

The Anglican and Methodist Church of St Andrew  
**Data Protection Policy Appendices**

Date: 09.05.22 V4

Next Policy Review Date by Church Council: \_\_\_\_\_Sept 2022\_\_\_\_\_

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# Guidance notes – emails and forms etc.

**Everyone involved in collecting and processing personal data (e.g. names, addresses, email or telephone numbers) or communicating with individuals using personal data needs to read the Data Protection Policy.**

Whenever the Church collects new information about individuals we will ensure individuals are made aware:

- that the information is being collected,
- of the purpose that the information is being collected for,
- of any other purposes that it may be used for,
- with whom the information will or may be shared
- and how to contact the Data Controller.

This information is communicated in Data Privacy statements which should be included on forms that are used to collect personal data.

The Church will only obtain relevant and necessary Personal Data for lawful purposes and will only process the data in ways which are compatible with the purpose for which it was gathered.

These notes provide supplementary guidance for email communications and for forms that collect personal information.

Where possible, we should use Church Suite as it is a central source of up-to-date individual information with email permissions and is designed to make GDPR compliance much easier. Additionally it is easier to track communications, for example, if there is a complaint or subject access request.

## Email

- We should not email anyone unless we have permission to do so
- Having an email for one purpose does not mean that we can email for another unrelated purpose – if in doubt ask (NB you cannot email someone to ask if you can email them you have to choose another method))
- All emails should contain an opt-out (see below)
- We should keep a record of all opt-ins and opt-outs – and enact any opt-out (erasing the email address from the emailing list)
- We cannot assume someone is happy to receive emails in unless explicitly opted in – i.e. ticked a box to say they are happy.

*The Anglican and Methodist Church of St Andrew Paddock Wood, Maidstone Road, Paddock Wood, Kent TN12 6DZ. Registered Charity No. 1137783 This email and any attachments are confidential. Any use, copying or disclosure other than by the intended recipient is unauthorised. If you have received this message in error, please notify the sender immediately via 01892 833917 and delete this message from your computer and network. You are receiving this email as you are opted-in to receive this communication by email. If you no longer want to receive this, please notify [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk) specifying which email communications you no longer wish to receive, or alternatively, if you want to be opted out of all St Andrews' email communications.*

## Telephone

- We should not phone anyone unless we have permission to do so
- If the number is published on the member's list we have permission to contact them by telephone only about church activities
- Having an telephone number for one purpose does not mean that we can telephone for another unrelated purpose – if in doubt ask (NB you cannot email telephone to ask if you can telephone them you should choose another method))
- We should keep a record of all telephone opt-ins and opt-outs – and enact any opt-out (erasing the telephone number from the phone list)
- We cannot assume someone is happy to be called unless explicitly opted in – i.e. ticked a box to say they are happy.

## Forms

- Forms collecting personal data should contain a data privacy notice (see next section) and the notice needs to be tailored to the form/ situation.
- A template is below and needs to be adapted to the reason for data collection and the way in which the data will be used
- We just need to tell the person why we are collecting their data and what we are going to do with it:
- The items in **Green**, **Orange** or **Red** need tailoring – just include the parts that are relevant to the form

**Green** – likely to be relevant and most likely to be used

**Orange** - may be relevant

**Red** - unlikely to be relevant

**Purple** – delete

**Black** - keep

- Items in black need to be kept in
- Items in purple need to be deleted
- The data privacy notice should be signed and dated by the individual

- **Please note** – if the personal data is not obtained directly from the data subject, you will need to provide the data subject with the following additional items of information within 1 month of having received their personal data: -
  - The categories of the personal data you are processing; and
  - The source from where the personal data originates and whether it came from publicly accessible sources

# DATA PRIVACY NOTICE

The Anglican and Methodist Church of St Andrew  
Maidstone Road, Paddock Wood, Kent, TN12 6DZ  
Tel: 01892 837617  
Email: [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk)

## Your personal data – what is it?

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. The processing of personal data is governed by the General Data Protection Regulation 2016/679 ("GDPR").

## Who are we?

The Anglican and Methodist Church of St Andrew is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

## How do we process your personal data?

The Anglican and Methodist Church of St Andrew complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- For members of the clergy - to provide pastoral care to parishioners;
- For Diocesan bodies –
  - To enable us to provide a voluntary service for the benefit of the public as specified in our constitution;
  - To administer membership records;
  - To fundraise and promote the interests of the charity;
  - To manage our employees and volunteers;
  - To maintain our own accounts and records.
  - Our processing also includes the use of CCTV systems for the prevention of crime.
- For PCCs –
  - To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
  - To administer membership records;
  - To fundraise and promote the interests of the charity;
  - To manage our employees and volunteers;
  - To maintain our own accounts and records.

