



The Church of Scotland

Larbert East Church of Scotland

Our mission is to show God's Love
by sharing the Good News of Jesus Christ
with our neighbours
through worship, service, teaching and friendship

GDPR and Data Protection Policy

This document contains a summary of the policies that the GDPR working group have agreed upon in order to ensure that the church complies with the legislation and minimises the risk of incidents, liability and prosecution of our congregation and elders. Terms in **bold** are defined within this document.

1. Data Sharing Consent (**DSC**)

All of our church groups and teams share personal data in some respect. This could, for example, be on group or team rotas, minutes, articles in Eastwords or in the Order of Service. The following information may be collected, stored and shared:

- Full Name
- Email Address (this should be a personal email address as per Church of Scotland guidelines but this will not be policed – it is up to individuals to follow the guidance on the form)
- Telephone Number

This will be done by means of a Consent Form. A single form has been designed to be used for all church (adult) groups and will be administered as follows:

- The administration of the **DSC** will be administered by the Data Protection Officer (**DPO**) on behalf of the congregation by means of the form.
- Data on the form will be entered into the church's membership database.
- The membership database will contain a flag showing whether a person has provided consent and the date on which the form was signed.
- Consent will be gathered on a one-off basis. The DPO will, on a best endeavours basis, try to ensure that only one consent form is issued to any given person.
- The paper copy of the form will be securely stored for future audits.

1.1 Children

Special consideration needs to be given to the data we capture about Children in our church family. For those aged 12 (inclusive) and under, the following information may be collected, stored and shared amongst the Young Church leaders and may also be stored on the church's membership database:

- Full Name
- Date of Birth (as the young church groups and activities are structured around the age of the child)

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- Home Address, including postcode (in case we need to contact a parent/guardian or return the child home in case of an emergency)
- Telephone Number (in case we need to contact a parent/guardian)
- Email address (to circulate information about the Young Church and activities)
- The name, relationship and telephone number for an emergency contact (in case we cannot contact the named parent/guardian on the form)
- The details of any medical conditions or allergies (to ensure that the Young Church leaders are aware of these)
- Whether the child is allowed to participate in Family Communion services or not
- Whether the child may sit in the **Green Zone** of the church during live streamed/recorded services or not
- Whether the child may appear in photographs or not

The paper form will be stored securely and will not be removed from church premises. The consent form for children will have a life of one year and will be re-collected in the weeks after the school summer holidays. When a child reaches high school age and moves to the Youth Group, the consent form will be passed to the Youth Group leaders.

1.2 Young People

Special consideration also has to be given to our Young People. A young person is defined as a person aged between 13 and 18 (inclusive).

The following data will be gathered and will be shared amongst Youth Group leaders and will be stored in the Church's membership database:

- Full Name
- Date of Birth (to ensure eligibility to provide consent)
- Home Address (in case we need to contact a parent/guardian or return the young person home in case of an emergency)
- Telephone Number (in case we need to contact the young person)
- Email address (in case we need to contact the young person)
- The name, relationship and telephone number for an emergency contact
- The details of any medical conditions or allergies (to ensure that the Youth Group leaders are aware of these)
- Whether the young person agrees to sit in the **Green Zone** of the church during live streamed/recorded services or not
- Whether the young person agrees to be in photographs or not

The paper form will be stored securely and will not be removed from church premises. The consent form for young people will be treated as perpetual unless the young person wishes to update any of the data or consents on the form.

1.3 Other Vulnerable Groups

It is important that other vulnerable groups, especially the visually impaired and those worshipping under a Covenant of Responsibilities, are made aware of this policy and particularly the implications of live streaming of services (see section 3).

Two clearly-marked areas have been provided in the **red zone** of the sanctuary for those confined to wheelchairs who do not wish to be visible on the live stream/recording.

