

Data Protection Policy

Version 2.0 May 2026

1. Introduction

North Abingdon PCC Christ Church (Christ Church Abingdon) is registered with the Information Commissioner as a controller **ZB195569** and is governed by the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Regulations 2003 (PECR).

Everyone who has any connection with Christ Church Abingdon is important to us and our Data Protection Policy, in accordance with the General Data Protection Regulation (GDPR) effective from 25 May 2018, is designed to ensure that any personal information we have about anyone who is in contact with us in any way is securely protected and, unless there is a lawful basis, will never be shared with others without consent. Also, anyone for whom we hold information has the right to know what information we hold and to ask for that information to be corrected if necessary, or removed if they so wish.

Christ Church Abingdon's staff, volunteers, trustees and contractors are required to adhere to this policy, which is designed to protect the personal data of data subjects - our beneficiaries, supporters, volunteers, employees and trustees.

2. Version log

Version	Author	Change Description	Date Approved
1.0	Mike Warner	First Version	Nov 2018
2.0	Andy Vöyce	Updates: • Amended review cycle to 2 years and signatory • Update links to ICO • Addition of section 4 Responsibilities of staff and volunteers • Added section 5 The right to raise a concern or complaint	May 2026

3. Policy

Our Policy is to adhere to the GDPR 7 principles, set out in Attachment 1.

To put this Policy into practice, we will:

- Display our Data Privacy Notice, Attachment 2, at our Northcourt Road site and on Sundays at our Long Furlong site as well as on both our church websites. Printed copies can be provided on request.
- Provide different methods of obtaining consent to enable us to hold the information we require for the smooth "running" of our church. Note that under GDPR legislation, we must get parental

consent to hold personal data on any child under 13. To keep in line with our Safeguarding Policy, we will also require parental consent to hold any personal data for under-18s, except for:

- I. 16-year-olds who can legally give their consent for their name and address to be on the Electoral Roll;
 - II. (Where an over-13-year-old has recently started attending a church youth group, we will hold their name and emergency contact number while we endeavour to receive a parental consent form.
- c) Enable anyone who so wishes to review or change the information we hold about them and to remove this information unless we are required to keep it by law.
 - d) Require all staff involved with the collection, processing and disclosure of personal data to be aware of their duties and responsibilities to adhere to this policy.
 - e) Strongly encourage all voluntary leaders of any of our church ministries to keep all data they hold secure.
 - f) Offer and provide advice and support to staff and voluntary leaders on the best way to keep data secure.
 - g) Take appropriate immediate action, should it be necessary, in accordance with the GDPR legislation, in the event of any data breach.

Note that Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held. It can include your name and age, your contact details, any Gift Aid data we may have on you. In short, if we hold this information in our files, then it probably counts as personal data.

4. Responsibilities of staff and volunteers

Christ Church Abingdon's Data Protection Officer, who is also Operations Director, is required to:

1. Provide compliance advice to staff
2. Ensure that staff receive appropriate data protection training and guidance
3. Ensure that Christ Church Abingdon's data protection policies and documents are appropriate and up to date
4. Be the focal point for the administration of any subject access requests
5. Deal with data subject rights in relation to erasure, objection, restriction and rectification that staff feel unable to manage themselves
6. Log and assess all personal data breaches
7. Report applicable data breaches to the ICO within the statutory 72-hour time limit
8. Renew, and ensure that Christ Church Abingdon's controller registration with the ICO is accurate annually.
9. Keep a central register of all organisations that Christ Church Abingdon shares personal information with
10. Maintain and update the organisation's Records of Processing Activity, Privacy Notices, and any associated data protection assessments (e.g., DPIAs or LIAs).
11. Advise staff on the interpretation of this policy and guidelines and to monitor compliance with the policy.

All staff and volunteers are responsible for:

12. Working in compliance with the data protection principles as set out in this policy and Christ Church Abingdon's data protection guidance as set out in the document titled 'understanding-your-responsibilities-for-data-protection'

13. Ensuring that any personal information that they provide to Christ Church Abingdon in connection with their employment, volunteering or other contraction agreement is accurate
14. Informing Christ Church Abingdon of any personal data breach which they become aware of immediately
15. Responding to any data subject requests to erase, access, correct or object to the personal information held and processed by Christ Church Abingdon.

5. The right to raise a concern or complaint

You have the right to raise a concern or make a complaint about how we handle personal data. If you believe your information has been used unfairly, unlawfully, or in a way that does not align with this policy, you can contact us using the details provided in this document. We will acknowledge and investigate your complaint in line with our Data-Protection Complaints Procedure. If you remain dissatisfied with our response, you also have the right to escalate your concern to the Information Commissioner's Office, which oversees data-protection compliance in the UK.

