



Fleet & Crookham Churches Together in Schools

Privacy Policy

Introduction

This policy sets out how and why FACCTS obtains, uses and protects personal information.

FACCTS' aims are, in brief, to offer Christian education and promote the Christian faith in local schools. We want to be completely transparent about why we need the personal details we request when you communicate with us and how we will use your data.

Personal Data – How is it governed?

The processing of personal data is governed by the General Data Protection Regulation (GDPR) 2016/679 effective 25th May 2018.

GDPR Terms

- **Personal data** is information about a living individual which is capable of identifying that individual eg name, address, telephone number, email address, photo including on any digital media etc. This may include sensitive personal information – see below.
- **Processing** is anything done with/to personal data e.g. including storing it, putting it into a rota or home group list.
- The **data subject** is the person about whom personal data is processed.
- The **data controller** is the person or organisation who determines the how and what of data processing

Who are we?

FACCTS acts as its own Data Controller and is responsible to you for how we process your data and for what purposes.

Where do we hold data?

The majority of data we hold is contact information - names, email addresses, mobile phone numbers. This, and other, data is held mainly on the desktops or personal devices of schoolworkers, directors and volunteers. For business continuity reasons, some documents are held in the cloud on services such as Microsoft's OneDrive and Dropbox. A limited amount, mainly accounting information, is held on paper. We include visual images on our Facebook pages. All data will always be treated in accordance with our Data Protection Policy and this General Privacy Notice.

How do we collect and process data?

In the course of our work, we may collect and process information (personal data) about many different people (data subjects). This includes data we receive straight from the person it is about, for example, where a volunteer provides their contact details. We may also receive information about data subjects from other sources including, for example, previous employers or contacts for references.

We process personal data in both electronic and paper form and all this data is protected under data protection law. The personal data we process can include information such as names and contact details, employment details, bank details (where relevant), together with visual images of people.

At any point, you can withdraw your consent for us to store or process your data (please see "Your rights and your personal data" below).

We do not hold types of information that are called "**special categories**" of data in the GDPR, also known as sensitive personal information.



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We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is an overarching safeguarding requirement to process this data for the protection of children and adults who may be put at risk through our work. This processing will only ever be carried out on advice from the responsible Safeguarding director.

What is the legal basis for processing your personal data?

The purpose for the processing data must be lawful, transparent and fair.

Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the GDPR, is met:

- a) the processing is **necessary for a contract** with the data subject;
- b) the processing is **necessary for us to comply with a legal obligation**;
- c) the processing is necessary to protect someone's life (this is called "**vital interests**");
- d) the processing is necessary for us to perform a task in the **public interest**, and the task has a clear basis in law;
- e) the processing is **necessary for legitimate interests** pursued by FACCTS or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject.
- f) if none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear **consent**

How do we process your personal data in FACCTS?

Most of the personal data held by FACCTS is processed because it is necessary for our legitimate interests. In addition, we have sought and obtained consent from those receiving updates and information for prayer.

Some of our processing is:

- necessary for compliance with a legal obligation, e.g. tax
- necessary for carrying out obligations under employment and social security law.

We use your personal data for some or all of the following purposes:

- To communicate between directors, schoolworkers and volunteers;
- To communicate with local schools e.g. to arrange Christmas and Easter presentations;
- To communicate with partners such as Scripture Union and Open The Book;
- To repay expenses incurred on behalf of the charity;
- To manage our employees and to meet our legal obligations concerning them;
- To carry out safeguarding procedures (such as DBS checks and training) in accordance with our safeguarding policy to ensure that children attending one of our activities are kept safe;
- To process a donation that you have made and, if relevant, to include that donation in our Gift Aid claim
- To send you updates and information for prayer;
- To process an application for a role;
- To promote the work of FACCTS on our Facebook pages;
- To maintain our own accounts and records in accordance with the requirements of the Charity Commission;

Where your information is used other than in accordance with one of the legal bases (above), we will first obtain your consent to that use.



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Sharing your personal data

Your personal data is treated as strictly confidential. It will only be shared with other members of the FACCTS community for the purposes described above.

We use an outside body, which is GDPR compliant, to operate our payroll. Other than that, we will only share your data with third parties, outside of FACCTS, with your consent or where we are required to do so by law. Our Independent Examiner has the right to view but not retain any record they choose.

How do we keep data up to date?

We are reliant on those we communicate with to ensure that their contact details are up to date.

How long do we keep your personal data?

We keep data in line with our policy for data retention, a copy of which is available by emailing office.faccts@gmail.com.

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

How do we secure your personal data?

We require all those holding personal data to password protect their personal devices.

How will we handle a data protection breach?

Where staff, members or volunteers think that our policy has not been followed, or data might have been breached or lost, this will be reported **immediately** to the Project Co-ordinator, currently Will Parker.

We will keep records of personal data breaches, even if we do not need to report them to the Information Commissioners Office (ICO).

We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when someone in FACCTS becomes aware of the breach. In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient.

Your rights and your personal data

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 request.



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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 restrict or 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 withdraw your consent to the processing, at any time, for any processing of data to which consent was sought.

You can withdraw your consent to the processing of your data by telephone, email, or by post (see Contact Details below).

6. 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.

7. The right to lodge a complaint with the Information Commissioner's Office

If you believe that the church has not handled your personal data in accordance with data protection law you can complain to the ICO – contact details below.

What if we need to do further processing?

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

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at: The Project Co-ordinator, FACCTS, c/o Fleet Methodist Church, Reading Road South, Fleet, Hampshire GU52 7TF. Email: office.faccts@gmail.com.

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

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