



Data Privacy Guidance For Staff & Volunteers.

The Church of Christ the King, Kettering.

This Policy and Procedure was adopted at a Parochial Church Council meeting
held on.....

Signed:
By Warden on behalf of PCC

Signed:
Vicar and Mission Leader

*It will be reviewed annually, in **July**, accepted and written in the minutes of the PCC.*

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Introduction

Christ the King staff and volunteers process and work with personal data to deliver a variety of group activities and events throughout the year. These guidelines have been produced as a guide for them, to ensure that the church of Christ the King complies with current Data Protection legislation.

The information in this factsheet is derived from the Guide to the General Data Protection Regulation (GDPR), the requirements of the Data Protection Act 1998, the Privacy and Electronic Communication (EC Directive) Regulations 2003 and guidance issued by the Information Commissioner's Office (ICO).

Further detailed guidance can be obtained from the Information Commissioner's website – see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

1 Why is data protection important?

All public and private organisations are legally obliged to protect any personal information they hold. This document provides guidance to staff and volunteers who work with congregation members' and visitors' personal data. Personal data includes names and contact details.

2 How does it apply to staff and volunteers?

As part of the church of Christ the King, all ministry areas and groups need to comply with the requirements of the legislation.

The PCC hold, maintain and enforce the policy and guidance. However, as a church we are not currently required to register with the ICO or have a specific Data Controller, as defined by the General Data Protection Act.

The PCC have taken the decision to voluntarily register with the ICO and to make Andy Stilwell the Data Controller because he is a member of both the PCC and the staff team or in his absence _____.

Ministry heads and their teams are required to ensure that any personal records they keep are maintained using the guidance included in this document.

Data Protection legislation requires organisations to take care over the personal information on individuals that they hold and to use it only for relevant communication.

Broadly, the Act covers any information held on a computer that relates to living individuals. For example, this may include information such as name, address, date of birth and opinions about the individual, images and video, or any other information from which the individual can be identified.

3 What staff & volunteers need to do

Volunteers, particularly those dealing with ministry area event or group registration details, are responsible for ensuring that any personal data is processed in accordance with the principles of the General Data Protection Act. Where an issue arises with respect to data protection, volunteers should follow the advice provided on these pages.

a) Fairly and lawfully processed

The General Data Protection Act requires organisations to ensure that all personal data received from members is processed fairly and lawfully and that they are open and honest (transparent) about the reasons for obtaining the data.

In practice, this means that staff and volunteers must be clear as to why they are collecting personal data and what they intend to do with it.

Personal data is regularly collected from members of the church and the public through registration for one of the ministry area groups, activities, or events (e.g. Friday night youth and children's groups). Anyone registering with a ministry area should be advised of the church's privacy statement when joining / completing registration details. The privacy notice / statement stipulates that individuals must give their consent to the processing of personal data for the purposes specified. It is suggested that they are also asked for their preference in how they wish to be contacted.

If they are vulnerable adults or children, permission to use the specified methods of communication should also be sought.

Registration data should only be used for:

- I. Managing membership status and subscriptions
- II. Providing effective and appropriate membership services
- III. Communicating with members with regard to organisational issues
- IV. Promoting CtK events and group activities

b) Processed for specified purposes

Ministry areas or groups must never pass on information about members to other individuals or organisations without explicit consent being obtained. Examples of this may include: promoting other churches' or organisations' events (e.g. New Wine).

Under **no** circumstances should ministry areas or groups pass on any personal data relating to members or prospective members to third parties without consulting the Incumbent, Standing Committee, PCC and the individual.

c) Adequate, relevant and not excessive

Only data needed for the specific purpose should be asked for or recorded. Information that is not relevant for the purpose must not be collected simply because it might be useful in the future.

d) Accurate and, where necessary, kept up to date

Ministry area heads should ensure that any database is maintained and kept updated to ensure effective communication with those people linked to the ministry area or group.

Ministry areas should ensure that group members are able to simply update or change their contact details, either through a form or via the website. (i.e. a termly mailing giving the current details held and a slip / form to make any changes that are required).

Any changes should be communicated to the team leading the group / ministry area as required. On receipt of any updated information, ministry areas and groups should discard or archive previous records and replace them with the new information where appropriate.

It is important that inaccurate and out-of-date information is regularly deleted/destroyed and inaccurate records corrected (i.e. archived either digitally or in hard copy and stored in accordance with diocesan rules on how long records should be kept. Where paper records are to be destroyed they should be shredded.)

e) Not kept for longer than is necessary

It is important that appropriate data retention periods are defined and adhered to.

