

The Grouped Parishes of Sandford and St Philip's Milltown

DATA PROTECTION POLICY

1. Introduction

This Policy sets out how personal data is collected, stored, disclosed and erased by the Grouped Parishes of Sandford and St Philip's Milltown (the "**Parishes**").

This Policy was developed by a sub-committee of both Select Vestries. It was then presented to, and ratified by, both Select Vestries in connection with the coming into force of the General Data Protection Regulation (known as the "**GDPR**") in Ireland on 25 May 2018.

The Parishes are, together, a "**data controller**" for the purposes of the GDPR. This means that the Parishes decide why personal data is collected, and how it is processed (i.e. how it is then stored, disclosed and erased).

2. Aims of the Policy

The Parishes have legal obligations under the GDPR. The aims of this Policy are:

- to ensure that the Parishes comply with the GDPR;
- to ensure that the rights of those whose personal data is held by the Parishes are protected; and
- to ensure that the Parishes observe the seven key principles of the GDPR:
 - that personal data is processed in a transparent manner;
 - that personal data should only be processed for the purpose(s) for which it was collected (and for closely related purpose(s));
 - that personal data is only collected if it is necessary and relevant to do so;
 - that personal data be accurate and up-to-date, and that steps are taken to ensure that inaccurate data is fixed or erased;
 - that personal data is only kept for so long as needed, having regard to the purpose(s) for which it was collected (subject to limited exceptions);
 - that security measures be put in place to protect personal data; and
 - that data controllers (such as the Parishes) be able to show compliance with their obligations under the GDPR.

3. What personal data is held by the Parishes?

The Parishes may collect, use, store and transfer different kinds of personal data and use it for a variety of different purposes.

This personal information may include name, address, email address, and telephone number.

In some cases (including, for example, for the purposes of Garda vetting for specific roles, in connection with employment contracts, for the purposes of completing tax rebate forms, for the purposes of carrying out baptisms, marriages, confirmations, funerals, and burials, for the purposes of carrying out the ministry of the Church, and for the purposes of maintaining lists of volunteers for jobs and committees around the Parishes), this personal information could also include date of birth, PPS number (or an equivalent number), marital or family status, nationality, identification information (such as a driving licence or passport), occupation/skills,

income, information on physical or mental health, information on religious or philosophical beliefs, information on political opinions, and information on criminal convictions/offences).

Furthermore, it may include images from the CCTV cameras located at St Philip's Church, and at the Rectory.

The Data Protection Sub-Committee (see details at the end of this Policy) maintains a table setting out:

- the records kept by the Parishes;
- where those records are kept, and how they are kept securely;
- who has a copy of those records, or can otherwise access them;
- the personal data that forms part of those records; and
- how long each of those records is kept for.

If you would like further information on the personal data held about you by the Parishes, please contact the Data Protection Sub-Committee.

4. Why is that personal data collected?

The Parishes collect personal data for one or more of the following reasons:

- to enable the Parishes 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 Parishes;
- to manage the Parishes' employees and volunteers;
- to maintain the Parishes' accounts and records (including the making of payments and the processing of tax rebates);
- to inform parishioners and others who have provided their contact details to the Parishes of news, events, activities and services running in the Parishes, or relevant Diocesan events; and
- to enable the Parishes to comply with their legal and regulatory obligations, Diocesan requirements, and any requirements imposed by the Parishes' insurers, and to defend any legal claims.

5. How do the Parishes comply with the seven key principles of the GDPR?

5.1 Transparency

The Parishes have a Data Privacy Notice dealing with the GDPR, which is available on the Parishes' website, on request, and on the noticeboards in both churches.