- Other cases:
  - To inform individuals of news, events, activities or services running at The Anglican and Methodist Church of St Andrew
  - To operate The Anglican and Methodist Church of St Andrew web site and deliver the services that individuals have requested through the website
  - To share your contact details with the diocesan office so they can keep you informed about news, events, activities and services that will be occurring in the diocese and which are relevant to the role you are undertaking
  - To process gift aid applications
  - To contact individuals via surveys to conduct research about their opinions of current services or of potential new services that may be offered

## What is the legal basis for processing your personal data?

The legal basis for processing your data is:

- Consent of the data subject (see consent form at the end of this privacy notice);
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.  
Details of contract.....
- Processing is necessary for compliance with a legal obligation;  
The statutory requirement to provide the data is  
.....  
The consequences of not supplying the data are  
.....
- Processing is necessary to protect the vital interests of a data subject or another person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.  
The legitimate interests are  
.....

## Article 9 Processing

*[If you are processing special category personal data (i.e. sensitive personal data), as well as satisfying one of the processing conditions set out in Article 6 (above), you will also need to satisfy one of the processing conditions set out in Article 9 (below). You should note that the same colour coding as detailed above applies. Personal data which reveals religious belief is classed as sensitive personal data under the GDPR].*

- Explicit consent of the data subject [*link to "Consent Form" as above*];  
[Use this for example, to be able to tell people about events, news, services]
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
  - there is no disclosure to a third party without consent.

### [This clause allows you to collect and process data without consent]

- Processing relates to personal data manifestly made public by the data subject;
- Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity;
- Processing is necessary for reasons of substantial public interest on the basis of EU or Member State law;
- Processing is necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional;
- Processing is necessary for the reasons of public interest in the area of public health;
- Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes.

*[Where the personal data are collected direct from the data subject, the data subject must be informed whether he or she is obliged to provide the personal data and the consequences, if he/she does not provide the data].*

## Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with The Anglican and Methodist Church of St Andrew. We will only share your data with third parties outside of the parish with your consent.

## How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the purposes for which you gave consent and use the following criteria to determine how long to retain your personal data:

- Legal or administration requirement (e.g. proof of consent)
- Consent is still relevant
- The data is still accurate, suitable and compliant for future use

## Your rights and your personal data

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

- The right to request a copy of your personal data which the Church holds about you;
- The right to request that the Church corrects any personal data 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 the Church to retain such data;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller
- 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
- The right to lodge a complaint with the Information Commissioners Office.

## Further processing

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

## Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Office Manager at:

Tel: 01892 837617

Email: [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk)

Address:

The Anglican and Methodist Church of St Andrew, Maidstone Road, Paddock Wood, Kent, TN12 6DZ

You can contact the Information Commissioners Office on 0303 123 1113 or via email

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

## Consent

By signing this form you are confirming that you have read this Data Protection Notice and that you are consenting to The Anglican and Methodist Church of St Andrew holding and processing your personal data for the following purposes (please tick the boxes where you are happy to grant consent): -

*[Insert relevant purposes where you will be relying on consent to process the personal data, for example: -*

*To keep you informed about news, events, activities and services;*

*To contact you with surveys about current events;*

*To share your contact details with the diocesan office so they can keep you informed about news and events, activities and services that will be occurring in the diocese and which are directly relevant to the role you are undertaking;*

*All of the above.*

By email [ ]

by text [ ]

by post [ ]

by phone [ ]

Name.....

Address.....

.....

Telephone.....

Email address.....

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent we will not be able to use your personal data, except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm.



# St Andrew's Church, Paddock Wood

## CCTV Policy

**Date: 01.10.21, v4**

**Next Policy Review Date by Church Council: \_\_\_\_\_ Sept 2025 \_\_\_\_\_**

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### **Introduction**

St Andrew's Church records closed circuit television (CCTV) images to reduce crime and monitor its church and buildings in order to provide a safe and secure environment for members, staff and visitors, and to prevent loss or damage to church property.

The system currently comprises two cameras, one in the reception area and one outside the shop. More cameras will be added. Images are recorded on a dedicated digital video recorder (DVR) in the office. The CCTV system is operated and monitored by the Property and Fabric Committee.

