



Data Protection Policy

1. Introduction

The Cambridge Centre for Christianity Worldwide ('CCCW') operating name for the Henry Martyn Trust ('HMT') is committed to protecting the rights and privacy of individuals in accordance with the EU General Data Protection Regulation (the 'Regulation').

In this policy 'staff' are the employees of the Henry Martyn Trust, who work at CCCW.

2. Purpose and Scope

In carrying out its responsibilities, CCCW is required to process certain information about individuals such as staff, HMT trustees, CCCW library users, CCCW Archive users, Research Associates, Encounter Bursary Applicants, and other users, defined as 'data subjects' in the Regulation. This information, or 'personal data' as it is often referred to, must be processed according to the principles contained within the Regulation.

CCCW staff, or others who process or use any personal information on behalf of the CCCW, including HMT trustees (i.e. 'data users'), have a personal responsibility to ensure that they adhere to CCCW's Data Protection Policy and the Regulation.

Any breach of this Policy, or the Regulation, can be considered as a disciplinary matter. It may also be a criminal matter for which CCCW, and the individual concerned, could be held criminally liable.

3. Data Protection Principles

CCCW data users must comply with the eight Data Protection Principles. These define how data can be legally processed. 'Processing' includes obtaining, recording, holding or storing information and using it in any way.

Personal data must:

1. Be processed fairly and lawfully and only when certain conditions are met.
2. Only be obtained and processed for specified and lawful purposes.
3. Be adequate, relevant and not excessive.
4. Be accurate and, where necessary, up to date.
5. Be kept for no longer than necessary.
6. Be processed in accordance with data subjects' rights.
7. Be protected by appropriate security measures.
8. Not be transferred outside the European Economic Area, to countries without adequate protection unless the consent of the data subject has been obtained.

The Regulation defines both personal data and **special category personal data** (please refer to the Definitions section below). Data users must ensure that the necessary conditions are satisfied for the processing of personal data. In addition, they must adhere to the extra, more stringent conditions in place for the processing of special personal data. Special personal data should normally only be processed if the data subjects have given their explicit (written) consent to this processing, and must be protected with a higher level of security. It is recommended that special records are kept separately in a locked drawer or filing cabinet, or in a password-protected computer file. (We note that information about religious beliefs is special data.)

4. Security

The security of personal data in the possession of CCCW is of paramount importance and is, therefore, addressed in various policies and procedures.

The CCCW security procedures include:

- Entry controls to prevent unauthorised people gaining access to confidential information and personal data.
- Lockable desks/cupboards for secure storage of confidential information/personal data.
- Shredding for paper records with confidential information and personal data that is no longer being stored.
- Ensuring unauthorised people are not able to see confidential information on paperwork or computer screens being used by staff.

5. Use of Personal Data

Use of personal data must be only in accordance with the CCCW data protection policy and privacy notices. If other uses are required the relevant privacy notice must first be updated and the data subjects covered by the notice informed.

6. Responsibilities – General Principles

All personal data held on behalf of CCCW, whether electronically or on paper, must be kept securely, no matter whether it is kept by an individual or on the commonly-accessible server.

Personal data must not be disclosed to any unauthorised third party by any means, accidentally or otherwise.

Where staff are unsure as to whether they can legitimately share/disclose personal data with other individuals, either within or outside CCCW, they must seek advice from their manager.

All staff should note that unauthorised disclosure may be a disciplinary matter. It may also be a criminal matter for which CCCW and the individual concerned could be held criminally liable.

7. Henry Martyn Trust Responsibilities

The Henry Martyn Trust has responsibility for ensuring that:

- All staff are aware of their responsibilities under the Data Protection Policy and the Regulations and of the risks/consequences of failure to comply with related requirements.
- That mechanisms are put in place to protect data (and particularly special data) during day-to-day operations.
- All personal data being processed within CCCW complies with the Data Protection Policy (including any subsequent amendments or additions) and with the Regulations.
- That all forms and correspondence used by CCCW to request personal data clearly state the purposes for which the information is to be used, the period of time it is to be retained, and to whom it is likely to be disclosed.
- All personal data held within CCCW is kept securely and is disposed of in a safe and secure manner when no longer needed.
- All Data Protection breaches are notified to the Chair of the Henry Martyn Trust and the CCCW administrator, with remedial action taken to mitigate the risk of reoccurrence.
- An annual audit of the personal data within CCCW is carried out and recorded.
- Where a new or different purpose for processing data is introduced, the policy and/or privacy notices are updated.
- CCCW's Data Protection Policy is regularly reviewed and updated in line with best practice.
- Staff have access to training on their responsibilities under the Data Protection Policy and the Regulation, both on-line and through more traditional training methods.
- Responses to requests for information under the Regulation, and related compliance matters, are dealt with in a timely manner and in line with requirements of the Regulation.
- Advice and guidance on any area of the Policy or Regulation is provided to staff on request.

8. Staff Responsibilities

All staff must take personal responsibility for ensuring that:

- They are aware of their responsibilities under the Data Protection Policy and the Regulation and the risks/consequences of failure to comply with the related requirements. Where they are uncertain of their responsibilities, they must raise this with their manager.

- They complete on-line training if they require further information about data security.
- Personal data relating to any living individual (staff, trustees, students, contractors, members of the public etc.) which they hold or process is kept securely.
- Personal data relating to any living individual is not disclosed, either orally or in writing, accidentally or otherwise, to any unauthorised third party.
- All Data Protection breaches are notified to their manager, with remedial actions implemented to mitigate the risk of reoccurrence.
- Personal data which they provide in connection with their employment is accurate and up-to-date, and that they inform CCCW of any errors, corrections or changes, for example, change of address.
- Passers-by cannot read confidential information from papers or computer monitors; this includes locking computers when left unattended.
- Never giving out personal information by telephone without being confident that the caller is entitled to it; requests by email should be encouraged.

