



Policy for Safeguarding of Vulnerable Groups

October 2021

The Lord is a refuge for the oppressed, a stronghold in times of trouble.

Psalm 9:9

ST MARK'S VERSAILLES & ST PAUL'S GIF SUR YVETTE

SAFEGUARDING POLICY

1. Introduction & Overview

St Mark's Church, Versailles and St. Paul's Church, Gif sur Yvette, undertake to provide an environment where vulnerable groups (children, young persons and vulnerable adults) can participate in organised church activities safe from physical or physiological harm or abuse.

It should be noted that for the purpose of this document, any time that St Mark's Church is mentioned, St Paul's Church, Gif sur Yvette is included.

The Church is called to share the good news of God's salvation through Jesus Christ. The life of our communities and institutions is integral to how we address this task. The good news speaks of welcome for all, with a particular regard for those who are most vulnerable, into a community where the value and dignity of every human being is affirmed and those in positions of responsibility and authority are truly trustworthy. Being faithful to our call to share the gospel therefore compels us to take with the utmost seriousness the challenge of preventing abuse from happening and responding well where it has.

In terms of definition, "**Vulnerable Groups**" are children or young persons who have not yet attained their 18th birthday, or for vulnerable adults who although being an adult aged 18 or over have difficulty to look after themselves or to protect themselves against harm or exploitation.

Given the French context of St Marks Church, provision of a safe environment for children is provided first and foremost by aiming to meet the requirements as set out under French Law (see Loi n° 2007 – 293 du 5 mars 2007 at www.legifrance.gouv.fr). In addition, St Marks should annually review the Safeguarding Policy Statement of the Church of England and guidelines as set out by the Church of England, Diocese in Europe (see Annexe 1).

An appointment procedure, including disclosure checks, shall be followed for those working with Vulnerable Groups, and suitable training shall be provided. It shall also be ensured that St Mark's premises and associated insurance cover are appropriate for the activities organised and held.

The responsibility for approval and implementation of this policy falls to the Chaplain and church council (PCC) of St Marks.

2. Appointment Procedures

A Safeguarding Officer shall be appointed by the St Mark's Church PCC who, upon accepting this responsibility, shall be registered with the Diocese of Europe. The Safeguarding officer shall themselves be subject to the same disclosure checks as other volunteers who work with Vulnerable Groups.

All clergy employed by St Mark's Church and lay-people holding the Bishops' licence shall complete the relevant safeguarding checks through the Safeguarding Team of the Diocese in Europe prior to appointment. Churchwardens shall also complete the relevant safeguarding checks through the Safeguarding Team of the Diocese in Europe.

3. Volunteer Worker Recruitment and Appointment Procedure

Group leaders shall implement a recruitment or selection process appropriate to requirements of their Vulnerable Group. Once they have confirmed that a volunteer is an appropriate person to work within such group, the applicant shall be referred to the Safeguarding Officer who will initiate the volunteer worker appointment procedure.

An exception is recruitment for Operation Stephen which will also follow the additional guidelines for Operation Stephen.

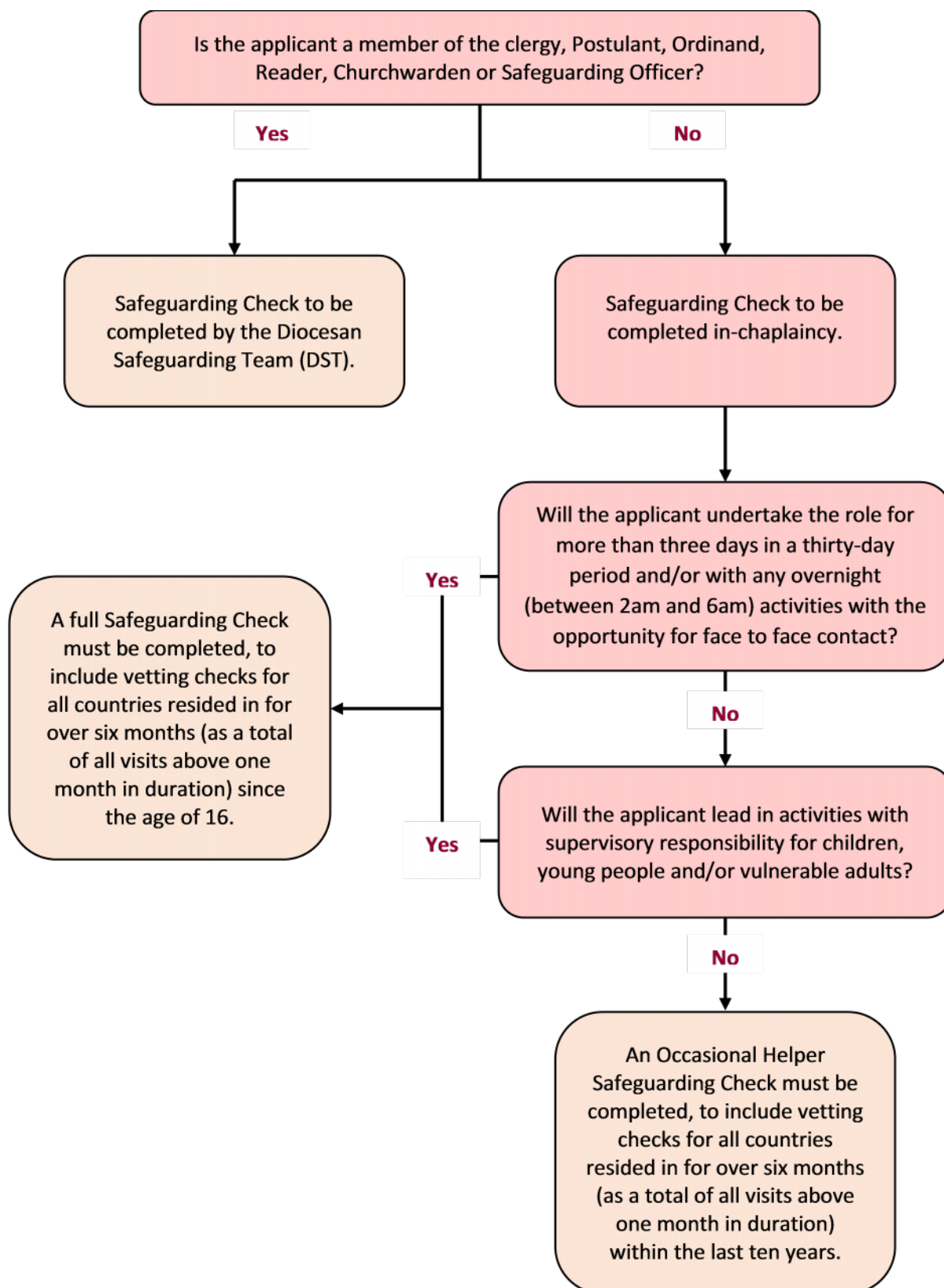
The Safeguarding officer will ensure that adults who apply to work with Vulnerable Groups complete the Confidential Declaration Form ("**CDF**") (Annexe 2) and apply for an '*Extrait de Casier Judiciaire*' from the French authorities online at: <https://casier-judiciaire.justice.gouv.fr/pages/accueil.xhtml>. The Safeguarding Officer will then make all necessary checks and follow up any issues identified before advising the applicant and leaders of the activity concerned when the clearance process has been successfully completed. Only once the full process is successfully completed shall the applicant be considered to have clearance to work with Vulnerable Groups.

