

# **WRBC CONFIDENTIALITY AND DATA PROTECTION POLICY**

## **1. INTRODUCTION**

*Why is confidentiality important at WRBC?*

As a Church at the centre of our community it is important that we are a place of trust and safety for everyone, whether they are church members or not. As a Church we cannot and should not be seen as a place that is not trustworthy, that gossips or breaks confidences. We ask everyone to think carefully about what they know and who they talk to. If in doubt about anything, particularly if you are worried for someone's safety or the personal health or well-being then you should speak to your line manager, the Minister or a Deacon.

This policy asks everyone to be aware about the knowledge they hold about other people. You may know something about an individual's personal circumstances, either because you are a friend, or have developed a personal relationship and understanding with the person. You may know that person through church, in the wider community, or have got to know them while serving together at Church, or in some other way. In getting to know them they may tell you information about a personal or family situation, for example a marriage break-up, family ill health, or other difficult personal situations.

As staff and volunteers, we need to avoid making church attendees uncomfortable or embarrassing them by gossiping or talking 'out loud' or without discretion about personal situations in front of others. Would you wish to have something overheard by others when it was not meant to be?

## **2. KEY POINTS**

- WRBC will maintain a policy on the confidentiality and protection of personal data (this document).
- We will only keep sufficient information to meet our genuine needs.
- We will only use information for the intended purpose.
- We will keep information up to date and accurate.
- We will keep that information safe and secure; and take appropriate backup copies.
- We will only keep sensitive data as long as necessary and then purge any data which is no longer required with appropriate sensitivity.
- We will not disclose that information except via the guidelines contained in this policy.
- We will respond appropriately to any information requests and keep records of such requests and any information provided.
- When communicating any confidential information by electronic means, we will include suitable warnings about data sensitivity.
- Any breaches of confidentiality must be reported immediately as per this policy.

### **3. FORMAL POLICY**

The purpose of this policy is to set out clearly the procedures and principles used when WRBC is dealing with confidential and personal information within a formal work context and where people volunteer with us.

This policy applies to paid staff and to any volunteers within the Church who deal with members of the public, for example in youth work, uniformed groups, Meeting Point, etc.

The Confidentiality and Data Protection Policy gives clarity about why personal information is required and to ensure that: -

- information is relevant to the purpose and not excessive
- information is accurate
- personal data collected for one purpose should not be used for another purpose
- confidential and/or personal information is kept securely
- individuals will have access on request to their own personal data held either manually or electronically – see section 8.

### **4. SENSITIVE PERSONAL INFORMATION**

In order to be able to run the church effectively, WRBC keeps records of Church family members and also records information about staff and volunteers. All such information is treated as confidential. Sensitive information will not be disclosed without the express prior consent of the individual, except in exceptional circumstances as described in section 7.

WRBC seeks to promote Christian fellowship and encourages all the members and congregation to share addresses, telephone numbers and email addresses. These are published from time to time in the Church Directory which is made freely available in printable form to all those in the Directory but not to others. The Directory is kept electronically in the password protected part of the Church website. Members and adherents who do not wish to be in the Directory should inform the Secretary / web master of their wish to opt out, otherwise they may be included.

We will only keep sensitive data as long as necessary and then purge any data which is no longer required with appropriate sensitivity. We will regularly review the sensitive data we hold; for example, membership lists and addresses of church family; and ensure that such data is kept accurate and up to date. When any information is no longer required, we will delete such details and update our web site with the corrected information.

Where any information needs to be passed on to a third party, the person must fully understand the reason and agree that this information can be passed on. Staff and volunteers may as part of their duties within the Church or as a Church member become aware of personal and sensitive information about other people. For example, their state of health, their personal and family circumstances. Such information is both sensitive and personal information and should not be shared with anyone else without their express agreement.