2. Social Media

The church has a presence on Facebook. The group noted that the page is publicly accessible and, therefore, we must be careful with what is posted. The following policies were adopted:

- Any posts must not tag or (fully) name any person who has not signed the **DSC** form, submitted the article for publication or clearly given permission in the email thread for their details to be published. This includes any reproduction of the notices from the Order of Service.
- In the event of any doubts, the status of whether someone has signed the **DSC** form or not can be obtained from the **DPO**.
- Any posts on the page made by anyone in breach of this policy must be removed by an administrator.
- No photographs may be posted other than by administrators.
- Photographs must conform to policy 4 in this document or must be removed by an administrator. Photographs taken until 31st December 2018 will be exempt from this policy but must be removed upon request by any person visible in the photograph.

3. Live Streaming

Church services will be routinely live streamed on the internet and the audio and video is recorded and uploaded for future playback. It must be clear to any person in the sanctuary whether the location that they are in at any time during a service or event is part of the area visible on the live stream or not. To support this, the sanctuary has been divided into two zones:

- From the middle to the rear of the sanctuary, including the area under the balcony and the balcony itself are designated as the **red zone**. Under no circumstances will this area be included in the visual element of any live stream. On the ground floor, the pews in this area are marked with stickers at either end with a picture of a red camera framed in a red circle with a strike through and the words *This pew is not visible on the live stream*. This area contains an ambient microphone, therefore the audio of this area may be broadcast and/or recorded.
- The front of the ground floor, including the areas to the side, the chancel and the pulpit are designated as the **green zone**. This area may be included in the visual and audio elements of the live stream, which may also be recorded. The perimeter of the **green zone** is marked by A3 sized posters mounted on pillars in the sanctuary and at next to the anniversary door. The pews in the **green zone** are marked with stickers at either end with a picture of a green camera framed in a green circle and the words *This pew is visible on the live stream*.

Prior to any service that will be live streamed beginning, there must be details on the Powerpoint Loop advertising this prominently and an audio announcement must be made at least two minutes before the service begins (to ensure that any visually impaired people are aware) explaining that the service will be live streamed and providing a final opportunity to move seats.

3.1 Medical Emergencies

If a medical emergency arises in the **green zone** of the sanctuary during the broadcast, it is expected that the live visual stream will be terminated and a still picture will be displayed instead.

3.2 Baptisms

When someone is being baptised, consent is gathered for the live streaming element (see section 5.3). The person or people operating the live stream must be clear on whether consent has been provided for the baptism to be broadcast. In the event that consent has not been provided, the baptism must not be broadcast. The audio element is subject to a separate consent and, therefore, it is feasible that a family may wish the audio but not the video to be broadcast. In this event, a still picture will be displayed instead of the visual stream.

3.3 Welcome Teams

Welcome teams must be aware of these policies. As part of their duties, welcome teams should ensure that the notices are in place and that the stickers are in place at the end of each pew. Spare stickers should be available and welcome teams should be aware of the location of these.

Welcome teams should be particularly alert for visually impaired people and visitors – it is expected that they will explain the position with respect to the service being live streamed and, particularly with respect to visually impaired people, to help them to a seat in the zone of the church that they wish to be seated in. Welcome teams should also be aware of the location of the privacy notice in case anyone wishes to see this.

4. Photography

Photographs taken for use on church media must conform to the following rules:

- Photographs must only be taken in the **green zone** of the sanctuary.
- Photographs should ideally not be taken facing the rear of the sanctuary, although there will be circumstances where this is unavoidable. If photographs are taken facing the rear of the sanctuary, people seated in the red zone must not be identifiable in the picture or it must not be published.
- Photographs must not be taken in any other area of the church or church grounds unless appropriate consent is gathered. This would typically be by the posting of a clear sign at the entrance to the area, by a clause on the ticket or verbally on admission. This should ideally be discussed with the **DPO** in advance.

5. Printed Media

This policy is for printed media designed for public circulation. There are two primary documents covered by this policy, namely:

- The Order of Service
- EastWords, the church magazine

No person may be named, nor contact details for a person disclosed in either of these publications unless:

- The person submitted the article themselves
- The person has signed the **DSC** form. This can be confirmed by contacting the **DPO**.
- The person has clearly asked for it to be published or confirmed that they are happy for their details to be published in the email thread submitting the article for publication.

