SP Saint Philip's Church

Privacy Policy Appendices

Appendix 1- Contact details

Church members name and contact details will be entered into our church database, which is held on the church office computer, is in a password protected file and accessed only by the staff team. You may choose which details you want us to use to contact you.

We send our update emails using Mailchimp, which has its servers in the US and uses third party processers in other countries. Mailchimp rely on standard contractual clauses to ensure that any sharing of data outside of the UK is in line with the UK GDPR. Mailchimp helps us to monitor the effectiveness of our social reach and improve their own services by using cookies and other tracking technologies to collect information about how you interact with emails sent and other technical data. A link to their privacy policy can be found in appendix 6. You may opt out of receiving our update emails at any point by contacting the administrator at St Philip's Church (admin@stphilipssheffield.org).

Your contact details will be removed from the database once you are no longer a member of the church – unless you ask to remain as one of our "church friends".

Appendix 2- Pastoral data

Pastoral data is taken on two occasions. Firstly, during prayer ministry. Notes are taken to inform the prayer process and are offered to members or shredded at the end of the prayer process which is usually between 1 and 6 meetings.

Secondly notes may be taken during a pastoral meeting so that an accurate record of the conversation can be retained. This is to safeguard both minister and member. These notes may be later entered digitally if they were not originally and will be stored confidentially. They may be shared with denominations in a safeguarding or supervisory capacity strictly on a need-to-know basis.

Appendix 3- Employment

Employment application information is collected from employees to enable us to enter into a contract of employment with them. If an employee is unable to provide this information then we will be unable to enter into that contract.



The information you supply will be:

- Held on the church office computer which is password protected and accessed only by the Team Leaders and administrator. It may also be held in paper form in the locked HR cabinet.
- Destroyed six years after you leave our employment, unless otherwise specified by Safeguarding guidance on the retention of records from the Church of England, such as in the case of ministers or those who directly work with children and vulnerable adults.¹
- We will be undertaking performance appraisals as part of your employment and copies of the reports from these (along with all documents supplied as part of your application) will be kept in a password protected section of our church computer, which can only be accessed by the Team Leaders as your Line Managers. If appropriate, information from these documents may be shared with other charity Trustees but will NOT be shared with anyone else without your consent.

Appendix 4- Social media pages/ Audio sharing sites

Please note that with regards to social media pages and audio sharing sites, members are free to join these pages and to choose their consent preferences regarding media identity data they consent to being shared by the church on these sites. Some are internal (Whatsapp, Private Facebook, Private Google), whilst others are open to the public. Please do look at the privacy policies provided by these platforms (see below), as the Church do not accept any responsibility or liability for their policies.

Privacy policy links:

- Facebook Privacy Policy: https://www.facebook.com/about/privacy
- Google Privacy Policy: https://policies.google.com/privacy?hl=en-US
- Instagram Privacy Policy: https://www.instafollowers.co/blog/what-is-instagrams-privacy-policy
- Spotify Privacy Policy: https://www.spotify.com/us/legal/privacy-policy/
- Twitter Privacy Policy: https://privacy.twitter.com/en/blog/2020/update_terms_and_privacy_policy
- Whatsapp Privacy Policy: https://www.whatsapp.com/legal/?lang=en&doc=privacy-policy&version=20160825
- Youtube Privacy Policy: https://support.google.com/youtube/answer/2801895?hl=en

¹ (<u>Microsoft Word - Safeguarding Records Retention Tool kit -Dec 15 (Final version)</u> (<u>anglican.org</u>)



Appendix 5-

5a) Sharing your personal data internally

Where your personal data is shared internally, this has been detailed below:

Legitimate interests:

- Pastoral, prayer or personal data may be shared between community leaders, leadership team members, discipleship group leaders and team leaders for supervision or pastoral care, strictly on a need-to-know basis and in the knowledge of the person concerned. If the person concerned requests for information to be shared with the wider church for prayer or another appropriate reason, this will only be shared in an appropriate format in liaison with that person, because of their request.
- Data relating to children or their parents/carers is shared with volunteer children's team where appropriate.
- Some administrative data, such as rota information is shared with other church members for administrative purposes.
- Volunteer/intern data may be shared with trustees, leadership team and host families where appropriate.

