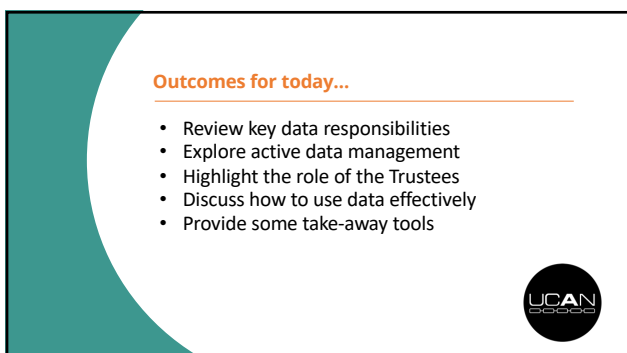
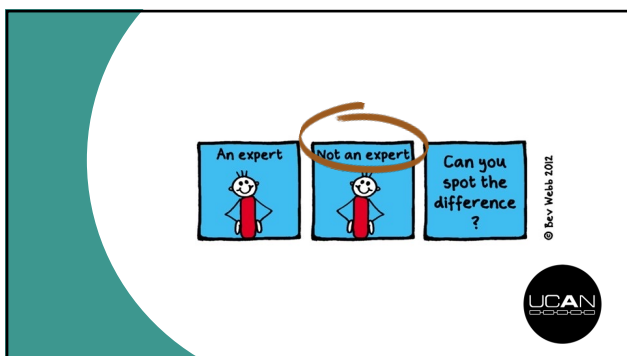


1



2




3

Principles of Data Protection / GDPR


- Lawfulness, fairness and transparency (why and how)
- Purpose limitation (for what)
- Data minimisation (avoid duplication)
- Accuracy (up-to-date)
- Storage limitation (retention)
- Integrity and confidentiality (security)
- Accountability (assurance/governance)

ico.org.uk




4

Data ownership



"It's my data.....
and I'll cry if I want to..."

Image from Disney's Finding Nemo




5

Individual Rights

- Understand what data the church holds about them and how it is being used
- See the information and get their own copy of it to use however they want
- Correct the information if it is wrong
- Ask for it to be deleted or limit how it is used
- Complain if they don't like what the church is doing with their data.


ncvo.org.uk



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The Church and Data


- Understand the 'why'
- Document the 'how'
- Only use it for 'the what'
- Centralise and avoid duplication
- Review regularly and keep up-to-date
- Don't retain for longer than needed
- Store securely
- Create accountability around data



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Commons Mistakes

- Cc'ing instead of bcc'ing
- Adding people to WhatsApp without consent
- Live-streaming and use of photos
- Printed details in newsletters, directories, or on notice-boards
- Lack of security on digital files and systems
- Keeping data for too long



8

Why?


- Legal basis:
 - Legitimate interest (running your charity, meeting charitable purposes)
 - Consent
 - Fulfil a contract – event or course booking
 - For compliance / statutory obligations
 - Sensitive 'religious' information



9

Why?


- Without data:
 - Harder to pay attention to results
 - We become slaves to hearsay and anecdotal reflection



10

How?


- Create and maintain a data register or Information Asset Register.
 - Where is your data stored?
 - Systems, filing locations, physical locations etc.



11

How?


- Choose systems which are:
 - Secure
 - User customisable permissions
 - Centralised and accessible
 - Multipurpose to minimise duplication



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What?

- Use it for the purpose it was gathered
- Don't use it for marketing or fundraising unless you have permission
- Use it 'well' to help you fulfil your aims.
 - Engagement levels / building community
 - Pastoral care
 - Effective discipleship
 - Risk Management



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Centralise and avoid duplication



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Review regularly


- Annual data audit
 - Review asset register
 - Review personal data
 - Who? and why?
- Self-service apps



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Retention


- Retention Guidelines
 - Common sense
 - Usefulness
 - appropriate
 - Statutory requirements
 - Consistent and followed
- <https://www.churchofengland.org/about/libraries-and-archives/records-management-guides>



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Security - Digital


- Passwords (and password policies)
- 2FA
- Own devices
- Portable media
- Shared cloud storage
- User permissions



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Security - Physical


- Visible monitors
- Printed lists and documents
- Locked filing cabinets
- Discreet office space



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Create accountability

- You don't need a DPO but a designated trustee is helpful
- Their role to seek assurance
- Monitor an audit trail of compliance
- Check procedures are being followed
- Things happen when people ask (and check-up)



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Within the past 12 months


- Data audit and 'cull'
- Revision of documentation – still accurate?
- Recording activity 'audit trail'
- Training or 'know-how' reminders
- New inductions
- Documenting any breaches



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Don't forget


- Live-Streaming
- CCTV
- Photographs and video



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What documentation should you have?


- Data Protection policy and Privacy statement. Referenced on web and easily found
- Information Asset register with responsible persons and retention guidelines.
- Record of any data audits



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What documentation should you have?


- Data breach procedure
- Record of data breaches – ideally not empty!
- Subject Access Request procedure
- Record of SARs
- Other policies are appropriate – CCTV, Live Streaming etc.



23

Using Data well


- From anecdote to evidence – pay attention to results
- Monitor engagement
- Track progress
- Prevent people from being overlooked
- Facilitate cohesive team



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Take-away tools

- UCAN Nov23 Pack
 - Privacy statement and policy
 - Asset Register & Audit
 - Data Breach procedure
 - SAR procedure
 - List of Appointed Persons



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Further guidance

- ico.org.uk
- www.ncvo.org.uk



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