

Tabernacle Cardiff Privacy Policy 2020v0.3

Document history

Revision history

Date	Version	Author	Revision Summary
9/3/2020	0.1	Mike Johnson	Initial version presented to Church Council
9/11/2020	0.2	Mike Johnson	Incorporation of appendices and amendments suggested by Richard Clarke (Plymouth)
29/11/2020	0.3	Mike Johnson	Following affirmation of department leaders re. record keeping.

Review and Approval history

This document requires review and approval by Church Council at least every three years.

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	0.3

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28 Introduction

29 Tabernacle Cardiff Church is committed to protecting the rights and privacy of members,
30 adherents, Youth meeting members, Sunday school children, and visitors (the *data subjects*)
31 in keeping with the Data Protection Act 1998 and the General Data Protection Regulation 2018.

32 This policy shows how the Church complies with these requirements and takes a graduated,
33 context and risk aware approach to related procedures. Inadequate attention to information
34 and privacy risks can be a source of significant material harm to individuals, the Church and
35 the wider gospel cause. Adherence to sensible policy and practice is fundamental to the
36 smooth running of the Church.

37 The policy will be reviewed at least every three years to ensure it is up to date (see review
38 history on page 1).

39 Tabernacle Cardiff is the *Data Controller* and this policy is written by and for the Church
40 Trustees.

41 Data falls into two categories¹ – Personal Data and Special Category Data:

- 42 • **Personal Data** is any other information relating to an identified or identifiable living
43 person, such as their postal address.
- 44 • **Special Category Data** is any data about legally protected characteristics, such as racial
45 or ethnic origin, religious or philosophical beliefs, physical or mental health, etc.

46 Personal data is held regarding financial records, member roll, consent and attendance at
47 youth meetings, involvement, DBS (Disclosure and Barring Service) checks, and wider contacts.

48 Given that adherence to a church is an expression of religious belief, ***any data evidencing this
49 could be construed as special category personal data***. Many Christians welcome the
50 opportunity to demonstrate religious affiliation, such as in public acts of worship, where
51 identity is manifestly made public by the data subject. Nevertheless, we are determined to
52 uphold individual rights to privacy².

53 Audit and access

54 Data will be amended as necessary and will be reviewed annually to ensure it is kept up to
55 date. The church secretary will trigger this audit every New Year and require returns from
56 leaders of the church works and departments.

57 Under the Freedom of Information (FOI) regulations, everyone has the right to access
58 information held by the Church about them. Requests should be made to the Church Office in
59 writing, or by using the office@tabernaclecardiff.org email address. The regulations require
60 public bodies to respond to requests within 20 days. This response would include notice of any
61 fee payable (to cover expenses incurred).

62 Use of data

63 Data is processed to facilitate the work of the Church. It is not shared with any outside
64 organisation. If a request for information is made it will not be passed on without prior

¹ Data Protection Act

² Evidence of participation in services can bolster an asylum seeking adherent's claim for refugee status but it can also put them and their family in mortal danger.

65 informed consent, ideally in writing, of the individual concerned who may freely deny consent
66 without giving a reason.

67 It is therefore unnecessary to register with the Information Commissioner's Office or pay a
68 fee as limited information is held and only processed towards the **legitimate interest** of the
69 Church and its adherents³.

70 Personnel

71 The Church Office, Finance Team, and various works of the church (such as Sunday School),
72 use and process data for and on behalf of the Trustees of the Church. The Church Office,
73 Finance Team and leaders of the church works operate procedures that will provide security
74 and protection against unauthorised access to information. For example, paper-based
75 records are stored in locked filing cabinets and the Church Microsoft OneDrive is used for
76 electronic information and access is password protected.