### **Data Protection**

The use of CCTV, and the associated images and any sound recordings, is covered by GDPR (General Data Protection Regulation) 2018.

The church will comply with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

It is a requirement of the GDPR2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Church Council will ensure that this requirement is fulfilled.

The Council will ensure that the location of any CCTV equipment is carefully considered to ensure that images captured comply with GDPR.

### **Siting the Cameras**

One camera is sited in reception which is the main entrance to the church and buildings.

The second is sited outside the shop where it can capture people entering the car park, and in the vicinity of the shop and Wallis Room.

The cameras are sited so they only capture images relevant to the purpose for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.

The church has positioned the cameras so that the coverage is restricted to the church premises only.

Signs are placed so that members, staff and the public are aware that they are entering a zone which is covered by surveillance equipment. The purpose of the use of CCTV is displayed – e.g. “CCTV in operation for your safety and security”

### **Storage and Retention of CCTV images**

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. Recordings are retained for no more than 60 days unless required for evidential value.

All retained data is stored securely (password protected) in the church office, and access to recorded images is restricted to those staff authorised to view them and, other than for evidential purposes, will not be made more widely available.

The Church office and P&F Chair are responsible for ensuring the following checks are carried out

To be done monthly

- Check that the cameras and equipment are working properly
- Check that live CCTV images are being properly recorded
- Ensure any special features are accurate (e.g. time display)
- Report immediately if equipment is faulty or damaged via email / phone to IT support.

Check and ensure that any recorded CCTV images over 60 days old are being deleted from the system.

An annual review of the use of CCTV is undertaken by Property and Fabric Committee; the checklist used is in Appendix B.

### **Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR.

All requests should be made in writing to the Church Office. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified, for example, date, time and location.

Provided that recordings are still available, the church will respond to requests within 30 calendar days of receiving the written request. We may need to extend this time (by up to a maximum of a further two months) if the request is complex.

The church reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an investigation.

### **Access to and Disclosure of Images to Third Parties**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the church where these would reasonably need access to the data (e.g. investigators).

### **Third Party Requests should be made in writing to the Incumbent.**

The data may be used within the churches discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Approved list of individuals that has access to CCTV footage is included here as Appendix A.

It is required that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of data and against accidental loss, damage or destruction.

The nature of the data to be processed should be considered and where it contains details of inappropriate/unnecessary material it must be processed with greater care.

### **Complaints**

Complaints and enquiries about the operation of CCTV within the church premises should be directed via the office to the Chair of P&F.

## Appendix A: ACCESS RIGHTS

Level	Name	Access
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1	Property and Fabric Team and individually approved technical support staff	
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Full Access & Operational Use

2	Clergy Team	
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Full Access

3	Church Wardens	
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Viewing of CCTV footage

4	Church Council Members	
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Viewing of CCTV footage

5	Other church members or hall users	
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Viewing of CCTV footage, provided authorised by Clergy Team or Church Wardens

## Checklist for users of limited CCTV systems monitoring small retail and business premises

This CCTV system and the images produced by it are controlled by ..... who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998.<sup>1</sup>

We (.....) have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.			
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			

<sup>1</sup>Not all small businesses need to notify. Current notification requirements can be found [here](#).

There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, images will not be provided to third parties.			
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

**Please keep this checklist in a safe place until the date of the next review.**

# COOKIE POLICY

## Cookie Policy/Usage

Our website uses Cookies to help us provide you with a useful and reliable browsing experience and to help us improve our site. Cookies are small files of letters and numbers that are stored on your device. When someone visits our website, we collect standard internet log information and details of visitor behaviour patterns. We collect this information in a way which does not personally identify anyone.

Cookies are small text files that are placed on your device to help our website provide a better user experience. Cookies are stored on your individual device and you have full control over their use.

## How to change your cookie settings

You may deactivate or restrict the transmission of cookies by changing the settings of your web browser. Cookies that are already stored may be deleted at any time. To find out more about cookies and how to manage or delete them, visit [www.aboutcookies.org.uk](http://www.aboutcookies.org.uk).

Find out how to manage cookies on popular browsers:

[Google Chrome](#)

[Microsoft Edge](#)

[Mozilla Firefox](#)

[Microsoft Internet Explorer](#)

[Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).

If you choose to disable cookies, you may not be able to use all the features on our website.

