

# RUSHMERE CHRISTIAN FELLOWSHIP

## PRIVACY NOTICE



### INDEX

INDEX .....	1
PRIVACY NOTICE STATEMENT .....	1
PRINCIPLES.....	1
YOUR RIGHTS AND YOUR PERSONAL DATA .....	2
USE OF PERSONAL DATA .....	2
LEGAL BASIS FOR PROCESSING PERSONAL DATA.....	3
SHARING YOUR PERSONAL DATA .....	3
RETAINING YOUR PERSONAL DATA.....	3
APPLYING THE PRINCIPLES .....	4
RIGHT TO ACCESS INFORMATION.....	4
PRIVACY NOTICE DETAILS.....	4
CONTACT DETAILS .....	5
APPENDIX 1 .....	6
APPENDIX 2 .....	7

### PRIVACY NOTICE STATEMENT

Rushmere Christian Fellowship holds and processes personal data about individuals for the purpose of general church administration and communication.

As a church we are committed to complying with Data Protection law and the rights of individuals under it. We are also committed to complying with the principles of the General Data Protection Regulation (GDPR) 2018, as set out below. We recognise that this relates to all personal data, whether held on paper, on computer or other media.

All church staff members or volunteers who obtain, handle, process or store personal data for Rushmere Christian Fellowship must adhere to these principles.

The Data Controller of Rushmere Christian Fellowship is Andy Mortlock on behalf of the Elders and Trustees.

### PRINCIPLES

Rushmere Christian Fellowship agrees to work to the following set of principles, as set out in the General Data Protection Regulation (GDPR) 2018:

- Personal data shall be processed lawfully, fairly and in a transparent manner.
- Personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in any manner incompatible with that purpose or purposes.
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are used.
- Personal data shall be accurate and, where necessary, kept up to date. Personal data that is found to be inaccurate shall be deleted or corrected without delay. All

personal data shall be periodically checked to make sure that it remains up-to-date and relevant.

- Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose and it is securely deleted when it is no longer required.
- Personal data shall be processed in line with the rights of the data subject.
- Personal data storage shall be safe and secure. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to other countries without adequate protection.

## YOUR RIGHTS AND YOUR PERSONAL DATA

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which RCF holds about you.
- The right to request that this personal data is corrected if it is found to be inaccurate or out-of-date.
- The right to request your personal data is erased where it is no longer necessary for RCF to retain such data.
- The right to withdraw your consent to the processing of your personal data at any time.
- The right to request that you are provided with any personal data and where possible, to transmit that data directly (by automated means) to another data controller (known as the right to data portability), where applicable.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, where applicable.
- The right to lodge a complaint with the Information Commissioner's Office.

## USE OF PERSONAL DATA

Rushmere Christian Fellowship holds personal data about staff, church members, regular church attendees and other individuals who have provided such information for a specific purpose. This data is used for the following purposes:

- To maintain contact details within the Church Directory - including sharing this information with others in the Church Directory, sharing prayer needs and details of church activities, services and events.
- The day-to-day administration of the church - including maintaining membership records, providing pastoral care and oversight, preparation of rotas, etc.
- The day-to-day administration of church activities - for specific groups e.g. Toys & Noise, The Ark, Impact, Energize, CAMEO, home groups, etc.
- Contacting people in the local area to keep them informed of relevant church activities and events.
- To maintain our own accounts and records, including the processing of gift aid and financial records of giving for tax purposes, employed staff salary details, etc.
- To manage our employed staff.
- To maintain pastoral or safeguarding records, in very specific situations.

### Further processing:

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

## LEGAL BASIS FOR PROCESSING PERSONAL DATA

Explicit consent from the individual (data subject) will be obtained in order to keep you informed about church events, activities, services and prayer news.

Processing is necessary for carrying out our legal obligations in relation to Gift Aid, tax regulations, employment law and safeguarding regulations.

## SHARING YOUR PERSONAL DATA

The RCF database will be held securely by Andy Mortlock. This will be comprised of information obtained from the consent forms only.

If you have given explicit consent for your personal data to be included in the Church Directory, then this will be shared with everyone else who is also listed in the Church Directory. Information contained in the Directory should not be passed on to any other person without the express permission of the individual concerned.

All finance records are held by the RCF Treasurer and may be shared with the RCF Trustees, on request.

In very specific situations, there may be a need for trained individuals within our church to maintain pastoral or safeguarding records. This information is treated as highly confidential and private and will be limited to the trained individual or the members of the RCF Safeguarding Team, depending on the nature of the situation.