The Parishes use Consent Forms, which require a person's express consent to the Parishes contacting them by telephone, by post or by email. These forms make it clear that, if the person consents to being contacted in a particular way (i.e. telephone, post, or email), the Parishes will use that method of communication to keep in contact with them in relation to future events and other church news, activities or services (and, in the case of parishioners, relevant Diocesan events). The forms

also make it clear that a person who has completed a form can withdraw his/her consent at any time by contacting a member of the Parishes' Data Protection Sub-Committee (the current members of that Sub-Committee are listed in the Data Privacy Notice and at the end of this Policy) (except in very limited situations e.g. where the Parishes are required by law to use that person's personal data).

All other lists maintained by the Parishes are bespoke and the personal data on those lists will have been provided for that bespoke reason. For example:

- there are specific consent forms for each list relating to children, such as the lists for each Sunday School, the Garden Gang, the Confirmation Group, and the Choral Scholars;
- each member of each Select Vestry confirms (annually) their contact email address to the Hon. Secretary of the relevant Select Vestry;
- those who wish to be entered in either Register of Vestry Members provide their contact details for that specific purpose;
- those who wish to volunteer for various jobs and committees around the Parishes must tick a box which expressly indicates their wish to volunteer for those roles, and provide both their email address and telephone number. They are also given the option to provide details of any particular skills that they have which they are happy to offer to the Parishes. That information is given to the relevant parishioner(s) who coordinate(s) those jobs or committees, and are added to the relevant General Parish List(s);
- those who wish to be added to other lists (including the Choir, Choral Union, Sandmillers, and Sandmill Strollers) must either approach the relevant person(s) in charge directly (information on those areas is likely to have been included in the emails sent to those whose details are on the relevant General Parish list); and
- information is provided when baptisms, marriages, confirmations, funerals, and burials are being arranged.

If a person indicates that he/she wishes to withdraw his/her consent, then that person must contact a member of the Parishes' Data Protection Sub-Committee, and the Sub-Committee will arrange for that person's data to be removed from lists on which it appears, provided that the Parishes do not otherwise need to retain that personal data to comply with legal, regulatory or insurance obligations.

5.2 Purpose

The persons whose personal data is collected are made aware of the reason for its collection. The reasons for the collection of personal data are also set out in the Data Privacy Notice.

5.3 Minimum Data

Personal data sought by the Parishes from any individual is adequate and necessary for, and relevant to, the purposes for which it is collected.

5.4 Accuracy

The lists maintained by the Parishes are periodically reviewed to ensure their accuracy.

Those who are in charge of each list are asked to check it annually for any obvious inaccuracies.

Data access request

The Data Privacy Notice confirms that, if a person wishes to submit a data access request, they must use the form of data access request available on the GDPR section of the website of the Representative Church Body here: <https://www.ireland.anglican.org/parish-resources/501/general-data-protection-regulation-gdpr#section-501>. That form should be posted to The Data Protection Sub-Committee, c/o The Rectory, Sandford Close, Ranelagh, Dublin 6, or sent via email to a member of the Parishes' Data Protection Sub-Committee. If a data access request is received, the following steps must be taken:

- **Step 1:** the member of the Data Protection Sub-Committee who receives the request must send a copy of it to the other members of that Sub-Committee, and the Sub-Committee will discuss how best to respond;
- **Step 2:** compliance with the request must be managed by the Data Protection Sub-Committee, and that Sub-Committee will acknowledge receipt of the request to the person from whom it was received;
- **Step 3:** the Data Protection Sub-Committee will:
 - validate the identity of the person from whom the request was received;
 - check whether additional information is needed from that person to enable the request to be processed;
 - log receipt of the request;
 - check what information is held about that person;
 - gather that information/identify where that information is kept;
 - keep the person from whom the request was received updated on the progress of the response;
 - check whether any exemptions are relevant;
 - collate all information held about that person;
 - agree what information is to be provided, and whether any information needs to be redacted in accordance with any applicable law;
 - approve the response to the request;
- **Step 4:** within one month, the person from whom the data access request has been received must be provided with a copy of the personal data held by the Parishes about him/her, details of the purpose(s) for which that data is held, details of those to whom that data has been disclosed, and how that data was obtained (subject to any exemptions).

