



**Kemnay Parish**  
Church of Scotland

## Kemnay Church Data Protection Handling Procedure

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## Introduction

In order to function, Kemnay Parish Church has nominated people who manage personal data to discharge their duties. This document provides an overview of the procedure for data handling that the church has agreed. All data stored and processed must remain accurate and where the data is personal must be processed according to the UK and EU data 8 protection principles as listed in the Kemnay Parish Church Data Protection Policy.

Data handlers (users) will be allocated a church O365 domain account which has been configured to meet the requirement of their duties. In the event that a user is unable to access this system, arrangements will be made through the church office to provide access by producing up to date printed copies of the data as necessary.

Any church data handlers will be required to sign a declaration that they understand the principle of data protection and agree to adhere to this Data Handling Procedure.

All matters of concern must be addressed to the Church Data Protection Officer.

## What data will be held?

Data handlers will be required to confirm in writing the data required in order to function. These details will be reviewed by the Church Data Protection Officer to identify any sensitive data. We may be required to report this information to the Data Controller for Gordon Presbytery. An appropriate O365 Group will be created to hold the approved data. The data handlers will then be given the necessary access to record and maintain the data.

## How will the data be collected?

Any personal data needed will be collected from the data subjects by asking them to fill in a form (paper or electronic) which will include a statement about what data is being collected and how it will be processed. There will also be provision for the subject to confirm their dated and signed consent for the church to hold the data and use it in the execution of its own business. The statement will include a commitment that the church will not pass the data provided on to any other individual or body unless specifically required in the discharge of its duties or for legal purposes. Paper submissions will be scanned and archived digitally in O365 and original copies retained in a secure cabinet.

Any data collected prior to the introduction of this procedure will be shared with the data subjects when they will be required to confirm its accuracy and provide consent for its storage and use. The Church will endeavour to complete this process within one year of the introduction of this procedure.

## How will the data be kept up to date?

Provision will be made for data subjects to have the option to view all data held about them upon request. In any case, the data handlers will regularly ask the data subjects to review the data stored and update/correct it as necessary. This will be done on a three yearly cycle or on occasions when data is being used for some purpose.

## What if a data handler does not want to maintain the electronic data set?

Where a data handler does not wish to maintain the data electronically or is unable to do so, a manual procedure will be used where the data will be passed to the church office to be

added to the electronic archive. Paper copies will be made available to the data handler when necessary. These copies, whether amended or not, will subsequently be returned to the church office for action as necessary. Data handlers will be made aware of their responsibility to manage printed data copies, keeping it secure and never to disclose it to any unauthorised third party.

### Managing Printed Copies of Personal Data

Printed copies of personal data shall not be created unless this is necessary for the individual using the data to do their work. This may include a list of names and addresses for elders who visit the homes of members or adherents and those receiving the Kirk News.

Principles for managing paper copies of personal data:

- Church Secretary/Data Handler to provide a printed copy of data required
- Printed copy given to the data handler in order to complete task
- Data handler to manage the data according to data processing principles
- Data handler will notify Church Secretary about any inaccuracies found.
- When no longer needed any printed personal data should be either returned to the church secretary or destroyed.
- Printed personal data lists should never be left unattended or disposed in recycling or general waste system.
- Printed data sets should never be kept any longer than is necessary to complete the task.

### Privacy Policy

The privacy policy will be produced and made available to all data subjects and individuals who have access to and responsibility for managing personal data.

### Procedure for dealing with an abuse of personal data

The Church Data Protection Team will review the circumstances surrounding any potential abuse and produce a report to the Kirk Session documenting what happened and what steps have been taken to prevent recurrence and any other relevant information.

In the event that an abuse of any personal data has been identified, the Data Officer will complete a Data Protection Breach Notification Form and send it to the Presbytery Clerk (Data Controller) and the Church of Scotland Law Department.

### Data Storage System

All data required will be stored in the church O365 domain account. An O365 Group will be setup for each data storage requirement with the minimum number of users allocated read and/or write access as needed.

- O365 OneDrive is the primary file storage system which will be over-laid with O365 Groups as necessary.
- For each set of data there will be at least two authorised users, one being the church secretary and the other being the data handlers who are charged with responsibility for the day to day maintenance of the data.
- O365 web apps will be used to maintain the data files. These will include Word and Excel.

- Most users will have a web only license allocated to their account.

### Data Sets and Associated Data Maintainers

Note: The Secretary will have full access to the following data sets.