With respect to Baptisms, Deaths and Marriages:

- Baptisms may only be noted with consent (see section 6.3)
- GDPR only applies to living persons, therefore death notices are considered exempt
- Marriages are a matter of public record and may be published accordingly

6. Worship Protocols

It is normal that names may be said in various contexts during worship. This can happen for a variety of reasons but the person leading the service should be mindful to respect privacy wherever possible.

6.1 Birthdays

It is custom to celebrate special birthdays by announcing them and the congregation singing Happy Birthday. This should ideally be done before the live stream of the service begins.

6.2 Notices

Again, it is normal for people to be named in the notices of the Order of Service. When the notices are being read out, the person reading them should respect the privacy of those named by using first names only, if possible. It is reasonable and acceptable to fully name people who have signed the **DSC** form. Verification of whether a person has signed the form or not can be obtained from the **DPO**.

6.3 Baptisms

As part of the data gathered in preparation for Baptisms, a form is provided covering the data protection aspects. This includes whether:

- The details may be placed in the Falkirk Herald
- The names of the party may be included in the Order of Service (which covers publication on the web site and the Facebook page)
- A picture of the person being baptised may be shown on the Powerpoint presentation/screens during the service
- Whether the audio of the baptism may be recorded and made freely available on our website and other media

- Whether the audio and video may be broadcast live on the internet and be made available for future download
- For photographs to be taken during the baptism (which covers publication on the church's Facebook page)
- For the name of the person being baptised to be included in Eastwords, which may also be published on the church website
- For the name of the person baptised to be added to the cradle roll, which is displayed in the sanctuary

These decisions will be communicated to those who need to know in advance of the baptism taking place.

7. Church IT

A large amount of personal, sensitive and confidential data is exchanged within church teams. This can range from rotas through to pastoral care lists. The people named on these lists can be extremely vulnerable and protection of their personal information is a priority for the church.

To facilitate this, the church will provide a secure personal email address and secure file storage to all teams along with training in how to use them. It is expected that these will be used for exchanging such information and that information of this nature will not be emailed or transferred from these secure services and locations.

It is accepted that some people will be unable to use these services – those in such a position must undertake to handle printed copies carefully and, in particular, to pay attention to sections 7 and 8 of this policy.

8. Retention Policy

Personal data, be it on paper or in digital format (including emails) must not be retained for longer than is legally necessary. With a few exceptions, this will mean that most data should be destroyed after the practical use for it has passed. For example, extracts from the Elder District Lists distributed to Elders prior to communion should be deleted or securely destroyed after communion has been completed. Rotas should be destroyed when the last date on them has passed. The main exceptions will be:

- The Communion Roll, which is retained forever for historical record keeping
- Financial information, which must be retained for seven years

9. Handling of data on Paper

Personal data that is either printed out or written down poses a much greater risk than data stored on the Church's IT system. Ideally, personal data should not be written down or printed out but where this is unavoidable, consideration should be given to whether the data needs to be removed from church premises or not. If it does, our legal advice is that it should preferably be transported securely (i.e. in a locked case).

Written or printed data should be securely destroyed when the need for it has passed. Ideally, this would be by shredding it. If this is not possible, it should be ripped into small pieces.

Written or printed data must be locked securely away when not in use.

10. Employees/Ministry Team

Church employees and our ministry team are also subject to these policies and have their own version of the **DSC**, covering disclosure and sharing of their:

- Full name
- Email Address
- Telephone Number

All of these things are collected for the purposes of making the ministry team known to others, and to provide contact details throughout the various mediums used by the church for its communications.

This policy also recognises that we may store their personal data for the purposes of employing them, such as keeping tax records and paying wages and salaries.

11. Approval

This policy was created and approved by the Data Protection Group, who act on behalf of Kirk Session and Congregation in these matters. All proposed changes must be submitted via the Data Protection Officer.

A handwritten signature in black ink that reads "Simon HESSETT". The signature is written in a cursive style with a horizontal line underneath the name.

SIMON HESSETT

Data Protection Officer