Upon receipt of a completed CDF the Safeguarding Officer shall first review the contents to ascertain if any conviction, offence, police investigation or other matter renders the applicant unsuitable for work with Vulnerable Groups. If no issues are identified, the Safeguarding Officer will then aim to obtain police clearance or verify appropriate references for every country the applicant has lived for 6 months or more in since the person was 16 (in the last 10 years for helpers) other than France. In the event of any area of doubt, or if police clearance or reference checks prove to not be possible for each location/country the dossier will be passed to the Diocese Safeguarding Officer who will decide if the applicant can be given clearance to work with Vulnerable Groups.

Upon completion of the self-declaration disclosure process, including police clearance and reference checks, and upon receipt of a positive result following the '*Extrait du Casier Judiciaire*' clearance process, the Safeguarding officer shall inform the applicant and the appropriate team leader(s) that he/she has been cleared to work with vulnerable groups.

Clearance to work with vulnerable groups will be considered to be for a maximum period of 5 years. After a period of 5 years, or a shorter period if new information or a change in circumstances leads to the Safeguarding Officer considering that a recheck is appropriate, the volunteer worker appointment procedure must be completed again if the individual is to continue to work with vulnerable groups. If no group leader is appointed, this role shall be performed by the chaplain and/or the church wardens.

4. Initiating the Safeguarding Check process:



5. Church Groups affected by this policy

Although this policy shall apply to all activities or events organised for Vulnerable Groups, the following groups are specifically highlighted as groups that must comply with the policy:

Crèche (Little Lights)	0 - 3 years
Sunday School (Galaxies)	3 – 11 years
St Paul's Sunday School	3 – 11 years
Youth	11 - 18 years

Operation Stephen Volunteers at Operation Stephen undertake to abide by the separate Operation Stephen guidelines.

It should, however, be noted that children and vulnerable adults are under their parents, guardians or carers responsibility when at church and when not actually participating in an organised group activity. An example of this is church meals and barbeques where vulnerable individuals remain under the responsibility of their parent, guardian or carer, unless specific arrangements have been made for their care.

6. Staffing Levels

The following numbers of persons ("workers") are recommended as the minimum numbers acceptable for activities organised for vulnerable groups:

0 - 3 years	1 person for every 2 children
4 - 8 years	1 person for every 6 children
over 8 years	1 person for the first 8 children and then one extra person for every extra 12 children
Vulnerable adults	staffing should be determined on a case-by-case basis and workers record their decisions.

Each group should have at least 2 workers (with at least one leader) and it is recommended that a gender balance be maintained as far as possible. While any individuals who have not yet completed the clearance procedure, or any youths below 18 years of age, can assist with activities organised for Vulnerable Groups they cannot be counted in the minimum number of persons stated above and if they assist, they do so under the supervision of those who have already completed the clearance process.

The definitions of "lead/leader" "helper" here are defined as follows:

- youth/children or vulnerable group leader: any worker with overall responsibility for youth or children's work in the church who has completed full safeguarding clearance checks and level C2 Training. There may be more than one leader at a time for an activity.
- youth/children teacher or helper or vulnerable group helper: a worker, who has completed vetting checks for occasional helpers and at least level C1 Training, with overall responsibility for leading or helping in a session for youth or children's work or vulnerable adults in the church under delegation from a youth/children or vulnerable group leader.

7. Guidelines for groups and activities

- Undertake a health and safety risk assessment
- A registration form must be completed for every child or young person who attends groups or activities, which should include up-to-date information on parents' contact numbers, medical information (e.g. allergies) and any special needs in the form set out in Annexe 3. The information in these forms should be reviewed annually or as and when it changes i.e. a child is diagnosed with a medical condition/ allergy etc. It will normally be completed by a parent.
- An attendance register must be kept and be available at all group meetings.
- A First Aid kit must be available on any premises that are used by children.
- An accident and incident logbook must be available, and all accidents recorded. The logbook should be stored in a secure place. Any significant incidents must be recorded (e.g. a fight between children).
- There should be access to a telephone, if possible.
- In premises where children's groups meet, local child helpline telephone numbers should be displayed e.g. 119 allo enfance en danger (<https://www.service-public.fr/particuliers/vosdroits/F781>).
- Parents must sign a consent form before children are transported in a private car and before any photography or images are taken – see Annexe 3.
- Otherwise, no transport should be given to children you are supervising, on their own or your own, unless: there are exceptional circumstances, e.g. in an emergency for medical reasons; or where parents fail to collect a child and no other arrangements can be made to take a child home. In such situations, the circumstances; and your decision must be recorded and shared with the relevant leader, the Chaplain or Church Safeguarding Officer at the earliest opportunity.

In addition, regarding any trips that are off-site (i.e. not at church premises):

- The church leadership must be informed and agree to the activity.
- Details of the activity and any itinerary must be given in advance to parent/s and consent forms (set out in Annexe 3) received in advance of the activity taking place.
- Details of the activity and a list of contacts must be left with someone in the church.
- Details of the activity and arrangements must be given to the local Safeguarding Officer and/or incumbent.
- A risk assessment must be undertaken, and confirmation obtained that the activity is covered by Chaplaincy Council insurance (where available).
- A leader must be designated to take responsibility for First Aid.

Many of these items are equally applicable to groups involving vulnerable adults.

8. Code of Safer Working Practice

All those working on behalf of the chaplaincy with children, young people and adults, must:

- Treat all individuals with respect and dignity.
- Ensure that their own language, tone of voice, and body language is respectful.
- Ensure that children, young people and adults know who they can talk to about a personal concern.
- Record and report any concerns about a child, young person or adult and/or the behaviour of another worker with their activity leader and/or local Safeguarding Officer. Sign and date the record.

- Obtain written consent for any photographs/videos to be taken, shown, displayed or stored (please see Model Consent Form - Images).
- Administer any First Aid (when required) with others around.

In addition, all those working on behalf of the chaplaincy with children and young people, must:

- Always aim to work with or within sight of another adult.
- Organise toilet breaks for young children. Ideally, there should be two adults of the same gender as the children assisting with toileting. At a minimum, ensure another adult is informed if a child needs to be taken to the toilet.
- Respond warmly to a child who needs comforting but allow the child to determine the degree of physical contact.
- Ensure that the child and parents are aware of any activity that requires physical contact and its nature before the activity takes place.

Must not:

- Invade an individual's privacy whilst washing and toileting.
- Use any form of physical punishment.
- Be sexually suggestive about or to an individual.
- Scapegoat, ridicule or reject an individual or group.
- Permit abusive peer activities e.g. initiation ceremonies, ridiculing or bullying.
- Show favouritism to any one individual or group, including those who may attempt to involve in excessive attention seeking.
- Allow unknown adults access to children, young people and adults that may be vulnerable. Visitors should always be accompanied by an approved person.
- Allow strangers to transport children, young people and adults who may be vulnerable in the group.
- Befriend children, young people and vulnerable adults on social media except for the purpose of joining a church youth or galaxies social media group as described in the Social Media Paragraph below.
- Take photographs on personal phones or cameras without the prior consent of the person(s) whose photographs are being taken..

In addition, for children and young people, must not:

- Give transport to children you are supervising, on their own or your own, unless there are exceptional circumstances; e.g. in an emergency for medical reasons or where parents fail to collect a child and no other arrangements can be made to take a child home. In such situations, the circumstances and your decision must be recorded and shared with an appropriate person at the earliest opportunity.
- Drink alcohol, smoke or take drugs whilst working with or supervising children. Where children are in attendance at a church event but no childcare or youth activity is arranged then parents and carers must act as they feel appropriate. Church Officers have a responsibility to ensure that any event organised under the auspices of the chaplaincy is appropriate and safe for all in attendance.

- Arrange social occasions with children and young people (other than events which also include adult family members/carers) outside organised group occasions.

9. Acceptable Touch

Sympathetic attention, humour, encouragement and appropriate physical contact are needed by children and adults. Some physical contact with children, particularly younger children, is wholly appropriate.

The following guidelines regarding touching are suggested:

- Always ask permission.
- Be mindful of your body position.
- Keep everything public. A hug in the context of a group is very different from a hug behind closed doors.
- Touch should be in response to a child's needs and not related to the worker's needs. It should be age appropriate, welcome and generally initiated by the child, not the church officer.
- Avoid any physical contact that is or could be construed as sexual and/or abusive/offensive.
- Allow the child to determine the degree of physical contact with others except in exceptional circumstances (e.g. when they need medical attention).

In addition:

- You can allow the people you support in your role to give you brief hugs if you feel comfortable with this.
- You can allow the people you support in your role to hold hands or link arms with you to help with travel and stability.
- You should discourage the people you support in your role from touching your face. You can offer your hand instead.
- You should discourage the people you support in your role from sitting on your lap. You can offer to sit side by side.
- You should avoid using touch if the person you support in your role is very distressed and is unlikely to tolerate it.

Church officers at all levels must take responsibility for monitoring one another in the area of physical contact. They should be encouraged to challenge one another if necessary. Concerns about possible abuse or inappropriate behaviour should always be reported.

10. Visiting Adults

Visiting vulnerable adults in their homes is an essential element of many church officers' roles. Many members of the congregation will be well known to the church officer, and where there have been no previous concerns, the level of risk to the church officer or members of the congregation during visits will usually be low. However, unexpected circumstances can be encountered, some of which may place a church officer at risk; for example, the unexpected presence in the home of a relative or friend with a history of violence or threatening behaviour. Unfortunately, case histories also show that a member of the congregation may be at risk from a church officer. For these reasons it is very important for chaplaincies to ensure that their church officers and congregation members are as safe as they can be, and

that there is accountability and transparency in the manner in which church officers engage in lone working or visits to homes.

To assure the person you are visiting of their safety, and for your own as a church officer:

- If possible, undertake a risk assessment before an initial visit, especially if you do not know the person. If there are any concerns or risks known before a visit is made, you are advised always to undertake a risk assessment. In these circumstances, consider whether the visit is necessary, or whether you should be accompanied by another church officer. In addition, visiting in pairs may be advisable, especially if the adult is perceived to be vulnerable.
- Do not call unannounced; call by appointment, and if appropriate, telephone the person just before visiting.
- Be clear about what support you can offer and the purpose and limitations of any pastoral care / support that is available.
- Do not make referrals to any agency that could provide help without the adult's permission, and ideally encourage them to set up the contact, unless there are safeguarding concerns.
- Never offer "over the counter" remedies to people on visits or administer prescribed medicines, even if asked to do so.
- Do not accept any gifts from adults other than token items, to avoid misunderstandings or subsequent accusations from the person or their family. If someone wants to make a donation to the church, put it in an envelope, mark it on the outside as a donation and obtain a receipt from the Treasurer.
- Make a note of the date when you visit people, report back about the visit to the agreed named person and say what is concerning or going well. They will report safeguarding concerns to the local Safeguarding Officer and/or incumbent, or directly to the Diocesan Safeguarding Advisor (DSA) at the following link: <https://europe.anglican.org/safeguarding/who-to-contact> if they are not available.

11. Lone working

We strongly recommend that you risk assess any activities that involve lone working; for example, opening and locking places of worship, preparing places of worship before services, encouraging an open church environment and other situations relevant to your environment.

Lone working is an everyday and essential practice for clergy and church workers. Lone working includes any work activity undertaken in isolation from other workers. Home working, working alone in an office, work travel and working at remote locations, such as home visits, could all constitute lone working.

One to one contact with individuals (e.g. pastoral care) should be properly planned, its risks considered and recorded effectively. It is essential to acknowledge appropriate physical, sexual, emotional and psychological boundaries. Inappropriate touching or gestures of affection are to be avoided. Consider your physical environment if you find yourself alone with an individual.

Planning Lone Working: Considerations

- Is lone working necessary? Confidentiality can be assured with other people within reach.
- If there are casual callers, take precautions before opening the door.
- Who will be involved? Who else should know about it?
- When and where will it take place? Avoid making arrangements that could be misinterpreted.
- Is there a risk of violence? A good working definition of violence is: Any behaviour which produces damaging or hurtful effects, physically or mentally, on people.
- Are there any increased risks to the worker?
- Are there any known medical or other factors which could make either party more vulnerable? Some medical conditions can lead to disinhibition.

Control Measures

Lone working should be planned in advance and noted in an appropriate diary or other record. Where possible it should be notified to an appropriate person. (This is not necessary when work is done at home and does not involve face to face contact with other people.) Some of the people the lone worker is at risk of meeting are those who, through medical reasons or substance abuse, are liable to mood swings leading to physical violence. It is recommended good practice to encourage the person you are meeting to enter a room first and for the lone worker to seat themselves closest to the door. Should the situation lead to risk of violence, the lone worker then has a higher chance of withdrawing safely. The lone worker must have access to a landline phone or carry a mobile phone and be accustomed to use it. Supervisors of home visitors (e.g. Eucharistic Ministers) should occasionally visit, accompany or observe lone workers. Automatic warning devices (e.g. personal attack alarms) can be obtained for use in risky places or activities. It may be appropriate for lone workers to be asked to check in once they have completed their task or have safely reached their home following it.

Assessing Risks

It is recommended good practice that a risk assessment be completed and control measures identified for lone working. Chaplaincies running pastoral visiting schemes should undertake such an assessment.

12. Use of Social Media

Social media sites enable users to create and share content and keep in touch with other users. They include maintaining a profile page on a networking site such as Facebook, Twitter, Instagram, Snapchat; writing or commenting on a blog, whether it is your own or the blog of another person; taking part in discussions on web forums or message boards. For many, especially young people, using social media is an extension of physical face to face relationships. It is therefore important that churches also engage with their community and worshippers through these platforms. However, this must be done safely to avoid the risk of:

- Forming inappropriate relationships.
- Saying things you should not, such as offensive, sexual or suggestive comments.
- Blurring the boundaries between public work/ministry and your private life.

- Grooming and impersonation (including the giving of inappropriate gifts).
- Bullying and harassment.

The Role of the Chaplaincy Council

The Chaplaincy Council must approve the use of social media and mobile phones by the church. Where there are Facebook or similar online groups set up on the church's behalf, the Chaplaincy Council must ensure there is a named person to whom all workers are accountable.

The named person must be a church officer and should be aware of the account name and password so that they can at any time log on to the account to monitor the communications. The named person should be proactive in fulfilling this role.

Communications must be shared with the named person. Church officers remain bound by professional rules of confidentiality. Where there is concern that a young person or adult is at risk of abuse, or they themselves pose a risk of abuse to others, safeguarding procedures must always be followed.

Guidance for Church Officers

DO:

- Have your eyes open and be vigilant.
- Maintain the upmost integrity – honesty, transparency, consistency and accountability are key. Treat online communication with children, young people and adults as you would communication that is face to face. Always maintain the same level of confidentiality.
- Report any safeguarding concerns that arise on social media to the local Safeguarding Officer, incumbent and/or Diocesan Safeguarding Advisor (DSA).
- Always assume that everything you write is permanent and may be viewed by anyone at any time; that everything can be traced back to you personally as well as to your colleagues or the church. Always think before you post.
- Draw clear boundaries around your social media usage associated with your private life and your use of different social media for public ministry. Keep church account/s and profiles separate from your personal social media account/s; e.g. only use a Facebook page, Twitter or blogs for public ministry, while keeping a separate Facebook profile for private life.
- Always ask parents/carers for written consent to:
 - use and store photographs of children/young people from activities or events in official church publications, or on the church's social media, website and displays.
 - use telephone, text message, email and other messaging services to communicate with young people.
 - allow young people connecting to the church's social media pages.
- Only use an account approved by the Group Leaders or Safeguarding Officer to communicate with children, young people and/or vulnerable adults where no other leaders or helpers are on copy. The named person should be able to access and review conversations, and the account should be visible to young people and their parents. Young people must be made aware that any

communication will be viewed by all users. Save any messages and threads through social networking sites, so that you can provide evidence to the named person of your exchange when required.

- Avoid one-to-one communication with a child or young person.
- Use clear and unambiguous language in all communications and avoid abbreviations that could be misinterpreted.
- Save and download to hard copy any inappropriate material received through social networking sites or other electronic means and show immediately to the named person, local Safeguarding Officer, incumbent or, if appropriate, Diocesan Safeguarding Adviser.
- Use passwords and log off promptly after use to ensure that nobody else can use social media pretending to be you.

DO NOT:

- Use a personal Facebook or any other social media account in your work with children, young people or vulnerable adults unless it is via a group chat such that all messages are visible to the whole group including other leaders.
- Add children, young people or vulnerable adults as friends on your personal accounts.
- Facebook stalk (i.e. look through people's Facebook pages to find out about them).
- Say anything on social media that you would not be happy saying in a public meeting, to someone's face, writing in a local newspaper or on headed notepaper.
- Comment on photos or posts, or share content, unless appropriate to your church role.
- Use visual media (e.g. Skype, Facetime) for one to one conversations with young people. Use visual media in group settings only.

In particular, do not allow content to contain or share links to other sites that contain:

- Libellous, defamatory, bullying or harassing statements.
- Breaches of copyright and data protection.
- Material of an illegal nature.
- Offensive sexual or abusive references.
- Inappropriate language.
- Anything which may be harmful to a child, young person or vulnerable adult, or which may bring the church into disrepute or compromise its reputation.

13. Data capture, Consent Forms and Procedures

Leaders of activities for Vulnerable Groups are responsible for the recording of appropriate information, to allow an adequate level of care to be provided for the children or vulnerable adults in their groups. Information recorded should normally include necessary medical information, details of any special needs, and appropriate parent or guardian contact details. Formally obtaining consent from carers, where applicable, for the participation of vulnerable individuals in activities or groups is also a requirement. Full disclosure is not required for the first couple of sessions where an individual may be visiting or trying out a group.

Leaders of activities for vulnerable groups are required to implement data capture and consent forms which are appropriate for the particular group that they lead. Annexe 3 contains examples of 'Child Information & Contact details', and 'Parental Consent' forms, which can be used or adapted as appropriate.

Workers and other individuals who have access to or use the data provided concerning those participating in vulnerable groups are responsible for strictly maintaining the confidentiality of this data and processing of such personal data in accordance with St. Mark's Church Data Protection Policy set out in Annexe 5.

Leaders of activities for Vulnerable Groups are responsible for development and implementation of appropriate rules and practices for the individuals within their groups. This shall include but not be limited to rules for toilet breaks. Operation Stephen has its own guidelines.

Each group leader must keep an attendance register of the children or vulnerable adults present at each session. These registers must be kept in a permanent archive.

St. Mark's shall comply with all applicable GDPR measures in the storing and processing of personal data.

14. Facilities & Equipment

St Mark's Church aims to provide premises, facilities and equipment suitable for use by vulnerable groups.

Space: Groups and events should aim to provide at least 2 square metres of unencumbered space per vulnerable individual.

Toilets: St Mark's Church provides toilet facilities with a visible fire alarm for less-able bodied individuals. Children's activities should have clear guidelines about how children should be accompanied when going to the toilet.

Warmth and cleanliness: Meeting places should be clean, warm, well-lit and well-ventilated.

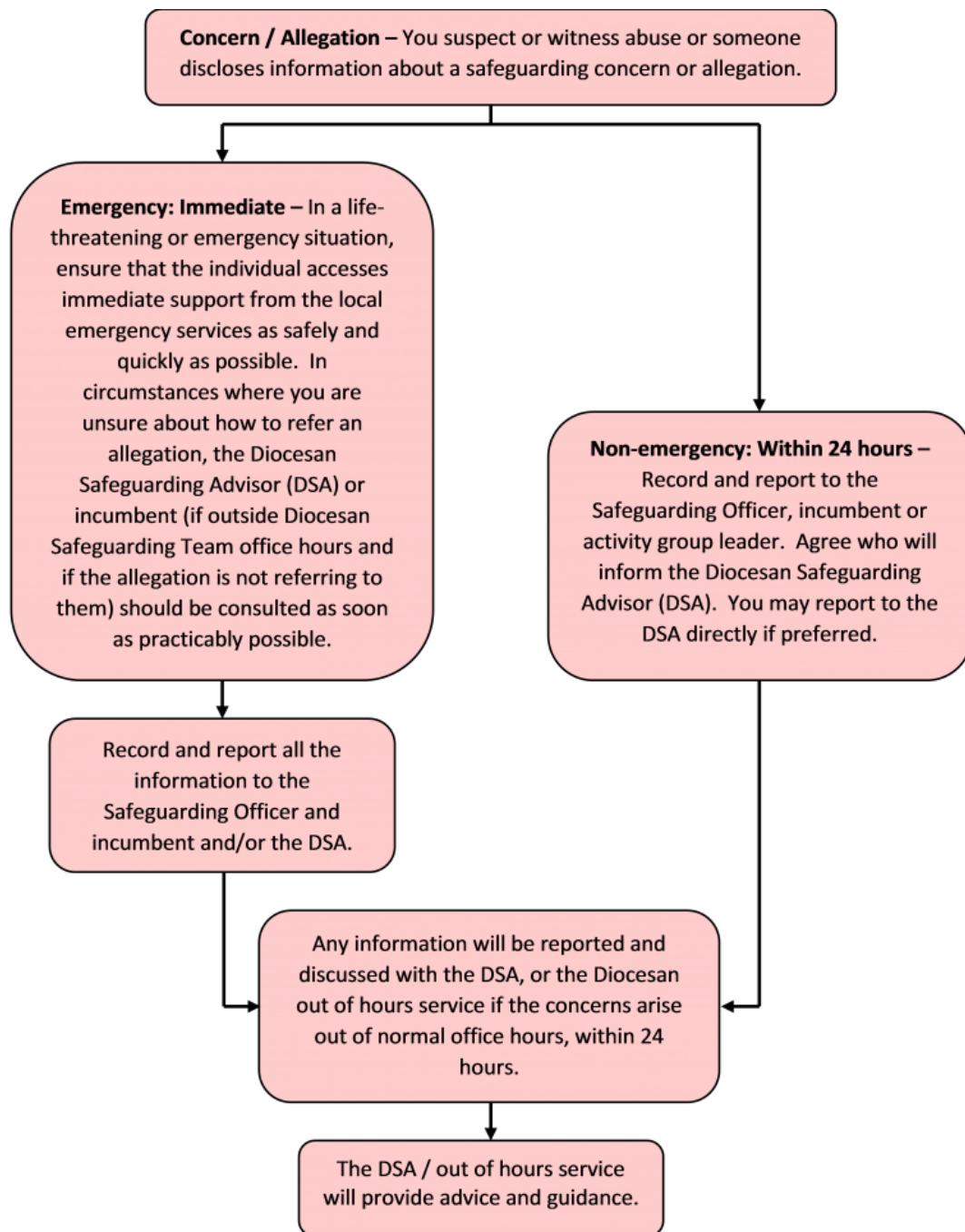
First Aid and practical safety: See Annexe 4

Food and Snacks: Drinking water is always available on site and should be available for offsite activities. Snacks should only be made available to children if checked against allergy information.

Special needs: St Mark's welcomes children and young people with special needs to our groups. The premises and toilets have features to make them accessible to people with disabilities.

Insurance: St Marks carries appropriate insurance cover, including public liability insurance, to cover all activities both on church premises and offsite. The church council (PCC) is responsible for ensuring the insurance cover in place is adequate.

15. What to do regarding a safeguarding concern or allegation: quick guide



- **Record** all action.
- **Consider** the support needs of all those affected by allegations of abuse at all points in the above stages.
- **Remember** the safety and welfare of any child or adult takes precedence over all other concerns.

If in doubt, always inform the Safeguarding Officer

Please ensure that any individual/private contact with a member of a Vulnerable Group is logged and reported to the Safeguarding Officer via e-mail at safeguard.saintmarksversailles@gmail.com

ANNEXES

Annexe 1 – Church of England Diocese in Europe Safeguarding Policy Statement for Children, Young People and Adults (2017)

Annexe 2 – Confidential Declaration Form

Annexe 3 – Parental Forms

- i) Child Registration Form (Galaxies) Information & Contact details
- ii) Youth Registration Form Information & Contact details
- iii) Youth Parental Consent Form (Example)

Annexe 4 – First Aid & Practical Safety

Annexe 5 – St. Mark's Church Data Protection Policy

Diocesan Safeguarding Policy Statement

"For surely I know the plans I have for you, says the Lord, plans for your welfare and not for harm, to give you a future with hope." (Jeremiah 29.11)

In accordance with the Church of England's Safeguarding Policy, the Diocese in Europe is committed to:

- Promoting a safer environment and culture.
- Safely recruiting and supporting all those with any responsibility related to children, young people and vulnerable adults within the church.
- Responding promptly to every safeguarding concern or allegation.
- Caring pastorally for victims/survivors of abuse and other affected persons.
- Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons.
- Responding to those that may pose a present risk to others.

The Diocese in Europe will:

- Endeavour to create a safe and caring place for all.
- Support each local Safeguarding Officer to work with the incumbent and the Chaplaincy Council to implement policy and procedures.
- Safely recruit, train and support all those with any responsibility for children, young people and adults to have the confidence and skills to recognise and respond to abuse.
- Encourage each chaplaincy to arrange appropriate insurance cover for all activities involving children and adults undertaken in the name of the chaplaincy.
- Advise each chaplaincy to display in church premises and on the chaplaincy website the details of who to contact if there are safeguarding concerns or support needs.
- Listen to and take seriously all those who disclose abuse.
- Take steps to protect children and adults when a safeguarding concern of any kind arises, including notifying the Diocesan Safeguarding Adviser whose details can be found at the following link: <https://europe.anglican.org/safeguarding/who-to-contact>.
- Offer support to victims/survivors of abuse regardless of the type of abuse, when or where it occurred.
- Care for and monitor any member of the church community who may pose a risk to children and adults whilst maintaining appropriate confidentiality and the safety of all parties.
- Review the implementation of the Safeguarding Policy, procedures and practices at least annually.

Annexe 2

Confidential Declaration Form

STRICTLY CONFIDENTIAL

To be completed in full by applicants for all voluntary and paid roles with the Diocese in Europe

Role Information

Chaplaincy Name	
Church Name	
Role Title	

Personal Information

Title		Surname	
First Name			
Middle Name(s)			
Date of Birth			
Any Former Name(s)			
Email Address			
Landline Telephone No.			
Mobile Telephone No.			
Address			

Country Information

Current country of residence	
Since when have you been resident (month and year)?	

List all countries where you have been resident for longer than one month in duration since the age of 16:

Country	From (mm/yyyy)	To (mm/yyyy)

Court and Police Investigations / Convictions

Please answer all questions below. If you answer yes to any question, please give full details and continue on a separate sheet if necessary. All matters will be checked with the relevant authorities.

You must be honest and answer all the questions to the best of your knowledge. In the event of appointment, any failure to disclose relevant information could result in the withdrawal of any offer of appointment within the chaplaincy / diocese.

Convictions, Warnings, Cautions, Reprimands, etc.

In answering questions 1 and 2 you do not need to include information if it complies with all of the following criteria:

- i. A period of 11 years (or 5.5 years if under 18 at the time of the conviction) has passed since the date of the conviction; **and***
- ii. It is your only offence; **and***
- iii. It did not result in a prison sentence or suspended prison sentence (or other form of detention); **and***
- iv. It was not violent, or drug related, or sexual in nature.*

Question 1

Have you ever been convicted of or charged with a criminal offence?

Yes

No

If yes, please give details including the nature of the offence(s) and the dates. Please give details of the court(s) and country/countries where your conviction(s) were heard, the type of offence(s) and sentence(s) received and details of the reasons and circumstances that led to the offence(s):

Question 2

Have you ever received a caution, reprimand or warning from a police service?

Yes

No

If yes, please give details below, including the date and country of the investigation(s), the police force(s) involved, details of any investigation(s), the reason(s) and disposal(s) if known:

Historical investigations, prohibitions, records of harm to children or adults who may be vulnerable.

In answering questions 3 to 9 you must include all information to the best of your knowledge.

Question 3

Are you at present (or have you ever been) under investigation by a police service, an employer or other organisation for which you worked for any offence / misconduct in any country?

Yes

No

If yes, please provide details:

Question 4	Are you or have you ever been prohibited and/or barred from working with children and/or vulnerable adults, in any country?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, please provide details:</i>		
Question 5	Has a family court (or equivalent in any country) concluded that you have caused significant harm* to a child and/or vulnerable adult, or has any such court made an order against you on the basis of any finding or allegation that any child and/or vulnerable adult was at risk of significant harm* from you, in any country? <i>* Significant harm' involves serious ill-treatment of any kind including neglect, physical, emotional or sexual abuse, or impairment of physical or mental health development. It will also include matters such as a sexual relationship with a young person or adult for whom an individual had pastoral responsibility or was in a position of respect, responsibility or authority, where he/she was trusted by others. It also includes domestic abuse.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, please provide details:</i>		
Question 6	Has your conduct ever caused or been likely to cause significant harm to a child and/or vulnerable adult, and/or put a child or vulnerable adult at risk of significant harm, in any country?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, please provide details:</i>		
Historical complaints and allegations – whether or not they were proven.		
<i>In answering questions 7 and 8, please declare any complaints or allegations made against you, however long ago, that you might have significantly harmed a child, young person or adult who is vulnerable. Any allegation or complaint investigated by the police, Children's Services, an employer, voluntary body or other body for which you worked must be declared. Checks will be made with the relevant authorities.</i>		
Question 7	To your knowledge, has it ever been alleged that your conduct has resulted in significant harm to a child and/or vulnerable adult, and/or put a child or vulnerable adult at risk of significant harm in any country?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<i>If yes, please provide details, which may include the date(s) and nature of the allegation, and whether you were dismissed, disciplined, moved to other work or resigned from any paid or voluntary work as a result:</i>		

Question 8	Have you ever had any allegation made against you which has been reported / referred to and investigated by the Police / Social Services / Social Work Department (Children or Adult's Services or equivalent) in any country?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>If yes, please provide details, which may include the date(s) and nature of the allegation, and whether you were dismissed, disciplined, moved to other work or resigned from any paid or voluntary work as a result:</i></p>		
Miscellaneous questions.		
Question 9	Has a child in your care or for whom you have or had parental responsibility ever been removed from your care, been placed on the equivalent of a Child Protection Register or been the subject of any form of: child protection planning, a care order, a supervision order, a child assessment order or an emergency protection order, or a similar order under any other legislation, in any country?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>If yes, please provide details:</i></p>		
Question 10	<p><i>Please only answer this question if some or all of your work with children or adults is at your home. Please answer this question to the best of your knowledge and ability.</i></p> <p>Is there anyone who is 16 years of age or over living or employed in your household who has ever been charged with, cautioned or convicted in relation to any criminal offence or is that person at present the subject of a criminal investigation / pending prosecution?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>If yes, please give details including the nature of the offence(s) and the dates. Please give any further details, such as the reasons or circumstances, which led to the offence(s):</i></p>		

Declaration

- I confirm that the above information (and that on any attached sheets) is true, accurate and complete to the best of my knowledge.
- I confirm that I am not barred or otherwise banned in any way from working with children / vulnerable adults.
- I will apply for any relevant safeguarding checks to the position for which I have applied, if I am appointed. I am aware that details of pending prosecutions, previous convictions, cautions, or bind overs, etc., against me will be disclosed along with any other relevant information which may be known to the police, and barred lists held in the relevant countries where I have lived since the age of 16.
- I agree to inform the person within the place of worship / diocese responsible for safeguarding if I am convicted of an offence after I take up any post within the place of worship / diocese. I understand that failure to do so may lead to the immediate suspension of my work with children or vulnerable adults and / or the termination of my employment / voluntary work.
- I agree to inform the person within the place of worship / organisation responsible for safeguarding if I become the subject of a police and / or a social services / (Children's Social care or Adult Social Services) / social work department (or equivalent) investigation. I understand that failure to do so may lead to the immediate suspension of my work with children or vulnerable adults and / or the termination of my employment / voluntary work.

Signature

Print Name

Date

As a place of worship / organisation we undertake to meet the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679 and all other relevant legislation. To see how your data will be stored and used, please see the Diocese in Europe's Privacy Policy: <https://europe.anglican.org/information/privacy-policy>

This form is strictly confidential and, except under compulsion of law, will be seen only by those with a role in authorising and making your appointment. It is only required once for each appointment.

Please Return To:

FOR ALL CLERGY, PTO, READER, POSTULANT, ORDINAND, CHURCHWARDEN AND CHAPLAINCY SAFEGUARDING OFFICER POSITIONS, PLEASE RETURN YOUR COMPLETED FORM DIRECTLY TO:

The Diocesan Safeguarding Administrator
Diocese in Europe
14 Tufton Street
London
SW1P 3QZ
europe.safeguarding@churchofengland.org

FOR ALL OTHER IN-CHAPLAINCY POSITIONS THAT REQUIRE SAFEGUARDING, PLEASE RETURN YOUR COMPLETED FORM TO YOUR CHAPLAINCY SAFEGUARDING OFFICER.

FOR ANY QUERIES REGARDING WHO TO RETURN YOUR COMPLETED CONFIDENTIAL DECLARATION FORM TO, PLEASE EMAIL THE DIOCESAN SAFEGUARDING TEAM AT europe.safeguarding@churchofengland.org.

Annexe 3i

St. Mark's, Versailles and St. Paul's Gif-sur-Yvette Registration Form and Permission – 2021/2022

To be completed by the parent/guardian of the child.

Group Details

Group Name	St. Mark's Galaxies (preschool and elementary ages Sunday school)
Group Leader Name	Robin Vogelzang

Participant Information

Child's Name	
Child's Date of Birth	
School Name	
School Year	

In case of emergency:

Name of Parent/Guardian	
Address of Parent/Guardian	
Telephone no. of Parent/Guardian	
Email Address of Parent/Guardian	
Doctor's name and address	

Participant Information – Other

Does your child have any (a) allergies (incl. food allergies), (b) medical conditions, (c) medication, (d) special needs, or (e) anything else that we need to know about?	Please specify:
Permission to use parent e-mail for information about St Mark's Galaxies events?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Permission to join the St Mark's Galaxies WhatsApp group?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Agreement to share contact details (phone number and email visible in distribution lists) within the group?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Agreement to allow photos to be shared within the group?	<input type="checkbox"/> Yes <input type="checkbox"/> No

By signing this form, you are confirming that you are consenting to St. Mark's, Versailles holding and processing your personal data for the purpose of providing information about St Mark's Galaxies events. You can withdraw or change your consent at any time by contacting the Church office at office.saintmarksversailles@gmail.com. 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.

Signed: _____

Name: _____

Date: _____

St. Mark's, Versailles and St. Paul's Gif-sur-Yvette Group Registration Form and Permission 2021/22

Participant Information

Name of Youth		
Date of Birth of Youth		
Email address of Youth		
Permission to use e-mail for information about St Mark's Youth events?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Mobile number of Youth		
Permission to join the St Mark's Youth or other activity WhatsApp group?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Agreement to share contact details (phone number and email visible in distribution lists) within the group?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Agreement to take photos and share them within the group?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Agreement to take photos and share them publicly?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Permission to participate in Youth Events on the premises at St Mark's Versailles under the supervision of the Youth Leaders?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Are there any (a) allergies (incl. food allergies), (b) medical conditions, (c) medication, (d) special needs, or (e) anything else that we need to know about?	Please dive details:	
School Name		
School Year		

Parent / Guardian Information

Name of Parent/Guardian:		
Address of Parent/Guardian:		
Telephone No. (emergency contact) of Parent/Guardian:		
Email Address of Parent/Guardian:		
Permission to use e-mail for information about St Mark's Youth events?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

By signing this form, you are confirming that you are consenting to St. Mark's, Versailles holding and processing your personal data for the purpose of providing information about St Mark's Youth events. You can withdraw or change your consent at any time by contacting the Youth Leaders at youth.saintmarksversailles@gmail.com or the Church office at office.saintmarksversailles@gmail.com. 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.

Signed: _____

Name: _____

Date: _____

Annexe 3iii

Parental Consent Form (example)

I give permission for my son/daughter/ward,

_____ (name)

to participate in [**name of activity, date and details**] including travel by car between St Marks Church and [**location of activity**], in the charge of the St Mark's Youth Leaders.

If it becomes necessary for him/her to receive medical treatment and I cannot be contacted, I hereby give my general consent to any medical treatment and authorise the leader in charge to sign any document required by the hospital or other authorities.

Je soussigné autorise le responsable à faire pratiquer en cas d'urgence, toute intervention thérapeutique ou chirurgicale nécessaire, y compris l'anesthésie, qui serait décidée par un médecin.

Signed _____

Name _____

Contact Number _____

Is there any other information that the leaders should know ?

Annexe 4

First Aid & Practical Safety

- Make sure that you know where the First Aid kit is located (in the church kitchen. Workers are encouraged to have first aid training & at least one person with such training is required on site for every 20 vulnerable individuals.
- Make sure that you know the Fire alarm procedure & location of the fire extinguishers.
- Make sure that any significant accident or incident is recorded in the Report Book (in the church office).
- No alcohol, drugs or tobacco should be used by children's workers nor by the children themselves.
- Young children must never be left unaccompanied by children's workers.
- Never play or involve young people in activities which bring them into danger.
- Don't allow children with infectious diseases to mix with others.

Annexe 5

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

St Mark's, Versailles and St Paul's, Gif-sur-Yvette ("St. Mark's") are committed to protecting personal data and respecting the rights of our data subjects; the people whose personal data we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and adopting good practice. We process personal data to help us:

- a) maintain our list of church members;
- b) provide pastoral and prayer support for members and others connected with our church;
- c) provide services to the community including Operation Stephen;
- d) safeguard children, young people and adults at risk;
- e) recruit, support and manage staff and volunteers;
- f) maintain our accounts and records;
- g) promote our events and services;
- h) respond effectively to enquirers and handle any complaints;
- i) manage our building, including both maintenance and hiring out spaces;
- j) raise support from funding bodies; and
- k) plan strategically for the future.

This policy has been approved by St Mark's church council who are responsible for ensuring compliance with our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

Why this policy is important

We are committed to protecting personal data from being misused, getting into the wrong hands as a result of poor security, being shared carelessly, or being inaccurate. This is important as people may be upset or harmed if any of these things happen.

This policy sets out the measures we commit to take as an organisation and, what each of us will do to ensure we comply with the relevant legislation. This policy is compliant with European-wide **General Data Protection Regulation** – GDPR regulations (effective from May 2018). The competent supervisory body in France is the *Commission Nationale Informatique et Libertés* (CNIL) and the legislation is referred to as *Règlement Général sur La Protection Des Données*, RGPD.

In particular, we will make sure that all personal data is:

- a) processed lawfully, fairly and in a transparent manner;
- b) processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary for the purposes for which it is being processed;

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

- d) accurate;
- e) not kept longer than necessary for the purposes for which it is being processed;
- f) processed in a secure manner, by using appropriate technical and organisational means; and
- g) processed in keeping with the rights of data subjects regarding their personal data.

Application of this policy

As an employee or volunteer processing personal information on behalf of the church, you are required to comply with this policy.

If you think that you have accidentally breached the policy, it is important that you contact our Data Protection Officer ("DPO") at: office@saintmarksversailles.com immediately so that we can take swift action to try and limit the impact of the breach. If our DPO is not available, please contact the Chaplain.

Anyone who breaches the Data Protection Policy may be subject to disciplinary action, and where that individual has breached the policy intentionally, recklessly, or for personal benefit they may also be liable to prosecution or to regulatory action.

Chaplaincy staff, officials and members may be given data by individuals with whom they are friends, to be used for personal reasons, independently of their church responsibilities. Personal circulation lists should not be used for church purposes unless there is a legal purpose (see below) for doing so. Use discretion, and consult the Data Protection Officer if there is any uncertainty about how to use or store personal data where it overlaps with data handled in the course of an official church role.

As a volunteer: If you are responsible for procedures that involve personal data, you must follow the rules set out in this Data Protection Policy.

As a data subject of St Mark's: We will handle your personal information in compliance with this policy.

As an appointed data processor/contractor: Any company appointed by us as a data processor is required to comply with this policy or with provisions as least as protective as those within this policy pursuant to any contract with St. Mark's. Any breach of the policy will be taken seriously and could lead to St. Mark's bringing a claim or taking contract enforcement action, against the company or terminating the contract. Data processors have direct obligations under the GDPR, primarily to only process data on instructions from the controller (us/St. Mark's) and to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved.

Our Data Protection Officer: is responsible for advising St Mark's staff and members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to them.

Before you collect or handle any personal data as part of your work (paid or otherwise) for St Mark's, it is important to read this policy carefully and understand what is required of you, as well as the organisation's responsibilities when we process data.

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

Training and guidance

We will make use of the diocese's training to ensure that staff are regularly kept aware of their responsibilities with respect to Data Protection. Other stakeholders, such as church wardens, church council and key volunteers, may be asked to complete online training provided by the Church of England.

Our data protection responsibilities

What personal information do we process?

In the course of our work, we may collect and process information (*personal data*) about many different people (*data subjects*). This includes data received directly from the person, for example, where they complete forms or contact us, and information about data subjects from other sources.

We process personal data in both electronic and paper form and all this data is protected under data protection law. The personal data we process can include information such as names and contact details, education or employment details, and visual images of people.

In some cases, we hold types of information that are called "special categories" of data in the GDPR. This personal data can only be processed under strict conditions.

'*Special categories*' of data (defined in GDPR/ RGDP as sensitive personal data) includes information about a person's: racial or ethnic origin; political opinions; religious or similar (e.g. philosophical) beliefs; trade union membership; health (including physical and mental health, and the provision of health care services); genetic data; biometric data; sexual life and sexual orientation.

We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is a clear lawful basis to process this data such as where it fulfils one of the substantial public interest conditions in relation to the safeguarding of children and of individuals at risk or one of the additional conditions relating to criminal convictions set out in the applicable data protection law.

Other data may also be considered 'sensitive' such as bank details but will not be subject to the same legal protection as the types of data listed above and will require additional measures of security and protection.

How to legally use personal data?

Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the GDPR, is met:

- a) the processing is necessary for a contract with the data subject;
- b) the processing is necessary for us to comply with a legal obligation;
- c) the processing is necessary to protect someone's life (this is called "vital interests");
- d) the processing is necessary for us to perform a task in the public interest, and the task has a clear basis in law;

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

e) the processing is necessary for legitimate interests pursued by St Mark's or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject; or

f) if none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear consent.

How can we legally use 'special categories' of data?

Processing of 'special categories' of personal data is only lawful when, in addition to the conditions above, one of the extra conditions, as listed in Article 9 of the GDPR, is met. These conditions include where:

a) the processing is necessary for carrying out our obligations under employment and social security and social protection law;

b) the processing is necessary for safeguarding the vital interests (in emergency, life or death situations) of an individual and the data subject is incapable of giving consent;

c) the processing is carried out in the course of our legitimate activities and only relates to our members or persons we are in regular contact with in connection with our purposes;

d) the processing is necessary for pursuing legal claims; or

e) if none of the other legal conditions apply, the processing will only be lawful if the data subject has given their explicit consent.

What we must inform individuals before we use their data?

We adopt the Church of England's recommended Privacy Notices (for role-holders and non-role-holders) without alteration. These will be displayed on our website and on a church noticeboard, and all regular attendees will be made aware of the Privacy Notice when they give their details to St Mark's for inclusion on the church database. Regular emails to the mailing list will have the hyperlink to the privacy notices included at the end. This information is commonly referred to as a 'Privacy Notice'.

If we plan to pass the data onto someone else outside of St Mark's, we will give the data subject this information before we pass on the data.

Where none of the other legal conditions apply to the processing, and we are required to get consent from the data subject, we will clearly set out what we are asking consent for, including why we are collecting the data and how we plan to use it. Consent will be specific to each process we are requesting consent for and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data.

Think carefully before collecting data about the purposes for which you are collecting it, to ensure that consent for all these purposes is gained.

Consent can however be withdrawn at any time and if withdrawn, the processing will stop. Data subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent. For example, church emails will always have an 'unsubscribe' link at the end.

A record of the consent will be kept (ideally in electronic form).

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

We will reconsider every two years whether or not we need to renew consent for our mailing list (next due on 1st January 2022). This will only be necessary if our processing operations and purposes evolve beyond their current scope.

Data will be adequate, relevant and not excessive

We will only collect and use personal data that is needed for the specific purposes described above (explained to the data subjects in privacy notices). We will not collect more than is required to achieve those purposes.

Accurate data

We will make sure that personal data held is accurate and kept up to date. The accuracy of personal data will be checked at the point of collection. If it is obvious that data is inaccurate (for example, a 'bounced' email), St Mark's will make reasonable efforts to ensure that it is corrected.

Important data such as our records on children attending activities will be renewed every year to ensure accuracy.

Keeping data and destroying it

We will not keep personal data longer than is necessary for the purposes that it was collected for and will delete all such data within 72 hours of any request made by a data subject of its deletion.

Check the data you are holding at regular intervals to ensure that it is not held beyond this time frame.

Security of personal data

We will use appropriate technical and organisational measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, from accidental loss, destruction or damage.

We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing.

Measures will include technical and organisational security measures. In assessing what measures are the most appropriate we will take into account the following, and anything else that is relevant:

- a) the quality of the security measure;
- b) the costs of implementation;
- c) the nature, scope, context and purpose of processing;
- d) the risk (of varying likelihood and severity) to the rights and freedoms of data subjects; and
- e) the risk which could result from a data breach.

Measures may include:

- a) technical systems security;
- b) measures to restrict or minimise access to data;

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

- c) measures to ensure our systems and data remain available, or can be easily restored in the case of an incident;
- d) physical security of information and of our premises;
- e) organisational measures, including policies, procedures, training and audits; and
- f) regular testing and evaluating of the effectiveness of security measures.

For data stored on a computer, one or more of the following will be applied, depending on the sensitivity of the data and relevant risks related to such data:

- a) store data on a password protected computer where the password is only known to the data handler;
- b) store data on a password protected cloud site compliant with European GDPR regulation or equivalent;
- c) password protect individual files; and/or
- d) take care when using your computer in a public place: consider what is displayed on the screen and who can see it.

Consider your own computer security carefully and take steps to ensure the data you hold is secure.

For hard copies of data

Wherever possible, material will be scanned and stored securely (see below), then shredded:

- a) If for some reason a hard copy of the data must be kept, it will be stored in a locked drawer of the filing cabinet.
- b) To show how we comply with the law, we will keep clear records of the decisions we make concerning personal data (setting out our reasons for those decisions). The records of these decisions will be stored by the Data Protection Officer.

Care should be taken not to leave the filing cabinets unlocked when no-one is in the office, particularly on a Sunday or times of high traffic in the building.

Working with people we process data about (data subjects)

Data subjects' rights

We will process personal data in line with data subjects' rights, including their right to:

- a) request access to any of their personal data held by us (known as a *Subject Access Request*);
- b) ask to have inaccurate personal data changed;
- c) restrict processing, in certain circumstances;
- d) object to processing, in certain circumstances, including preventing the use of their data for direct marketing;

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

- e) data portability, which means to receive their data, or some of their data, in a format that can be easily used by another person (including the data subject themselves) or organisation;
- f) not be subject to automated decisions, in certain circumstances;
- g) withdraw consent when we are relying on consent to process their data; and
- h) right to be forgotten, the data subject has the right for information to be erased.

If any request is received from a data subject that relates or could relate to their data protection rights, this will be forwarded to the Data Protection Officer immediately, copying in the Chaplain.

We will act on all valid requests as soon as possible, and at the latest within one calendar month, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

All data subjects' rights are provided free of charge.

Any information provided to data subjects will be concise and transparent, using clear and plain language.

Direct marketing

We will comply with the rules set out in the GDPR, and any laws which may amend or replace the regulations around direct marketing. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, telephone (both live and recorded calls) and fax.

Direct marketing means the communication (by any means) of any advertising or marketing material which is directed, or addressed, to individuals. "Marketing" does not need to be selling or be advertising a commercial product. It includes contact made by organisations to individuals for the purposes of promoting the organisation's aims.

Advertising church events would be considered 'marketing'.

Any direct marketing material that we send will identify St Mark's as the sender and will describe how people can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing, we will stop the direct marketing to such data subject as soon as reasonably possible.

Working with other organisations & transferring data

Sharing information with other organisations

We will only share personal data with other organisations or people when we have a legal basis to do so and if we have informed the data subject about the possibility of the data being shared (in a privacy notice) unless legal exemptions apply to informing data subjects about the sharing. Only authorised and properly instructed staff and volunteers are allowed to share personal data.

We will keep records of information shared with a third party, which will include recording any exemptions which have been applied, and why they have been applied. We will follow CNIL's statutory Data Sharing Code of Practice (or any replacement code of practice) when sharing personal data with other data controllers. Legal advice may be sought as required.

Data Protection Policy

St Mark's, Versailles and St Paul's Gif-sur-Yvette

Managing change & risks

Dealing with data protection breaches

Where staff or volunteers think that this policy has not been followed, or data might have been breached or lost, this will be reported immediately to the Data Protection Officer, copying in the Chaplain.

A data breach could include: accidentally copying the wrong people into an email, leaving a computer with confidential information visible on the screen in a public place, or having a computer or documents stolen.

We will keep records of personal data breaches, even if we do not report them to CNIL.

We will report all data breaches which are likely to result in a risk to any person, to the CNIL. Reports will be made to the CNIL within 72 hours from when someone in the church becomes aware of the breach. If a breach is considered serious enough to report to the CNIL, the chaplain, church wardens and church council will also be made aware of the situation.

In situations where a personal data breach causes a high risk to any person, we will (in addition to reporting the breach to CNIL), inform data subjects whose information is affected, without undue delay.

This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

Practical Summary

All personal data collection and handling must be done in compliance with GDPR regulations and this policy.

Inclusion in the 'church address list' requires either a signed consent form or subscription to the MailChimp account.

The full church address database will be kept:

- securely on the chaplaincy computer
- In the MailChimp account

Individuals may only have access to the information that is essential to fulfil their particular role and must comply with the requirements of this policy.

It is understood that church members may wish to contact one another. Where there has not been personal sharing of contact details this will be facilitated by the office forwarding requests but never by disclosing data without consent.

Regular whole church mailings will use the MailChimp platform. This allows for strengthened consent, and for data subjects to update or remove themselves from mailings.

Where data needs to be kept in hard copy this will be secured in the church office.