



Castle Hill Baptist Church, Castle Hill, Warwick, CV34 4EX

Registered Charity #1129504

PRIVACY & DATA PROTECTION POLICY

Approved on 23rd July 2026

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1. PRIVACY & DATA PROTECTION POLICY

1.1 Introduction

Castle Hill Baptist Church (hereinafter called 'the church') is committed to protecting the privacy and personal data of our members, volunteers, beneficiaries, staff, and all individuals who interact with us.

The policy is based on the seven principles set by the **UK GDPR 2021** law and the **Data Protection Act 2018**.

This policy explains how we collect, use, store, share, and protect personal data.

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2. UK GDPR Seven Principles

2.1 Lawfulness, Fairness & Transparency

We process data only when we have a lawful basis and provide clear information to individuals about how we will use it.

2.2 Purpose Limitation

We collect data only for specific, legitimate purposes, including:

- Religious services and pastoral care
- Membership and volunteer management
- Donations and Gift Aid
- Safeguarding
- Legal compliance

2.3 Data Minimisation

We collect only what is necessary.

2.4 Accuracy

We keep data accurate and up to date.

2.5 Storage Limitation

We retain data only as long as needed (see Retention Schedule 12.3).

2.6 Integrity & Confidentiality

We use appropriate security measures to protect data.

2.7 Accountability

We maintain documentation, policies, and training to demonstrate compliance.

3. TYPES OF DATA WE PROCESS

- Contact details
- Membership and attendance records
- Donation and Gift Aid information
- Volunteer and staff records
- Pastoral care notes
- Safeguarding information
- Photos and videos
- Special category data (e.g. religious beliefs)
- Medical information where necessary to ensure that the care and hospitality that we provide suit your needs.
- Details of your visits to our website (including, but not limited to, traffic data, location data, weblogs and other communication data). See below for more information.
- Details of your visits to our Church management system
- Details of your visits to our social media pages.

4. LAWFUL BASIS

- Consent
- Legitimate interests
- Legal obligation
- Contract
- Vital interests

5. SHARING DATA

We do not sell personal data. We may share data with:

- HMRC
- Safeguarding authorities
- IT service providers
- Regulators
- BUGB
- HEBA

6. INTERNATIONAL TRANSFERS

- The data that we control may be transferred and stored outside the U.K., for example, where our software providers store information on servers outside the U.K. It may also be processed by staff operating outside the U.K. who work for one of our suppliers or for us.
- Where there is a transfer outside the U.K., to the best of our ability, we will ensure that the organisation to which the information is transferred subscribes to equivalent standards under the GDPR.

7. INDIVIDUAL RIGHTS

Individuals may request:

- Access
- Correction
- Deletion
- Restriction
- Objection
- Portability
- Withdrawal of consent

8. CHILDREN & ADULTS AT RISK

We apply heightened confidentiality and safeguarding standards.

9. DATA SECURITY

9.1 How we keep your data safe:

- Encryption
- Access controls - only those with legitimate need can gain access
- Secure storage
- Staff training
- Incident reporting

9.2 Minister, deacons, staff and volunteers

The minister, the deacons, the church staff, and volunteers must ensure that **access** to the mailbox and to any other means containing data processed for the church's purposes (e.g. removable drives, folders, online accounts, etc.) is **exclusive and protected** (i.e., not accessible to anyone else, including family members). E.g., external drives should be stored securely in a location not accessible to family members, a separate account/login should be used on a shared computer, and the account must be password protected.

10. DATA BREACHES

Breaches are assessed and reported by the nominated representative to the deacons and the ICO (Information Commissioner's Office), within 72 hours, when required. Reporting to the ICO applies only to cases where the breach poses a high risk to individuals. In such cases, the nominated representative will also promptly inform the affected individuals.

Breaches can be assessed using the DATA BREACH RESPONSE TEMPLATE (Section 12.5)

11. CONTACT

Our nominated representative is David Ho. For further information about how we use your personal information, how we store it securely, and your rights to access the information we hold about you, please get in touch with us.

