



Central England Quakers Data Protection Policy

Central England Area Quaker Meeting (registered charity 224571) is one of some 70 Area Meetings which make up the Religious Society of Friends in Britain.

CEQ is the combination of 17 Local Quaker Meetings in Birmingham, the West Midlands, Warwickshire and Worcestershire at which public Meetings for Worship are organised on a regular basis. It is the body through which membership of the Society is held, and in which we support each other and work together for spiritual growth and social witness in the wider world.

We are mindful of Quaker Advices and Queries 37:

“Are you honest and truthful in all you say and do? Do you maintain strict integrity in business transactions and in your dealings with individuals and organisations? Do you use money and information entrusted to you with discretion and responsibility?”

This policy explains how we will do this.

Adopted by CEQ Trustees 4th June 2018

TABLE OF CONTENTS

1	What this policy is for	2
1.1	Policy statement	2
1.2	How this policy applies to you & what you need to know	3
1.3	Training and guidance	3
2	Our data protection responsibilities	4
2.1	What personal information do we process?	4
3	Working with people whose data we process.....	7
3.1	Making sure processing is fair and lawful	7
3.2	Accurate data.....	7
3.3	Keeping data and destroying it.....	7
3.4	Keeping records of our data processing	7
3.5	Direct marketing.....	7
4	Working with other organisations & transferring data.....	8
4.1	Sharing information with other organisations.....	8
4.2	Data processors	8
4.3	Transferring personal data outside the European Union (EU).....	8
5	Managing change & risks	9
5.1	Data protection impact assessments.....	9
5.2	Dealing with data protection breaches	9
	Schedule 2 – ICO Registration	10

1 WHAT THIS POLICY IS FOR

1.1 POLICY STATEMENT

1.1.1 Central England Quakers, (CEQ) are committed to being honest and truthful in all we say and do.

We aim to maintain strict integrity in business transactions and in our dealings with individuals and organisations. We aim to use money and information entrusted to us with discretion and responsibility.

We wish to be transparent about how we hold and use personal data

1.1.2 We hold and use personal data to help us:

- a. To maintain our directory of meeting members and attenders;
- b. Provide pastoral support for members and others connected with our meetings;
- c. Safeguard children, young people and vulnerable adults;
- d. Maintain our accounts and records;
- e. Promote our testimonies and concerns;
- f. Deal with enquiries;
- g. Meet contractual obligations to employees and volunteers;
- h. Seek peoples' views and opinions;
- i. Hire out the meeting houses;
- j. Communicate with members and attenders

1.1.3 This policy sets out the measures CEQ are committed to taking as an organisation and what each of us will do to ensure we comply with the relevant legislation

1.1.4 We will make sure that all personal data is:

held and used lawfully, fairly and in a transparent manner;
held and used for specified, explicit and legitimate purposes;
adequate, relevant and limited to what is necessary for the purposes for which it is being held;
accurate and, where necessary, up to date;
not kept longer than necessary for the purposes for which it is being used;
held and used in a secure manner, by using appropriate technical and organisational means;
held and used in keeping with the peoples' rights regarding their personal data.

1.1.5 The policy has been approved by the CEQ Trustees who are ultimately accountable for our compliance with legal obligations.

1.2 HOW THIS POLICY APPLIES TO YOU & WHAT YOU NEED TO KNOW

1.2.1 We ask everyone who holds or uses personal information, whether as an employee, trustee, volunteer, role holder or simply as a member or attender to adhere to this policy.

It is a necessary part of your work or service for CEQ that you read this policy carefully and understand your and our responsibilities before you collect and use personal data. Not adhering to the Policy may breach the trust people have put in us when they give us their personal information and damage the reputation of CEQ.

We would therefore need to take action including the possibility of disciplinary proceedings. Where an individual has breached the policy intentionally, recklessly, or for personal benefit they may also be liable to prosecution or to regulatory action.

Any external company (data processor) we appoint to process data for us will be required to comply with this policy under their contract with us. Any breach of the policy will be taken seriously and could lead to us taking contract enforcement action against the company or terminating the contract. Data processors have direct obligations under the GDPR, primarily to only process data on instructions from the controller (us) and to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved.

If you think that you have breached the policy it is important that you contact the Data Lead, CEQ Clerk to Trustees, immediately so that we can take swift action to try and limit the impact of the breach.

1.2.2 In line with Advices & Queries 37, we will continue to remind Friends of the need for, and support them in the use of, appropriate procedures and security measures for any information that they hold to protect this information from misuse or inadvertent disclosure. We will continue to remind Friends that our policy applies to paper records as well as electronic ones.

1.2.3 If you have any questions about this policy, are unsure about whether anything you plan to do, or are currently doing, might breach this policy, or have any concerns that the policy has not been followed please refer to our CEQ Data Lead.

