13 July 2026

Your data and how we look after it

St James Church Data Protection Policy and Privacy Notice

Like any organisation, St James Church needs to keep a certain amount of information on the people its serves and those who work for it. This policy describes what data we keep, what your rights are to ask to see the information, have it amended if it is wrong, and have it deleted if we don't need to keep it.

The EU's General Data Protection Regulations (GDPR) came into force in May 2018 and were enacted in the Data Protection Act 2018.

This policy draws on the current guidance issued by the Information Commissioner's Office (ICO), the independent authority established to oversee data protection in the UK. Text in double quotation marks is taken directly from the ICO's online guide to GDPR, and many other phrases follow the ICO guide closely.

Website: https://ico.org.uk Telephone: 0303 123 1113.

This paper is also the "Privacy Notice" required and will be published on the church website.

1. Data Protection Policy

Our policy is to follow the guidance issued by the Information Commissioner's Office, and guidance issued by the Church of England. The latter may be found on the Parish Resources website (http://www.parishresources.co.uk/) and may be supplemented by local guidance from the Diocese of Bath and Wells as it relates to the implementation of GDPR in a parish church situation. We will avoid introducing interpretations made by third parties which are not backed up explicitly by the ICO or CofE guidance.

In essence, there are three main practical aspects to the policy:

- To maintain a record of what data we hold.
- To issue a Privacy Notice so that data subjects know their rights. (This document is that notice).
- To keep data securely to minimise the risk of it being stolen or misused.

We do not need to pay a fee to the ICO. Their guidance says "you don't need to pay a fee if you are processing personal data only for one (or more) of the following purposes … not-for-profit purposes" (https://ico.org.uk/media/for-organisations/documents/2258205/dp-fee-guide-for-controllers-20180221.pdf).

2. Lawful basis for processing personal data

Personal data can only be held if it is not possible to achieve the same purpose without it. We are also required to fulfil the requirements of one of the six available "lawful bases for processing". In our case, two of these bases apply to different types of data:

- "Legitimate Interests"

  This applies to most of the data we hold. It covers membership records of various types, the information we need to hold regarding our paid staff, and contact

details of hirers of our premises. Without this data we could not function as an organisation.

- "Consent"

  This applies to contact data we hold for people who are not regular members.

  The prime instance here is when people give us their contact details for baptisms, weddings and funerals, or because they are prospective members. We include a 'consent' tick box on the form we use to collect contact details to remove any ambiguity as to whether this information is being held under the "consent" basis or the "legitimate interests" basis.

  It also covers membership of our Facebook groups, where, while most of the group members are also church members, there could also be 'fringe' members who are interested but do not otherwise attend church activities. Similarly, it would apply in future should we establish, for example, an email mailing list on our website for sending out the bulletin or other information to 'fringe' contacts.

"Special Category Data"

GDPR requires extra protection for "special category data". We do not explicitly hold such data, which is defined as information on "race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation." However, a church database could be regarded as implicitly recording the religion of those in it. We therefore need to declare that the relevant "condition" for holding this data is:

> "(d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects".

Disclosure

We do not disclose any of our personal data records to third parties.

Criminal Conviction Data

When a Disclosure and Barring Service (DBS) check is made, the only data we keep is the certificate number and the date on which it was sighted.

If more complex safeguarding matters arise, these are handled according to current Church of England procedures.

Children

The Data Protection Act 2018 sets at 13 the age at which a child can give consent to the holding of their personal data. Nevertheless, we would not normally hold data for any minor without the consent of their parent or guardian.

3. "Data Controller"

The PCC is the official custodian of the data held by the church. Any requests to access data should be made to the PCC Secretary, who will then pass them on to the officers who hold the relevant records.

If you wish to check something straightforward, such as that we hold your current email address, or you spot a spelling mistake somewhere, please ask the church office directly.

The vicar is also an official custodian of records relating to pastoral work they undertake. Any requests to access this data should be made to the vicar.

In practice, the vicar and PCC are joint data controllers, because they operate together.