Legal obligation:

 If appropriate, employment data may be shared with charity trustees for accountability and transparency purposes. This includes during the recruitment process with those who make up the interview/selection panel. Occasionally another church member may make up part of the interview panel and thus will get access to information linking to the recruitment process also.

Consent:

 Based on consent from members, media identity data is shared with members or visitors/ inquirers, within internal communication, on church displays or on Zoom.



5b) Sharing your personal data externally

Where your data is shared with third parties, this has been outlined below:

Third party	What information is shared?	Purpose	Legal bases
Accountants from Paul Horton Associates (PHA)	Financial, transaction, identity and contact data (e.g. Gift Aid/payroll). We have a data sharing agreement in place with PHA.	Accounting purposes.	Legitimate interests
Yorkshire Baptist Association	Pastoral, membership/denominational, attendance, governance and employment (including staff sickness information), data.	Accountability and supervision- shared strictly on a need-to- know basis.	Legal obligation or Public task
Brightpay	Payroll information.	Employees can be paid.	Contract
CAF Bank	Identity, contact and ethnicity (special categories of personal data) details of trustees and bank signatories.	Financial controls.	Legal obligation
Charity Commission	Governance and financial data, which includes the identity and contact details of trustees. The Charity Commission share the accounts and trustee's annual report on their website. When completing our annual return with the Charity Commission, some personal information, including in some instances special categories data, may be processed. We take special care when sharing this information that we do this in line with our obligations under the Data Protection Act 2018, making sure that we only share required information.	When required for legal reasons.	Legal obligation, Public task
Sheffield Diocese	Pastoral, membership/denominational, attendance, aggregated, governance, employment (including staff sickness information), and safeguarding data.	Safeguarding, accountability and supervisionshared strictly on a need-to-know basis.	Legitimate interests, Legal obligation, Public task or Vital interests
Church of England Pensions Board	Pensions data.	Pensions.	Legitimate interests



Faithstar (our external auditors)	Financial, transaction, employment, identity and contact data.	Once a year for accountability purposes.	Legal obligation
HMRC	Financial, transaction, employment, identity, contact and other data required by HMRC for payroll, gift aid and tax purposes.	Gift Aid/employment purposes.	Legal obligation
Nine Foot One	Media identity data and information about the church.	With your consent- for displaying the life of the church on the website.	Consent
Sheffield City Council Children's Social Care Services	Data, which could include special categories of personal data, relating to children, their parent/carers or vulnerable adults where there is a safeguarding concern may be shared if to gain consent may place them at risk.	For Safeguarding.	Legal obligation, Vital interests
Videographer/ photographer	Photos/ videos taken.	With your consent, for displaying the life of the church	Consent

5c) Storing your personal data externally

Personal information is also held by various organisations for us, for various purposes, under the legitimate interest legal basis. Some of this data may be transferred or stored outside of the UK by these organisations, as part of the way they operate. There are certain rules, which these organisations need to adhere to, to meet the conditions of the UK GDPR when transferring data. The table below includes whether data may be shared outside of the UK and what the organisation relies on to make the transfer lawful. You can view individual privacy policy links in Appendix 4 and 6 to find out more.

Third party	Why?	Could this data be transferred or stored outside the of UK? What does it rely on in terms of UK GDPR to make this transfer lawful?
Atlassian (Trello)	For storing administrative data.	Yes- data centres/hosts
		are located outside of
		the UK. Relies on
		Standard Contractual



