



Representative Church Body of  
the Church of Ireland

# General Data Protection Regulation Overview

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# Introduction

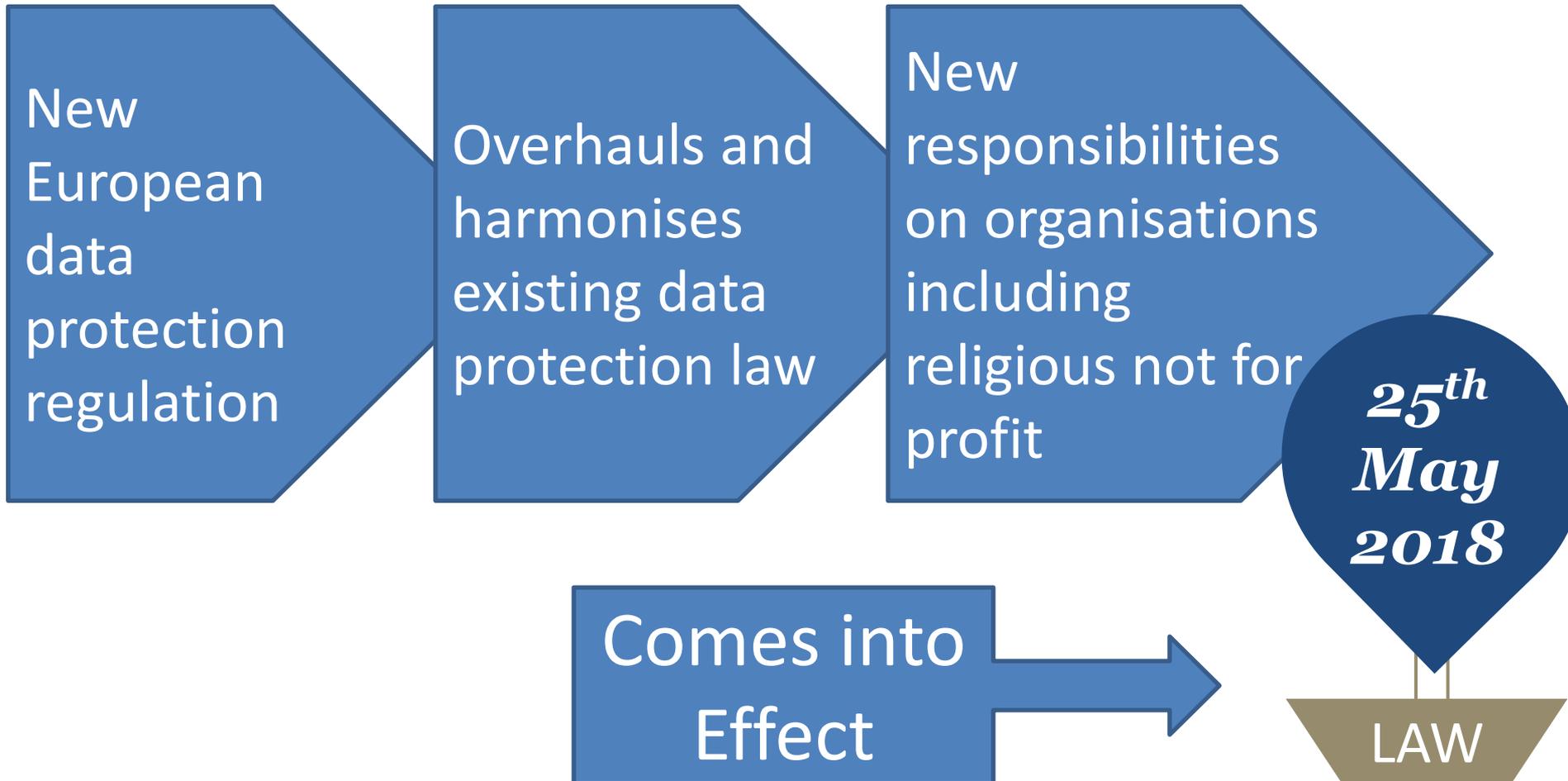
- Data Protection Coordinator for the Representative Church Body
- Manage GDPR compliance for Church House, Dublin and Belfast
- Support GDPR compliance across the Dioceses and Parishes

## Contact:

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- 01 - 4125660



# What is General Data Protection Regulation (GDPR)?



# General Data Protection Regulation

- Aligns regulation to the modern digital world
- Ensures that processing of personal data protects and respects individual's rights
- Standardises, strengthens and enhances individuals rights to the privacy and protection of personal data
- Emphasises transparency, security and accountability

## **Non-compliance?**

Depending on severity - up to 4% of global annual turnover or €20million.....

