New Hope Church

General Policies & Procedures

Data Protection Policy and Procedure

This document replaces any procedure previously issued or other custom and practice

Data Protection Policy and Procedure

	Position/Title	Date
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Changes From Last Update

Section 1 – Introduction	Updated the policy to reflect UK GDPR, the Data Protection Act 2018 and PECR. Clarified that New Hope Church is the Data Controller and that trustees retain overall responsibility for data protection compliance.	02/07/2026
Section 2 – The Principles	Replaced the previous Data Protection Act principles with the UK GDPR principles, including lawfulness, fairness, transparency, accountability, data minimisation, accuracy, storage limitation and security.	02/07/2026
Section 3 – Special Category Data	Added a new section covering the processing of special category data, including religious beliefs, health information, safeguarding concerns and pastoral support information, together with the lawful basis for processing such data.	02/07/2026

Section 4 – Maintaining Confidentiality	Removed requirements for staff, trustees and leaders to sign the policy. Added practical confidentiality obligations and updated circumstances in which information may be disclosed, including safeguarding and legal requirements.	02/07/2026
Section 5 – Use of Personal Information	Added provision for processing information relating to vulnerable individuals where necessary for their safety and wellbeing. Added communication methods used by the church and the right to opt out of non-essential communications.	02/07/2026
Section 6 – Examples of Personal Data Held by the Church	Expanded and modernised the list of personal data processed by the church, including safeguarding records, DBS information, payroll records, donation records, emergency contacts, photographs, video recordings and communication preferences.	02/07/2026
Section 8 – Storage of Information on Paper Hard Copy	Strengthened requirements for secure storage, restricted access and secure destruction of paper records containing personal data.	02/07/2026

Section 9 – Data Retention	Added a new data retention schedule setting out suggested retention periods for Gift Aid records, payroll records, safeguarding records, volunteer/DBS records, membership records, CCTV/livestream recordings and children's records.	02/07/2026
Section 10 – Rights to Access Information	Updated individual rights to reflect UK GDPR, including rights of access, rectification, erasure, restriction, objection and data portability. Updated Subject Access Request provisions and response timescales.	02/07/2026
Section 11 – Photographs and Video	Added provisions relating to livestreaming, notification of filming, consent arrangements, protection of children and vulnerable adults, and retention of livestream recordings.	02/07/2026
Section 12 – Website Privacy Statement	Expanded the privacy notice to include website contact forms, event registrations, mailing lists, cookies, analytics tools and embedded media.	02/07/2026
Section 13 – Third-Party Data Processors	Added a new section recognising the use of trusted third-party providers such as email systems, cloud storage and accounting software.	

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1. Introduction

New Hope Church (herein referred to as "NHC") is the Data Controller for the purposes of UK GDPR and the Data Protection Act 2018. The trustees retain overall responsibility for ensuring that personal data is processed lawfully, fairly, securely and transparently.

NHC uses personal data relating to living individuals for the purposes of church administration, pastoral care, safeguarding, communication and the lawful operation of the church.

NHC recognises the importance of the proper and lawful handling of personal data and is committed to protecting individuals' privacy and complying with applicable data protection legislation.

NHC is committed to complying with:

- UK General Data Protection Regulation ("UK GDPR")
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR), where applicable

All personal data, whether held electronically, on paper, or in other formats, shall be processed lawfully, fairly, securely, and transparently.

2. The principles

NHC shall comply with the UK GDPR principles that personal data must be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept no longer than necessary

- Processed securely and confidentially
- Accountable, with appropriate records and governance maintained

These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation and storage of personal data. Employees and any others who obtain, handle, process, transport and store personal data for NHC must adhere to these principles.

3. Special Category Data

As a church, NHC may process "special category data", including:

- religious beliefs
- health information
- safeguarding concerns
- pastoral support information

This information will only be processed where:

- explicit consent has been obtained; or
- processing is necessary for legitimate church activities under Article 9 UK GDPR; or
- safeguarding or legal obligations apply.

Access to such data shall be restricted to authorised persons only.

