

General Data Protection Regulation (GDPR) Policy

St Mary's, The Parish Church of Buckden.

1. Background

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

2. Scope

This procedure describes the processes in place at St Mary's Buckden for collecting, storing and processing personal data under GDPR; keeping personal data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure and ensuring that appropriate measures are in place to protect personal data.

3. Administration

3.1 Data Controllers

There are two data controllers (separate legal entities) covered by this policy:-

- i) The Parochial Church Council (PCC) of St Mary's, Buckden
- ii) The Priest in Charge of St Mary's, Buckden (position currently vacant)

3.2 Legal basis for processing personal data

Church activities fall into three different categories as regards the legal basis for processing personal data.

LEGAL OBLIGATION. For example:-

- Data relating to the church electoral roll. This is a legal obligation, as it is a requirement under the Church Representation Rules.
- Gift-Aid applications
- Service Registers for general services, funerals, marriages, baptisms, confirmations.

LEGITIMATE INTEREST. For example:-

- Administration of groups (limited to members of the group)
- Compilation and publication of volunteer rotas

CONSENT. For example:-

- Sending out regular mailings and information about events
- Direct contact initiated by church representatives

3.3 Privacy Notice

The St Mary's Privacy Notice includes a summary of the purposes and legal basis for processing personal data in relation to church activities.

There is a copy posted in church (noticeboard outside the Living Stones Room) and on the website.

The Privacy Notice is reviewed every year by PCC

3.4 Review of personal data held

Every 5 years the data controllers will perform a review of personal data held and complete a new data audit to ensure that all data is up to date. The next review is due in 2028.

3.5 Data Retention

All records are retained only as long as they are current.

We retain data in accordance with the guidance set out in the guide "Keep or Bin: Care of Your Parish Records" from the Church of England

4. Data Collection, Storage and Processing

- 4.1 For those activities where personal data is being processed under legal obligation, the data is stored and processed as required by that legal obligation and by the person responsible for that activity and not subject to the main GDPR consent process.

For example:-

- Electoral roll forms and records are stored and processed by the Electoral Roll Officer
- Gift Aid declarations and financial records are stored and processed by the Treasurer & Planned Giving Secretary.

- 4.2 For those activities where personal data is being processed under legitimate interest, data is stored and processed by the persons involved and not subject to the main GDPR consent process. For example:-

- Closed groups may share their contact details amongst themselves
- Names of rota volunteers are recorded on the rota planning document and on the published rotas.

- 4.3 Where consent is being used as the legal basis for processing personal data, the following process will be followed.

- 4.3.1 Evidence of consent: either a completed consent form or a written communication (including email) will be saved as hard copy only, in alphabetical order, in the GDPR Consent File. These records will be retained as long as the consent is current.

- 4.3.2 Details (personal data) from the consent form / written communication are entered into the St Mary's Contacts Spreadsheet (saved in the St Mary's google drive under church contacts). The contacts spreadsheet includes a series of fields which document exactly what consent has been given and which contact lists an individual has asked to be included in.

- 4.3.3 Mailings are managed using Mailchimp. Individuals can subscribe to the mailings and can unsubscribe themselves at any time. Access to St Mary's Mailchimp is limited to those trained as administrators of the system, typically churchwardens and Priest in Charge.

5. Individual Rights

5.1 Sharing personal data

All personal data processed by the data controllers will be treated as strictly confidential and will only be shared with other members of the church where necessary in order to carry out a service to other church members or for purposes connected with the church. Personal data will only be shared with third parties outside of the parish with the explicit consent of the person concerned except in cases where there is a legal obligation to do so (eg: a criminal investigation, safeguarding or child protection case).

5.2 The right to be informed

Individuals have a right to be given "fair processing information". St Mary's consent forms all include the identity of the data controllers and summarise how the information will be used. In addition, the privacy notice explains the lawful basis for the processing of their data; data retention periods (how long you keep it for); who you will share it with and that individuals have a right to complain to the ICO if they think that there is a problem in the way that you deal with their personal data.

5.3 Data requests from individuals

Individuals are advised to contact the email A1churchbuckden@gmail.com or the churchwardens with any data requests or queries. On receipt of a data request, the contacts spreadsheet would be checked to confirm what data is being processed for that individual. A copy of the relevant line

from the spreadsheet would be provided to the enquirer if requested. All requests must be dealt with within one month of receipt.

The right to access - Individuals have the right to access their personal data so that they are aware of and can check the lawfulness of the use and the accuracy of the data.

The right to correction - Individuals have the right to have their personal data corrected if it is inaccurate or incomplete.

The right to erasure (also known as the right to be forgotten) - Individuals have the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

The right to restrict processing - Individuals have the right to restrict processing of their personal data in certain circumstances, for instance they may consider the processing to be unlawful and rather than request erasure, they ask that it be restricted, i.e. that the processing is limited in some respect;

The right to data portability - is not envisaged to be relevant to the manual records held.

6. Children

Although the law allows children aged 13 or over to give their own consent, St Mary's does not collect or process any personal data for under 18s and would rely on contact through the parents/guardians and consent from the parents/guardians.

7. CCTV

There is CCTV installed in the church building for security.

There is appropriate signage in place to inform all visitors that the building is covered by CCTV.

The recording equipment is in a locked room (the vestry) and is password protected. The images are accessible only within the church building and only to the PCC Management Committee and may be shared with the police in the case of a crime being committed. There is no automatic transmission of images to another location. The images are recorded but are automatically overwritten after 14 days.

8. Friends in Deed (FID)

Friends in Deed is a group supported by St Mary's PCC and is covered by this GDPR procedure.

The group organises volunteer visitors, drivers, and a Community Café for those in need of support or companionship within the village.

Although a separate consent form is used and tailored to FID activities, it references the St Mary's data controllers, privacy notice and GDPR procedure.

9. Data Breaches

Any suspected personal data breach must be recorded and investigated.

ICO (and the individuals concerned) must be notified if it is likely to result in risk to the rights and freedoms of individuals.

References

General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA 2018)

"Keep or Bin: Care of Your Parish Records" from the Church of England

Policy reviewed and approved by St Mary's PCC on 24/11/2025