



Data Protection Policy

Dated June 2022

1. Data Protection Policy Statement

During the course of our activities, the Diocese of Wrexham (the “Diocese”) – in its curial offices, parishes, departments and agencies – will collect, store, use and otherwise process **Personal Data** (which may also include **Sensitive Personal Data**) about the people with whom it interacts. This may include information about parishioners, volunteers, clergy, employees, contractors, suppliers and other third parties. This data is gathered in order to enable the Diocese to comply with its statutory obligations and to achieve its charitable objects of advancing and maintaining the Roman Catholic religion through the operation of its parishes and its other activities.

Everyone has rights with regard to how their **Personal Data** is handled by organisations. The Diocese is committed to ensuring that **Personal Data** is properly and securely managed in accordance with the Data Protection Act 1998 (“DPA”) and believes this is an important part of achieving trust and confidence between the Diocese and those with whom it interacts. The Diocese will make every effort to achieve best practice in relation to data protection and will regularly review its procedures to ensure they are adequate and up to date.

Any breach of this, any other diocesan data protection policy or data protection legislation will be taken seriously and may result in legal action being taken against the Diocese or the individual responsible for the breach.

2. Introduction

The Diocesan Trustees have overall responsibility for compliance with data protection legislation, and the Diocesan Data Protection Officer, is responsible for ensuring day to day compliance with this policy and the relevant legislation. The Data Protection Officer will undergo training at least once every 12 months.

The Diocese is registered with the Information Commissioner’s Office as a **Data Controller** and is required to comply with the eight enforceable data protection principles, which provide that **Personal Data** must be:

1. Processed fairly and lawfully
2. Obtained for specified and lawful purpose(s)

3. Adequate, relevant and not excessive for the purpose(s)
4. Accurate and kept up to date
5. Not kept longer than necessary for the specified purpose(s)
6. Processed in accordance with Data Subjects' rights
7. Secure
8. Not transferred outside of the EEA without adequate data protection

This policy applies to all **Personal Data** created, stored or otherwise processed by the Diocese in whatever format (e.g. paper, electronic, film) and however it is stored (e.g. electronically or in filing cabinets). It also includes information that is in paper form but intended to be put onto a computer.

All clergy, staff and volunteers of the Diocese who are involved in the **Processing** (which includes collecting, accessing, using and/or disclosing) of **Personal Data** held by the Diocese have a duty to protect the data they process by complying with this policy as they are part of the Diocese as **Data Controller**. To the extent that the Diocese instructs another body or organisation to process **Personal Data** on its behalf as a **Data Processor**, the Diocese will remain **Data Controller** under the DPA and will ensure that the **Data Processor** also complies with the DPA.

3. General Statement

This policy is intended to ensure that **Personal Data** is dealt with in accordance with the data protection principles and with data protection legislation generally. The Diocese will therefore:

- Ensure that, when personal information is collected, the **Data Subject** is informed what data is being collected and for what legitimate purpose(s).
- Be transparent and fair in processing **Personal Data**.
- Take steps to ensure the accuracy of data at the point of collection and at regular intervals thereafter, including advising **Data Subjects** of their right to ask for rectification of **Personal Data** held about them.
- Securely dispose of inaccurate or out-of-date data, or data which is no longer required for the purpose(s) for which it was collected.
- Share information with others only when it is lawful to do so and inform individuals with whom their data may be and/or has been shared and for what purpose(s).
- Ensure that data is processed in line with **Data Subjects'** rights, which include the right to:
 - Request access to any **Personal Data** held about them by the Diocese;
 - Prevent the processing of their data for direct-marketing purposes;
 - Ask to have inaccurate data amended;
 - Ask the Diocese to prevent **Processing** of their **Personal Data** which is likely to cause unwarranted or substantial damage or distress to themselves or anyone else.
- Ensure that all clergy, volunteers and employees are aware of and understand the Diocese's data protection policies and procedures.

