

Brightons Parish Church (BPC) – Our Policies to safeguard our life together as a congregation

We have recently updated or introduced some church policies which can be found on the Contact page of the Website ([Contact – Brightons Parish Church \(brightonschurch.org.uk\)](http://brightonschurch.org.uk)). You can also find paper copies of these policies at the front and rear vestibules of the church and a copy of the General Privacy Notice (detailed on the next page) is displayed on our noticeboards.

These policies may feel quite formal, but it's really important we have these in place to safeguard our life together as a congregation. These (or similar) policies are expected to be in place in churches, organisations, and workplaces across the country.

We have provided some details below on each of the policies to help make it clear what they are for and why they are required. It's also important for everyone to know who is responsible for complying with them - it may be you, as one of our Trustees, or as part of our congregation.

If you have any questions, please do feel free to contact Judith Norton, our Session Clerk (sessionclerk@brightonschurch.org.uk)

Data Protection

- The Congregation of Brightons Parish Church takes the security and privacy of personal information seriously. As part of our activities we need to gather and use personal information about a variety of people including members (current and former), non-members, adherents, employees, office-holders and people who are in contact with us. The Data Protection Act 2018 (the "2018 Act") and the EU General Data Protection Regulation ("GDPR") regulate the way in which personal information about living individuals is collected, processed, stored or transferred.
- Our Data Protection policy explains the provisions that we will follow when any personal data is collected, processed, stored or transferred on behalf of the congregation.

Who is responsible for complying with this? We expect **everyone processing personal data on behalf of the congregation** (see paragraph 5 in the Data Protection policy for a definition of "processing") to comply with this policy in all respects.

As an example: At Pre-5s you collect names, addresses and other personal information at registration. You should ensure this data is treated confidentially (as it is subject to GDPR) and that it is not left or shared without the consent of the individual concerned, even between parents/other attendees to the group.

Data Retention

- The congregation of Brightons Parish Church gathers personal information from individuals and external organisations as well as generating a wide range of personal data, all of which is recorded in documents and records, both in hard copy and electronic form.
- The purpose of our policy is to set out the retention and disposal guidance of data for Brightons Parish Church's congregational office bearers/those involved with safeguarding to adopt and strive to keep records up to date.

Who is responsible for complying with this? Our congregational office bearers and those involved with safeguarding.

As an example: You run a Group that requires registration forms, such as BB, GB or Sunday School. These forms should only be kept for as long as you need to contact the individuals noted on the forms.

Bribery & Procurement

- Our Bribery & Corruption policy is in place to ensure that all church business entered into at Brightons Parish Church is conducted in an honest and ethical manner. The Church of Scotland takes a zero-tolerance approach to bribery and corruption, and we are committed to acting professionally, fairly and with integrity in all our dealings as a congregation.
- The purpose of this policy is to:
 - set out our responsibilities as the financial board of the congregation, and of those working with/for us, in observing and upholding our position on bribery and corruption and the adoption of good procurement procedures; and
 - provide information and guidance to those working with/for us on how to recognise and deal with bribery and corruption issues.

Who is responsible for complying with this? Everyone.

Examples are provided in the policy.

Conflict of Interest

- Our Conflict of Interest policy has been developed to provide guidance to all Trustees (Elders and Deacons) regarding conflicts of interest in order to avoid any actual or potential conflicts of interest, perception of bias or misuse of authority, and to ensure and evidence that all decisions by individual Trustees on behalf of Brightons Parish Church are taken only in the best interests of the congregation at all times.

Who is responsible for complying with this? All Elders, Deacons, and those involved in management of its affairs who are not Elders or Deacons, eg our Treasurer.

As an example: you are a Deacon or Elder and a decision is being made at Deacons' Court about which company the church uses to provide a service. A close relative of yours owns one of the companies being considered. You therefore need to declare a conflict of interest and withdraw from the meeting when the decision is being made.

General Privacy Notice

- Our General Privacy Notice outlines the way in which the congregation of Brightons Parish Church will use personal information provided to us. Personal information includes any information that identifies you personally, such as your name, address, email address or telephone number.

Who is responsible for complying with this? We expect **everyone who processes personal data on behalf of the congregation** (see paragraph 5 of the Data Protection policy for a definition of "processing") to comply with this policy in all respects.

As an example: You are on the Communications Team and you hold email addresses for the congregation so you can send out regular communications. You must ensure that these email addresses are stored safely and only shared if required (in a password protected file). When sending out 'bulk' emails ensure the recipients are bcc'd (blind carbon copied) so that everyone's email addresses aren't shared.

Employer Privacy

- Brightons Parish Church, as an Employer, collects and processes personal data relating to its employees to manage the employment relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. Our Employer Privacy Notice outlines the way we will do this.

Who is responsible for complying with this? All Trustees (Elders and Deacons) – known as the “Employer” in the policy.

As an example: You are on the Finance Team. So that you can arrange remunerations for church employees, you have access to personal data regarding bank account and national insurance details. You must treat this information confidentially and store it safely.