Turkey Street Community Church

Data Protection and Privacy Policy

Data Controller details

Data Controller: Turkey Street Community Church
Charity number: 1214011
Church address: Turkey Street Community Church, 5 Elsinge Road, Enfield, EN1 4PG
Data Protection Lead*: Gareth Skyrme
Email: gareth@turkeystreetcommunitychurch.com
Phone: 07915 382818
**This is usually a trustee or a member of staff.*

This policy first adopted / last reviewed: July 2026
This policy due for review: July 2027
This is the Data Protection Policy for Turkey Street Community Church. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data.
This policy covers our use of **personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photograph, video, email address, or postal address). Identification can be by the information alone or in conjunction with any other information.
Our **processing of personal data** is governed by the Data Protection Bill/Act 2017-2019 and the General Data Protection Regulation 2016/679 (the "GDPR" and other legislation relating to personal data and rights such as the Human Rights Act 1998).

How is your data used and processed?

Examples of data processed by the Church include:

- Names and addresses and other contact details of Church Members and others attending our services and other activities.
- Pastoral records and notes, which may be sensitive in nature.

- Where there is a legitimate interest to facilitate our charitable aims and activities, or where you have added them to our database or provided them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, and dependants.
- Where you give financially in support of Turkey Street Community Church or pay for church activities (event bookings, etc.).
- As a church (religious organisation), the data we process is likely to constitute sensitive personal data because the very fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: mental and physical health, details of injuries, medication/treatment received, data concerning criminal records, fines, and other similar judicial records.
- Recorded information including recorded telephone conversations, emails, photographic / video / CCTV images.

As a Data Controller, our staff and volunteers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. If you have any concerns about how your data is being used, please speak with our Data Protection Lead.

What are we doing with your data?

We only hold data that either we are legally obliged to or that helps us fulfil our missional and charitable aims as a church. We are a membership organisation and good communication with our membership is an essential part of being church.
Therefore, we will hold and process data to:

- Enable us to meet all legal and statutory obligations.
- Comply with and facilitate our comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- Deliver our Church's mission and to carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our church.
- Administer our membership records.
- Enable us to follow up membership, course and event enquiries.
- Maintain our own accounts and records.
- Process and record financial donations that you have made (including Gift Aid information).
- Communicate with you about our services, events, meetings, mission and other matters which are relevant to you as part of our church community.

What is our legal basis for processing your personal data?

Our legal basis is as follows:

- Most of our data is processed because it is necessary for our legitimate interests to enable our charitable and missional aims. For example, maintaining membership records, safeguarding

children and adults at risk of abuse, recording our financial donations, and operating team rotas for the effective function of Sunday services or other groups.

- Some of our processing is necessary for compliance with a legal obligation. Retaining safeguarding records and gift aid declarations are examples of this.
- We may also process data if it is necessary for the performance of a contract with you, or to provide a direct service to you. For example, if you buy tickets for a church event.
- As a religious organisation, we are permitted to process information about your religious beliefs to administer our membership.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use. For example, if you are a regular attender and request to receive our weekly news.

Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential.
The main church database is only accessible by church staff and those holding leadership roles within the church. Basic contact details of church members are made available to other church members via a dedicated portal of the database.
Data will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Our agents, servants and contractors. For example, if we utilise commercial providers to send out newsletters on our behalf, or to maintain our database software.
- On occasion, other churches with which we are carrying out joint events or activities.

Our primary database is ChurchSuite and our financial records are stored on [INSERT SYSTEM NAME] {e.g. ExpensePlus}. In addition, some data may be held by individual staff on church email accounts hosted by Google.

How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with our church services, activities and events, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review, by which we assess who is actively engaging in church life, and where this is not the case, we will remove your data.
Additionally:

- We will keep some records permanently if we are legally required to do so. For example, this covers wedding registers and some safeguarding records.
- We may keep some other records for an extended period. For example, it is current best practice to keep financial records for a minimum period of seven years to support HMRC audits.

What are your rights regarding your personal data?

You have the following rights with respect to your personal data: When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

- **The right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request, we will respond within one month. There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- **The right to correct and update the information we hold on you.** If the data we hold about you is out of date, incomplete or incorrect, you can inform us and your data will be updated. {You may want to state here if the individual has the ability to update their own information, such as "You can update or change your own data using your login to our database."}
- **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purposes).
- **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post.
- **The right to lodge a complaint with the Information Commissioner's Office.** You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.

Transfer of data abroad

Any electronic personal data transferred to countries or territories outside the UK will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the UK. Our website is accessible from overseas, however it is our general practice not to publish any personal data on our website.

Further processing

If we wish to use your personal data for a new purpose not covered by this policy, then we will provide you with a new policy prior to commencing the processing to explain this new use and set

out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

You are very welcome to get in contact with us…

If you have any queries or concerns about how we use your data, please do get in contact with us. Our Data Protection Lead and their contact details are given on the first page of this document. If you wish to make a complaint about our handling of your data, please see Appendix 2.