In essence data should not be retained for any longer than is necessary to fulfil the reason it was collected. If the data is for vulnerable children and/or adults the current diocesan retention periods must be adhered to. (Please see the Peterborough diocesan website or contact the CTK safeguarding officer via the church office).

f) Processed in line with the rights of the individual

Currently the Church of Christ the King does not operate a single central database for all the ministry area groups and activities. It is important that each area ensures that it offers anyone registering with them complete transparency and, if requested, allows them to view the personal data that is being held on their database about them or their ward / child.

If they have given consent for pictures or video that has been taken of them or their children, they have the right to request that the images are deleted or removed from use at any time after the consent has been given. (Further details of how to obtain consent for taking pictures and video can be found in the Christ the King guidelines for taking of photos and video)

g) Kept secure

In all cases great care must be taken to secure and maintain any personal data held, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Volunteers processing data must ensure that:

- i. Access to laptops/computers where personal data is stored is restricted to authorised users only;
- ii. Any database passwords are kept secure and not shared with other people;
- iii. Computers/laptops containing personal data should always be stored securely – i.e. not left in a vehicle overnight;
- iv. Data collection through the website must be done with appropriate security policies and the latest security software in place.

h) Not transferred to countries outside the European Economic Area unless the information is adequately protected.

If you are using bulk email tools or storing data on websites it is possible that the servers are located outside the European Economic Area. It is recommended that you only use services provided by companies who host data within the UK or have signed the appropriate safe harbour agreements.

For more information on this please see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

4 Privacy policy statements and registration forms.

The following statements should be displayed in the Christ the King Church building and on the CtK website. Also used in conjunction with the included current consent forms and in line with the social media guidelines and the guidelines for taking photos and video.

Standard Privacy Notice:

Adopted at PCC Feb 2018

DATA PRIVACY NOTICE

For the PCC and Church of Christ the King, Kettering.



Your Personal Data – What is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

Who are we?

The PCC of Christ the King, Kettering is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

The PCC of Christ the King, Kettering complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To enable us to provide a voluntary service for the benefit of the public on the Ise Lodge and in the Kettering area as specified in our vision and mission;
- To administer membership records;
- To fundraise and promote the interests of the charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records (including the processing of gift aid applications);
- To inform you of news, events, activities and services running at Christ the King;

What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services and process your gift aid donations and keep you informed about diocesan events.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church. We will only share your data with third parties outside of the parish with your consent.

How long do we keep your personal data¹?

We keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England website [see footnote for link].

Specifically, we retain electoral roll data while it is still current; gift aid declarations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals) permanently.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the PCC of Christ the King Kettering holds about you;
- The right to request that the PCC of Christ the King, Kettering corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the PCC of Christ the King, Kettering to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [*Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means*].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable) [*Only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Office at CtK via Office@ctk.org.uk or the Data Controller (currently Andy Stilwell) via Youth@ctk.org.uk

¹ Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/about-us/structure/churchcommissioners/administration/librariesandarchives/recordsmanagementguides.aspx>



Welcome to Christ the King

We would love to stay in touch with you and let you know more about us. So if you are here for the first time or have recently begun journeying with us it would be a great help if you could please fill out the details below:

Name: _____

Name: _____

Names & (Ages) of Children: _____
(Please could you complete a youth and children's work consent form for each child)

Address: _____

Email Address: _____

Phone Number: _____

By signing this form you are confirming that you are consenting to the PCC of Christ the King, Kettering holding and processing your personal data for the following purposes:

(please initial the boxes where you grant consent)

I consent to the church contacting me by: post ___ phone ___ email ___ Social Media ___

___ ___ To keep me informed about news, events, activities and services at Christ the King
(note you can unsubscribe from Ministry Update messages at any time);

___ ___ To add my details to ChurchSuite, the web based Church director and administration tool.

___ ___ To share my contact details with the members and ministry leaders of Ctk through the
online address book (ChurchSuite) so they can communicate with me and keep me informed
about news, events, activities and services that will be occurring at the church of Christ the
King, Kettering.

Signed: _____ Dated: _____

If you are completing this for your partner, please ask them read initial above and sign below:

Signed: _____ Dated: _____

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent, we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm. You can find out more about how we use your data from our "Privacy Notice" which is on display in the corridor and available from our website or from the Parish Office.

You can withdraw or change your consent at any time by contacting the Parish Administrator at Christ the King Church Office, Deeble Road, Kettering, NN16 7AA or Office@ctk.org.uk ☎ 01536 517553.