## **5. COMMUNICATIONS**

When communicating any confidential information by electronic means, we at WRBC will include suitable warnings about data sensitivity including an indication in the email/document header/footer/template that the item should be treated as Confidential. An example text for such warnings is:

This email and any attachment to it are confidential. Unless you are the intended recipient, you may not use, copy or disclose either the message or any information contained in the message. If you are not the intended recipient, you should delete this email and notify the sender immediately. Any views or opinions expressed in this email are those of the sender only, unless otherwise stated.

Examples of documents which are to be treated as confidential are the Church Directory, minutes of the Deacons' and Church Members' Meetings, prayer chain emails (where they contain private requests), etc.

When emailing sensitive information to groups both inside and beyond the church family, BCC will be used for group emails so that distribution list email addresses are not visible to all recipients.

All contact with those people who may participate in outreach courses/ events, who are not part of WRBC church directory, shall be only through church email addresses, not from personal email accounts.

Printed copies of confidential documents, such as those indicated above, will be disposed of by shredding wherever possible.

## **6. OUR RESPONSIBILITIES**

This policy applies equally to our Minister, other staff, the Deacons and volunteers.

All staff will be given a copy of the Confidentiality and Data Protection Policy as part of their terms and conditions and the implications will be covered as part of their induction. Staff members, Deacons and other relevant volunteers will be asked to sign an agreement to work within this policy.

- It is important if someone shares some personal information that they do not 'gossip' or 'talk behind that person's back', or tell someone else about their personal situation without their express consent.
- If someone (the supporter) is supporting someone else within the Church, formally or informally, have been asked to pray for them or something that concerns them, or are part of the visiting team then if 'following things up' the supporter should make sure that any enquiry about 'how things are' is handled sensitively and without any third party overhearing the conversation.
- If anyone is concerned for someone's safety and well-being then they should speak immediately to their line manager, the Minister, or a Deacon.
- Personnel and volunteer information will be kept locked away with access only by the relevant line manager/church official.
- Information (including job references) will be given to third parties only with the express permission of the individual concerned.
- Breaches of confidentiality by staff will be dealt with via the disciplinary procedure for employees.

## **7. LEGISLATIVE FRAMEWORK**

The Church will monitor this policy to ensure it meets statutory and legal requirements including the current versions of the Data Protection Act, Children Act, Rehabilitation of Offenders Act, Prevention of Terrorism Act, and Social Security Administration (Fraud) Act and subsequent legislation that affects confidentiality.

## **8. ACCESS TO INFORMATION BY EXTERNAL ORGANISATIONS**

There are some occasions where information may be disclosed without consent:

- Where the Church has a statutory duty to disclose information.
- In exceptional circumstances where the health and safety of the individual is at risk, but only to recognised statutory agencies e.g. the police or Social Services.
- In cases where there is evidence of criminal activity likely to cause a public nuisance, a report will be made to the police (e.g. drug dealing).

## **9. BREACHING CONFIDENTIALITY**

There are a very small number of situations where a decision has to be made to breach confidentiality. Where an employee or volunteer believes that confidentiality either should be breached or has already been breached; the following steps should be taken: -

1. The employee must raise the matter immediately with their line manager, the Minister or a Deacon (the designated Deacon), giving reasons for the (proposed) breach of confidentiality. Possible options should be discussed and written notes of this discussion made.
2. The Minister/designated Deacon is responsible for making a decision on next steps.
3. If the Minister or designated Deacon agrees in exceptional circumstances to breaching confidentiality, a full written report on the case should be made and the agreed action taken. The leadership team will be informed.
4. If the Minister or designated Deacon does not agree to breach confidentiality, then this is the final decision of the organisation.

All requests for information whether with or without the individual's consent should be made in writing and given in writing with a file note made. Where individuals have given consent, a copy of the information disclosed should be made available to them.

**Walsworth Road  
Confidentiality and Data Protection Policy  
Staff & Volunteer Agreement**

I have read and understood the content of the Confidentiality and Data Protection Policy and agree to abide by its rules in all circumstances.

Name : ..... Signed : ..... Date: .....

Name : ..... Signed : ..... Date: .....