

Data Protection Policy

Brighton Elim Church operates several projects and our services are delivered by staff and volunteers to people in the greater Brighton, Hove and Newhaven area. To provide the best possible service to the city and our Church community, Brighton Elim Church collects and processes certain types of personal information. Brighton Elim Church recognises the importance of the correct and lawful treatment of personal data and all data will be subject to the legal safeguards specified in General Data Protection Regulation (May 2018).

We have tried to make our policies as understandable as possible whilst ensuring that we include the statutory information we need to. However, if you need any help or clarification we are more than happy to talk through our policies around data protection. Please just [email](#) or speak to Garry Wight.

Terms and Definitions

GDPR – General Data Protection Regulation

Data Controller – Brighton Elim Church (trustees, staff, volunteer project leaders)

Data Processor – Payroll processors (Kevin Calmiano), Pension provider (ELIM), DBS service (Due Diligence Checking DDC), Cloud storage and Email providers (iKnow, Microsoft 365, Dropbox, Google, MailChimp).

Data Subject – Living individuals who are the subject of personal data (trustees, staff, church partners and community, volunteers, service users, service suppliers and professional business contacts)

Personal Data – Information relating to a living individual who can be identified from that information (or from that information in conjunction with other information held). This includes (but is not limited to) name, address, date of birth, email address, telephone numbers, salary information, bank account details, DBS checks.

Special Categories of Personal Data Information relating to ethnic origin, political opinions, religious or philosophical belief, physical or mental health condition, sexual orientation, criminal offences.

Data Processing Any handling of data: collecting, editing, storing, disclosing, sharing, archiving.

SARS – Subject access requests

ICO – Information Commissioner's Office (<https://ico.org.uk>)

Introduction

Brighton Elim Church recognises the importance of the correct and lawful treatment of personal data. Brighton Elim Church has a designated Trustee for Data Protection (Christy Smith) and a volunteer member as Data Protection Lead (Garry Wight). The Trustee for Data Protection will provide oversight and support to the Data Protection Lead. The Data Protection Lead is responsible for ensuring Brighton Elim Church are compliant with GDPR and is the point of contact for all data protection matters (by emailing admin@brightonelim.org.uk). The Data Protection lead will be responsible for reviewing and updating all policies and notices relating to GDPR, providing training to staff and volunteers who have access to and process personal data, maintaining records, completing subject access requests, reporting potential breaches.

All personal data, whether it is held on paper, on computer or other media, will be subject to the appropriate legal safeguards as specified in the General Data Protection Regulation (GDPR) May 2018.

Brighton Elim Church fully endorses and adheres to the principles of data protection ensuring that the personal information held by us is:

1. Processed fairly, lawfully and in a transparent manner
2. Collected and used for limited, specific purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and up-to-date
5. Not kept for longer than necessary
6. Processed in accordance with individual's rights
7. Kept secure
8. Not transferred to countries that do not have adequate protection in place

Lawful Processing of Data

Brighton Elim Church will collect data that is required for the legitimate purpose of our organisation (under the category of legitimate business use). We have several categories of individuals that we require holding personal data for:

1. Trustees
2. Staff (current and former)
3. Brighton Elim Church Partners and Church Members
4. Volunteers
5. Service Users and Beneficiaries
6. Job Applicants
7. Service Suppliers
8. Professional Business Contacts and Building Hirers

Brighton Elim Church also holds data on individuals who subscribe to our weekly newsletter and other publicity emails. Brighton Elim Church will obtain informed consent from individuals to hold their personal data for this purpose. Consent can be withdrawn at anytime by contacting admin@brightonelim.org.uk

Collection and Processing of Data

Brighton Elim Church will only collect and process data that we require to support and inform our church community, run our projects and buildings and to adhere to our legal obligations. This is set out in our Privacy Statements and Notices. All data will be retained for the minimum amount of time as set out in our Data Retention Policy.