Email: secretary@warwickbaptists.org.uk Phone 07939 966218

If you wish to report a data breach, please follow the complaint procedure available on the church website <https://warwickbaptists.org.uk/complaints>

12. APPENDIX

- COOKIE POLICY FOR THE CHURCH WEBSITE <https://warwickbaptists.org.uk/>
- PRIVACY NOTICE (SHORT VERSION)
- DATA RETENTION SCHEDULE
- SAFEGUARDING & DATA HANDLING ADDENDUM
- RECORDS OF PROCESSING ACTIVITIES (ROPA)
- DATA BREACH RESPONSE TEMPLATE

12.1 COOKIE POLICY FOR THE CHURCH WEBSITE

<https://warwickbaptists.org.uk/>

1. Introduction

This Cookie Policy explains how we use cookies and similar technologies on our website. We are committed to protecting your privacy and complying with the **UK General Data Protection Regulation (UK GDPR)** and the **Privacy and Electronic Communications Regulations (PECR)**.

By law, we must:

- Inform you when cookies are used
- Explain what they do and why
- Obtain your consent before setting any non-essential cookies
- Allow you to withdraw consent at any time

2. What Are Cookies?

Cookies are small text files placed on your device when you visit a website. They help the site function, improve performance, and allow us to understand how visitors use our website.

Cookies may be:

- **First-party** (set by our website)
- **Third-party** (set by external services such as YouTube or analytics tools)

PECR applies to **any technology** that stores or accesses information on your device, including cookies, pixels, scripts, and similar tools.

3. Types of Cookies We Use

3.1 Strictly Necessary Cookies

These cookies are essential for the website to function and do not require consent.

3.2 Performance / Analytics Cookies

These cookies help us understand how visitors use our website so we can improve it. They require your consent before being set.

3.3 Functionality Cookies

These cookies remember your preferences and enhance your experience. They require consent unless they are essential to the service you request.

3.4 Third-Party / Embedded Content Cookies

These cookies are set by external services such as YouTube, Vimeo, and Cloudflare. They require consent.

4. Why We Use Cookies

We use cookies to:

- Ensure the website functions correctly
- Improve performance and user experience
- Understand how visitors use our site
- Remember your preferences
- Support secure online forms and donations

We do **not** use cookies to sell or share your data with advertisers.

5. Your Cookie Choices

5.1 Giving Consent

When you first visit our website, you will see a cookie banner that allows you to:

- Accept all cookies
- Reject all non-essential cookies
- Choose specific cookie preferences

Consent must be freely given, specific, informed, and unambiguous.

5.2 Withdrawing Consent

You can change or withdraw your consent at any time by:

- Using the “Cookie Settings” link on our website
- Adjusting your browser settings

Withdrawing consent does not affect the lawfulness of cookies already used before withdrawal.

6. Managing Cookies in Your Browser

Most browsers allow you to:

- Block all cookies
- Block cookies from specific sites
- Delete cookies
- Clear browsing data

Instructions can be found in your browser's help section.

7. Changes to This Policy

We may update this Cookie Policy to reflect changes in:

- The law
- Our website
- The cookies we use

8. Who does this?

The Nominated Representative is responsible for ensuring this part of the policy is implemented effectively in line with changing regulations.

12.2 PRIVACY NOTICE (SHORT VERSION)

To be displayed on notice boards and other designated locations within the Church premises.

Privacy Notice

- We collect and use personal data to support our religious and charitable work.

What We Collect

- Contact details
- Donation information
- Membership and attendance
- Pastoral and safeguarding information
- Photos and videos (with consent)

How We Use It

- Church administration
- Religious services and events management
- Events, volunteering and staff
- Donations and Gift Aid

Your Rights

You may request access, correction, deletion, or withdrawal of consent.

Contact

Our nominated representative is David Ho.

Email: secretary@warwickbaptists.org.uk Phone 07939 966218

Please refer to the PRIVACY & DATA PROTECTION POLICY published on the Church website for more information.