6. Review cycle

This Policy and the incorporated attachments will be reviewed by the PCC, as it is deemed appropriate, but no less frequently than every two years, and amended as necessary.

7. Approvals

This policy and attachments were approved by the PCC on:

Name: Revd Keith Dunnett	Signed: 
Position: Incumbent	Date: 11 May 2026 Version: 2.0

For completion, each time the policy is reviewed/edited:

Lead Data Protection Trustee	Cherry Tweed Church Warden
Monitoring of the procedures	Operations Director
Reporting To	Standing Committee on behalf of the PCC
Next Review Date	May 2028

Attachment 1: The 7 Principles

At the heart of the GDPR are seven key principles:

That personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest or historical research or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, historical research or statistical purposes subject to implementation of the appropriate measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (this also covers secure access to data).
7. The subject of accountability - i.e. the controller. Therefore, Christ Church Abingdon shall be responsible for and able to demonstrate compliance with the principles (this is a brand-new principle).

Attachment 2 Data Privacy Notice

Everyone who has any connection with Christ Church is important to us. To serve you in the best way that we can, Christ Church needs to hold certain items of personal data about you.

We have certain legal obligations in how we process this personal data, and you have certain rights. These are described below.

Above all, this notice is to assure you that any information we have about you is securely protected, and unless there is a lawful basis, will never be shared with any third parties unless you give your informed consent.

What do we mean by 'personal data'?

This is any information that can be used to identify you. It can include your name and age; your contact details; any Gift Aid data we may have on you ...In short, if we hold this information in our files, then it probably counts as personal data.

What do we mean by 'processing'?

'Processing' is the overall term that covers how we store, handle, and use your personal data.

What do we do with this personal data?

The personal data lets us serve you as your church. In particular, it lets us maintain our electoral roll, church directory, and church email lists; operate as a charitable organisation in the service of the Parish of North Abingdon and its people; manage our finances; operate as a responsible employer; and abide by other legal requirements.

What don't we do?

Your personal data is strictly confidential. It is shared only with other members of the church to carry out specific services for you or other church members. It is only shared with third parties, inside or outside the parish, with your explicit consent, unless there is a lawful basis for doing so.

We do not acquire or retain any personal data that is not relevant to any of our purposes.

We do not acquire personal data speculatively on the grounds that it might be useful one day.

What are our obligations?

Our obligations and your rights are set out by the General Data Protection Regulation¹. We are also advised by the recommendations of the Church of England in the guide 'Keep or Bin: Care of Your Parish Records'² and Christ Church Abingdon's own Data Retention Policy.

Personal data is gathered for specific purposes that help us carry out our activities as a church and is used only for those purposes. If a new purpose arises, then a notice is sent to every individual whose personal data we hold, inviting their explicit consent for the new use. Personal data that is not needed is deleted.

We protect your personal data from loss, misuse, unauthorised access and disclosure.

If your personal data changes or is inaccurate, then we will correct or update it promptly.

Personal data is time-limited and reviewed or deleted once that limit is reached. Specifically:

¹ This can be found at https://ec.europa.eu/info/law/law-topic/data-protection_en

² This can be found at https://www.churchofengland.org/sites/default/files/2017-11/care_of_parity_records_keep_or_bin_-_2009_edition.pdf

- Electoral roll data is reviewed annually. Updates are made where necessary. Personal data of anyone who has left the parish must remain on ER copies for the last complete review and for six years thereafter.
- Gift aid declarations and associated paperwork are retained for up to 6 years after the calendar year to which they relate.
- Parish registers (baptisms, marriages, funerals) are kept permanently. This is a legal requirement.
- Data relating to safeguarding and children's activities (including registers and DBS checks) is kept permanently.

What are your rights?

This is not a full list of all your rights, but these are the ones most likely to apply to you.

- You can ask for a copy of the personal data which we hold about you, and we will provide it within one calendar month.
- You can ask us to correct any personal data that is inaccurate or out of date. If there is any dispute about its accuracy or the way we process it, you can request that a restriction be placed on further processing until the matter is resolved.
- You can ask us to erase your personal data when it is no longer necessary for us to retain it, if we have not already done so. (Note that we cannot erase data which we are legally required to retain.)
- You can withdraw your consent to our processing your personal data at any time.
- You can object to the way in which we process your personal data.

Finally, if you are dissatisfied with our handling of your personal data and you feel we are not addressing your concerns properly, you can lodge a complaint with the Information Commissioner's Office (<http://ico.org.uk>).

Any questions?

If you have any questions about our processing of your personal data, please contact the Parish Administrator in our Church Office:

- Church Office, Christ Church, Northcourt Road, Abingdon OX14 1PL
- 01235 539172;
- office@cca.uk.net

Alternatively, you can contact the Information Commissioner's Office:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF;
- 0303 123 1113
- <https://ico.org.uk/global/contact-us/contact-us-public/>