4. Maintaining Confidentiality

NHC will treat all your personal information as private and confidential and not disclose any data about you to anyone other than the church leaders, employed staff and trustees of the church, or authorised volunteers, in order to facilitate the administration and day-to-day ministry of the church.
Information and data stored by the church office will not be distributed in any form such as digital, hard copy or any other form which might breach the Data Protection Act.
Your personal information will not be given or sold to any other person, company or church.

All staff, trustees and authorised volunteers handling personal information must:

- maintain confidentiality
- use information only for authorised church purposes
- follow this policy and safeguarding procedures

Personal data will never be sold to third parties.

Information may only be disclosed:

- where legally required
- for safeguarding purposes
- where necessary to protect individuals from harm

- where consent has been given

5. Use of Personal Information

NHC will use data for four main purposes:

1. The day-to-day administration of the church including pastoral care and oversight, calls, emails and visits, preparation of rotas, maintaining financial / giving records for audit and tax purposes.
2. Contacting you to keep you informed of church news, activities and events.
3. Statistical analysis to gain a better understanding of church demographics.
4. With specific permission from each member, for the production of a church address book which will be made available to other members of NHC.
5. In relation to vulnerable individuals (primarily children), where volunteers are acting *in loco parentis*, information may be processed where necessary to ensure their medical safety and wellbeing.

Personal information will not be passed onto any third parties outside of the church environment.

Church communications may include:

- email
- telephone
- messaging platforms
- printed materials

- online systems

Individuals may opt out of non-essential communications.

6. Examples of personal data held by the Church

NHC may hold and process personal data including:

- names, addresses, telephone numbers and email addresses;
- membership and attendance records;
- pastoral care records;
- safeguarding information;
- children's and youth activity records;
- volunteer and DBS-related information;
- payroll, employment and financial records;
- Gift Aid and donation records;
- emergency contact details;
- photographs and video recordings where applicable;
- communication preferences;
- website or online platform contact information.

This list is not exhaustive and other personal data may be processed where necessary for the lawful operation of the church.

7. Storage of Data on Electronic Media

All church leadership, employed staff and trustees who store personal information obtained under this policy on any electronic system or part of the NHC website, are required to do so in accordance with the principles of the Data Protection Act 2018, and to take due care to ensure that the information remains secure through the use of passwords and encryption where appropriate. This includes:

- Email / telephone / address books held on personal computers, mobile phones, Tablets etc
- Data stored on memory sticks and/or portable hard drives

The Act requires all organisations to have appropriate security to protect personal information against unlawful or unauthorised use or disclosure, and accidental loss, destruction or damage.
Data should be kept on secure computer systems and/or in secure manual filing systems. In particular: passwords should be kept secure, should be changed regularly and not shared.
If computers are in shared areas the user should lock or log off when away from his or her desk.
In order to prevent virus attacks care should be taken when opening emails and attachments or visiting new websites.
Computer screens should be positioned away from windows to prevent accidental disclosure of personal data.
Personal data being taken off the premises should be encrypted if it would cause damage or distress if lost or stolen.
Back-ups of data should be kept.

The Church address book is provided online. It is strictly controlled, through the use of name specific passwords, which are set up and authorised by the Data Controller or a nominated person. It can only be accessed by users who have specific permission to do so.

The Church address book may be provided in paper form to church members without website access. Recipients must ensure that it is stored securely and not left visible or accessible when not in use.

8. Storage of Information on Paper Hard Copy

Appropriate measures shall be taken to ensure that paper records containing personal data are stored securely and accessible only to authorised persons. Confidential paper waste must be securely disposed of using appropriate destruction methods, including shredding where necessary.

9. Data Retention

NHC will only retain personal data for as long as reasonably necessary.