Employment records for RCF staff members are kept by their Line Manager, the Treasurer and the Trustees, as appropriate.

Personal data will only be disclosed to a third party if one of the following circumstances applies:

- We are legally compelled to do so.
- There is a public duty to disclose.
- Disclosure is required to protect the interests of the individual concerned.
- The individual concerned has requested (or given their consent to) the data being disclosed.

## RETAINING YOUR PERSONAL DATA

All financial records will be kept for up to six years after the calendar year to which they relate.

All other personal data will be retained for the duration that you remain a member of RCF or until you request for your data to be removed from any of the lists held by RCF.

If you would like your data removed from any of the lists held by RCF, please contact Andy Mortlock - [See Contact Details](#). Please note that all processing of your personal data will cease once you have withdrawn consent, but this will not affect any personal data that has already been processed prior to this point.

## APPLYING THE PRINCIPLES

1. All RCF staff and volunteers who process personal data on behalf of the church will be required to agree to sign a Data Processor Agreement form - See [Appendix 1](#).
2. Andy Mortlock has been appointed as the Church's Data Controller. All questions and concerns in relation to this Privacy Notice should be addressed to Andy.
3. All individuals whose names and contact details are published in the Church Directory will be asked to give explicit consent for their details to be included by completing a Connection or Membership Card. Data will be removed from the electronic master copy of the Directory and the next printed edition of the Directory if the individual concerned requests this.
4. A hard copy of the Church Directory will be made available for any individual whose name appears on it. Information contained in the Directory should not be passed on to any other person without the express permission of the individual concerned. Electronic copies of the Church Directory will not be supplied to avoid this being inadvertently passed on to people outside RCF. The Church Directory will not be posted publically.
5. Updated contact information should be given to Andy Mortlock - [See Contact Details](#).
6. Personal information (including photographs) of individuals will not be published on the RCF website without obtaining explicit and informed consent from the individuals concerned or their parents. We will never publish the names of children and young people alongside their photographs.
7. Private and confidential personal data held by staff and volunteers on behalf of Rushmere Christian Fellowship will be held and processed in a secure manner to prevent unauthorised access. This means we will store paper-based data in secure, lockable cupboards, use password protections of sensitive electronic documents, restrict access to both paper and electronic personal data to those who need to process it for one of the above uses, and ensure that personal data is transmitted securely in a way that cannot be intercepted by unintended recipients.
8. Whenever practically possible, permission will be obtained from the individual or their next of kin before a prayer request is circulated to the church.

## RIGHT TO ACCESS INFORMATION

Staff, church members and other individuals whose personal information is held by Rushmere Christian Fellowship have the right to access that information. This right is subject to certain exemptions outlined in the General Data Protection Regulation 2018.

Any person who wishes to exercise this right should make the request in writing to Andy Mortlock. We will aim to comply with such requests as quickly as possible, but will ensure that it is provided within a month of receipt of a written request, 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.

If, subsequently, personal details are found to be inaccurate or out-of-date, they can be amended upon request.

## PRIVACY NOTICE DETAILS

The Privacy Notice was updated in line with current legislation in May 2018.

A copy of the Privacy Notice is available on the RCF website and will be made available, on request, to any member of the church, the parents or carers of any child from the church, or any other person associated with the church.

The Privacy Notice will be monitored and reviewed at least every five years.

If any staff or church member feels that there are things missing from this document, or need to be amended, they should speak to the RCF Data Controller.

If you are concerned about the way we are handling your personal data, please speak to Andy Mortlock in the first instance. However, you also have the right to lodge a complaint with the Information Commissioner's Office (ICO) - [See Contact Details](#).

## CONTACT DETAILS

RCF Data Controller: Andy Mortlock  
01473 720401  
andy@rcfchurch.org.uk

ICO: 0303 123 1113  
<https://ico.org.uk/global/contact-us/email/>  
Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

Guide to Data Protection: <https://ico.org.uk/for-organisations/guide-to-data-protection/>

*Updated: 9 May 2018*

**APPENDIX 1**

**DATA PROCESSOR AGREEMENT FOR RUSHMERE CHRISTIAN FELLOWSHIP**

For the purposes of the General Data Protection Regulation (GDPR) 2018, the Data Controller of Rushmere Christian Fellowship is Andy Mortlock on behalf of the Elders and Trustees.

..... (name) has been appointed by the Trustees and Elders of Rushmere Christian Fellowship as a Data Processor to process the following personal data on their behalf:

.....

for the sole purpose of:

.....