Rectify inaccurate data

If a request is received to rectify inaccurate personal data, the Data Protection Sub-Committee will ensure that this request is logged, acknowledged promptly, that lists are checked for any inaccuracies and rectified, and the requester is notified that any inaccuracies have been rectified.

Right to be forgotten

In certain cases, a person will have the right to have their personal data erased without undue delay. However, while that right applies to both hard copy and soft copy records, it is not an absolute right and the Parishes will not be required to comply with such a request if they have a lawful basis for retaining that personal data. If such a request is received, it will be logged and acknowledged promptly, and if the Parishes are required to comply with it, the erasure of the personal data will be managed by the Data Protection Sub-Committee.

5.5 **Duration of Storage**

The lists referred to in paragraph 5.1 above are periodically reviewed to ensure that the personal data for each individual on that list is not being held for longer than the relevant retention period.

In deciding the length of time for which personal data is held, we proceed in accordance with the Retention Policy developed by the Representative Church Body. That Retention Policy is available on the GDPR section of the Representative Church Body's website: <https://www.ireland.anglican.org/parish-resources/501/general-data-protection-regulation-gdpr#section-501>.

Those who are in charge of each list are asked to check it annually for any obvious inaccuracies.

5.6 **Confidentiality and Integrity**

All computers and mobile phones on which those lists are held are password protected. Those who hold each list are asked to confirm that the computers and phones on which that information is held are password protected.

Back-up copies of the lists that are held on computers are held on computers that are password protected.

All lists kept in hard copy in the Rectory are kept in a safe.

All persons that hold lists referred to in paragraph 5.1 above have been made aware of their obligations in relation to the processing of personal data arising from the GDPR.

Data Breaches

A data breach is an event that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data.

If a data breach occurs, the following steps must be taken immediately:

- **Step 1:** the person who becomes aware of the breach must email a member of the Data Protection Sub-Committee.
- **Step 2:** the Data Protection Sub-Committee must contact the Data Protection Officer of the Representative Church Body of the Church of Ireland – contact details as follows: Rebekah Fozzard, Representative Church Body, Church of Ireland House, Church Avenue, Rathmines, Dublin 6, D06 CF67 (Rebekah.fozzard@rcbdub.org).
- **Step 3:** if the breach involves a risk to the person whose data is affected (such as the risk of identity theft), the Data Protection Sub-Committee must notify the Data Protection Commissioner within 72 hours - contact details as

follows: E-Mail - dpcbreaches@dataprotection.ie; Phone - 1890 252231 (local); 057 8684800.

- **Step 4:** if the breach involves a high risk to a person whose data is affected, that person must be notified without delay by the Data Protection Sub-Committee.

5.7 Accountability

To ensure compliance with the GDPR, the Parishes took the following steps:

- developed a Data Privacy Notice, this Policy, the table of all lists held by the Parishes, and new Consent Forms;
- circulated GDPR-related information provided by the Representative Church Body of the Church of Ireland to both Select Vestries;
- informed all parishioners (via the SandMill News and the Parishes' website and by email) of the steps taken by the Parishes to ensure compliance with the GDPR, and of their rights under the GDPR;
- took steps to ensure that consents are on file for those on the lists held by the Parishes;
- put in place a process for dealing with data access requests, and requests to have inaccurate data corrected;
- put a procedure in place to deal with data breaches; and
- put in place a log of all GDPR-related activity (i.e. access requests, data breaches etc.).

6. Review

This Policy will be reviewed in Q1 of each year by the Data Protection Sub-Committee and both Select Vestries.

The Data Protection Sub-Committee currently comprises:

Julie Davenport (St Philip's Select Vestry)

E-mail: julesrdavenport@gmail.com

Maedhbh Erwin (Sandford Select Vestry)

E-mail: maedhbherwin@gmail.com

The Revd Canon Sonia Gyles, The Rectory, Sandford Close, Ranelagh, Dublin 6

E-mail: sandford@dublin.anglican.org