

# UPDATE

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No. 4  
June 2022

This bulletin is intended for Parish Secretaries, priests, deacons, administrators, rota co-ordinators and newsletter editors. Please copy it round. In view of the big reduction in my working hours (see item below) this may be the last issue I have time to compile, so I have seen fit to include a brief index of the topics covered in past issues, which are all on the Diocesan website. May God bless you all with a good summer, and delightful holidays if you are able to take them.

Brin Dunsire  
Data Protection Manager

# DATA

# PROTECTION

## Not-quite farewell...

As some of you know, I have just attained the ripe old age of 66, and as my State Pension should start coming through in a few weeks, I am **semi-retiring from 24th June**. Following a week's pre-booked holiday, from 4<sup>th</sup> July I will be commencing a new contract with the diocese which will involve me working only two days a week, instead of the current four



I anticipate this will mean in practice that I will be at my office in Great Missenden on Mondays, which will be the primary day to deal with any Data Protection queries and tasks, and Tuesdays will be my usual day to visit Bishops House and attend to Archiving matters. Therefore, any queries sent to me after 5pm on a Tuesday may not be seen until the following Monday.

If you have a question which is really urgent, or if you receive a **Subject Access Request** (which we have to deal with very promptly), please phone one of my colleagues at the Finance Office on 01604 712065 and they will know how to get hold of me

So I will be continuing in my role as **Data Protection Manager** for at least another year, and will be doing my best in limited hours to offer you advice and support in this area of your work, though I do not think I will have the time-capacity to come and visit you

In the four years since the GDPR came into force, we seem, by the grace of God, to have managed it without any crises, and most parishes seem to have grasped their obligations and kept themselves, and the Diocese, out of trouble, for which I am very grateful

My warmest thanks to all the parish priests, my fellow deacons, our wonderful secretarial and administrative staff, and the many volunteers, who have made me welcome and listened attentively to my rantings

Please pray for me as I make the transition to the next phase of God's plan for my life

May He bless you all, and grant success in all your endeavours for His Kingdom

## Updating your Privacy Notices



The **Diocesan Privacy Notice (General)**, which is a key document on our website and which many of you refer to in your own parish websites and forms for many purposes, is reviewed and re-adopted annually by the Trustees. Every so often, it has to be amended to keep up with the latest advice from our insurers, or with external developments such as the UK leaving the EU. The most recent tweak has been to update my own contact email into the new northamptondiocese.org format. (See p. 3) The Notice has now reached version 1.7.

if you simply point people at the Diocesan Notice on the website, there should be no need for you to take any action following these amendments, as the version on the website should always be the latest one. But if, as is Good Practice, you have a **parish** version of the Privacy Notice published on your website or noticeboard, then it is important that this should also be the latest available version, and so I am asking Neil Roseman to upload the current version 1.4 of the Parish Privacy Notice onto the website, so that you can download it, insert your parish logo or graphic if any, add the parish name and contact person where shown in red text, then make it available on your own websites

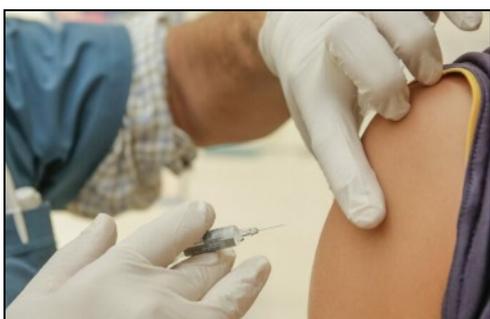
## Track and trace data - a reminder

To assist the NHS during the more dangerous phases of the pandemic, churches were requested to make a record of all who attended each Mass or service, so that in the event of an outbreak traceable to that church, worshippers could be warned that they might have been in near contact with an infected person. Many churches will have recorded phone numbers as well as names. Now that that obligation is over and we have moved to a more relaxed "living with Covid" phase (though we should still be conscious of many people's fears, and preserve some safety practices to restore confidence) you are reminded that all paper or electronic data collected for "Track and Trace" **should by now have been shredded/ deleted**, and should *not be used for any other purpose* -not even to update the census or parish phone directory.



## Vaccination status - can you ask ?

As with the above item, this may seem to be several months too late to be useful, but if the infection rate rises again (at the time of writing, hospital admissions involving a Covid infection had just risen by 24% in a week ) It may again become topical. Some parishes asked if it was legitimate, or an invasion of privacy, to insist that staff and volunteers should disclose their vaccination status before being accepted for - or being allowed to continue in - roles that involved close personal contact. We conducted a Legitimate Interests Assessment and concluded that this was justifiable in the light of our high-level duty to create a safe environment for our activities, but that no *records* should be made of vaccination-status enquiries. In other words, the "processing" of this special-category personal-health data should be limited to *viewing* the data on someone else's medical card or smartphone, and making a decision based on it, but no list or record should be kept of who had been checked - though it would be advisable to record the parish's decision on a certain date to *make* such enquiries, and what steps were taken to ensure that all organisers and activity managers were doing so. This is so that, in the event of a complaint that the parish/diocese had not discharged its duty of care properly by allowing an infected person to continue in a close-contact activity, we could at least prove that we had done our best to implement a policy of asking everyone about their vaccination status.





## A new face at the iCO

John Edwards from New Zealand has taken over the role of UK Information Commissioner, replacing Elizabeth Denham CBE in January 2022. We wish him well, but hope that this is not a face we will see taking an investigative interest in any of our parishes!

