

**GDPR**

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

**(a) Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**(b) Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**(c) Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**(d) Vital interests:** the processing is necessary to protect someone’s life.

**(e) Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**(f) Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)
**(Copied from the ICO website)**

Having considered all the laws, these are the three most relevant to House Church.

**Legitimate Interest**

House Church will hold details under Legitimate Interest for the following:

**Church Gatherings**

Church goers who have asked or given permission for their details to be held on ChurchSuite may be contacted by email/post/text or telephone. This will only happen if they need to be told something that affects their attendance or information that might be considered helpful for their attendance.
**Giving**

Details of Giving/Gift Aid will be held on ChurchSuite and hardcopy for the period required by the law. Givers will only be contacted by email/post/text or telephone if it is in relation to their giving.

**Rotas**

Details of people who are on a rota will be held on ChurchSuite but they will only be contacted by email/text/phone for rota purposes.

**Conferences/Events/Courses**

Details of people attending courses etc will be held both by hardcopy and on the system till after the course and will only be contacted in relation to the course by email/text/phone or post.

**Parents details for children/teenagers attending HOUSE Kid’s Ministries**

Details of parents will be kept for health and safety reasons both on the ChurchSuite and hardcopy as long as the children/teenagers remain in attendance or where it is required by law. They will only be contacted by email/post/text or telephone if it is relation to their child’s/teenager’s attendance to that Ministry.

**Discipleship Community**

Details of Discipleship Community and their leaders will be held on ChurchSuite and a hardcopy of their forms will be held for the appropriate time. They will only be contacted in relation to this Ministry.

**Consent**

On the 8th May 2018 and again in 21 July 2022 a text or email was sent to everyone on our ChurchSuite database asking their permission for HOUSE to hold their details so that they can receive general emails/text/receive post or telephone calls.

In the text/email sent out people were given the option to amend their own and family details, or they could ask to be forgotten.

People will only be contacted by email/text/post or by telephone who have given consent for us to do so unless it falls under Legitimate Interest.

**Right to be forgotten**

Everyone who asked to be forgotten will be deleted from the system unless they fit into the criteria for Legitimate Interest. All paperwork will be searched and destroyed unless it needs to be kept for Child Safeguarding or Health and Safety purposes or where it is required by law for us to do so.

**Contract**

**Room Booking**

Details of Room hire will be held on ChurchSuite, hardcopy and in our finance department (for invoicing purposes) till after the event and we receive payment. The details will also be held on Sage for invoicing purposes and accounting and will be held for the duration set out by the Government. Details may also be kept if they intend to hire rooms on a regular basis, but clients will only be contacted in relation to their booking.

**House Coffee**

Requests for food that are attached to Room Bookings will be held on ChurchSuite and a hardcopy given to our finance department. All other general requests for food will be held in our finance department for invoicing. Again, these details will be held on Sage for invoicing purposes and accounting and will be held for the duration set out by the Government.

**House Church’s Action in relation to GDPR**

1. In April 2018 House Church created a Privacy and Data Protection Notice that is available on request. A copy was uploaded to ChurchSuite and was attached to the email/text that was sent out asking for consent.
2. On 21 July 22, HOUSE sent email and text to everyone who was active on ChurchSuite asking consent for them to receive emails/text/post and receive phone calls. They were also given the option to amend their details including opting out of receiving emails etc and the right to be forgotten.
3. Anyone who had/has asked to be forgotten was/will be removed from ChurchSuite unless they still have a child/teenager who is still attending Kid’s/Teenager’s Ministry, or it falls or comes under legitimate interest.
4. All paperwork has been/will be destroyed for those people who have asked to be forgotten unless it needs to be kept for Safeguarding reasons or Health and Safety issues.
5. A Giving/Gift Aid information sheet on why we hold people’s details for Giving/Gift Aid was created and is available on request.
6. All forms will now ask for consent to hold their details on our database (unless it falls under legitimate interest) and ways that we can contact them eg: email, text etc and a hardcopy of the Privacy and Data Protection Notice was made available on request.
7. People who have no email or text and they don’t fall under Legitimate Interest will be deleted, archived or contacted asking for their Consent.
8. People who have received a consent request by either email/text/post but haven’t responded will be archived unless they fall under Legitimate Interest.
9. Everyone’s Consent will be updated when and if they request it either through sign up forms or digitally through ChurchSuite. Parents who have children in either HOUSE Kids, HOUSE Tots HOUSE Youth will be given an opportunity to change their consent via email or HOUSE Kids, HOUSE Tots or HOUSE Youth forms.
10. HOUSE Kids and HOUSE Youth will archive children and youth including their parents on and when appropriate (probably on a yearly basis).