Data Set	Data Maintainer(s)	File Store Requirements
<b>Church Roll of Members and Adherents</b>	Secretary (depute FWO and GA convenor)	Excel
<b>FWO &amp; GA Records</b>	FWO & GA Convenors	Excel/Word
<b>Cradle Role</b>	Cradle Roll Secretary	Excel/Poster in Church
<b>Church Rotas (Welcome Team, Youth &amp; Childrens Groups, Loaves &amp; Fishes volunteers, Church Prayer/Bible Readings/AV, Elder Communion Duty, Flowers, Tea etc.)</b>	Various on as needs basis	Excel/Word
<b>Session/Board and working Group minutes.</b>	Session Clerk and Clerk to the Board and working group convenors.	Word
<b>Group member details (children/youth groups/bible study groups, Good morning group, Men's group etc.)</b>	Group Leader	Excel
<b>Formal email distribution lists</b>	Church Secretary	O365/Outlook
<b>Formal paper based contacts list</b>	Produced by Church Secretary with reference copies being constantly updated. Paper copies should be minimised with copies reissued as necessary.	Excel/Word
<b>Church Centre Bookings and details needed for billing and communicating with customers.</b>	Church secretary, Church Centre Treasurer, Loaves and Fishes Manager.	O365 Group calendar and on paper file in church office.
<b>Safeguarding Register</b>	Safeguarding officer	Word

### Detailed breakdown of data needed for each Data Set

The following is a summary of the data fields needed for each data set. These data sets will to be confirmed by each group leader or data set owner – as a general principle the church will not store more than the minimum data which is needed to do its work. Data duplication should be avoided in order to provide a “single point of truth” which can be maintained/updated as necessary. Any data held will be audited on a three yearly basis to

confirm its accuracy. An audit trail of changes made will be maintained to show additions, modifications and deletions.

### Church Roll of Members and Adherents

Type of access	Name/office
Read/Write	Church Secretary, FWO & GA Convenors (Partial)
Read Only	Minster, Elders/volunteer visitors – access to subsets as necessary (printed / electronic)
Field	Comment/Type
Title	Mr, Mrs, Miss, Ms, Dr etc.
Full Name	Text
Address 1	Text
Address 2	Text
Address 3	Text
Post Code	Post Code
D.O.B./ D.O.D. (Death/Departure)	Date format
Date Joined	Date format
Phone number	Number
Mobile Phone	Number
Email Address	email
Facebook/Twitter account	Yes/No
Care Area	Text
FWO	Yes/No
Gift Aid	Date
Status	Text

### FWO & GA Records and associated letters

Type of access	Name/office
Read	Church Treasurer
Read/Write	Church Secretary,FWO & GA Convenor
Field	Comment/Type
Title	Text
Full Name	Text
Address 1	Text
Address 2	Text
Address 3	Text
	Text
Post Code	Text
Care Area	Text
Financial details (giving)	Currency
letters	Text

### Cradle Role

Type of access	Name/office
Read/Write	Church Secretary
Field	Comment/Type
DOB (Baptism)	Date
BOB	Date
Full Name	Text
ADDRESS	Text

### Church Rotas

Type of access	Name/office
Read/Write	Church Secretary
Read	Published on Church Web Site and paper copies issued if necessary to volunteers
Field	Comment/Type
Full Name	Text
Email Address	Text
Contact Phone Number	Text

### Session/Board and Working Group minutes

All meeting notes and minutes to be created and stored in a Group Shared folder in the O365 domain. Any copies emailed to group members will be in PDF format to prevent unauthorised alteration. All session and board members to be offered an account.

### Church Working Group member details

Each group leader shall be responsible for maintaining a list of members and contact details. Only necessary personal data shall be recorded. Email distribution lists – Contact List  
 Each of the church working groups will have a facility for group mailing list setup using the O365 system. Group members will be encouraged to always use the group email setup for any group communications. Use of personal email addresses for message containing personal data (Hotmail, gmail etc...) will be actively discouraged – O365 activity notifications may be sent to personal accounts. As a general rule where groups of users are being emailed all recipients will be blind copied (BCC) to ensure that personal email addresses are never disclosed.

It is acceptable to Text Message or personal email to notify members when communications have been sent out - no personal data would be shared with either of these methods.

Some general purpose email lists will be maintained by the church secretary. These will include Church Members (where personal email address has been provided.)

### Church Centre Bookings and related procedures (applications, billing etc)

The following procedure has been applied.

- Booking enquiry by phone or email.
- Booking form sent out from church office – paper or email attachment.

- Booking form received (paper or electronic) with name, organisation, address, phone, email address and booking requirements.
- Paper copy filed and relevant information passed to Bookings Officer (Nell) which she enters into her diary.
- Any interim communication e.g. emails also copied to file.
- After the booking event the BO completes a profoma of charges to be invoiced which is sent to the Church Centre Treasurer.
- Invoice sent to customer by post or as email attachment.
- Paper copy retained by Church Centre Treasurer.
- Payment made by cash, cheque or funds transfer (online).
- Cash or cheque held by Treasurer until paid in at local post office.