

COMPASSION NETWORK UK

Data Protection Policy

Introduction

Compassion Network UK (CNUK) needs to collect, gather and use certain information about individuals. These can include supporters, suppliers, business contacts, staff and other people the organisation has a relationship with or may need to contact.

The information CNUK collects and holds is in order to deliver on its charitable objectives which are listed on the Charity Commission as:

- To advance the Christian faith throughout Wales and the UK for the benefit of the public mainly but not exclusively through the holding of prayer meetings, religious education and to provide outreach and pastoral care for the community.

This policy describes how this personal data must be collected, handled, and stored to meet the company's data protection standards and to comply with the law.

This data protection policy ensures CNUK:

- complies with all current data protection law and follows good practice;
- protects the rights of staff, supporters and partners;
- is open about how it stores and processes individuals' data;
- protects itself from the risks of a data breach.

Data protection law

The UK General Data Protection Regulation (UK GDPR) tailored by the Data Protection Act 2018 supersedes the Data Protection Act 1998 (DPA). The regulation describes how organisations must collect, handle and store personal information and apply regardless of whether data is stored electronically, on paper or on other materials.

CNUK is committed to following the data protection principles to make sure any information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

The conditions for processing are set out in the Data Protection Act 2018. Unless a relevant exemption applies, at least one of the following conditions will be met by CNUK and its staff whenever personal data is processed:

- The individual whom the personal data is about has consented to the processing.
- The processing is necessary:
 - in relation to a contract which the individual has entered into; or
 - because the individual has asked for something to be done so they can enter into a contract.
- The processing is necessary because of a legal obligation that applies (except an obligation imposed by a contract).
- The processing is necessary to protect the individual's "vital interests". (This condition only applies in cases of life or death, such as where an individual's medical history is disclosed to a hospital's A&E department treating them after a serious road accident).
- The processing is necessary for administering justice, or for exercising statutory, governmental, or other public functions.
- The processing is in accordance with the "legitimate interests" condition.

CNUK will NOT: **Do we currently adhere to the first two points? YES. There is a tick box exercise for the individual to check once they give over their information. Once their card is handed over it is entered into the system (24 hours) and then shredded (so we do not keep any data on physical file)**

- **We will collect and hold any personal data of the members of our audiences on secure cloud services.**
- **We will collect and hold any personal data of anyone under the age of 18 on secure cloud services.**
- hold any information once it's been requested to be deleted from our system (within a four-week admin period).
- give or sell our data to anyone else without the individual's consent.

Policy Scope

This policy applies to:

- CNUK UK (head office)
- All branches of CNUK: currently in Wales (2022).
- All staff ("staff" for ease of reference and clarity) and volunteers of CNUK.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the UK GDPR (this can include names of individuals, postal addresses, telephone numbers and email addresses, etc).

Data protection risks

This policy helps to protect CNUK from some very real data security risks, including:

- Breaches of confidentiality, i.e. information being given out inappropriately.
- Failing to offer choice, i.e. all individuals should be free to choose how the company uses data relating to them.
- Reputational damage, i.e. the company could suffer if hackers successfully gain access to sensitive data.

Responsibilities

Everyone who works for or with CNUK has some responsibility for ensuring data is collected, stored and handled appropriately.

Each time personal data is handled, staff of CNUK must ensure that it is handled and processed in line with this policy and data protection principles.

However, the following groups have key areas of responsibility:

The **Board of Trustees** is ultimately responsible for ensuring that CNUK meets its legal obligations.

Are the terms highlighted relate to us? Or do we use other titles? I would say no as we don't yet have this scope. I would put it generally to US and then list out responsibilities.

The **Executive Director** is responsible for:

- Keeping the Board updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Overseeing any contracts or agreements with third parties that may handle the company's sensitive data.

The **Executive Director and Operations Manager** are responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data CNUK holds about them (also called 'subject access requests').
- Working with our external IT Support Partner to ensure data protection compliance is followed by them and our cloud-based services.
- Approving any data protection statements attached to communications such as

emails and letters.