If you think that you are being obstructed from accessing personal data referring to you, you should contact the Information Commissioner's Office (ICO) - see above.

4. Individual Rights

The GDPR provides the following rights for individuals:

- The right to be informed: providing "fair processing information", typically through a privacy notice. The document you are reading is that notice.
- The right of access: to allow you to be aware of and verify the lawfulness of what we do.
- The right to rectification: personal data can be rectified if it is inaccurate or incomplete.
- The right to erasure: you can request the deletion or removal of personal data "where there is no compelling reason for its continued processing."
- The right to restrict processing: you can block the processing of personal data. But please bear in mind that this could exclude you from being contacted or informed about any matter connected with your membership of the church.
- (The right to data portability: this is not relevant because there are no data sharing services that we might wish to join.)
- The right to object: you can ask us to stop using your data if you have an objection on "grounds relating to his or her particular situation". This might, for example, occur if another member of your household objects to you receiving letters from us.
- (Rights in relation to automated decision making and profiling: this is not relevant because we do not carry out these activities.)

Details of all records are held in a Data Catalogue. This may be inspected by data subjects on request. It is not published because it includes details of where the data is held.

5. How we use your data

The data we hold for non-members is for contact purposes only.

All of the data we currently hold about church members is used to manage various aspects of church membership. The definition of membership in a Church of England parish is ambiguous, because people may (a) be on the Electoral Roll, and/or (b) attend services regularly, and/or (c) participate in the Planned Giving Scheme. In some cases, any of these qualifiers may be absent. In practice, inclusion on any one of these records indicates membership of St James Church.

Our Church membership database holds names, addresses and telephone numbers, also dates of birth for those under 18. It shows what posts each individual currently holds and records the associated safeguarding information – mainly as dates. The database also records membership of homegroups and other groups.

The Electoral Roll is a legal document as prescribed by the Church Representation Rules. It is a simple list of names and addresses. When it is required to be published, only names are displayed.

The records held by our Planned Giving Officer include financial contributions made to the church, so their distribution is limited to the PGO and the Treasurer only.

The church has various Facebook groups. Membership records are handled through standard Facebook procedures, including the option to leaving a group.

The church's YouTube channel is governed by standard YouTube policies. We do not have access to any personal data about individual subscribers to the channel.

We do not share personal data with any third party, including the diocese or the central organisation of the Church of England.

6. Keeping your data securely

We strictly control access to digital records, whether these are held on the church computer, or held by specific church officers off site.

The Church Membership database is held on a software package called ChurchSuite. This is fully maintained commercial software specifically for uses by churches, and conforms to all GDPR and safeguarding requirements. Church officers who have a need to access the database can do so remotely under controlled access. When reports are produced for other church officers, they are advised to avoid printing these reports if at all possible, and to store any such printouts under lock and key.

In practice, it is not practical to keep all records in the church office and nowhere else, because most officers and other leaders carry out church work primarily in their homes. We have established procedures for handling sensitive data that is held off-site.

The Data Catalogue outlines the security arrangements for each type of record.

7. Annual Review Process

This Data Protection Policy is reviewed annually by the PCC. This is prompted by its inclusion on the schedule of annual business in the PCC Standing Orders.

The review should include checking that each of the types of records in the Data Catalogue are being handled according to the stated procedures listed above.

It should also include consideration of any new types of record that may have been created during the year, and whether due regard has been paid to the lawful basis for processing such data.

The review should check that for each type of record the following details are correct:

- Summary description
- How it is held
- How it is protected
- Where it is held
- Who keeps it up to date
- Who else has access to the master version
- How copies are distributed and protected
- How long the data is retained
- How backups are managed
- Action items.

Version control

14 May 2018	First edition approved by the PCC.
9 September 2019	Updated references to Data Protection Act 2018.
13 July 2020	Updated for transfer of membership database to Church Suite.
12 July 2021, 11 July 2022	Minor clarifications.
10 July 2023, 8 July 2024, 14 July 2025	Reapproved, no amendments.
13 July 2026	Section2 – data held – added number of DBS certificate.

■