By signing this document:

1. The Data Processor agrees to ensure that the data will:
  - a. Be held securely at all times and not made available to anyone else without the express permission of the Church Trustees or Elders.
  - b. Be destroyed once it is no longer needed or a request is made for it to be deleted by the Data Controller.
  - c. All be handed over to the Church Trustees or Elders, on request, or if the Data Processor ceases to be a member of the Church or withdraws from this role.
  
2. The Data Processor acknowledges that they will process the data only according to the instructions provided by the Church Trustees or Elders and that they must not process this data for their own purposes.
  
3. The Data Processor understands that any electronic device used to store the personal data must be password or pin-protected and that appropriate firewall measures are in place.

I agree to the above.

Signed: .....  
(Data Processor)

Date: .....

## APPENDIX 2

### INFORMATION AUDIT

Data/Document:	Data held:	Who provides information?	Lawful basis for processing:	Used for:	Located/Stored/Shared with:	Retention:
Church Database	Name, Address, Phone Numbers (including mobiles), Email Address, Names of children, Church Member status	Church Member or regular attender (Age 16 and over)	Consent	Contact details within the church - weekly bulletin of activities and events of church. Maintaining membership records. Providing pastoral care. Preparation of rotas.	Electronic database stored with Data Controller, with password protection. Back-up copy kept in locked cupboard. Church Directory paper copy distributed to those on the Directory. Details used to produce email distribution lists. Details used to produce list of Church Members.	Church Directory updated regularly. Contact details may be deleted from the database, on request, at any time.
Emergency Details for Children	Name, date of birth, contact details for parents/guardian, allergies, relevant medical information (in the case of an emergency)	Parent/guardian	Consent	Emergency situations where information may need to be given to medical practitioners quickly. Events and activities involving children - The Ark, Fun Days, Toys & Noise, etc. Contact details for informing families of relevant activities and church events.	Paper copy stored with Team Leader, but on site for events (lockable portable briefcase/file).  Details used to produce electronic email distribution list, if permission given.	Updated at every Fun Day.  Contact details may be deleted from the electronic master copy of the email distribution list, on request, at any time during the year.
Emergency Details for Youth	Name, date of birth, contact details for parents/guardian, allergies, relevant medical information (in the case of an emergency)	Parent/guardian	Consent	Emergency situations where information may need to be given to medical practitioners quickly. Events and activities involving youth - Impact, Energize, social activities, etc. Contact details for informing families of relevant activities and church events.	Electronic database accessed by all Youth workers - password protected.  Paper copy on site for events (lockable portable briefcase/file).	Database is updated on annual basis in September or when new youth join the group their details are added.  Contact details may be deleted from electronic database or the email distribution list, on

					Details used to produce email distribution list, if permission given.	request, at any time during the year.
Gift Aid Declaration	Bank name, account and sort code Amount given	Church Member or regular attender	Consent	Maintaining financial records for the processing of gift aid and for tax purposes.	Paper copy stored with Treasurer Information shared with HMRC	All financial records are retained for up to six years after the calendar year to which they relate.
Safeguarding information	Any disclosure information	Anyone	Legal Obligation	Legal obligation to share with official bodies.	Designated Person for Safeguarding/ Safeguarding Trustee/ Safeguarding Elder	All safeguarding information is retained in line with current Safeguarding regulations.
Information about Employed Staff	Contracts of Employment Pension details Bank account details Employment records - including salary, sick leave	Employee Trustees Elders Treasurer	Legal Obligation	Maintaining records in relation to employing staff e.g. salary details, pension details. Management of employed staff e.g. Contracts of Employment, sick leave.	Trustees Treasurer Elders (particularly Line Manager)	All financial records are retained for up to six years after the calendar year to which they relate.  All other records are retained in line with current Employment Law regulations.
General contact information	Name, email address, phone numbers, address, children's names and ages, specific interests	Individual completing Contact Card (from local area)	Consent	Contact details for informing individuals/families of relevant activities and church events.	Information shared with the administrator in the relevant age group - to be included in an email distribution list.	Contact details will be deleted from the electronic email distribution list, and the Contact Card will be securely disposed of, on request, at any time.
Contact information for Speakers or local Youth Leaders	Name, email address, phone numbers, address, church link	Speaker or Youth Leader	Consent	Contact details for booking Speakers for services and other events. Networking on relevant events in the area.	List of speakers stored with Stephen French. List of local Youth Leaders stored with James Edgell.	Contact details may be deleted from the list, on request, at any time.