

# DATA PRIVACY STATEMENT

Trinity United Reformed Church, London Road, High Wycombe HP11 1BJ



## 1. Personal data

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the 'GDPR').

## 2. Data Controller

The eldership (serving elders) of Trinity United Reformed Church is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

## 3. How do we process your personal data?

The eldership of Trinity United Reformed Church complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use personal data for the following purposes: -

- to administer membership records;
- to celebrate birthdays and share pastoral care and concern
- to maintain our financial accounts and records (including the processing of gift aid);
- to provide news and information about events, activities and services at the church;
- to fundraise and promote the interests of the church;
- to manage employees and volunteers;
- to enable the church to provide voluntary services for the benefit of the public in our local community;
- to manage hire of the building and contact with hirers and users
- to provide contact details of officers and others with specific responsibilities (eg DBS signatories) to the synod office and Church House. This enables the synod and national administration of the United Reformed Church.
- to record CCTV images, stored normally for up to three months, to prevent crime against the building; to make visitors, volunteers and staff safer; and to allow us to monitor contractual compliance with our lettings agreements (see separate CCTV policy)
- to livestream and/or record our weekly worship onto YouTube or other media platforms  
*(note: there are ways to still be involved in such worship but not be visible or audible)*

## 4. What is the legal basis for processing your personal data?

- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
  - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
  - there is no disclosure to a third party without consent; or
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement; or
- Explicit consent of the data subject has been given.

## 5. Sharing personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties with your consent.

## 6. How long do we keep data?

We retain data on the following basis:

Record Type	Retention Period*
1. Membership rolls	Indefinitely
2. Members, adherents and friends contact details	24 months after the last contact
3. Junior Church roll	until the child/young adult reaches the age of 18.
4. Junior Church contacts	24 months after the last contact
5. Cradle roll	Indefinitely
6. Gift aid declarations and paperwork	6 years after the calendar year to which it relates
<b>7. Marriage Schedule information</b>	As required by the Registrar General
8. Register of Baptisms	Indefinitely
9. Register of Funerals	Indefinitely
10. Grave Records	Indefinitely
11. Personal data relating to events for which additional information is gathered eg Church holidays	Disposed of immediately after the event unless anything has occurred (eg an accident) which indicates that records should be retained for a longer period.
12. Records of attendance of children/young people and helpers	Indefinitely for safeguarding purposes
13. Photographs and videos of events <b>and services</b>	Normally not less than 24 months after the event – selected items retained for historical records.  <b>Note:</b> Images that are “published” including YouTube video streams may be available and in the public domain longer if copied, downloaded or reposted by a third party. Whilst Trinity can remove a stream once published we are unable to “delete” a video/image that has been republished.
14. Insurance Records	Indefinitely
15. Safeguarding matters	Indefinitely or until advised otherwise by authorities
16. Accident Books	3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 18)
17. Complaints (non -safeguarding)	3 years after resolution of complaint (unless further action is anticipated)
18. Minute Books	Indefinitely
19. Employee Records	6 years after the date of termination of employment
20. Pension Records (money purchase)	6 years after transfer or value taken
21. Visitors Books	N/A

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\* Retention periods shown are for illustration only. The Church must determine its own retention periods to meet its own need and statutory compliance.

22. CCTV images	Three months unless images are to be used as evidence in a police investigation. (Images resulting in a conviction are required by law to be kept securely for the duration of the sentence, which could be more than 20 years.)
23. Worship services on YouTube or other social media	Indefinitely or within time limits requested by copyright holders of hymns. (see point 13)

## 7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of the personal data which Trinity United Reformed Church holds about you (a Subject Access Request or 'SAR');
- The right to request that the eldership of Trinity United Reformed Church corrects 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 Trinity United Reformed Church to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provide you with your personal data and where possible, to transmit that data directly to another data controller.
- 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 personal data;
- The right to lodge a complaint with the Information Commissioners Office.

## 8. Further processing

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

Trinity will periodically seek renewed consents for the personal data it holds and processes.

## 9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Church Secretary at Trinity United Reformed Church, London Road, High Wycombe HP11 1BJ ([secretary@trinity-urc.org.uk](mailto:secretary@trinity-urc.org.uk)).

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.

The Elders  
Trinity United Reformed Church  
Reviewed and updated March **2023**