9. Disposal Policy for Personal Data

The Regulation places an obligation on CCCW to exercise care in the disposal of personal data, including protecting its security and confidentiality during storage, transportation, handling, and destruction.

All staff have a responsibility to consider safety and security when disposing of personal data in the course of their work. Consideration should also be given to the nature of the personal data involved, how sensitive it is, and the format in which it is held.

10. Retention Policy for Personal Data Records

The Regulation places an obligation on CCCW not to hold personal data for longer than is necessary. CCCW's policy is to use the retention periods suggested in the University of Cambridge's Master Records Retention Schedule, as updated from time to time.

www.information-compliance.admin.cam.ac.uk/records-management

11. Contractors, Short-Term and Voluntary Staff

CCCW is responsible for the use made of personal data by anyone working on its behalf, whether as an agent, in a voluntary capacity, or as a consultant or contractor undertaking work for CCCW.

12. Transfer of Data Outside CCCW

When CCCW shares personal data with another organisation, liability for adherence to the Regulation, in relation to this data, rests with CCCW. Should the receiving organisation breach the Regulation, CCCW would be held responsible for that breach.

A data sharing agreement may be required before sharing personal data with other organisations in order to conduct business.

Your data may be taken out of the CCCW Centre by authorised Trustees and staff members, as appropriate for the purposes of the Centre. The HMT trustees and staff are aware that this carries a higher risk to your personal information, and have signed data sharing agreements to hold your data as securely as possible, for as short a time as possible. When data is removed from the CCCW Centre, responsibility for any breaches rests with CCCW.

13. Transfer of Data Overseas

The Eighth Data Protection Principle prohibits the transfer of personal data to any country outside the European Economic Area (EEA) (EU Member States, Iceland, Liechtenstein and Norway) unless that country ensures an adequate level of protection for data subjects.

In all instances where personal data is being sent outside the EEA, the consent of the data subject should be obtained before their personal information is sent. This includes requests for personal data including from overseas colleges, financial sponsors and foreign governments.

14. Privacy notices

Privacy notices are provided on the website that should be read in conjunction with this policy.

15. Use of images

CCCW will gain the consent of individuals whose images are used for marketing and PR activities, including in-print, online and on social media. We acknowledge that restrictions can be put on staff using such images in their personal publishing but that other people are outside centre control.

16. Data Protection Officer

The CCCW does not have (and is not required to have) an appointed Data Protection Officer.

17. Rights of Individuals

To be informed	This policy, and any relevant privacy notices provide the information you are entitled to receive
Access	<p>Please contact us if you would like confirmation that your data is being processed and access to your personal data.</p> <p>There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).</p>
Rectification	<p>Please inform us of any data which you would like rectified and we will usually respond within a month of the request.</p> <p>We will pass on the changes to any third parties who need to change their records and let you know this has been done.</p>
Erasure	You may exercise your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible we will comply with all such requests.
Restrict processing	You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications. If possible we will inform any third parties to whom your data has been disclosed of your requirement.
Data portability	Your data is across manual records and on staff computers. We will do our best to provide information in a portable format but it is unlikely we can create systems to do.
To object	<p>If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).</p> <p>We will stop processing your data for direct marketing if you tell us to.</p> <p>We will stop processing your data if you object to processing for purposes of research and statistics.</p>
Not to be subject to automated decision-making including profiling	We do not use any automated decision-making.

18. Making a Request

Staff, Trustees, CCCW library users, CCCW Archive users, Research Associates, Encounter Bursary Applicants, users of the CCCW's facilities, and members of the public have the right to access personal data that is being kept about them insofar as it falls within the scope of the Regulation.

Requests should be made in writing via email to centre@cccw.cam.ac.uk or by post to Cambridge Centre for Christianity Worldwide, Westminster College, Madingley Rd, Cambridge, CB3 0AA.

The CCCW does not charge an administrative fee to access information and will seek to ensure that the information is provided within 30 calendar days.

There is no right to an internal review of a decision taken regarding release of personal information.

If the requestor is not satisfied with the response received from the CCCW they do, however, have the right to appeal directly to the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (ico.org.uk).

Agreed at Henry Martyn Trust meeting on 25th April 2018

18. Definitions

Data	Information which is being used or held in a computerised system, or a 'relevant filing system' i.e. a manual filing system that is structured in such a way that data contained within it is readily accessible. Data can be written information, photographs, fingerprints or voice recordings.
Personal Data	Information that identifies and relates to a living individual, and includes any expression of opinion or intention about the individual.
Special Personal Data	Personal data consisting of information as to race/ethnic origin; political opinion; religious or similar beliefs; trade union membership; physical or mental health or condition; sexual life; and criminal record.
Processing	Anything which can be done with personal data i.e. obtaining, recording, holding, organising, adapting, altering, retrieving, consulting, disclosing, aligning, combining, blocking, erasing, destroying etc.
Data Subject	An individual who is the subject of personal data.
Data Controller	Refers to the Cambridge Centre for Christianity Worldwide. This includes CCCW staff and Henry Martyn Trust trustees who collect and process data on behalf of CCCW.
Data Processor	Any person (other than an employee of the CCCW) who processes personal data on behalf of the CCCW e.g. printing agency.
Data Users	Refers to both Data Controller and Data Processors.