4. Data Security

The Diocese shall ensure that appropriate security measures are taken to prevent unauthorised or unlawful **Processing**, damage to or loss (accidental or otherwise), theft, or unauthorised disclosure of **Personal Data**. In particular, all clergy, employees and volunteers shall take the following steps to secure personal information:

- Only those who are authorised will be able to access **Personal Data** and process it.
- **Personal Data** will only be stored on the central computer system and not on individual PCs, portable electronic devices or removable storage media unless those devices have been encrypted.
- Passwords will be kept confidential and will be changed regularly.
- PCs will be locked or logged off and paper documents will be securely locked away when individuals are away from their desks.
- Offices, desks and filing cabinets/cupboards will be kept locked if they hold **Personal Data** of any kind, whether on computer or on paper.
- When destroying **Personal Data**, paper documents will be securely shredded and electronic data will be securely deleted.
- **Personal Data** removed from an office will be subject to appropriate security measures, including keeping paper files away from public visibility, the use of passwords/passcodes and encryption of portable electronic devices and must be stored securely (e.g. not left in the boot of a car).

When receiving telephone or email enquiries, employees and volunteers will be required to exercise caution before disclosing any **Personal Data** and will:

- Not give out **Personal Data** over the telephone unless in very limited circumstances where they know or can verify the caller's identity and their entitlement to receive the information requested;
- Require callers to put their requests in writing so their identity and entitlement to receive the information may be verified;
- Ensure **Personal Data** is securely packaged and consider the most appropriate means by which the data should be sent (e.g. special delivery, courier or hand delivery);
- Refer to the Data Protection Officer for assistance in difficult situations and in all cases involving **Sensitive Personal Data**.

Personal Data will only be transferred to a third-party acting as a **Data Processor** (such as a contractor or supplier) if the Data Protection Officer is satisfied that the third party has in place adequate policies and procedures to ensure compliance with data protection legislation. Data sharing agreements will be used where appropriate.

5. Subject Access Requests

Any individual has a right of access to the **Personal Data** which the Diocese holds about them. To be valid, a **Subject Access Request** from a **Data Subject** for the information the Diocese holds about them must be made in writing and provide enough information that is reasonably required to enable a search for the requested information to be undertaken. This includes requests made via email or on social media.

All **Subject Access Requests** will be dealt with by the Data Protection Officer. Clergy, employees or volunteers who receive a **Subject Access Request** must forward it to the Data Protection Officer immediately in order that such requests can be replied to 'promptly' and in any event no later than 40 calendar days from receipt of the request (or receipt of the fee).

A fee of up to £10 may be charged for dealing with **Subject Access Requests**.

The Diocese cannot limit the number of **Subject Access Requests** made by a **Data Subject** but, where there has not been a reasonable interval between two requests from the same **Data Subject**, or where identical requests have been received, the Diocese may lawfully refuse to respond and, if so, the Data Protection Officer will inform the **Data Subject** of this in writing within the 40 day period.

6. Monitoring and Review

This policy will be reviewed every 12 months and may be subject to change.

7. Contacts

Any queries regarding this policy should be addressed to the Data Protection Officer. Complaints relating to data protection should in the first instance be addressed to the Data Protection Officer and will be dealt with under the diocesan complaints policy.

Further advice and information can be obtained from the Information Commissioner's Office at www.ico.org.uk

Glossary

Data Controllers are the people or organisations who determine the purposes for which, and the manner in which, any personal data is processed. They have a responsibility to establish practices and policies in line with the DPA. For the purposes of this policy the Diocese is the data controller of all personal data held and used by the Diocese as an organisation including its offices, parishes, departments, agencies, clergy, employees and volunteers.

Data Processor means any person who or organisation which processes personal data on behalf and on the instruction of the Diocese as data controller. Data processors have a duty to protect the information they process for and on behalf of the Diocese by following this and other diocesan data protection policies at all times.

Data Subjects include all living individuals about whom the Diocese processes personal data. A data subject need not be a UK national or resident. All data subjects have legal rights in relation to their personal data and the information that the Diocese holds about them.

Personal Data means data relating to a living individual who can be identified from that data or from that data and other information which is in, or is likely to come into, the Diocese's possession. Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. Mere mention of someone's name in a document does not necessarily constitute personal data, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition.

Processing is any activity that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or disclosing personal data to third parties.

Sensitive Personal data means information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, the commission or alleged commission of any offence or any criminal proceedings or sentencing involving that person. Sensitive personal data can only be processed under strict conditions and such processing will usually, although not always, require the explicit consent of the data subject.

Keith McDonogh
Chair of Trustees
For and on behalf of the Trustees of the Diocese of Wrexham

Date: