

Church of Scotland

TEST & PROTECT PROCEDURE

Attendance Registration and Data Release Smartphone App

1) Scope

- a) The procedure is to be used by congregations of the Church of Scotland as they assist the NHS Scotland Test & Protect strategy by recording attendance at church services and events. This procedure is for the smartphone app version of attendance records.
- b) The data controller for this process will be the Assembly Trustees of the Church of Scotland.
- c) All congregations and any other Church of Scotland entities will be data processors.

2) Output

- a) The output of this process will be a secure, encrypted electronic Register of Attendance which can be referred to by NHS Scotland Test & Protect.

3) Effective Date

- a) 22nd July 2020

4) Resources Required

- a) (by congregation officials) copies of the QR code image document which will be supplied by the Church of Scotland data protection officer.
- b) (by congregation members and visitors) the smartphone app known as "Tap My Data" installed on their iPhone or Android smartphone device. Visit www.tapmydata.com for information. The app is available in the Apple Store and on Google Play.
- c) An appropriate Privacy Notice (supplied by the Church of Scotland DPO).
- d) User instructions as supplied by the DPO.

5) Nominated Officials

- a) At least one person to act as liaison with Church of Scotland data protection officer (DPO) for communication about registration and use of the smartphone app and in the event of a Test & Protect enquiry by NHS Scotland.
- b) Names and contact telephone numbers of congregation liaison to be registered with the DPO. The DPO will contact all congregations with details of how to register as part of the COVID-19 briefing issued by the Church of Scotland.

6) Data Subjects

- a) The smartphone app will only record personal data when it is used in conjunction with the QR codes provided. When used in this way it will process personal data belonging to the following categories of data subject:
 - i) Congregation members (as noted in the Communion roll)
 - ii) Visitors
 - iii) Ministers
 - iv) Employees

7) Personal Data To Be Collected

- a) The smartphone app system will collect only the items of personal data provided to it by the data subject when they registered for their app user account:
 - i) Full name, telephone number.
- b) Any other personal data provided by the data subject to the smartphone app will not be collected for the purpose of creating and maintaining the register of attendance by the Church of Scotland.
- c) Each register of attendance record in the smartphone app system will also identify the location of attendance, the date and the time at which the QR code was clicked or check in occurred.

8) Technical & Organisational Security Measures

- a) The electronic register of attendance is encrypted in transit and at rest.
- b) Access to the electronic register can only be authorised by the DPO
- c) Access to the register of attendance is protected by a key code known only to a limited number of Church of Scotland officials.
- d) There will be no need for congregations to access the electronic record of attendance.
- e) Any requests to access the data contained in the register of attendance must be referred to the Church of Scotland DPO, who will verify the nature of each request and proceed accordingly.

9) The Process

- a) If a congregation wishes to make use of the smartphone app, a congregation official (eg, Minister, Session Clerk or Treasurer) should notify the Church of Scotland data protection officer using the online form provided for the purpose of registering the liaison point of contact. The email address provided should be one to which the QR code document can be sent, together with any necessary documentation or instructions.
- b) The DPO will enable the congregation on the Tap my Data System and verify to the congregation contact by email that this has been done.
- c) The DPO will issue a unique QR code page in PDF format (A4 page size).
- d) The QR code document can be printed out as many times as needed and published as needed in the Church premises: It is suggested a copy is posted at every entrance, for example.
- e) Copies of the appropriate privacy notice should also be prominently displayed.

- f) Church officials “meeting and greeting” can draw attention to the smartphone registration option and the QR codes.
- g) Each person attending the Church need only register using the smartphone app and QR code once per visit. Then on each subsequent visit.
 - i) Note: Everyone can register using the paper system *and* the smartphone app. Duplication is not an issue, what matters is we have a record of attendance.

10) Data Retention and Disposal

- a) We are required to keep the register of attendance for only 21 days.
- b) The Tap My Data system is configured to delete data older than 21 days and does so on a daily basis. The office of the DPO will handle this.

11) Responding To A Request For Register of Attendance Data

- a) The only person able to authorise a request for register of attendance data is the Church of Scotland data protection officer (DPO) or one of his nominated colleagues in the Law Department.
- b) The Church of Scotland DPO is the single point of contact with NHS Scotland Test & Protect officials on behalf of all Church of Scotland congregations. All requests must be referred to him.
- c) The DPO will respond to NHS Scotland with the electronic register direct. The congregations have no access to the electronic record, which means the DPO will only ever be contacting the congregation nominated officials with regard to the paper register of attendance.

Data Protection Issues

The type of personal data we are collecting is basic and minimised as far as we can.

Nevertheless, we face challenges because of the heavily distributed nature of our collection of this personal data and the fact that by its nature it suggests the religious preference of the data subject (and is therefore classified as “special category” data). It could also be classified as behavioural data, in that we are recording attendance at a specific location.

We are doing so for good reasons. We are stepping up to our responsibilities to support the Test & Protect strategy of NHS Scotland and in doing so we are playing our part in protecting those within our congregations and the people in our local communities.

As an organisation we need to be able to demonstrate our accountability for how we collect and process the personal data involved. Upholding the rights of each data subject. Which is why this procedure has been developed. We are trying to keep this as simple and effective as possible so that people feel able to take part. It may not be perfect, so we will be keeping it under constant review throughout its deployment during the COVID-19 pandemic and associated restrictions.

The use of the smartphone app makes the attendance registration process easier for congregations to manage and for tech enthusiastic parishioners and visitors to use. Overall, the smartphone app is not intended to replace the paper-based attendance registration process. Instead it is a useful extension to it.

Data Subject Access Requests

Recording personal data in this way may cause individuals to exercise their rights over how their personal data is used by the Church of Scotland and invoke a Data Subject Access Request (DSAR) with us.

An online form specifically for this purpose will be published, linked from the Privacy section of the Church of Scotland website.

If someone makes a data subject access request directly at your congregation, you should note their name, contact details and the nature of their request and send it to the Church of Scotland DPO without delay. He will deal with the request.

Data Incidents and Breaches

If you are made aware of or detect an incident or breach involving this specific process you should inform the Church of Scotland DPO without delay.