



WhatsApp Privacy Guidelines

WhatsApp is a very useful tool that both our congregation and the SPS team like to use both personally and officially. This social app is a fantastic tool to pass on information, share thoughts, prayers, comments and organise events.

However, with all the great things WhatsApp offers, if a group is not properly managed it could have the potential to breach people's privacy. As a result, the team at SPS have put into place the following WhatsApp guidelines to ensure every official SPS WhatsApp group or broadcast adheres to and continues to meet GDPR requirements.

Data protection is something SPS take very seriously. For information about your personal data and privacy rights, please see our privacy notice at <http://sps.church/general-privacy-notice/>

What is the difference between 'personal' WhatsApp groups and 'official' SPS WhatsApp groups?

Sometimes members of the congregation and / or members of the church leadership may set up a personal WhatsApp group that could include other people from the SPS congregation. In these situations, SPS are not responsible for the running, privacy or management of these groups, even if the group discusses SPS related content. If a personal group has been set up and you would not like to be in it, you have the right to leave that group at any time.

Official SPS WhatsApp groups are defined as a group that has been created by the church specifically to communicate church related information (including events or prayer). The group will be managed by a member of the church leadership team and will adhere to the below guidelines.

SPS Official WhatsApp Group Guidelines.

- SPS will only create a group in order to communicate church related information. You have right to leave the group at any time and can contact the administrator directly to request to not be added to any future groups.
- There are 2 types of groups that SPS could add you to:
 - A broadcast group
 - An interactive group.
- Both group types have its own guidelines, in order to ensure your privacy is protected. These specifics are outlined below.

1. Guidelines specifics for a broadcast group

- In most circumstances when a group is created solely for SPS communications purposes, we will set up a WhatsApp broadcast group, so that only the administrator can pass on information.
- No group member can comment or participate in this type of group.
- Once the group has been set up, the administrator will inform you of the purpose of this group.
- The administrator has the right to remove members without warning should the person no longer be part of the congregation or relevant to the content being shared.
- Only the administrator can add people to the broadcast. If you think another member of the congregation should be part of this group, please let the administrator know.
- A broadcast group will be shut down when it is no longer needed, which will be determined by the administrator or another member of the church leadership team. The administrator will provide members a 2 day notice period before closing the group.

2. Guidelines specifics for an interactive group

- In some circumstances an interactive WhatsApp group will need to be created. An interactive WhatsApp group is your standard type of group, where members can comment and ask questions to the group.
- Once a group of this nature has been set up, the administrator will then inform you the purpose of this group. An example of this type of group could be an official SPS prayer group where members can share prayer requests so that the other group members can pray.
- Due to the nature of interactive groups, there is the potential for sensitive data to be shared by the members of the group. As a result, an administrator will shutdown this type of group once per term and immediately reopen for those who are applicable.
 - This is in order to ensure this sensitive data does not remain accessible for an unreasonable period of time and also to ensure group members are still an active part of SPS and / or relevant to the content being shared.
 - The administrator will give 2 days notice before closing down the group. At any time you can tell the administrator directly that you would no longer wish to be added to a group that is about to be reopened.
- An administrator will communicate this information upon the original creation of this interactive group.
- Only the administrator can add people to an interactive group. If you think another member of the congregation should be part of this group, please let the administrator know.
- An interactive group will be shut down when it is no longer needed, which will be determined by the administrator or another member of the church leadership team. The administrator will provide members a 2 day notice period before closing the group.

Commencement

These guidelines will be taking effect will be from 1st November 2018. Any official existing official WhatsApp groups prior to this date will be informed about these changes moving forward. Any new official WhatsApp group created after this date, will adhere to the guidelines above.

Contact Details

We have appointed a data protection lead (DPL) who is responsible for overseeing questions in relation to our privacy notice and associated guidelines. If you have any questions about these WhatsApp guidelines, including any requests to exercise your legal rights, please contact the DPL at **gdpr@sps.church** or writing to:

The Data Lead, St Paul's Shadwell, 302 The Highway, London, E1W 3DH.

You can contact the Information Commissioner's Office on 0303 123 1113 or via email or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF