**PRIVACY STATEMENTS**

**(Also referred to as Privacy Notices)**

**Introduction:** A key part of Data Protection legislation is ensuring people know what information we hold about them, the grounds on which we are holding that information and what we are doing with it. This is normally achieved by means of a ‘Privacy Notice’ or ‘Privacy Statement’. Under UK GDPR it is a legal requirement to include more details in these than has been the case in the past.

Page 8 of our L13 Guideline Leaflet ([www.baptist.org.uk/Articles/368695/BUC\_Guideline\_Leaflet.aspx](http://www.baptist.org.uk/Articles/368695/BUC_Guideline_Leaflet.aspx)) lists the information which really needs to be included in a church context.

**SAMPLE PRIVACY NOTICES**

There are many different ways of doing these and we are suggesting the following format. Below we then give some examples which follow this format and which can be adapted for your own use.

**Section 1:** The Identity and contact details of the Data Controller. Please note that if your church is a CIO, the CIO will be the Data Controller (and not the church Charity Trustees).

**Section 2:** The purpose or purposes for which the data is intended to be processed.

**Section 3:** The legal grounds for the processing. Please note that:

1. Where the personal data is being processed with the individual’s consent, they must be told that they have the right to withdraw their consent at any time without detriment to them;
2. Individuals must be informed if their personal data needs to be processed for a contractual or statutory reason and what the consequences are of failing to provide the information.

**Section 4**: Information which is necessary to enable people to understand how you are handling their personal information.

**Section 5:** Information about the rights which individuals have in relation to their data including the fact they have a right to complain to the ICO.

**The following are just examples and MUST be adapted
to suit your church’s processes and procedures.**

**Please note that the wording in purple is intended to be replaced by information relevant to your church and that the email address** **trustees@anytownbaptist.org** **is not a genuine email address and should not be used!**

***Sample Privacy Notice to include on a form for collecting information from church members.***

Under Data Protection legislation the church Charity Trustees of Anytown Baptist Church are the Data Controller and can be contacted by ringing xxxxx xxxxxxxx or emailing trustees@anytownbaptist.org

We are collecting this information to enable the church to keep in touch with you and provide pastoral support as appropriate.

Data Protection legislation allows us to process this information as we regard it as being in the church’s legitimate interest.

Your name and contact details will be entered into our church database which is held on the church office computer which is password protected and accessed only by the Ministers, Church Secretary and Church Administrator. Your contact details will be removed from the database once you are no longer a member of the church – unless you ask to remain as one of our “church friends”.

If you serve Anytown Baptist Church as a member of staff or in a key role then we will pass on your name and contact details to the Baptist Union of Great Britain and/or the Anywhere Baptist Association (of which we are members) to enable them to send you information relevant to your role. We will always ensure you are aware of what information is being shared with them and you will be able to decide which contact details are shared.

To enable us to provide adequate pastoral support to you and your family, one of the Ministers/pastoral team may record information which may be regarded as sensitive. This information will be stored (in password protected documents) on the church computer but the password will only be known by the Ministers/pastoral team. This information will NOT be disclosed to anyone else without your consent.

You have the right to ask to see any information we hold about you (including the pastoral support information) by submitting a ‘Subject Access Request’ to the Church Secretary. You also have the right to ask for information which you believe to be incorrect to be rectified.

If you are concerned about the way your information is being handled please speak to our Data Protection Trustee. If you are still unhappy you have the right to complain to the Information Commissioner’s Office.

***It is perfectly permissible to also include on this form a request for people to give their consent to being included in a Church Directory or Contact list. Here is some sample wording for this***

We would like to include your name and contact details in our Church Directory which will be distributed by email to all Church Members and in hard copy as appropriate. A copy will also be kept in the church office. We will not give copies of the Church Directory to anyone else. We will only include you if you give your specific consent for us to do so.

If you are happy for your details to be included please indicate where asked to do so below\*. You can ask for your all or any of details to be removed at any time.

\*Our website ([www.baptist.org.uk/gdpr](http://www.baptist.org.uk/gdpr)) gives an example of a form which can be used for this purpose

***Sample Privacy Notice to include on a form for collecting information about children attending a Holiday Club***

Under Data Protection legislation the church Charity Trustees of Anytown Baptist Church are the Data Controller and can be contacted by ringing xxxxx xxxxxxxx or emailing trustees@anytownbaptist.org.

We are collecting this information to enable the church to run the Holiday Club safely and ensure we can contact you (or other nominated adult) in case of an emergency.

Data Protection legislation allows us to process this information as we regard it as being in the church’s legitimate interest. If you are unable to supply the information requested then we will be unable to accept your child at our Holiday Club.

The information your supply will be held in paper form in a folder which will be kept in a securely locked cupboard in the church office. Only the Ministers and the Holiday Club leaders will have access to this information.

The information will be kept for three years from when the form was completed unless a safeguarding incident or concern is raised in which case it will be held for 75 years. If you have ticked the box asking us to keep you informed about future activities, we think your child might be interested in attending we will retain your details for the sole purpose of notifying you of such events. We will NOT pass on this information to anyone else. You have the right to ask to be removed from this circulation list at any time

If you are concerned about the way your information is being handled please speak to our Data Protection Trustee. If you are still unhappy you have the right to complain to the Information Commissioner’s Office.