Appendix 1: Definitions and Appointed Persons

Role	Definition	Appointed person/organisation
Data Controller	An individual or organisation who collects, stores and processes (uses) data.	Turkey Street Community Church
Data Protection Lead	The Data Protection Lead is responsible for the day-to-day organisational management of protection and is the go-to person for responding to any issues around data, dealing with subject access request and completing an annual data review.	Gareth Skyrme
Senior Information Risk Owner (trustee role)	The Senior Information Risk Owner (SIRO) is a trustee who works with the Data Protection Lead to provide the trustees with assurance that information risk is being managed appropriately and effectively across the organisation.	Gareth Skyrme

Appendix 2: Data Protection Complaints Process

Turkey Street Community Church ("we") take your concerns about how we handle your personal data or your data rights seriously.
If you wish to raise a complaint about the way your personal information is being handled, or about an incident that you believe compromises the confidentiality, integrity or availability of systems or data, (either accidentally or deliberately), and has caused or has the potential to cause damage to data subjects please submit a complaint via email / telephone to our Data Protection Lead Gareth Skyrme.
We will carefully investigate and review all complaints and take appropriate action in accordance with Data Protection Legislation. We will keep you informed of the progress of our investigation and the outcome.
The process for the review of complaints will be as follows:

- If there has been any incident affecting personal data or any breach in the Church's Data Protection Policy, the Data Protection Lead will ascertain whether the breach is still occurring. If so, appropriate steps will be taken immediately to minimise the effects of the breach.
- All complaints will be acknowledged within 30 days of receipt, including an estimate of when a response will be made.
- We will respond to all complaints without undue delay.
- Complainants will be kept informed of the progress of the complaint.
- Consideration will be given as to whether the circumstances amount to a breach of the Church's Data Protection policies or Data Protection legislation.
- At the conclusion of the investigation a written summary of the conclusion will be provided to the complainant together, where appropriate, with any action taken.
- Following the conclusion of the investigation our Data Protection Lead will review the circumstances and recommend to the Trustees any improvements to systems or procedures.

Should you not be satisfied with the outcome, you may contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Appendix 3: Data Retention Schedule

Type of Data	Retention Period
Church Member Information	Checked for accuracy annually. Name and record of membership kept permanently; other information kept for up to two years after leaving membership.

Details of regular attendees and other contacts (Non-Members)	Checked for accuracy annually. Removed within two years of contact ceasing.
Information about children	Checked for accuracy annually. Removed if a child does not attend a church group / activity for a year, unless their parent / carer is a Member or regular contact. Details of Non-Members' children who are not themselves attending will be deleted during the summer after they turn 18. Details of children of Members will be kept in the prayer diary until they are approximately 21.
Employment records	Six years after the post-holder leaves TSCC employment.
Financial records	Six years from the end of the relevant financial year. Church Annual Accounts and Reports are kept permanently.
Accident reports	Three years

Appendix 4: Information Security

Information security is the responsibility of every member of staff, Church Member and volunteer using Church data on, but not limited to, the Church information systems.
The Church will ensure information security by:

- Ensuring appropriate software security measures are implemented and kept up to date.
- Making sure that only those who need access have that access.
- Not storing information where it can be accidentally exposed or lost

- Making sure that if information has to be transported it is done so safely using encrypted devices or services

Access to IT systems on which personal information is stored must be password protected. Passwords must not be disclosed to others. If there is suspicion that a password has been compromised, it must be changed. Particular care should be taken to ensure confidentiality when Church data is stored or processed on personally owned devices.
Individuals must ensure that any personally owned devices which have been used to store or process Church data is disposed of securely. Software on personally owned devices must be kept up to date. Unsecured WiFi must not be used to process Church data.
All breaches of this Policy must be reported to the Data Protection Lead as soon as possible.

Appendix 5: Form to Complete for Annual Review

All personal data that Turkey Street Community Church holds needs to be reviewed annually. Please use this form to review the data you hold.

The 'data subject' is the person whose data you are dealing with. 'Processing' means using the data after it has been collected (e.g. contacting someone to advertise an event). If this is a person under 16 years of age, you should answer the questions with regard to the person's parent or guardian. Anyone completing this questionnaire should first read the Church Data Protection Policy.

Please tick appropriate box:

	Yes	No	N/A
Has the data subject been informed of processing?			
Has the data subject been informed of third parties to whom their data may be provided?			
Has the data subject given their consent to the processing?			
If the data subject has not given consent (or consent is not a sufficient ground for processing) is processing justified by data controller's legitimate interest?			
If the data is special category data has the data subject given explicit consent?			
Has the data subject been informed of the purpose(s) for processing?			
Is there a clear ground for processing each item of data?			
Is the information gathered no more than is necessary for the purpose(s)?			
Are steps taken to ensure data is accurate?			
Is there a system of rolling reviews to keep data up to date?			
Is there a data retention policy for this data?			
Is there a justification for retaining the data for the period in question?			
Has the data subject been informed of their right of access?			
Is the level of security applied to the data appropriate to the risks represented by the nature of the data to be protected (give consideration to possibility of theft, malicious damage or corruption including computer viruses, unlawful access, accidental disclosure, loss and destruction)?			
Are those who deal with personal data aware of purposes for which it has been collected?			
Are those who process data aware of parties to whom they can legitimately disclose it?			
Where consultants and contractors have access to the data is there a written statement in place governing their obligations regarding security and use of data?			
Are appropriate measures in place for the secure disposal and/or destruction of personal data no longer required?			
Where applicable has consent of the data subject been obtained to transfer personal data to countries outside the UK?			

Review carried out on …….

by……