### **The types of Cookies we use on this site are:**

#### **First Party Cookies**

These are necessary Cookies that are set by this website directly. These Cookies are essential to the running of our website and are kept for the duration of a user's visit. These keep track of things such as the session ID itself and whether the visitor has chosen to view the site in high visibility mode.

#### **Third Party Cookies**

These are Cookies set by other suppliers which we may be using to enhance our site and which are controlled by them.

#### **Google Analytics**

Like many websites, we use Google Analytics to collect information about visitor behaviour, such as the number of visitors to the various parts of our website. We do this to compile reports that help us improve our site. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here, what documents you download and what you click on. Analytics data is not tied to personally identifiable information (e.g. your name or address) so this information cannot be used to identify who you are.

# WEBSITE TERMS AND CONDITIONS

Welcome to our website. If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with [our privacy policy](#) govern St Andrews' relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website. The term 'the Anglican and Methodist Church of St Andrew' or 'us' or 'we' refers to the owner of the website whose address is The Anglican and Methodist Church of St Andrew, Maidstone Road, Paddock Wood, Kent, TN12 6DZ. The term 'you' refers to the user or viewer of our website.

## *THE USE OF THIS WEBSITE IS SUBJECT TO THE FOLLOWING TERMS OF USE:*

The content of the pages of this website is for your general information and use only. It is subject to change without notice.

Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.

Your use of any information or materials on this website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services or information available through this website meet your specific requirements.

This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance and graphics. Reproduction is prohibited other than in accordance with the copyright notice, which forms part of these terms and conditions.

All trademarks reproduced in this website, which are not the property of, or licensed to the operator, are acknowledged on the website.

Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.

From time to time, this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s).

Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland and Wales.

Note: The following Data Privacy Notice is available when someone completes the “Connect with Us” page (this is the only place where information is captured)

# DATA PRIVACY NOTICE

## STANDARD DATA PRIVACY NOTICE WITH A COVID COLLECTION OF DATA FOR TRACK AND TRACE ADDENDUM

The Anglican and Methodist Church of St Andrew  
Maidstone Road, Paddock Wood, Kent, TN12 6DZ

Tel: 01892 837617

Email: [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk)

Website: [www.standrewspw.org.uk](http://www.standrewspw.org.uk)

### **Your personal data – what is it?**

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. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (“GDPR”).

### **Who are we?**

The Anglican and Methodist Church of St Andrew is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

### **How do we process your personal data?**

The Anglican and Methodist Church of St Andrew complies with its obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

- We use your personal data for some or all of the following purposes: -  
To enable us to meet all legal and statutory obligations (which include maintaining and publishing our electoral roll in accordance with the Church Representation Rules);
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to

time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;

To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are gravely ill or bereaved) and to organise and perform ecclesiastical services for you, such as baptisms, confirmations, weddings and funerals;

- To deliver the Church's mission to our community, and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of each data controller;
- To administer the parish, deanery, archdeaconry and diocesan membership records;
- To fundraise and promote the interests of the Church and charity;
- To maintain our own accounts and records;
- To process a donation that you have made (including Gift Aid information);
- To seek your views or comments;
- To notify you of changes to our services, events and role holders;
- To send you communications which you have requested and that may be of interest to you. These may include information about campaigns, appeals, other fundraising activities;
- To process a grant or application for a role;
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;

Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.

### **What is the legal basis for processing your personal data?**

The legal basis for processing your data is:

- Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England or in The Methodist, Church of Great Britain). An example of this would be our safeguarding work to protect children and adults at risk.
- We will always take into account your interests, rights and freedoms. Some of our processing is necessary for compliance with a legal obligation. For example, we are required by the Church Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns.
- We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities.
- Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details. Where your

information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

### **Sharing your personal data**

Your personal data will be treated as strictly confidential, and will be shared only with The Anglican and Methodist Church of St Andrew. We will only share your data with third parties outside of the parish with your consent or if required to by law.

### **How long do we keep your personal data?**

We keep your personal data for no longer than reasonably necessary and we only retain your data for the purposes for which you gave consent and use the following criteria to determine how long to retain your personal data:

- Legal or administration requirement (e.g. proof of consent)
- Consent is still relevant
- The data is still accurate, suitable and compliant for future use

### **Your rights and your personal data**

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

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

#### 1. The right to access information we hold on you

- At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
- There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.

#### 2. The right to correct and update the information we hold on you

- If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.

#### 3. The right to have your information erased

- If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
- When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).

#### 4. The right to object to processing of your data

- You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

#### 5. The right to data portability

- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.