***Sample Privacy Notice to use when collecting information via your website***

***This example us for people completing a ‘contact us’ form so will need be adapted/expanded if you are collecting information for other purposes – prayer requests, signing up for a newsletter etc***

Under Data Protection legislation the church Charity Trustees of Anytown Baptist Church are the Data Controller and can be contacted by ringing xxxxx xxxxxxxx or emailing trustees@anytownbaptist.org.

If you complete this ‘Contact Us’ form on we will only retain your name and details for as long as is necessary for us to deal with your enquiry. We will NOT pass on your details to anyone other than the person (or people) in our church who are best able to deal with your enquiry.

If you are concerned about the way your information is being handled please speak to our Data Protection Trustee. If you are still unhappy you have the right to complain to the Information Commissioner’s Office.

***Sample Privacy Notice to include on a form requesting details from a new (or potential) employee***

Under Data Protection legislation the church Charity Trustees of Anytown Baptist Church are the Data Controller and can be contacted by ringing xxxxx xxxxxxxx or emailing trustees@anytownbaptist.org.

We are collecting this information to enable us to enter into a contract of employment with you. If you are unable to provide this information then we will be unable to enter into that contract.

The information you supply in this form will be

* Held on the church office computer which is password protected and accessed only by the Ministers, Church Secretary and Church Administrator.
* Destroyed six years after you leave our employment or six months from our last contact with you if you were unsuccessful in an application for a role with us.

We will be undertaking performance appraisals as part of your employment and copies of the reports from these (along with all documents supplied as part of your application) will be kept in a password protected section of our church computer which can only be accessed by the [Senior] Minister as your Line Manager. If appropriate, information from these documents may be shared with other charity Trustees but will NOT be shared with anyone else without your consent.

You have the right to ask to see any information we hold about you by submitting a ‘Subject Access Request’ to the Church Secretary. You also have the right to ask for information which you believe to be incorrect to be rectified.

If you are concerned about the way your information is being handled please speak to our Data Protection Officer. If you are still unhappy you have the right to complain to the Information Commissioner’s Office.

***Sample Privacy Notice to use when recording and uploading or live streaming church services and events***

Under Data Protection legislation the church Charity Trustees of Anytown Baptist Church are the Data Controller and can be contacted by ringing xxxxx xxxxxxxx or emailing trustees@anytownbaptist.org.

We are collecting your personal information for the purpose of recording and uploading, or live-streaming services from our church, online, to reach out to those who are unable to attend in person, or who wish to participate in our services remotely.

The categories of personal data we collect are as follows:

* We may capture your image whilst filming the church service;
* By taking part in the service this may indicate your religious belief and this will be treated as special category data.

For these purposes we collect and use personal data using consent. By signing a Consent Form\*, you are consenting to us using your data for the purposes above.

You may withhold your consent by sitting in a film-free area of the church. Such areas will be clearly marked by notices in the church. Please note that, once live-streaming or filming has started, consent cannot be withdrawn and your data will be on the internet.

You may be asked to give consent for your child’s image to be taken and processed by the church in the manner and for the purposes described above.

The original images will be stored securely and used in line with our data protection policy. For more information about how your personal data will be used by us, please visit [insert details here].

If you would like to see your images or you are concerned about the way your information is being handled, please speak to our Data Protection Trustee. If you are still unhappy you have the right to complain to the Information Commissioner’s Office.

**WEBSITES AND APPS THAT USE COOKIES**

A cookie is a small piece of text sent from a website and stored in your web browser. The cookie can be retrieved by the website the next time you return to it, so that the website can, for example, remember your saved preferences.

Providing information about your use of cookies is required by data protection law. You should have a Cookies Policy, or at least a ‘cookies’ section in your main Privacy Notice, if you operate a website or app that uses cookies. You should let your users know what cookies are, why you use them, the types of cookies you use and how they can control the cookies you place on their devices. You may also need to provide the similar information regarding the cookies you use from third-party social media and other service providers e.g. Facebook or YouTube. It would be helpful to include a link to their respective Cookies Policies.

***Sample Cookies Policy or ‘cookies’ section for main Privacy Notice***

**About Cookies**

Our website uses cookies. Cookies are small files which websites store on your computer, and which contain various types of information about your visit to a website. Although cookies do not normally contain information about you personally, they can record information about how you browse the internet. Once you agree, a small file is added to your computer’s hard drive which allows web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

**Cookies on our website**

Generally, we use cookies to help us administer this website and to improve the website’s usability. We may also use cookies to identify which pages are being used most frequently. This helps us analyse data about webpage traffic and improve our website to tailor it to user needs.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you would prefer. You should consult the documentation of your web browser for advice on how to do this. Please note that restricting or disabling cookies may impact the functioning of parts of our website.

Cookies normally expire after a length of time which can vary from a few minutes to more than a year. Some cookies are ‘session cookies’ which are deleted when you close your internet browser or after a period of inactivity. Others are ‘persistent cookies’ which remain on your computer until their expiration date.

We use the following cookies…[*insert cookie name and description*]

**Third Party Cookies**

We also use the following third-party social media and service providers to help us understand how users interact with our website.  This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Currently we use…eg. YouTube, Google Analytics [*insert purpose for which third-party cookies are used and a link to their cookies policy]*

Please note that your church will also need to provide a cookie consent notice, which will appear on your website and through which users can give you permission to obtain, use and process their data through cookies. The type of consent notice you need will be determined by the type of cookies you use. You must obtain the express consent of users e.g. by including an ‘I agree’ button, unless you only use those cookies that are covered by an exemption. More information about this is available from the ICO [here](https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-technologies/what-are-the-rules-on-cookies-and-similar-technologies/).