

Contemplative Fire Data Protection Policy & Procedures

Scope, Context and Purpose

This policy applies to all staff employed by Contemplative Fire, those subcontracted by Contemplative Fire and to all Trustees and other Companions holding positions of responsibility and Companion acting in volunteer roles.

The Data Protection Act 1998 and the General Data Protection Regulations May 2018 (Appendix A) require the protection of personal data and the registration of all organisations which process personal data with the Information Commissioner's Office (ICO). Contemplative Fire is registered as a Data Controller with the ICO.

This policy sets out the requirements of staff, Trustees and other Companions holding positions of responsibility and volunteers with regard to compliance with data protection legislation.

Definitions

Contemplative Fire is registered to process personal information as described and for the purposes set out in the Contemplative Fire Privacy Notice (Appendix B) and as noted below:-

- Accounts and financial records
- Advertising and promotion of Contemplative Fire and its activities
- Staff administration
- Administration of Membership Records
- Fundraising
- Realising the objectives of Contemplative Fire as a charitable organisation

Data is defined as information which is recorded with the intention that it should be processed on computer or recorded as part of a relevant filing system (manual). Categories of data are:-

1. Personal Data relating to a living individual who can be identified from the data e.g. membership name and address
2. Sensitive personal data relating to
 - a. racial or ethnic origins
 - b. political opinions
 - c. religious beliefs or similar beliefs
 - d. trade union membership
 - e. physical or mental health
 - f. sexual orientation
 - g. commission or alleged commission of an offence
 - h. any proceedings for any offence committed or alleged to have been committed by the data subject

Consent must be obtained from the data subject in order to process both these types of data. Explicit consent must be given when the data is in the sensitive category.

Policy Statements

- Contemplative Fire will comply fully with all aspects of current data protection legislation as set out in the Data Protection Act 1998 and the General Data Protection Regulations in force from May 2018. (See Appendix A)
- Contemplative Fire will make all reasonable efforts to maintain a comprehensive written notification with the ICO.
- Contemplative Fire will do its utmost to ensure all staff and Trustees are conversant with data protection legislation and practice and provided with appropriate training.
- Contemplative Fire will only hold data for prescribed purposes as set out in our Privacy Notice, including personnel administration; membership administration; accounting & financial purposes; promotion; fundraising and charitable objectives.
- Contemplative Fire will not pass personal data to third parties other than those specified in our Privacy Notice without express permission of individual data subjects.
- Upon request from individual data subjects, Contemplative Fire will provide access to personal data held on them. No charge will be levied for requests for access to personal data.

Employee Administration

Personal and sensitive data on employees are held on the Contemplative Fire computer and in manual files at the address of the Community Administrator. This will include:- full contact details; DOB and NI number; nationality; bank details; pension details; salary; job title; next of kin details; regular medication; Church affiliation & Christian experience; career history; qualifications & membership of professional bodies; references; appraisals.

Staff are required to sign a form consenting to data being held and processed for the following purposes:

- Recruitment and selection
- Performance management and training
- Absence recording
- Monitoring
- Statistical analysis

All staff may request sight of their personal details on computer provided reasonable notice (10 working days) is given. This does not include references, which are exempt under data protection legislation.

Application forms will include a section for consent to sensitive personal data being used for recruitment, selection and statistical purposes. Acknowledgement of any CVs received should also state the uses to which the information submitted will be put.

Security

Contemplative Fire will ensure all personal and sensitive personal data is secure against unauthorised access and theft.

- The IT network is as secure as possible from unauthorised access including access through the website.
- Individual PCs are password protected.
- The server used by Contemplative Fire is with Voluntary Action Sheffield who have their own security measures in place, compliant with data protection requirements.

- Data held in filing cabinets is locked away when not required
- Personnel and other files holding sensitive or confidential personal data are only made available to Community Members with authorised access.
- On line Community membership is authorised, controlled and monitored by authorised staff.
- Contemplative Fire uses icloud back up of computer files. Icloud has its own security measures compliant with data protection requirements. Access to the backup is password controlled

Contacts Data Collection and Use

- Data subjects must be informed as to why their data is required and how it will be stored and used. This information should be provided in the form of our Privacy Notice and Consent Form (Appendices B and C) and the Consent Form must be completed and returned by the individual data subject to establish consent to their data being stored and used.
- Data held by Contemplative Fire which enables an individual to be identified must not be given to any person outside Contemplative Fire without express permission of the individual concerned.
- No sensitive personal data can be revealed without written consent of the Data Subject.
- When using email distribution lists, these should be sent as blind copies.
- Personal data or other personal information, e.g. testimonies, opinions, photographs must not be published or used without obtaining consent from the individuals concerned.
- Personal data can only be used for the purposes for which it was originally obtained and for which clear consent has been given.