## Recent ICO fine

In Oct 2021, HIV Scotland, a Scottish registered charity, was fined £10,000 for contravention of the GDPR requirements for appropriate security measures in their use of email. They sent out a bulk email to 105 recipients which disclosed personal data of 65 of them to the others, because the Bcc facility was not used. The organisation had been aware for months that their communications procedures were shaky and that staff training was inadequate, and were in the process of implementing the MailChimp facility for bulk e-mails, but had not fully completed this by the time a mass e-mailing about a forthcoming meeting was set out, resulting in two complaints.

The seriousness here was, of course, that the people whose names were disclosed as part of their email addresses would have been perceived as people likely to be HIV sufferers, and thus it was very sensitive information. The charity was penalised, not so much for the seriousness of the harm actually done, which they had taken immediate steps to minimise, as for the poor quality of their internal data-awareness training and the evident lack of urgency in implementing secure communications procedures

Moral for our parishes and agencies - and we have said this before – if you are sending out a bulk email involving a number of private @ddresses, send it to yourself and use the Bcc facility for all the other addressees!

If it is important for everyone to know who else has had the message, deal with this by saying in your first line "this message is being sent to all participants in (whatever)"

## New e-mail addresses for priests and parishes

You should have had a message sent out recently by Neil Roseman, the Director of Communications, who has been over-seeing the roll-out of new "generic " e-mail addresses for parish offices, priests and deacons (and, in due course, secretaries and other roles in parish life where there is use of people's private e-mails at present)

I was going to reproduce excerpts from it but it is too long to fit in this space, unless at a tiny and unreadable font-size. (It was circulated on 14<sup>th</sup> June)

I just wanted to say that, as Data Protection Manager, I entirely support the security and data-control reasoning behind this move.

You can see from the case above that e-mails are among the most risky areas for data breaches. It is true that a centralised email system, as now used in many dioceses and organisations, cannot stop someone mistakenly sending out a bulk email which discloses numbers of private addresses. But if we move more and more towards having separate "business" email addresses for everything we do for the church, it will not matter if a big block of "other recipient" addresses is visible in the CC field - because, such non-personal addresses do not constitute personal data. If the charity in the example above had issued generic-form email addresses to all its members who were going to be attending the meeting, they would not have attracted the attention of the ICO.

There are other aspects of communications security which place minor additional burdens on us and aggravate us. I find it as irritating as anyone to have to find, activate and unlock my phone, simply to enter an approval for something I'm trying to do with Microsoft programs on my computer. But this is the reality of "multi factor authentication", I have become familiar with it from online banking, and if it keeps my private information more secure from hackers and criminals, then I can put up with it

Naturally, in implementing a new system of working across many dozens of disparate individuals, there are likely to be teething problems. If you find that something the diocese has required you to do is simply not working properly, then do not hesitate to contact Neil or Ovidiu.

## What we've covered in Updata -and what's on the website

### Issue 1 - Sept.2019

**Sick Lists**- names in newsletters, printed and online.

**CCTV** esp, re car parks

**Providing baptism certificates** esp. on telephone or e-mail requests

**Data breaches**, examples

**Sign-up** lists

### Issue 2 - Jan. 2020

**Windows 7** - now unsupported, need to upgrade

**Photos** in parish life

Lodging **security copies of passwords**

**Next-of-kin data** re funerals

**Retention of data** to prove consent

**Bulk e-mails** and the 2003 Regulations

### Issue 3 - October 2020

**Being Church in the Covid-19 pandemic** - censuses and other general points

**Live-streaming** of Masses

**Zoom meetings** and online ministry

**More on photos**

**Age(s) of consent**

**Data breaches** - more examples

All these back issues are available to download from the "GDPR library" at

<https://northamptondiocese.org/data/>, where you will also find:

- The "ACCEPTABLE USE AND PASSWORD POLICY V1.4 ( computer use and security)
- The "BRING YOUR OWN DEVICE" POLICY V1.2 (volunteers using their own computers)
- The COMMS TECHNOLOGY, PHOTOS AND FILMING POLICY (everything about online ministry, photography and filming)
- CONSENT BY MINORS FOR STREAMED BROADCASTS V1.1 - (for e.g. altar servers in a streamed Mass)
- CONSENT BY PARENTS FOR STREAMED BROADCASTS V1.1 ( as above, where subjects are under 16)
- CONSENT CLAUSE FOR PHOTOS/FILMING OF MINORS (general-purposes consent)
- COPYRIGHT LICENSING AND ONLINE MINISTRY - guidance notes for music, video etc used on Zoom/Teams
- DATA BREACH POLICY V1.2
- DATA BREACH REPORTING FORM V1.2 -for when something slips and we need to notify It
- DATA PROTECTION POLICY V2.4 - the basic Diocesan Policy
- PARISH RETENTION POLICY AND SCHEDULE V1.2 - how long you can/should keep different categories of records
- PRIVACY NOTICE (GENERAL) V.1.7
- PRIVACY NOTICE (PARISHES) V.1.4
- PRIVACY NOTICE FOR VICTIMS AND SURVIVORS WHO REPORT ABUSE WITHIN THE DIOCESE
- ROADSHOW POWERPOINT PRESENTATION - my slides from the summer 2018 presentations
- SHORT DATA PROTECTION CLAUSES V1 - brief clauses to add to a range of parish forms.
- UPDATA BULLETINS 1,2 AND 3