

Christ Church Moreton Hall

Data Protection Policy

This policy comes into effect immediately following agreement at a PCC meeting dated

27th July 2026

Introduction

This Data Protection Policy explains how the Parochial Church Council (PCC) handles personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The PCC is committed to protecting the privacy and security of all personal information it holds.

Data Controller

The **Parochial Church Council (PCC)** of Christ Church, Moreton Hall is the Data Controller.

Contact details: PCC Address: Christ Church, Moreton Hall, Bury St Edmunds, IP32 7EW
PCC

Email: office@ccmh.org.uk

Data Protection Lead (if appointed): _____

Roles, Responsibilities and Accountability

Data Protection Lead / Compliance Officer

The Parochial Church Council (PCC) has overall responsibility for ensuring compliance with data protection legislation. The PCC will appoint a Data Protection Lead (or Data Protection Compliance Officer) to oversee data protection matters on its behalf.

The Data Protection Lead is responsible for:

- Advising the PCC on compliance with the UK GDPR and Data Protection Act
- Acting as the main point of contact for data protection queries and concerns
- Coordinating responses to data subject requests
- Maintaining data protection records and reporting requirements
- Liaising with the Diocese and the Information Commissioner's Office (ICO) where required

Responsibilities of PCC Members, Staff and Volunteers

All PCC members, staff, office holders and volunteers who handle personal data are responsible for ensuring that such data is:

- Processed lawfully, fairly and transparently

- Used only for legitimate parish purposes
- Kept accurate and up to date
- Stored securely and accessed only by those with appropriate authority
- Not disclosed to unauthorised persons
- Not stored on IT systems other than secure CCMH IT systems (unless with prior written authorisation)
- Physical copies must only be stored in secure areas on church premises (unless with prior written authorisation)
- Retained only for as long as necessary
- Disposed of securely

All individuals handling personal data must follow this policy and any related procedures or guidance issued by the PCC or Diocese.

Duty to Report Data Breaches

All PCC members, staff and volunteers have a duty to report any actual or suspected personal data breach to the Data Protection Lead as soon as possible, and within 24 hours. This includes, but is not limited to:

- Loss or theft of personal data
- Accidental disclosure to an unauthorised person
- Unauthorised access to personal data
- Loss of devices or paperwork containing personal data

Prompt reporting is essential to allow timely investigation and, where necessary, notification to the Information Commissioner's Office within statutory timescales.

Consequences of Non-Compliance

Failure to comply with this policy or with data protection legislation may result in appropriate action. This may include:

- Additional training or corrective measures
- Restriction or removal of access to personal data
- Disciplinary action in line with parish or diocesan procedures
- Potential legal or regulatory consequences where breaches of data protection law occur
- Reputational damage to Christ Church Moreton Hall and the wider church
- Financial penalties

Personal Data We Collect

The PCC may collect and process:

- Names, addresses, phone numbers, email addresses
- Electoral Roll information
- Baptism, wedding, and funeral records
- Pastoral information provided voluntarily

- Gift Aid declarations and financial giving records
- Volunteer and safeguarding information
- Hall hire information
- CCTV images (if applicable)

How we obtain consent

Where the Parish relies on consent as the lawful basis for processing personal data, consent will be obtained in a clear, informed and unambiguous manner. Individuals will be provided with sufficient information to understand what data is being collected, how it will be used, and for what purpose, before consent is given.

Consent may be obtained in writing, electronically, or verbally where appropriate, and a record of consent will be kept.

Individuals have the right to withdraw their consent at any time. Information on how to withdraw consent will be provided at the point consent is obtained and may be exercised by contacting the Parish Office or the Data Protection Lead. Withdrawal of consent will not affect the lawfulness of processing carried out prior to withdrawal.

Once consent has been withdrawn, the Parish will stop processing the personal data for the relevant purpose unless there is another lawful basis that permits continued processing (for example, where processing is required by law or necessary for safeguarding purposes).

Lawful Basis for Processing

The PCC processes personal data under:

- Legal obligation
- Legitimate interests
- Consent
- Contract
- Public task

How We Use Personal Data

Personal data is used for:

- Worship, mission and pastoral care
- Administration of parish activities
- Maintaining membership and Electoral Roll records
- Managing volunteers, staff and PCC governance
- Financial administration and Gift Aid claims
- Safeguarding and legal compliance
- Communication regarding parish events and activities

Sharing Personal Data

The PCC will only share personal data where there is a legitimate need or legal obligation to do so. The PCC may share data with:

- Other church staff and officers (both paid and voluntary positions)
- The Diocese or other Church of England bodies
- HMRC (for Gift Aid)
- Safeguarding authorities
- Service providers acting on behalf of the PCC
- Police and other agencies where legally required

Data is never sold or shared for third-party marketing and any data sharing is carried out in accordance with data protection legislation.

Data Retention

The PCC follows the **Church of England Records Management Guide**. Examples:

- Electoral Roll: 6 years
- Gift Aid records: 6 years after final claim
- Marriage registers: permanent
- Baptism registers: permanent
- Safeguarding records: as required by national guidance

Security

The PCC uses appropriate technical and organisational measures, including:

- Secure storage of paper records
- Password-protected digital systems
- Restricted access to sensitive information
- Regular review of data handling practices

Your Rights

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure (where applicable)
- Restrict processing
- Object to processing
- Request data portability (where applicable)
- Withdraw consent at any time (where consent is used as the lawful basis)

Requests should be submitted in writing to the PCC.

Subject Access Requests (SARs)

The PCC will:

- Acknowledge SARs within one month
- Verify identity before releasing data
- Provide copies of personal data held
- Explain how and why the data is processed

Extensions may apply for complex requests.

Data Breaches

Any data breach will be:

- Logged in the PCC breach register
- Investigated promptly
- Reported to the Information Commissioners Office (ICO) where required and within the statutory deadline where necessary
- Communicated to affected individuals when necessary

Contact Details

Any questions about the Christ Church Data Protection Policy should be directed in the first instance to: The Data Controller, The Parish Office, Christ Church, Moreton Hall, Bury St Edmunds, IP32 7EW. Telephone: 01284 725391 (answerphone) or office@ccmh.org.uk