Appendix A

The following links are to the relevant Data Protection legislation referenced in this policy.

Data Protection Act 1998: <https://www.legislation.gov.uk/ukpga/1998/29/contents>

GDPR Regulations 2018: <https://gdpr-info.eu/>

Appendix B



Data Privacy Notice Contemplative Fire

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

Contemplative Fire is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

Contemplative Fire complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To administer membership records;
- To fundraise and promote the interests of the Contemplative Fire Community;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of standing orders and gift aid applications);
- To inform you of news, events, activities and resources provided by Contemplative Fire;
- To operate the Contemplative Fire website and deliver the services that individuals have requested, including membership of and access to the on line community and receiving alerts by email to posts on the site.
- To contact you via surveys to conduct research about your opinions of Contemplative Fire's events, resources, website, activities and potential new initiatives.
- In anonymised form for analytics of our website to collect standard internet log information and details of visitor behaviour patterns.

4. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and resources and process your standing orders and donations, including gift aid .
- Processing is necessary for compliance with a legal obligation to which the data controller, Contemplative Fire, is subject – to process your standing orders and donations, including gift aid.
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other

members of Contemplative Fire for purposes connected with your attendance at / participation in Contemplative Fire events and activities. We will only share your personal data with other organisations, in particular retreat and events venue providers, where this is required by them to ensure they have necessary information to comply with health and safety regulations and to provide appropriate level of services. We will only share your personal data with external accountancy services for the purpose of providing accurate records to inform financial records and the drawing up of annual accounts. We will only share your anonymised personal data with other organisations, particularly the statistics office of the Anglican Church in connection with Contemplative Fire's status as an Acknowledged Community of the Church.

We will not share your personal data without your consent as notified by your completed consent form.

6. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary and we only retain your data for the following purposes. Specifically, we retain contact details data while it is still current. We retain standing order forms, gift aid declarations and associated paperwork for finance purposes for 6 years from the date you notify us that you are ceasing involvement with Contemplative Fire .

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Contemplative Fire holds about you;
- The right to request that Contemplative Fire corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Contemplative Fire to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Community Administrator at info@contemplativefire.org or Contemplative Fire, The Circle, 33 Rockingham Lane, Sheffield S1 4FW.

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.

Appendix C



Your privacy is important to us, and we want to communicate with our Companions, Friends and all those interested in our Contemplative Fire Community in a way which has your consent, and which is in line with UK law on data protection. As a result of a change in UK law, we now need your consent to how we contact you. (Previous forms you have sent us no longer apply). Please fill in the contact details you want us to use to communicate with you:

Name: _____

Address: _____

Email Address: _____

Phone Number: _____

By signing this form you are confirming that you are consenting to Contemplative Fire holding and processing your personal data for the following purposes (please tick the boxes where you grant consent):-

I consent to Contemplative Fire contacting me

by post phone or email.

To keep me informed about news, events, activities of Contemplative Fire; to send me mailouts of Community resources; to request information for specific purposes related to your contact with/ involvement in the Community and event attendance.

(Note you can unsubscribe from these at any time)

For Companions only: I consent to including my above given contact details in the Contemplative Fire Contacts List which is circulated to all Companions

Signed: _____ Dated: _____

You can grant consent to all the purposes, one of the purposes or none of the purposes. Where you do not grant consent we will not be able to use your personal data. So for example, we may not be able to let you know about forthcoming services and events, except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm.

Please return this completed form asap by email or post to: info@contemplativefire.org

Address: Contemplative Fire, The Circle, 33 Rockingham Lane, Sheffield S1 4FW

You can withdraw or change your consent at any time by contacting the Community Administrator of Contemplative Fire, at the above email and address. Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law, but this will not affect any personal data that has already been processed prior to this point.

Please contact The Community Administrator if you have any questions.