

# Hornsea United Reformed Church Data Protection Policy



Data Protection Coordinator: Carol Rutherford

Deputy Data Protection Coordinator: Steve Seal

## 1. Introduction

Hornsea United Reformed Church is committed to complying with the Data Protection Act 1998 (the "Act"), which has been effective since March 1, 2000. This policy outlines the church's procedures to protect personal data and ensure that all employees, Elders, volunteers, and other partners who handle data on behalf of the church understand and adhere to their legal obligations.

## 2. Policy Statement

To operate effectively, Hornsea United Reformed Church collects and processes personal information about individuals, including members of the public, past, current, and prospective employees, volunteers, and partners. This data, whether in paper format, digital records, or other mediums, must be handled responsibly and in compliance with the Act to maintain trust and ensure operational success.

The church is committed to treating personal data lawfully and respectfully, endorsing the principles of data protection as laid out in the Act.

## 3. Data Protection Principles

Under the Act, there are Eight Principles of Practice that must be adhered to when processing personal data. These principles require that personal information:

1. **Fair Processing:** Must be processed fairly and lawfully and meet specific conditions.
2. **Purpose Limitation:** Collected only for specified, lawful purposes and not processed in ways incompatible with those purposes.
3. **Data Minimisation:** Adequate, relevant, and not excessive relative to the purpose.
4. **Accuracy:** Accurate and, where necessary, kept up-to-date.
5. **Storage Limitation:** Not retained longer than necessary.
6. **Rights of Individuals:** Processed in accordance with individuals' rights under the Act.
7. **Security:** Held securely with appropriate safeguards.
8. **International Transfers:** Not transferred outside the European Economic Area unless adequate protection is ensured.

The Act distinguishes between 'personal data' and 'sensitive personal data,' which includes racial or ethnic origin, political opinion, religious beliefs, trade union membership, sexual life, or criminal proceedings/convictions.

## 4. Handling Personal and Sensitive Information

Hornsea United Reformed Church follows strict guidelines for managing personal and sensitive information. The church will:

- Fully observe conditions for fair collection and use of information.
- Specify the purposes for information use, ensuring legal compliance.
- Collect only necessary information for operational or legal purposes.
- Ensure information quality and apply checks for appropriate retention duration.
- Implement technical and organisational measures to safeguard information.
- Prevent data transfer abroad without adequate protections.
- Enable individuals to exercise their rights under the Act, including:
  - Being informed about data processing.
  - Accessing personal information within 40 days upon request.
  - Preventing certain processing activities.
  - Correcting or deleting inaccurate information.

## 5. Data Protection Responsibilities and Procedures

To ensure compliance, Hornsea United Reformed Church will:

- Assign a dedicated Data Protection Coordinator responsible for overseeing data protection practices.
- Ensure all personnel handling personal data are trained and supervised appropriately.
- Provide clear guidance for inquiries about personal information from staff and the public.
- Promptly and courteously address questions about data handling.
- Regularly review and evaluate methods for handling personal data.
- Conduct data-sharing only under a formal agreement, ensuring data is disclosed confidentially and within authorised procedures.

## 6. Photography and Event Documentation

Hornsea United Reformed Church may take photographs or videos during events for documentation or publicity.

- **Individual Permission:** If an individual is the primary focus, explicit permission will be obtained. For minors, parental or guardian consent is required.
- **Large Gatherings:** In cases where individual consent is impractical, details of the data policy will be shared with attendees. If consent is not given, photos will be deleted within two months.
- **Private Photography:** The church cannot control photos or recordings taken by private individuals attending events.

## 7. Storage and Security of Photographs and Video

Photographs and videos taken by the church will be stored securely and access will be restricted to authorised personnel only. Images will only be retained as long as necessary for their intended purpose and will be deleted thereafter. If an Individual requests that an image be deleted or destroyed, the church will comply promptly.

## 8. Recording and Live Streaming of Services and Events

To accommodate remote participation, the church may record or live-stream services and events.

- **Focus of Recordings:** Recordings will focus on the stage and speakers, avoiding congregation images when possible. These recordings are public and may be shared on social media.
- **Review and Removal:** Recordings will be reviewed regularly and removed if no longer relevant.
- **Consent Withdrawal:** Individuals who have given consent for their image to be used can withdraw this consent by contacting the Data Protection Coordinator.

## 9. Policy Commitment

Hornsea United Reformed Church is dedicated to protecting individual privacy rights and ensuring that personal data is handled responsibly, accurately, and securely. This policy reflects the church's commitment to maintaining community trust while facilitating meaningful engagement and participation.

This data protection policy is in place to ensure that all individuals associated with Hornsea United Reformed Church can trust the church's approach to handling their personal information safely and respectfully.

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