#### 6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.

- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).

#### 7. The right to object to the processing of personal data where applicable.

#### 8. The right to lodge a complaint with the Information Commissioners Office.

### **Further processing**

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

### **Contact Details**

A copy of the Church Data Protection Policy can be found on the church website [www.standrewspw.org.uk](http://www.standrewspw.org.uk) or is available upon request at the church office (details below). To exercise all relevant rights, queries or complaints please in the first instance contact the Office Manager at:

Tel: 01892 837617  
Email: [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk)  
Address: The Anglican and Methodist Church of St Andrew, Maidstone Road,  
Paddock Wood, Kent, TN12 6DZ

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

The Anglican and Methodist Church of St Andrew is a registered charity. Our charity number in England and Wales is 1137783.

Tel: 01892 837617

Email: [office@standrewspw.org.uk](mailto:office@standrewspw.org.uk)

Address: The Anglican and Methodist Church of St Andrew, Maidstone Road,  
Paddock Wood, Kent, TN12 6DZ

## **COVID-19 Privacy Notice**

### **Online List of Clergy, Staff and Visitors to Church buildings**

This notice explains how information about you will be used temporarily by the Anglican and Methodist Church of St Andrew during the Covid-19 pandemic crisis so we can take your booking and at the same time put in place a list of clergy, staff and visitors to the church building/s, as requested by the Government in support of [NHS Test and Trace](#).

#### **1. Who we are**

The Anglican and Methodist Church of St Andrew are the data controller (contact details in section 7. below). This means we decide how your personal data is used and why.

#### **2. The information we collect about you and why we need it**

We collect your data in order to process your booking of a visit to the St Andrew's. However, we are also collecting your data for the purpose of supporting NHS Test and Trace, as requested by the Government.

Although we may have your contact details already the Covid-19 pandemic has created a unique situation and additional reasons for us to collect the name and contact telephone number of all clergy, staff and visitors who use/visit our church building/s in order to support NHS Test and Trace.

This is specifically in relation to contact tracing, which is the process of identifying, assessing, and managing people who have been exposed to a disease to prevent onward transmission and the investigation of local outbreaks.

In summary, Test and Trace:

- provides testing for anyone who has symptoms of coronavirus to find out if they have the virus;
- gets in touch with anyone who has had a positive test result to help them share information about any close recent contacts they have had; and
- alerts those contacts, where necessary, and notifies them they need to self-isolate to help stop the spread of the virus.

**This is voluntary, and you can opt out of letting us share your details with NHS Test and Trace. We will still accept your booking.**

#### **3. Lawful basis**

We will use your information lawfully, as explained below:

- **Consent** – We need your consent in order to collect your name and contact details to process your booking, and to share this with NHS Test and Trace if requested. You will give us your consent by providing your details by completing the on-line booking.
- **Explicit consent** – We need your explicit consent to collect your data on the basis that you may have revealed a religious belief by using/visiting our church building/s. You will give us your explicit consent by completing the on-line booking and opting in/indicating “Yes” where requested, or “No” if you do not want us to share you data with Test and Trace.

**You can withdraw your consent at any time after giving your details by letting us know you no longer want us to keep or share your personal data for the purpose of Test and Trace, however, once we have given your details to Test and Trace we will no longer be able to prevent processing. To contact us, please see our contact details at 7. below. We will continue to process your booking data, unless told otherwise.**

#### **Sharing your data**

Personal data that is collected for bookings will be used only to share with NHS Test and Trace if requested. It will not be used for other purposes outside of those specified in this Privacy Notice.

#### **Data Retention**

We will keep your name and contact details for 21 days and will dispose of it after this period.

### **6. Your Legal Rights**

Unless subject to an exemption under the GDPR or DPA 2018, you have the following rights with respect to your personal data: -

- The right to be informed about any data we hold about you;
- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent at any time, while the church body still has your data;
- The right to request that we correct any personal data 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 us to retain such data;
- 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 obtain and reuse your personal data to move, copy or transfer it from one IT system to another. [*only applicable for data held online*]
7. Complaints and queries

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Mrs Jo Young, c/o The Parish Office

If you do not feel that your complaint has been dealt with appropriately, please contact *Mrs Jo Young, c/o The Parish Office, St Andrew's Church, Paddock Wood*

You also have the right to lodge a complaint with the Information Commissioners Office. You can contact the Information Commissioners Office on 0303 123 1113 or online: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/> or <https://ico.org.uk/global/contact-us/>