Hanley; Christ Church, Fenton;
St Paul's, Mount Pleasant and Stoke Minster (St Peter ad Vincula)

DATA PROTECTION POLICY

The General Data Protection Regulation (GDPR) replaces the Data Protection Act 1998 on 25 May 2018.

The GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. collected, and unless the law provides otherwise, processed solely with the informed, unambiguous consent of the data subject concerned;
- d. adequate, relevant and limited to what is necessary in relation to the purposes for which they are used;
- e. accurate and, where necessary, kept up to date;
- f. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- g. kept securely and at a level of security appropriate to the data's sensitivity with access limited to those who are authorised appropriately.

The PCC of Stoke-upon-Trent & Fenton (hereafter 'the PCC') will comply with the GDPR by the following:

1. Data Privacy Notice

The PCC will approve and publish a Data Privacy Notice on the Stoke Minster website (www.stokeminster.org). The Privacy Notice explains how the PCC processes personal data and the purposes for which it is processed; how long personal data is maintained and an individual's rights in relation to personal data that the PCC holds.

2. Consent

A key principle of GDPR is consent. The PCC will ensure that where necessary written consent is sought for the processing of data. The PCC will produce a Data Consent Form which churches in the parish are to use to obtain consent. Whenever a church in the parish seeks to collect data that will be processed on the basis of consent, the PCC delegates obtaining consent to the relevant District Church Council (DCC).

The PCC expects each DCC to supervise:

- Obtaining consent from individuals as required;
- Maintaining a confidential file of completed Data Consent Forms;
- Reviewing its activities and advising the PCC when new consent needs to be sought for (new) activities so that the Data Consent Form can be duly revised.

3. Undertaking a Data Audit

The PCC will ensure a data audit is undertaken in each of its churches and that a fresh audit is undertaken every three years. The PCC will report on its compliance with the GDPR in the report

on its activities presented at the Annual Parochial Church Meeting (APCM). A data audit tool is available at www.parishresources.org.uk/gdpr/consent.

4. Breaches of Security

The PCC and/or individual DCCs (as relevant) will investigate any alleged breach of its data protection responsibilities and notify its insurers immediately so as not to invalidate its insurance cover.

5. Registration and the ICO

There is no requirement for the PCC to register with the Information Commissioner's Office (ICO). The PCC should also remain exempt from paying an annual 'data protection fee' provided that Personal Information stored on computer files is confined to factual information required for the church's activities (e.g. information held on the electoral roll or gift aid information).

6. Overseeing the Management of Data

The PCC is the data controller under the GDPR. The incumbent and clergy of incumbent status are all separate data controllers from the PCC under the GDPR. Staff and volunteers in each of the churches of the parish are required to have access to data. The PCC will publish a Data Management Declaration which all individuals who are processing data on behalf of the PCC will be required to sign. In the Declaration, staff and volunteers undertake to hold information confidentially and securely and to shred data when papers need to be destroyed. Where staff or volunteers are aware of a data breach, the Data Management Declaration makes clear the duty and process of reporting. The PCC may choose to include such a Declaration within the role description for various staff and volunteer posts.

7. Training

Everyone who handles data on behalf of the PCC will be given appropriate training on Data Protection compliance.