77 Procedures

- 78 1. **The annual data audit** will be reported to Church Council at the earliest
79 opportunity each New Year. This will require a return from department leaders
80 to outline records kept, methods of storage, and to affirm that only current
81 records are kept.
- 82 2. **Paper documents**, such as consent forms, DBS Certificates and Medical Forms,
83 are kept in locked filing cabinets in the Church Office. They are kept for reference
84 due to the Church's legitimate interests. Due to the distributed nature of church
85 departments, some paper records are kept off-site. The department leaders are
86 informed of this Data Protection Policy, its implications and requirements so as
87 to ensure that paper records kept off-site are stored in locked filing cabinets.
- 88 3. **Electronic records**, such as financial records and accounts are kept electronically
89 MS OneDrive online storage, password protected. The Finance Team is
90 responsible for maintaining financial information and, apart from members of
91 Church Council, only the Finance Team have shared, password protected access
92 to it. Sensitive files are password protected on an individual basis.
- 93 4. **Information transmission** will be assessed for risk. In high-risk situations where
94 transmission is unavoidable, encrypted password protected folders will be used,
95 with passwords sent through separate communication.
- 96 5. **'Take down' requests** related to online information will be reviewed by the
97 Church Council. Actions available include redaction, revoking public access to the
98 information of concern, in negotiation with the person affected.

99 People and their data

100 Members

101 The personal data held about church members is limited to names and contact details
102 (address, email addresses, phone numbers) on a members' database kept in MS OneDrive.
103 Gift-Aid declarations are completed by taxpayers, making it sensitive information. Members'

³ The church operates on a 'not-for-profit' basis, and only processes information necessary to establish or maintain membership or support, to provide or administer activities for people who are members of the organisation or have regular contact with it. The church only holds information about individuals whose data is necessarily processed for this purpose. All personal data processed is restricted to personal information that is necessary for this purpose.

104 bank account details, of those giving to the church funds, are retained to process the church
105 accounts. Paper-based information is stored in a locked filing cabinet in the church hall.
106 Electronic records are kept in a password protected Microsoft OneDrive folder. Information
107 is given voluntarily and held by the church as a legitimate interest relating to their
108 attachment to the church.

109 [Pastor and Officers](#)

110 In addition to the member's information mentioned above, Church Officers' email addresses
111 and phone numbers are published on the church website. Their names also appear in the
112 Church record of trustees on the UK Charities Commission website.

113 [Safeguarding](#)

114 Leaders and helpers in the various activities of the church are required to have a Disclosure
115 and Barring Service (DBS) check before helping. The application and resultant forms and
116 paper records are stored in a locked filing cabinet by the Church's safeguarding officer at
117 their home (DBS forms require 'wet' signatures).

118 [Rotas](#)

119 Monthly rotas containing the names of role-holders and their allocated role are made
120 available on two church noticeboards.

121 [Children](#)

122 The church operates activities for children and young people under the age of 18. Paper
123 registers and consent forms are completed and kept securely by the leaders of each activity.
124 Consent to attend the meeting is obtained from parents/guardians. It is not always possible
125 to obtain this consent on the first attendance, but this is secured as soon as possible
126 thereafter. This consent includes an opt-in to the use of media identifying the person under
127 18 years of age.

128 [Adherents and wider contacts](#)

129 Personal data is held by a nominated Church Officer in a paper notebook to record when
130 asylum-seekers come to the church for the first time. This is referenced when we are called
131 upon to write letters of support for asylum claims. Original electronic copies of these letters
132 are kept on the Church's password protected MS OneDrive.

133 A list of email addresses of contacts is maintained and used by the Pastor to share spiritual and
134 practical information electronically. Each email is sent with the blind copy feature, avoiding
135 sharing addresses with all recipients. Each email features an explicit invitation to opt-out of
136 such messages.

137 [Media](#)

138 [Photography](#)

139 The church has an archive of photographic material with the online service Flickr:
140 <https://www.flickr.com/photos/tabernaclecardiff/> A paid subscription is maintained to uphold
141 the appropriate level of service. Some photographs on Flickr are entirely private to the
142 account's login but most are publicly available. Some photographs identify the subject by
143 name. The Secretary keeps the login for Flickr which enables adding photos and access to the
144 entire archive. Consent for keeping photos of children is obtained from their legal guardian
145 when they join. Consent may be withdrawn at any time and photos deleted upon written or
146 verbal request that is sufficiently specific to enable a clear path of action.

147 [Video, including live broadcasts](#)

148 The church makes extensive use of live video broadcasts through YouTube where the video is
149 thereafter retained. Most of this footage features the preacher alone. During congregational
150 singing the wide-angle camera broadcasts from below the balcony, taking in a view from the
151 rear towards the pulpit of the central rows of the church including the rear aspect of members
152 of the congregation. This helps viewers joining online feel included in the service. However,
153 they become identifiable:

- 154 • While standing within shot facing away from the camera if they turn around during the
155 singing.
- 156 • Passing through doors beside the pulpit.

157 Multilingual notices (English, Welsh and Farsi – see appendix) are provided on the doors into
158 the chapel, advising the congregation of their potential visibility, and asking them to speak to
159 a steward if they have any issues.

160 [WhatsApp](#)

161 The church makes extensive use of the electronic messaging for organising its activities. For
162 example, groups for Sunday School, Stewarding, Church Council, Hospitality, Persian adherents
163 (known as ‘FFF’). Information, some of it personal, is retained on group members’ mobile
164 phones, often for long periods. Ongoing membership of these groups is voluntary.

165 [Website](#)

166 Visits to the church website are logged but this information is completely anonymous, not
167 stored and only used to aid the visitor’s in-session navigation. Anonymous usage data is
168 collected from visitors to the YouTube channel and SermonAudio.com but this information is
169 not stored or used apart from occasionally reporting aggregated use statistics, e.g. to the
170 Trustees.

171 Further detail is given in the Website Privacy notice appearing on the Church Website (see
172 Appendix).

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The Church Trustees

November 2020

177 Appendix: Multilingual notice regarding live video
178

179 **Croeso i'r Gwasanaeth - Welcome to the Service - به خدمات خوش آمدید**

180 *Sancteiddrwydd a weddai l'th dŷ Salm 93p5*
181 *Holiness becometh thy house O LORD, for ever. Psalm 93v5*
182 ای خداوند، قدوسیت خانه تو را می زبید تا ابدالابد.مزامیر 93:5
183

184 **Ydych chi yn y llun?**
185 **Are you in the picture?**
186 **ایا تو در عکس هستی؟**

187 Video of the service is broadcast live and stored online. We use a wide camera
188 angle for some of the service, the start, end, and during singing. Also, photos
189 are posted to the church archive at:

190 www.flickr.com/photos/tabernaclecardiff

191 If you have any concerns about this, please speak with a steward.



195 Appendix: TabernacleCardiff.org Privacy Notice

196 The trustees of Tabernacle Cardiff Church are committed to safeguarding the privacy of those who use the
197 Church Website or contribute in any way to the events and facilities we are responsible for. This policy sets
198 out how we treat personal information.

199 **1. Information collected**

200 You can browse the tabernaclecardiff.org website without disclosing any personal information about yourself.
201 All information provided is on a voluntary basis, such as through the contact form at
202 <http://tabernaclecardiff.org/contact-addresses/> . When you read, search or perform any other action on the
203 public tabernaclecardiff.org website, or communicate with us, we may collect, store and use the following
204 kinds of personal data:

- 205 • information about your computer and about your visits to and use of this website;
- 206 • information that you provide to us for the purpose of registering your interest in tabernaclecardiff.org
207 and events we organise, including but not limited to name, address, e-mail address, phone number;
- 208 • any other information that you choose to send to us.

209 We respect children's privacy and we do not knowingly or intentionally collect personal information from
210 anyone under the age of 18 without the consent of parents or guardians. If you are under the age of 18, please
211 do not submit any personal information to us. You should seek guidance from a parent or guardian to assist
212 you.

213 **2. Use of your personal data**

214 We respect your privacy and appreciate your interest. At no time do we ever provide your personal information
215 to any third party, associate, or service provider unless absolutely necessary in order to provide a service that
216 you have requested. We may use your personal information to:

- 217 • administer and enhance the website;
- 218 • send statements and invoices to you, and collect payments from you;
- 219 • send you general (non-marketing) communications.
- 220 • send you automated email notifications which you have specifically requested;
- 221 • send you news and other communications that may be of interest to you by email.
- 222 • deal with enquiries and complaints made by or about you relating to the website.

223 You may unsubscribe at any time from news and communications by e-mailing us at
224 office@tabernaclecardiff.org

225 In addition, we may disclose information about you:

- 226 • to the extent that we are required to do so by law;
- 227 • in connection with any legal proceedings or prospective legal proceedings;
- 228 • in order to establish, exercise or defend our legal rights

229 Where you submit personal information for publication on our website, we will only publish and otherwise use
230 that information in accordance with the consent you grant to us.

231 **3. Security of your personal data**

232 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of
233 your personal information. Unfortunately, the transmission of information via the internet is inherently
234 insecure. Although we will do our best to protect your personal information, we make no representation or
235 warranties as to the security of your data transmitted to the website. Any transmission is at your own risk.

236 We warrant to our affiliates that we will follow industry best practice in securing your personal data, encrypting
237 your data in transit and securing it using role-based authentication. Once we have received your information,

238 we will use strict procedures and security features to try to prevent unauthorised access. We will store all the
239 personal information you provide on our secure firewall-protected server. Tabernacle Cardiff holds your
240 personal data in accordance with the security provisions of the Data Protection legislation.

241 **4. Managing your data**

242 We will take reasonable steps to create an accurate record of any personal information you have submitted
243 through this website. However, we do not assume responsibility for confirming the ongoing accuracy of your
244 personal information.

245 **5. Data Protection**

246 Tabernacle Cardiff Church complies with the Data Protection Act. You may instruct us to provide you with the
247 personal data that we hold about you subject to the payment of a fee fixed at £10.00 (ten pounds sterling) and
248 a written request to: office@tabernaclecardiff.org

249 **6. Cookies**

250 Tabernaclecardiff.org uses cookies so that we can recognise your computer.

251 A cookie consists of information sent by a web server to a web browser, and stored by the browser. The
252 information is then sent back to the server each time the browser requests a page from the server. This enables
253 the web server to identify and track the web browser.

254 We may use both "session" cookies and "persistent" cookies on the website. In some cases, our third-party
255 service providers may use cookies on our sites. We have no access to or control over these cookies.

256 We may use Google Analytics to analyse the use of the tabernaclecardiff.org website. Google Analytics
257 generates statistical and other information about website use by means of cookies, which are stored on users'
258 computers. The information generated relating to our website is used to create reports about the use of the
259 website. Google Analytics uses only first-party cookies. This means that all cookies set by Google Analytics for
260 our website send data only to the servers for our website. The data cannot be altered or retrieved by any
261 service on another website. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>
262 Most browsers allow you to refuse to accept cookies. For example, in Microsoft Edge you can refuse all cookies
263 by clicking "Settings", "Site Permissions", "Cookies and site data", and selecting the sliding selector for "Allow
264 sites to save and read cookie data (recommended)". This will, however, have a negative impact upon the
265 usability of many websites.

266 **7. Links to other websites**

267 This website and our e-mail messages may contain links to other websites. We are not responsible for the
268 privacy policies or practices of other websites. This Privacy Policy applies only to the information we collect
269 on this website. We encourage you to read the privacy policies of these other websites.

270 **8. International data transfers**

271 Information that we collect may be stored and processed in and transferred between any of the countries in
272 which we operate in order to enable us to use the information in accordance with this Privacy Policy. You
273 expressly agree to such transfers of personal information. If you are accessing the site and service within the
274 European Economic Area, information which you provide will not be transferred to countries which do not
275 have data protection laws equivalent to those in force in the European Economic Area.

276 **9. Revisions**

277 We may update this Privacy Policy from time-to-time. Any such changes will not be detrimental to your privacy
278 or rights. Any changes to this Privacy Policy will be uploaded as a new Privacy Policy on our website with a
279 revised "Effective" date at the top of this policy. Since we may make changes at any time without notifying

280 you, we suggest that you should check this page occasionally to ensure you are happy with the revised Privacy
281 Policy.

282 **10. Contact**

283 If you have any questions, comments, requests, concerns or disputes regarding this Privacy Policy or our
284 treatment of your personal data please write to us by email to office@tabernaclecardiff.org