		Clauses (SCC's) for transferring data.
CAF Bank	Accounting purposes	No
Dropbox	Media identity data is sometimes uploaded here by members for ease of sharing with us or by us to share with Nine Foot One- our website providers. Audio recordings from in person gatherings are uploaded onto Dropbox initially, to be transferred onto our shared OneDrive, for sharing on the website.	Yes- servers are located in data centers across the US. Relies on SCC's for transferring data.
Eventbrite	For organising in person meetings in line with Covid-19 Government guidelines.	Yes- server located in the US. Relies on SCC's for transferring data.
Intuit (Quickbooks) Accounting software	Accounting purposes	No
Mailchimp	To send St Philip's update emails to the whole church.	Yes- server is located in the US. Also uses third party processors from other countries. Relies on SCC's for transferring data.
Microsoft Office	St Philip's shared documents are held on here,	Yes- global cloud.
365/ OneDrive	so all staff can access them.	Relies on SCC's for transferring data.
Nine Foot One	Website hosting services.	No
Outlook Express	To send and receive personal emails from/ to church members.	Yes- connected to the global Microsoft cloud. Relies on SCC's for transferring data.
Social Media sites (Google, Youtube, Facebook, Instagram, Twitter, Whatsapp), Audio sharing sites (Spotify, Apple) and Zoom	For sharing of media identity data or personal/prayer data publicly or privately.	Yes- some data may be stored where servers are located outside of the UK. Relies on SCC's for transferring data.
Stewardship Account	To make payments to supported individuals.	No
Thirtyone: eight	Carry out Disclosure and Barring Service checks for us.	No
123- Reg Domain	Web Hosting Services.	No
	1	1



5d) Your personal data that is shared with us

From time to time, we receive information about you as the data subject from other sources. This might include:

- Other church members/regular attenders
- With relation to Safeguarding: Thirtyone: eight, Sheffield Diocese, Yorkshire Baptist Association, social services, police or other churches
- Indirectly through social media sites and your interaction with emails.
- With relation to employment or volunteering: references.

Where this is information that we are collecting with your knowledge, for example, obtaining references or a DBS check, you will receive notice of this in writing, with reference to our 'Privacy Notice', prior to collection of this data.

Where data is received from another source without your prior understanding, you will be informed in writing of this within 1 calendar month, unless a legal exemption under the UK GDPR applies.

Appendix 6-

Links to Privacy Policy of other Third Parties that we share your data with:

Partner organisations with whom we have a data sharing agreement:

Paul Horton Associates Privacy Policy: https://www.ph-fs.co.uk/privacy-policy/

Administration related:

- Atlassian Privacy Policy: (Trello): https://www.atlassian.com/legal/privacy-policy
- Dropbox Privacy Policy: https://www.dropbox.com/privacy
- Microsoft Privacy Policy: Microsoft Privacy Statement Microsoft privacy

Finance related:

- Brightpay Privacy Policy: https://www.brightpay.co.uk/pages/privacy-policy/
- CAF Bank Privacy Policy: https://www.cafonline.org/privacy
- Faithstar Privacy Policy: <u>Faithstar Privacy policy 2021.pdf</u> and <u>Finance Handling and Communicating of Client Sensitive Information 2021.pdf</u>
- Intuit Privacy Policy: Intuit UK legal notice | QuickBooks UK
- Stewardship Account Privacy Policy: https://www.stewardship.org.uk/privacy/privacy-notice

Regulatory authorities/ organisations to whom we are held accountable:

- Charity Commission Privacy Policy: https://www.gov.uk/government/organisations/charity-commission/about/personal-information-charter
- Church of England Pensions Board Privacy Policy: https://www.churchofengland.org/sites/default/files/2019-09/CEPB%20Housing%20PN-update%20sept%202019.pdf



- Diocese of Sheffield Privacy Policy: https://www.sheffield.anglican.org/privacy
- HMRC Privacy Policy: <a href="https://www.gov.uk/government/publications/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-and-customs-hold-about-you/data-protection-act-dpa-information-hm-revenue-act-dpa-informa
- Sheffield City Council Privacy Notice: https://www.sheffield.gov.uk/utilities/footer-links/privacy-notice.html
- Thirtyone: eight Privacy Notice: Privacy notice Thirtyoneeight
- Yorkshire Baptist Association: <u>1548766704.pdf</u> (<u>d3hgrlq6yacptf.cloudfront.net</u>

Internal comms and website:

- Eventbrite Privacy Policy: <u>Eventbrite Privacy Policy</u> | <u>Eventbrite Help Centre</u>
- Mailchimp Privacy Policy: Mailchimp's Privacy Policy
- Nine Foot One Privacy Policy: <u>Privacy & Cookies ninefootone creative</u>
- Zoom Privacy Policy: https://zoom.us/privacy
- 123 Reg Domain Privacy Policy: https://www.123-reg.co.uk/terms/privacy/

Appendix 7-

Privacy Notice for information supplied on your Confidential Declaration

This notice explains how the information you supply in your Confidential Declaration is used and your rights with respect to that data as required by the General Data Protection Regulation 2016/679 (the "GDPR") and the Data Protection Act 2018, (the "DPA 2018").

