



The Parish of Sutton with Seaford

St Leonard's and St Luke's Churches

Our Data Protection Policy

The General Data Protection Regulations will come into force in May 2018 and the parish intends to show and provide evidence that it is aware of, understands and complies with them. Review of data held by the parish will be carried out regularly, in line with renewal of the electoral roll.

In order to demonstrate an understanding of the underlying principles, the parish will show that data will:

- be processed lawfully, fairly and transparently;
- be only used for the specific purpose for which consent has been given;
- be accurate and where necessary kept up to date;
- not be stored for longer than necessary and that storage is safe and secure.

Lawful process of data – will depend on specific consent and the processing must be a “legitimate activity” relating to members or former members with whom there is regular contact and must not be disclosed to third parties without consent.

Consent – must be freely given, specific, informed, unambiguous and able to be withdrawn. How and when consent was given must be recorded and capable of review over time. Consent must be clear, explicit and positive and there must be a set procedure for withdrawal which is as simple as giving it. Right to withdraw consent must be notified at the time when it is granted. Consent may not be appropriate in circumstances of informal arrangements such as readers and after-service tea and coffee rota.

Accuracy – there will be a right to be informed about “fair processing” of information by a privacy/data protection notice giving details of identity of users and nature of use to which data is put. Individuals may access their own information to assess accuracy and there will be a right to rectify data (including notifying third parties to whom data given) and also a right to erasure of all information held by specific request provided that purpose for which information held is no longer necessary.

Data security breaches – this means breaches resulting from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. The Information Commissioners Office must be informed along with individuals affected by the breach within 72 hours of discovery. The parish will seek advice from the diocesan registrar about suspected breaches without delay. Details of the scope, cause and nature of the breach together with planned mitigation actions will be provided to the ICO.

Signed (PCC Chairman).....(dated).....

Signed (Data Protection Officer).....(dated).....