



PARISH GIVING SCHEME

Data Protection Policy

1 Key Details

- * Policy prepared by: John Preston.
- * Approved by board / management on: 1st March 2017
- * Policy became operational on: 1st April 2017
- * Next review date: 1st March 2019.

2 Introduction

The Parish Giving Scheme needs to gather and use certain information about individuals. These can include donors, parish contacts, diocesan contacts, suppliers, employees and other people the charity has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

3 Why this policy exists

This data protection policy ensures the Parish Giving Scheme:

- * Complies with data protection law and follows good practice
- * Protects the rights of staff, customers and partners
- * Is open about how it stores and processes individuals' data
- * Protects itself from the risks of a data breach

4 Data Protection Law

The Data Protection Act 1998 describes how organisations — including the Parish Giving Scheme— must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Be processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

5 Policy Scope

This policy applies to:

- * The head office of the Parish Giving Scheme

- * All trustees, staff and volunteers of the Parish Giving Scheme
- * All contractors, suppliers and other people working on behalf of the Parish Giving Scheme

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- * Names of individuals
- * Postal addresses
- * Email addresses
- * Telephone numbers
- * ...plus any other information relating to individuals

6 Data Protection Risks

This policy helps to protect the Parish Giving Scheme from some very real data security risks, including:

- * Breaches of confidentiality. For instance, information being given out inappropriately.
- * Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- * Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

7 Responsibilities

Everyone who works for or with the Parish Giving Scheme shares the responsibility for ensuring data is collected, stored and handled appropriately and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- * The Board of Trustees is ultimately responsible for ensuring that the Parish Giving Scheme meets its legal obligations.
- * The CEO is responsible for:
 - Keeping the board updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Addressing any data protection queries from journalists or media outlets like newspapers.
- * The Head of Operations is responsible for:
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to see the data the Parish Giving Scheme holds about them (also called 'subject access requests').
 - Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Ensuring that regular checks and scans are carried out to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services.
 - Approving any data protection statements attached to communications such as emails and letters.

8 General Staff Guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required beyond the normal work processes, employees can request it from their line managers.
- The Parish Giving Scheme will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the Parish Giving Scheme's data security policy.
- Personal data should not be disclosed to unauthorised people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the Head of Operations if they are unsure about any aspect of data protection.

9 Data use

Personal data is of no value to the Parish Giving Scheme unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft. So:

- * When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
- * Bulk transfer of data must be encrypted before being transferred electronically.
- * Personal data should never be transferred outside of the European Economic Area.
- * Employees should not save copies of personal data to their own computers; employees should always access and update the central copy of any data.

10 Data accuracy

The law requires the Parish Giving Scheme to take reasonable steps to ensure data is kept accurate and up to date. The more important it is that the personal data is accurate, the greater the effort the Parish Giving Scheme should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible:-

- * Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- * Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- * The Parish Giving Scheme will make it easy for data subjects to update the information the Parish Giving Scheme holds about them. For instance, via the PGS website. Any instructions to change personal data received over the telephone are actioned immediately, those received by Email, letter or through the website will be actioned within 3 working days.
- * Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.

11 Subject access requests

All individuals who are the subject of personal data held by the Parish Giving Scheme are entitled to:

- * Ask what information the company holds about them and why.
- * Ask how to gain access to it.
- * Be informed how to keep it up to date.
- * Be informed how the company is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, sent to ceo@parishgivingscheme.org.uk The Parish Giving Scheme is the data controller, and can supply a standard request form, although individuals do not have to use this.

The Parish Giving Scheme will aim to provide the relevant data within 14 days, and in any event will do so within 40 days. The Parish Giving Scheme as data controller will always verify the identity of anyone making a subject access request before handing over any information.

12 Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, the Parish Giving Scheme will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Board and from the company's legal advisers where necessary.

13 Providing information

The Parish Giving Scheme aims to ensure that individuals are aware that their data is being processed, and that they understand:

- * How the data is being used
- * How to exercise their rights

To these ends, the Parish Giving Scheme has a privacy policy, setting out how data relating to individuals is used by the company.