ashwood church

Data Protection Policy

Last review date: June 2026

Next review date: June 2028

Version Control

Date	Version	Name	Description
	1.00		Initial version
15/08/2019	1.10	Gaye Locke	Updated for General Data Protection Regulation 2018 (GDPR)
04/06/2020	1.20	Gaye Locke	General review
15/10/2021	1.30	Gaye Locke	Review at end of Brexit transition (GDPR now UK GDPR) and mention of Event Brite (E.2)
01/02/2023	1.40	Gaye Locke	General review
03/05/2024	1.50	Gaye Locke	Amended to include email requests for SAR and reference to CCTV policy
22/06/2026	1.60	Gaye Locke	Amend number of days for response to SAR and add in use for employee and recruitment purposes

Ashwood Church Data Protection Policy

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A. Purpose

1. Ashwood Church needs to collect and use personal information about living individuals in order for the church to operate effectively and efficiently.
2. Ashwood Church recognizes the importance of the correct and lawful treatment of personal data. All personal data, whether it is held on paper, computer or other media, will be subject to the appropriate legal safeguards as specified in the GDPR 2018.
3. Ashwood Church is committed to processing data in accordance with its responsibilities under the GDPR 2018. Employees and any others who obtain, handle, process, transport and store personal data for Ashwood Church must adhere to the principles of the regulation.

B. The Principles

Article 5 of the GDPR requires that personal data shall be:

1. processed fairly and lawfully and in a transparent manner in relation to the individual;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
5. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage by using the appropriate technical and organisational measures.

C. General Provisions

1. This policy applies to all personal data processed by Ashwood Church.
2. Ashwood Church shall register with the Information Commissioner's Office as an organisation that processes personal data.

D. Lawful Purposes

1. All data processed by Ashwood Church must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
2. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.

E. Use of Personal Information

Ashwood Church use personal data for five main purposes:

1. The day-to-day administration of the church; e.g. pastoral care and oversight including calls and visits, preparation of ministry rotas, maintaining financial records of giving for audit and tax purposes. Where it is feasible, individual attendance may be monitored for the purposes of budgeting, safeguarding volunteers and providing the type of pastoral care that people associate with a caring church.
2. Contacting individuals to keep them informed of church activities and events. This may include details voluntarily provided by individuals via third parties such as Eventbrite where certain personal data is required to book onto specific events. In such instances the details requested and used are kept to the minimum to allow effective contact.
3. Statistical analyses; gaining a better understanding of church demographics. N.B. although collated church data may be passed to a third party, such as number of small groups or small groups' attendance, no personal data will be disclosed.
4. For recruitment and employment purposes. This will include contact, proof of identity and right to work details as well as information related to employment and education history. A more comprehensive list is included in the Ashwood Church Privacy Notice.
5. For trustee/director purposes. This will include contact details, proof of identity, fit and proper person declaration and conflict of interest information.

F. Maintaining Confidentiality

1. Ashwood Church will treat all personal data as private and confidential and not disclose any data about individuals to anyone other than the leadership and ministry overseers/coordinators of the church in order to facilitate the administration and day-to-day ministry of the church.
2. All Ashwood Church employees and volunteers who have access to personal data will be required to agree to abide by both the Confidentiality and Data Protection Policies.
3. There are four exceptional circumstances to the above permitted by law:
   3.1. Where the Church is legally compelled to do so.
   3.2. Where there is a duty to the public to disclose.
   3.3. Where disclosure is required to protect an individual's interest.

3.4. Where disclosure is made at an individual's request or with an individual's consent.

G. The Database

Information contained on the database will not be used for any other purposes than set out in this policy and the Ashwood Church Privacy Notice. The database is accessed through a remote server and therefore, can be accessed through any computer with internet access.

1. Access to the database is strictly controlled through the use of password protected, individual user names, authorized by the Data Controller.
2. Those authorized to use the database only have access to their specific area of use within the database. This is controlled by the Data Controller who is the only person who can authorise levels of access and security parameter settings.
3. People who will have secure and authorized access to the database include Ashwood Church employees, Leadership Team, Life Group Leaders and Trustees.
4. The database will NOT be accessed by any authorized users outside of the EU, in accordance with the GDPR, unless prior consent has been obtained from the individual whose data is to be viewed.
5. All access and activity on the database is logged and can be viewed by the Database Controller.
6. Personal information will not be passed onto any third parties outside of the church environment without the subject's specific consent.
7. Subject Consent. The need to process data for normal purposes has been communicated to all data subjects. In some cases, if the data is sensitive, for example, information about health, race or gender, express consent to process the data must be obtained. Where communications are sent to individuals based on consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Ashwood Church's systems.

H. Rights to Access Information – Subject Access Requests

1. All individuals who are the subject of personal data held by Ashwood Church are entitled to:
   1.1. Ask what information the church holds about them and why.
   1.2. Ask how to gain access to it.
   1.3. Be informed how to keep it up to date.
   1.4. Be informed what Ashwood Church is doing to comply with its obligations under the GDPR 2018.
2. Employees and other subjects of personal data held by Ashwood Church have the right to access their personal data, subject to certain exemptions: Personal information may be withheld if the information relates to another individual.
3. Any requests by individuals concerning the data held relating to themselves should be submitted via a Subject Access Request, to the Data Controller together with proof of identification. This can be done in writing to the Ashwood Church Data Controller, Ashwood Church, The Ashwood Centre, Portland Street, Kirkby-in-Ashfield, Notts, NG17 7AB, or via email to admin@ashwoodchurch.org.uk using the guidance available on line from https://ico.org.uk/ Email requests will be re-directed accordingly.
4. If personal details are inaccurate, they can be amended upon request.
5. Ashwood 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 of a completed 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.

I. Security Breaches

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data Ashwood Church shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

J. Associated Policy

Ashwood Church may also process images of persons who might be filmed and identifiable from footage through its use of CCTV within the Ashwood Centre. For further details please refer to the CCTV Policy.