Individual Rights

Brighton Elim Church will process data in accordance with individual's rights. Under the GDPR these are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

All enquiries from individuals relating to the data we hold and process on them should be sent to the Operations Team by emailing admin@brightonelim.org.uk and marked for the attention of the Data Protection Lead.

Maintaining Confidentiality

Brighton Elim Church will not disclose personal data to third parties for commercial or non commercial purposes, except where it is required to carry out our work, we have a legal obligation or consent is obtained, for example bank account information provided to our bank for processing of payments. All Brighton Elim Church staff and volunteers who have access to personal data will be required to adhere to the policies laid out in this document, our Confidentiality Policy, where appropriate our Bring Your Own Device to Work Policy and in the GDPR.

Information Security

In order to keep personal data secure, the following controls will be used:

- Electronic data (statistical information, e-mails, contacts and databases) may be stored in secure online databases and cloud storage services provided by a third party and kept on authorised password-protected devices (computers, tablets and smart phones). Any documents stored on authorised devices that contain personal data will be password protected. All staff and volunteers will be required to adhere to our Bring Your Own Device Policy where personal electronic devices are used for processing electronic data
- All special category data will be stored electronically in secure online storage databases provided by a third party. Where paper copies are required these will be stored in a locked filing cabinet with restricted access.
- Access to special category data is strictly controlled and authorised by the Data Protection Lead.
- Any papers collected will be kept secure, an electronic copy will be made and stored as above. They will either be filed in a locked file cabinet or destroyed when no longer needed.

International Transfers

Brighton Elim Church will ensure that the correct safeguards, that are in line with this policy, are in place for international transfers of personal data. These will only take place when we have either active consent or a contractual obligation and when the transfer is for a legitimate purpose relating to the work of Brighton Elim Church. Only data that is necessary for this purpose will be transferred.

Data Breaches

All breaches, or potential breaches, of security and confidentiality must be reported to the Data Protection Lead as soon as possible and within 24 hours. Where necessary, these will be reported to the ICO within 72 hours.

All breaches of confidentiality, resulting in a complaint or other challenge, whether internal or external, will be thoroughly investigated by an appropriate authority, internally (trustees) and externally where appropriate and may result in disciplinary action according to Brighton Elim Church's Disciplinary Policy.

Individual Responsibilities and Training

All Brighton Elim Church staff and volunteers have a responsibility to comply with Brighton Elim Church's Data Protection, Confidentiality, Data Retention and, where appropriate, Bring Your Own Device policies. Confidentiality must be maintained and correct procedures for personal data storage followed. Failure to do this may result in disciplinary action as set out in our Disciplinary Policy.

The Data Protection Lead will provide training to all staff members and volunteers who process personal data in order to ensure compliance and to inform individuals of their responsibilities. Training will be given during induction of new staff. Training will be repeated when there are changes to regulations or systems used at Brighton Elim Church.

Signed agreements to the Data Protection, Confidentiality and Bring Your Own Device Policies will be obtained for all staff and volunteers. For staff this is the Brighton Elim Church Policies Agreement form and for volunteers this is on the Volunteer application form. These agreements will be kept on file for each volunteer or paid worker.

Data Disclosures

There are circumstances where Brighton Elim Church is required to disclose personal data to other people/organisations (Data Processors). These include:

- Payroll providers and HMRC (Kevin Calmiano)
- Pension providers (ELIM)
- Disclosure and Barring Service Checks (Due Diligence Checking)

Access to Information (SARS)

The GDPR 2018 gives individuals the right to request a copy of any information held about them. Any individual wishing to access his/her personal data should make a request in writing to Brighton Elim Church. We reserve the right to charge for requests that are excessive, and proof of identity must be provided. Brighton Elim Church aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 1 month of receipt 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.

Implementation, Review and Monitoring

GDPR comes into affect 25th May 2018. We will be working towards compliance by this date and will have robust systems in place within 6 months of this date. Brighton Elim Church will review this policy and systems and changes to GDPR annually. Brighton Elim Church will register with the ICO.