12.3 DATA RETENTION SCHEDULE

The Nominated Representative, in cooperation with the Operations Manager, will be responsible for prompting a yearly review by users to ensure they are aligned with the following schedule of data retention.

The 'right to be forgotten' only applies if the retention of this person's data is no longer legally required and hasn't already been erased (except relating to a COSHH incident).

The church reserves the right to extend the retention periods set in this schedule in exceptional circumstances. In these instances, the extension will need to be formally approved by the Church Leadership Team, which will determine when the data will have to be deleted or anonymised. The determination will need to be motivated by one or more lawful purposes.

Unless agreed otherwise, physical data should be permanently destroyed so it cannot be reconstructed, scanned or read; digital data should be erased as not to be recoverable, with sensitive files erased using appropriate applications (e.g., file-shredders).

Governance

- Minutes, decisions: Permanent
- Policies: Current + 6 years
- Pastoral notes: As guided by Minister
- Sacramental records (life events e.g., marriage, baptism, dedications, funerals): Permanent
- Health and Safety incident logs (accidents, first aid): Current + 6 years
- Health and Safety COSHH/asbestos/noise incidents: 40 years

Volunteers & Staff

- Volunteer records: Current + 6 years after leaving
- Staff records: Current + 6 years after leaving
- Recruitment (unsuccessful): 12 months

Safeguarding

- Case files:
 - a) Records of safeguarding incidents, allegations or concerns (for any individual): 75 years after last contact with the individual concerned
 - b) Records that relate to safeguarding concerns/allegations about church workers (paid or voluntary): 75 years after employment/role ceases
 - c) Risk assessments/safeguarding contracts concerning known or alleged offenders: 75 years after last contact with the individual concerned
- Events or activities specifically for children and young people / adults at risk (where no safeguarding incidents or concerns raised):

- a) Registers / records of events or activities: current + 3 years
- b) Parent / carer consent forms: current + 3 years
- c) First Aid / accident forms: current + 3 years
- d) Health and safety risk assessment: current + 3 years
- Employment Records:
 - a) Ministers
 - i) Personnel records where there are safeguarding allegations / investigations, regardless of the findings: 75 years from the date of the minister's death
 - ii) Record of Disclosure and Barring Service (DBS) check history: 75 years from the date of the minister's death
 - iii) Record of disciplinary procedure relating to safeguarding allegations/offences: 75 years from date of the minister's death
 - b) Church workers (paid or voluntary)
 - i) Personnel records relating to those whose role involves contact with children and adults at risk: 75 years after employment / role ceases
 - ii) Record of DBS checks being undertaken: 75 years after employment / role ceases
 - iii) Record of disciplinary procedure relating to safeguarding allegations/offences: 75 years after employment / role ceases
- SEND records: Until the child is aged 25, or for 10 years after the case was received, whichever is longer
- Incident logs: 10 years

Finance

- Donations: Current + 6 years
- Gift Aid: Current + 6 years after last donation
- Contracts: 6 years after end

Communications

- Mailing lists: Until consent withdrawn
- Photos and videos: Until consent is withdrawn or legitimate interest ceases to exist

12.4 SAFEGUARDING & DATA HANDLING ADDENDUM

What Counts as Safeguarding Data

- Incident reports

- Risk assessments

Communications with authorities

- DBS outcomes
- Access

Restricted to:

- Safeguarding Team
- Minister
- Deacons
- Trustees
- Operations Manager
- Statutory authorities

Storage

- Encrypted digital files
- Locked physical storage
- No personal devices

12.5 DATA BREACH RESPONSE TEMPLATE

To be used in conjunction with the Complaints Policy timeline.

Date: ____ / ____ / ____ **Reported By:** _____

1. Description of Breach

2. Data Involved

- ☐ Contact and personal information
- ☐ Financial
- ☐ Medical info and S.E.N.D.
- ☐ Safeguarding
- ☐ Other (please specify) _____

3. Individuals Affected

Number: _____

4. Risk Level

☐ Low ☐ Medium ☐ High

5. Actions Taken

6. ICO Notification

☐ Yes ☐ No Date: _____

7. Communication with Individuals