Typical retention periods may includ

Record Type	Suggested Retention
Gift Aid records	6 years
Payroll records	6 years
DBS Certificate copies	Max 6 months
Volunteer personnel records (including DBS check log)	6 years after volunteering ends
Membership/contact records	10 years from last contact or by request
Safeguarding records	In accordance with the safeguarding policy; up to 50 years or longer where justified
CCTV/livestream recordings	Livestream indefinite (as part of the church's public archive), /CCTV 30 days
Children's attendance records (where child ceases attending)	5 years from last contact

Records no longer required will be securely deleted or destroyed.

10. Rights to Access Information

Individuals have rights under UK GDPR including:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure (where applicable)
- the right to restrict processing
- the right to object
- the right to data portability (where applicable)

Requests should be made to the Data Controller.

Any person who wishes to exercise this right should make the request in writing to the Data Controller, using the standard letter which is available on-line from www.ico.org.uk.
NHC will not normally charge a fee unless requests are manifestly unfounded or excessive.

11. Photographs and Video

Photographs or video taken within the church building or at church events may include individuals or groups of individuals attending these events. These photographs / videos will be used solely for the purpose of NHC advertising, marketing and public relations, and may thus appear in any advertising internal and/or external, website or other publicity material.

The Data Protection Act DOES apply where photographs are taken for official use, such as for identity passes, and these images are stored with personal details such as names. Where the Act does apply, it will usually be enough for the photographer to ask for permission to ensure compliance with the Act.

Photographs taken at NHC purely for personal use are exempt from the Data Protection Act. This means that parents, friends and family members can take photographs for the family album of their children and friends participating in church events.

NHC will take reasonable steps to:

- notify attendees where filming is taking place
- provide opportunities to avoid camera areas where practical
- obtain consent where appropriate

Children and vulnerable adults will not be intentionally featured without appropriate consent and safeguarding oversight.

Livestreams may remain available online after the event unless otherwise stated.

12. Website Privacy Statement

The following statement is provided for users of the New Hope Church Website (https://www.newhopechurch.co.uk/privacy-policy/):
At NHC we collect different types of information about our users for the following main reasons:
1. To provide an interactive web site where email is used to communicate with the users.
2. To provide a security mechanism whereby we can restrict content to certain groups of users.
3. To help us to improve the service we offer.

NHC's website may collect limited personal information through:

- contact forms
- event registrations
- mailing list signups

The website may also use:

- cookies
- analytics tools
- embedded media

Users will be informed where consent is required.

13. Third-Party Data Processors

NHC may use trusted third-party providers for services such as:

- email systems
- cloud storage
- accounting software
- online church management systems
- livestreaming platforms

Where third-party processors are used:

- appropriate contracts or safeguards shall be in place
- providers must process data securely and lawfully

14. Training and Responsibilities

Trustees, staff and relevant volunteers shall receive appropriate guidance regarding:

- confidentiality
- safeguarding
- secure data handling
- recognising data breaches

The Trustees retain overall responsibility for ensuring compliance.

15. Data Breaches

NHC takes all reasonable steps to protect personal data from unauthorised access, loss, misuse, disclosure, alteration or destruction.

A personal data breach may include, but is not limited to:

- loss or theft of personal information;
- sending personal information to the wrong person;
- unauthorised access to personal information;
- loss of devices containing personal data;
- cyber security incidents affecting church systems or records.

Any trustee, employee, volunteer or authorised person who becomes aware of a suspected or actual personal data breach must report it immediately to the Data Controller.

The Data Controller will assess the nature and severity of the breach and take appropriate action to contain and investigate the incident. A record of all data breaches, including actions taken, shall be maintained.

Where a personal data breach is likely to result in a risk to the rights and freedoms of individuals, NHC will notify the Information Commissioner's Office (ICO) without undue delay and, where required, within 72 hours of becoming aware of the breach.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, affected individuals will be informed without undue delay unless an exemption applies.

Following any breach, NHC will review the circumstances of the incident and implement any necessary measures to reduce the risk of recurrence.

16. Summary of Principles

NHC shall comply with the UK GDPR principles requiring personal data to be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes and not further processed incompatibly;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- retained only for as long as necessary;
- processed securely using appropriate technical and organisational measures;
- processed in a manner that demonstrates accountability and compliance.