The **Marketing and Communications Manager** is responsible for:

- Addressing any data protection queries from journalists or media outlets.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

General Staff Guidelines

CNUK grants access permissions to certain records on a 'need to know' basis to its staff, ie for HR processing (for ease or reference and clarity 'staff' includes salaried staff and volunteers). All staff must follow the CNUK data protection principles, namely:

- Data should not be shared informally with anyone. When access to confidential information is required staff must request access from their line managers.
- CNUK will provide training to all staff to help them understand the irresponsibilities when handling data.
- All staff should keep all data secure by taking sensible precautions and:
 - using **strong passwords**. These are provided by CNUK for Office 365 and internal database logins. All laptops and computers should be password protected. **What programs do CC use? Office 365, ChurchSuite, Planning Centre, CN Source, Orange Curriculum, Pro-Presenter, etc.**
 - **Personal data should not be disclosed** to unauthorised people, either within the company or externally.
 - **Data should be regularly reviewed and updated** if it is found to be out of date. If it is no longer required it should be cleansed and archived or deleted/disposed of.
 - Staff/volunteers should request help from their Department Directors if they are unsure about any aspect of data protection.

Data Storage

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the Executive Director.

CNUK runs a secure database and expects all paper documents to be saved securely as a pdf within its password protected Dropbox files. The CNUK database is housed by Blackbaud on their Raiser's Edge NXT platform and is password protected. Dropbox files are shared with staff on a 'need to know' basis. **Where does CC store information? ChurchSuite, Planning Centre**

As a rule, data should be safeguarded as follows:

- Paper or files should be kept in a locked drawer or filing cabinet when not required.
- Paper and printouts should not be left where unauthorised people could find them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

CNUK's electronic data is housed securely in the cloud via our IT Services Partner and safeguards include:

- All staff should use strong passwords that are changed regularly and never shared between staff.
- If data is stored on removable media (like a CD or memory pen) these should be kept locked away securely when not in use.
- Data should only be stored on designated systems, drives and servers and uploaded onto the approved cloud-based systems.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All computers and laptops used for work purposes should have the latest security and firewall software installed.

Data Use

Personal data is of no value to CNUK unless the charity can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft so staff should:

- ensure, when working with personal data, that the screens of their computers are always locked when left unattended.
- not share personal data informally: staff should access this information via the secure database.
- never transfer personal data or give it to anyone outside of the organisation.
- always access and update the central copy of any data and should NOT save copies of personal data to their own computers.

Data Accuracy

The UK GDPR requires CNUK to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all staff who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in the centralised database to reduce duplication.
- CNUK will make it easy for data subjects to update their information via the website and contact email address.

- Data should be updated as inaccuracies are discovered.

Subject Access Requests

All individuals who are the subject of personal data held by CNUK are entitled to:

- ask what information the company holds about them and why.
- ask how to gain access to it.
- be informed how to keep it up to date.
- be informed how the company is meeting its data protection obligations.
- request a copy of this information.
- request the right to be forgotten.

Individuals may request, via email to bridgend@compassionchurch.cc, to obtain copies of the information CNUK stores in electronic and paper form. CNUK will not charge for these requests but reserves the right to charge a reasonable fee should the request be manifestly excessive or unfounded, particularly if it is repetitive. Requests should be made for the attention of the Executive **Director** and, once the identity of the individual has been verified, CNUK will aim to provide the relevant data within four weeks.

Data Breach

In the unlikely event that CNUK suffers a data breach, the charity undertakes to advise all affected individuals as quickly as possible as to what information has been taken and when.

Disclosing data for other reasons

In certain circumstances the UK GDPR allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances CNUK will disclose the requested data. However, CNUK will ensure the request is legitimate with the Executive **Director** seeking assistance from the Board of Trustees and the charity's legal advisers where necessary.

Providing Information

CNUK aims to ensure that individuals are aware that their data is being processed, and that they understand:

- how the data is being used.
- how to exercise their rights.

To these ends CNUK has a Privacy Statement setting out how data relating to individuals is used by the charity. This is available on [request](#). and a version of this statement is also available at www.livemusicnow.org.uk **need a website or email here for CNUK... e-mail could be bridgend@compassionchurch.cc I'm sure we use Elim's at the minute. But, need to follow up to see exactly on here.**

Contact

If you have any questions regarding CNUK's Data Protection Policy, or other concerns over privacy, please email the Executive **Director** at bridgend@compassionchurch.cc who will be happy to discuss this further.

This policy was last reviewed and approved at the Board meeting on 23rd November 2020.

Executive Director

Date:

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