# Some Common Terms



## Data Subject

- Natural Living Person



## Data Controller

- Person determining the HOW and What



## Personal Data

- Information capable of identifying a living



## Processing Data

- Anything you might do with personal data



## Special Category Data

- Sensitive personal data

# Key Principles... GDPR



## Personal data is:

- Processed lawfully, fairly and transparently
- Only used for the specific purpose you received permission for, and no other purpose
- Is adequate, relevant and limited
- Is accurate and kept up to date
- Is only stored for as long as is necessary
- Is kept safe and secure



**No**  
keeping data  
'just in case'

# Individuals now have rights to:



**BE INFORMED**



**ACCESS** their personal information



Have personal data **ERASED**



Have personal data **CORRECTED**



**RESTRICT** processing



**OBJECT**



Data **PORTABILITY**



No **AUTOMATED** decision making

# 6 Ways to Process Personal Data



# Consent

- Article 4
  - **freely given**
  - **specific**
  - **informed**
  - **unambiguous**
  - **can be withdrawn**



indication of the data subject's wishes, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her



# Legitimate Interest



# 6 Ways to Process Personal Data





# DON'T PANIC

You may already have data protection policies in place, or you may need to start from scratch. Whatever the case, don't panic!

Once you have started on your journey towards compliance, and have a plan to become compliant, you will be fine!

GDPR puts a responsibility on  
each Diocese and Parish  
to **show accountability**

# A quick note on data breach!

## What is a breach?

- Something that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data

## What do I do?

- Follow your documented procedure which should include:
  - Inform the person in charge of Data Protection in your parish
  - Contact Rebekah Fozzard, Data Protection Coordinator, RCB
  - If a high risk to the individuals involved, e.g. through identity theft, GDPR makes informing the Data Protection Commissioner compulsory

# What each Parish needs to do:

## 1. Agree who is in charge

- Who is responsible for data protection in your parish?
- Download the GDPR checklist from the RCB website

## 2. Become Accountable

- Review ALL personal data you hold
- Document how you did your review

## 3. Develop processes, procedures and notices

- Data Privacy Notice
- Parish Retention Policy
- Procedure on how you get consent
- Procedure on what to do if a data breach

## 4. Communicate

- Poster on your notice board
- Update parishioners
- Communicate via parish magazines etc.

# You have been asking:

<b>Do we need to get consent from parishioners when GDPR commences?</b>	Not necessarily. You may already have existing consent. Just make sure it is explicit
<b>Can I only use consent?</b>	No, you can rely on another method of consent e.g. legitimate interest. Just document your reason why
<b>What is a data request?</b>	This is when an individual requests a copy of their personal data. Information must be provided within one month.
<b>Does my Parish need a Data Protection Officer?</b>	No; but someone needs to be in charge of managing data protection at a local level

# And you have been asking

<b>Does every website need a Data Privacy Notice?</b>	Yes
<b>Are we regulated by both the Data Protection Authority in Ireland and United Kingdom?</b>	Organisations working cross border are only regulated by the Data Protection Authority where they have their main establishment.
<b>Can we publish accounts with names, addresses and amounts of donations?</b>	Not without explicit consent from every member to do this. You will have to demonstrate evidence of consent.
<b>How long should we keep minutes of meetings?</b>	Last action plus 5 years and then archive
<b>What can we do to keep data secure?</b>	Have as much as you can online; don't have boxes of information unsecured; have strong passwords; locked cabinets

# Final Thoughts

*Compliance with data protection is something which will have to be lived, rather than a box to be ticked or a policy to be drafted and then set aside*

*GDPR compliance will have to be in the back of one's mind when dealing with any personal data*

## Questions?