1. Who we are

The Charity Trustees of St Philip's Church, Sheffield are the data controller (contact details in section 7). This means we decide how your personal data is processed and for what purposes.

2. The data we collect about you

We collect your name and address as provided by you in the Confidential Declaration Form, and where applicable, relevant conduct data and/or criminal offence data (including allegations); barring data; court findings or orders.

We also collect the following information about other individuals living or employed in your household who are over 16 years old, where applicable (see section 3, headed "Purposes and lawful bases for using your personal data" paragraph 3):

• criminal offence data (including allegations); barring data; court findings or orders.



It is our expectation that you will inform these individuals that you have put their details on the CD form, and that you explain the reason for this.

3. Purposes and lawful bases for using your personal data

The overall purpose of the confidential declaration is to ensure that we take all reasonable steps to prevent those who might harm children or adults from taking up positions of respect, responsibility or authority where they are trusted by others in accordance with the Safer Recruitment: Practice Guidance (2016).

We use your data for the following purposes and lawful bases:

- 1. Appointing individuals to positions of respect, responsibility or authority where they are trusted by others.
- 2. For the Diocesan Safeguarding Adviser to conduct a risk assessment where applicant discloses information on the form.
- 3. Collect information about members of your household for the purpose of undertaking a Disclosure and Barring Service check on them if you have applied for a role where you work from home with children.

It is the legitimate interest of the Charity Trustees of St Philip's Church Sheffield, to ensure that only appropriate individuals are appointed to certain positions, as established by the Promoting a Safer Church - House of Bishops Policy Statement (2017). We also need to be assured that no member of your household poses any risk.

It is also necessary for reasons of substantial public interest in order to prevent or detect unlawful act and protect members of the public from harm, including dishonesty, malpractice and other seriously improper conduct or for the purposes of safeguarding children and adults at risk. (Safer Recruitment Practice Guidance (2016)).

Legitimate Interest Assessment

We have a specific purpose with a defined benefit	The processing is an essential part of safer recruitment, to ensure that individuals appointed to positions of respect, responsibility or authority where they are trusted by others are properly vetted and pose no risk to children, vulnerable adults or the wider public.
The processing is necessary to achieve the defined benefit.	Without processing this data, there would be no assurance that suitable individuals are being appointed.
The purpose is balanced against, and does not override, the interests,	The risk of significant harm to others if inappropriate appointments are made outweighs the low risk to individuals of disclosing the data to us.



4. Sharing your data

Your personal data will be treated as strictly confidential and will only be shared with those involved in the recruitment/appointment process and, where appropriate, the Diocesan Safeguarding Adviser. It may be shared outside the Church for the prevention or detection of an unlawful act; to protect members of the public from harm or safeguarding purposes, or as required by law, under Schedule 1, Part 1, Part 2 or Part 3 (as appropriate) of the Data Protection Act 2018, with the following:

- Police
- Children's or Adults Social services in Local Authorities
- Statutory or regulatory agencies, (e.g. the DBS)

5. Data Retention

We keep your personal data, if your application is successful, for no longer than reasonably necessary for the periods and purposes as set out in the retention table below at the following link:

https://www.churchofengland.org/sites/default/files/2017-10/Safeguarding%20Records-%20Retention%20Tool%20kit%20-Dec%2015.pdf

If your application isn't successful, your data will be held for 6 months after the recruitment process ends, and then destroyed.

6. Your Legal Rights and Complaints

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 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 object to the processing of your personal data
- The right to obtain and reuse your personal data to move, copy or transfer it from one IT system to another.



7. Complaints

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please in the first instance contact the administrator at St Philip's Church, The Stamp House, 52 Bank Street, Sheffield, S1 2DS or admin@stphilipssheffield.org.

If you do not feel that your complaint has been dealt with appropriately, please contact Katie Bell, the Diocesan secretary and data controller at Church House, 95-99 Effingham Street, Rotherham, S65 1BL, Tel: 01709 309100.

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 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.