We will appoint local data leads who will:

- Act as a link between the Local Meeting/Branch and the CEQ IT & DP Committee
- Ensure that Friends in the Meeting (especially Office Holders) are aware of the policies and guidelines and, together with other Friends, establish local procedures which will encourage compliance with policies and guidelines

1.3 TRAINING AND GUIDANCE

1.3.1 We will provide general training at least annually for all staff to raise awareness of their obligations and our responsibilities, as well as to outline the law.

1.3.2 We will provide volunteers, members, attenders, and role holders the opportunity to attend general training workshops as appropriate.

1.3.3 We may also issue procedures, guidance or instructions from time to time.

2 OUR DATA PROTECTION RESPONSIBILITIES

2.1 WHAT PERSONAL INFORMATION DO WE HOLD AND USE?

2.1.1 We may collect and use information (personal data) about many different people. This includes data we receive straight from the person concerned, for example where they complete forms or contact us. We may also receive information about data subjects from other sources.

2.1.2 We hold and use personal data in both electronic and paper form and all this data is protected under data protection law.

2.1.3 We hold and use personal data about the following groups:

- Members and Attenders of CEQ
- CEQ Role holders
- Members of the public
- Employees of CEQ
- Volunteers of CEQ
- CCTV images

2.1.4 Members and Attenders of CEQ

Group	Members and Attenders
Data we hold	Name. Membership status. Safeguarding information. Postal address, email address, phone numbers. Pastoral care and health conditions information. We may also take photographs of activities and individuals for use on our web-site, social media and promotional material.
How collected	By Local Meeting Data Leads, via consent forms or Overseers.
Lawful basis for processing	Name, membership status, local meeting and safeguarding information for reasons of legitimate interest. All other personal information by consent. We will explicitly seek consent to publish a person's contact details in our directories.
Security	The information will be held centrally by the CEQ Secretary on a password protected secure server. Locally by Data Leads.
Retention	We hold data on members until they resign or transfer their membership or ask for data given by consent to be removed. We hold data on attenders for up to three years since last contact.

2.1.5 CEQ Role holders

Members and attenders appointed to roles through our Quaker Nominations process, and Quakers giving service as part of their Quaker commitment. They are not volunteers for the purposes of this policy

Data we hold	Name. Membership status. Safeguarding information. Preferred contact information (e.g. postal address, email address, phone number). Pastoral care information. We may also take photographs of activities and individuals for use on our web-site, social media and promotional material (e.g. photos of role holders).
How collected	By appointment process.
Lawful basis for processing	Legitimate interest.
Security	The information will be held centrally by the CEQ Secretary on a password protected secure server. Locally by Data Leads.
Retention	While role holder is in role.

2.1.6 Members of the public

Data we hold	Name and contact details.
Lawful basis for processing	Consent.
How processed	The information is collected when people register an interest in our activities. This information is not made publicly available.
Security	We will only hold one list for each specific consent. The data is held on our servers which are password protected.
Retention	Once a one-off request has been responded to the data subject's contact information will be deleted. Where we have been asked to keep someone informed of our activities (e.g. via a newsletter or newsfeed) we will retain the contact information until the data subject requests the information be deleted. .

2.1.7 CEQ Employees

Data we hold	Name, address, phone number, emergency contact name and numbers. Salary, payment, and pension details. Work history and qualifications. Relevant health information. Appraisal and feedback forms. Safeguarding information.
How collected	The contact information is collected at the start of employment and will be maintained throughout their period of employment. Employment records will be maintained throughout the employment.
Lawful basis for processing	Legitimate interest. Legal compliance.
Security	Employee data is held by the CEQ Line Manager of each employee and also by our accounting contractor.
Retention	The data on an individual employee is kept for at least eight years depending on legal requirements (e.g. pensions, safeguarding).

2.1.8 CEQ Volunteers

Volunteers are people who willingly give their time, energy and skills, without payment of wage or salary, for the benefit of both themselves and CEQ and to the good of the community. They are recruited through a process that is open to all, and not restricted to members and attenders of the Religious Society of Friends.

Data we hold	Name, address, phone number, Emergency contact name and numbers. Work/volunteer history and qualifications. Health issues and allergies. Safeguarding information.
How collected	The contact information is collected through volunteer application process and maintained throughout the period of volunteering.
Lawful basis for processing	Legitimate interest. Legal compliance.
Security	Volunteer data is held by the CEQ Line Manager or supervisor of each volunteer.
Retention	The data on an individual volunteer is kept for at least six years depending on legal requirements (e.g. safeguarding).

2.1.9 CCTV

Data we hold	We have CCTV cameras around some of our buildings.
Lawful basis for processing	Legitimate interest. For protection of staff, users and the building.
How processed	We communicate the use of CCTV via signage which indicates the areas covered and instructions for further information.
Security	The CCTV footage is held on the CCTV system.
Retention	We hold the CCTV footage for a limited period.

