**Bents Green Church – Personal Data Breach Policy**

*This policy has been adapted and modelled on the Interim Personal Data Breach Policy of the Methodist Church*

In this policy:

“**controller**” means the person or organisation that determines when, why and how to process personal data. It is responsible for establishing practices and policies in line with GDPR and the UK data protection legislation.

Trustees for Methodist Church Purposes (TMCP) are **controller** for **personal data** used by staff, volunteers at Local Church, Circuit and District level. This is for routine day to day data protection matters. For the purposes of this policy, the **Local Church** is **Bents Green Methodist Church**.

The Methodist Church in Great Britain is the **controller** responsible for all data protection matters concerning safeguarding and, complaints and discipline issues for the whole Methodist Church and other data protection matters for which the Connexional Team are solely responsible.

The “**appropriate controller**” is the **controller** for the matter in hand.

“**personal data**” is any information identifying a living individual or information relating to an individual that can be identified from that information/data (alone or in combination with other information in your hands or that can be reasonably accessed). **Personal data** can be factual (for example, a name, email address, location, or date of birth) or an opinion about that person’s actions or behavior. Personal information includes an individual’s name, address, date of birth, telephone number, email address, a photograph or disability, health, or ethnicity data.

“**personal data breach**” is any act or omission that compromises the security, confidentiality, integrity or availability of **personal data** or the physical, technical, administrative or organisational safeguards that we as a Church have put in place to protect it. The loss, or unauthorised access, disclosure (sharing) or acquisition, of **personal data** is a **personal data breach**.

A **personal data breach** could include, for example, emailing **personal data** to the wrong person; or leaving **personal data** in a public place where others can access it or losing a laptop or USB stick.

 “**we**” “**us**” are all the volunteers, ministers, and staff within the **Local Church** who handle **personal data.**

**“data champion”** is the person or persons appointed by the Local Church Council from time to time to advise and lead on data protection issues on behalf of the Local Church.

**Preventative measures, training, and record**

In accordance with Step 8 of the “*9 Standards for Methodist Managing Trustees to Take Now to Comply with GDPR*” and pending finalisation of the full Methodist Church Personal Breach Policy, **we** will follow the Methodist Church’s interim policy.

**We** will be prepared to deal with any personal data breaches by:

* having **systems in place to minimise** any potential **personal data breach**, including:
* ensuring electronic files are kept securely (e.g. passworded, encrypted and appropriate virus, malware, anti-phishing software is loaded to protect electronic data);
* ensuring manual files are held in locked filing cabinets or other suitably secure cupboards;
* operating a clear desk policy, and
* such other measures to prevent unauthorised access to data or to its loss.
* ensuring those of **us** handling **personal data** are trained in appropriate security measures so that **we** can help to look after the personal data of those involved in church life and using church premises.
* using the model “Managing *Trustees Personal Data Breach Register*” to record all instances of a personal data breach regardless of how small e.g. an email being sent to the wrong recipient.
* reviewing and providing training to those of **us** who deal with personal data in the Local Church so that **we** know what must be recorded and what must happen in the event of a **personal data breach**.

**What action will we and the Church take if we know or suspect that a Personal Data Breach has occurred?**

* **we** will take immediate action to get the information back e.g., recall the email and ask the unintended recipient not to read it and to delete the email
* **we** will retrace our steps to find lost papers or other items
* **we** will contact the train or bus company if **we** think we left them on public transport
* **we** will contact the Church **Data Champion** or a Church Steward or then Church Council Secretary as soon as reasonably practicable if **we** think that the breach needs to be reported
* the Church **Data Champion** or Church Steward or Secretary on behalf of the Church Council, will investigate the circumstances of the breach and record the data breach using either a hard copy form (attached) or by downloading and completing the online form: [Reporting a breach](https://forms.office.com/r/Hh4LzNEYbC)
* the **Data Champion** or Church Steward or Secretary on behalf of the Church Council will liaise with the Sheffield Methodist District Administrator/Data Champion, and gain support and advice as necessary
* the Church **Data Champion** or Church Steward or Secretary on behalf of the Church Council will keep track of all breaches, on the Local Church’s spreadsheet “*Personal Data Breach Record*” which will be held on a computer and kept up to date
* any matters relating to complaints and discipline, or safeguarding will automatically be referred to the District Administrator by the **Data Champion** or Church Steward or Secretary on behalf of the Church Council
* the Church Council will take whatever further action is advised by TMCP or the Connexional Team to remedy or mitigate the breach.

**Further examples of Personal Data Breaches**

* A couple are agents for an energy scheme where they receive a payment when people sign up through them to this scheme. They use the contact details in an old Church Directory to post information about this scheme to the homes of church members they know.
* The gift-aid secretary's laptop is stolen from a café. There is a file which contains the names and addresses of the gift-aid donors along with the amount of their donations over the years.
* Two people have a very similar work email address – both start with the same text. They frequently get emails meant for the other person.

Bents Green Methodist Church

EDI Impact Assessment – none

Approved by Church Council November 2023