3 WORKING WITH PEOPLE WHOSE DATA WE PROCESS

3.1 MAKING SURE PROCESSING IS FAIR AND LAWFUL

3.1.1 We will only hold and use personal data for the purposes listed above and when that use is transparent. This means we will provide people with a Privacy Statement which explains how and why we hold and use their personal data at the point we collect data from them, as well as when we collect data about them from other sources.

3.2 ACCURATE DATA

3.2.1 We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on.

3.3 KEEPING DATA AND DESTROYING IT

3.3.1 See our retention policy for each group.

3.3.2 We will not hold personal information for historical or archival purposes. We will however hold names of role holders (e.g. trustees, clerks, elders) and area meeting, business meeting and committee meeting minutes indefinitely. We will take care to remove personal information other than names from these records.

3.4 KEEPING RECORDS OF OUR DATA PROCESSING

3.4.1 To show how we comply with the law we will keep clear records of our processing activities and of the decisions we make concerning personal data (setting out our reasons for those decisions). Data Protection policies will be reviewed annually by the Governance and Compliance Committee and approved by CEQ Trustees.

3.5 DIRECT COMMUNICATION

3.5.1 We will only contact people who have given their consent to include them as part of our loving, worshiping community by informing them of events; making them aware of opportunities to offer service and to encourage financial support for our work and witness.

3.5.2 Any direct communications that we send will identify CEQ as the sender and will describe how people can object to receiving similar communications in the future. If a person exercises their right to object to direct communication, we will stop the communication as soon as possible.

4 WORKING WITH OTHER ORGANISATIONS & TRANSFERRING DATA

4.1 SHARING INFORMATION WITH OTHER ORGANISATIONS

4.1.1 We will only share personal data with other organisations or people when we have a legal basis or legitimate interest to do so and if we have informed the data subject about the possibility of the data being shared (in a privacy notice), unless legal exemptions apply to informing data subjects about the sharing. Only authorised and properly instructed office holders are allowed to share personal data.

4.2 DATA PROCESSORS

4.2.1 We will only appoint data processors on the basis of a written contract that will require the processor to comply with all relevant legal requirements. We will continue to monitor the data processing, and compliance with the contract, throughout the duration of the contract.

4.3 TRANSFERRING PERSONAL DATA OUTSIDE THE EUROPEAN UNION (EU)

4.3.1 Any contract we enter into with a data processor will say that personal data cannot be transferred (or stored) outside of the European Union unless this is permitted by the GDPR. This includes storage on a “cloud” based service where the servers are located outside the EU.

4.3.2 We will only transfer data outside the EU where it is permitted by one of the conditions for non-EU transfers in the GDPR

5 MANAGING CHANGE & RISKS

5.1 DATA PROTECTION IMPACT ASSESSMENTS

- 5.1.1 When we are planning to carry out any data processing which is likely to result in a high risk we will carry out a Data Protection Impact Assessment (DPIA). These include situations when we process data relating to vulnerable people, trawling of data from public profiles, using new technology, and transferring data outside the EU. Any decision not to conduct a DPIA will be recorded.
- 5.1.2 We may also conduct a DPIA in other cases when we consider it appropriate to do so. If we are unable to mitigate the identified risks such that a high risk remains we will consult with the ICO.
- 5.1.3 DPIAs will be conducted in accordance with the ICO's Code of Practice '[Conducting privacy impact assessments](#)'.

5.2 DEALING WITH DATA PROTECTION BREACHES

- 5.2.1 We ask that any employee, trustee, volunteer, role holder, member or attender who thinks that this policy has not been followed, or personal data might have been disclosed or lost, report this immediately to the CEQ Data Lead, who is CEQ Clerk to Trustees.
- 5.2.2 We will keep records of personal data breaches, even if we do not report them to the ICO.
- 5.2.3 We will report all data breaches which are likely to result in a risk to any person, to the ICO. Reports will be made to the ICO within 72 hours from when the CEQ Data Lead becomes aware of the breach.
- 5.2.4 In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.
This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

SCHEDULE 2 – ICO REGISTRATION

Data Controller: CENTRAL ENGLAND AREA QUAKER OFFICE

Registration Number: Z179681X

Date Registered: 15 June 2009 **Registration Expires:** 14 June 2018

Address:

PRIORY ROOMS & QUAKER MEETING HOUSE
40 BULL STREET
BIRMINGHAM
B4 6AF

Other names:

PEACE HUB, WARWICKSHIRE MONTHLY MEETING, WEST MIDLANDS QUAKER PEACE EDUCATION, CENTRAL ENGLAND QUAKERS, NORTHFIELD ECO CENTRE,