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.



Consent for taking & publishing images of Children & vulnerable Adults

At Christ the King Church, Kettering we include images of all adults, including those who may be vulnerable, in our publicity, but only with their consent. We also include images of children in our publicity with the consent of them and their parents or guardians. We have a duty of care to reduce the risk of inappropriate contact by ensuring that children must remain unidentifiable in publications. Please complete all areas of the consent form and hand to the church office or Data Controller (currently Andy Stilwell)

1. I _____ as a representative of Christ the King, Kettering
in my role as _____

2. Specific purpose image is to be used for: (tick those to be used)

- Church internal notice boards Church Publications Church website or Social Media
 Other please give details: _____

3. Storage

The image will be stored in:

- Computer file (specify which computer): _____
 Album
 Folder or Filing cabinet in Church Office
 The image will be destroyed after being used for _____

Please Complete Section B or C

B For completion by parent or guardian and child:

I consent to images of my child named below being used and stored, solely for the purposes specified above. I understand that the identity of my child will be protected in all publication of images.

Name(s) of child: _____

Name of parent or guardian: _____

Address: _____

Signatures: _____ (parent/guardian) _____ (child)

Date: _____

Children: The information requested on this form can be completed by a carer,

but only those with parental responsibility for a child can sign the consent (NB: This may not include a foster carer).

C For completion by adult who may be vulnerable and the person taking their consent:

I have seen the images that may be used for publication. I consent to these images being used and stored, solely for the purposes specified above.

I agree to / do not agree (delete as appropriate) to my name being given in a caption or article accompanying the images.

Name(s) of adult: _____

Address: _____

Signature: _____ Date: _____

Name of person obtaining consent: _____

Relationship to adult / role in the church or organisation: _____

Adopted at PCC Feb 2018



The Church of Christ the King Photo “Opt-Out” Form.

At Christ the King Church, Kettering we include images of all adults, including those who may be vulnerable, in our publicity, but only with their consent. We also include images of children in our publicity with the consent of them and their parents or guardians. We have a duty of care to reduce the risk of inappropriate contact by ensuring that children must remain unidentifiable in publications. This form is for those that no longer wish to have their picture posted to the church website or social media accounts, please fill out this form and return it to the church office or Data Controller (currently Andy Stilwell).

I hereby withhold my permission for the Church of Christ the King to use photographic images of the following individual(s): (please fill in names below)

Adult Name(s):

Child Name(s):

in or on the following media: (please tick those that apply)

- CtK website
- CtK Social media accounts (facebook, twitter, pintrest, youtube)
- CtK physical publications (leaflets, notice sheets, newsletters)

- CtK notice internal notice Boards

I, _____, am the parent or legal guardian of the above named child(ren). I have read and understand the provisions of this document. _____

_____ Parent/Guardian Signature Date

*If you give permission for the use of your photographic image to appear on the website, social media and publications of the Church of Christ the King this form does not need to be signed and returned. (This opt-out form is valid from the date received by the church office)

Little Ones Registration Form

Welcome to Little Ones at CtK. We ask everyone who regularly attends to complete a registration form to help us keep you informed about all that's going on with our group, and sometimes the wider church family.



Adult's name: _____

Relationship to child: _____

Address: _____

Email address: _____

Phone number: _____

Child's first name: _____ Child's surname: _____

Child's date of birth: _____ Boy / Girl (Please Delete as appropriate)

Child's first name: _____ Child's surname: _____

Child's date of birth: _____ Boy / Girl (Please Delete as appropriate)

Child's first name: _____ Child's surname: _____

Child's date of birth: _____ Boy / Girl (Please Delete as appropriate)

Please give any additional information about your child/children that would be helpful for us to know.

Please note that by signing this form you are confirming that you are consenting to the PCC of Christ the King Church, Kettering holding and processing your personal data for the following purposes (please tick the boxes where you grant consent)

I consent to the church contacting me by: post phone email social media

- adding my details to ChurchSuite (the web-based church directory and administration tool) to enable the church to communicate effectively with me;
- keeping me informed about news, events, activities and services at Christ the King; (please note that you can unsubscribe from Ministry Update messages at any time)
- keeping me informed about news, events, activities at Little Ones and Who Let the Dads Out?; (please note that you can unsubscribe at any time)
- I give permission for my son/daughter & me to be photographed or filmed when taking part in the activities and groups at CtK and the pictures and film footage used for CtK publicity / social media / displays. (for more information please speak to a member of staff or look at our privacy &/or taking and using image policy and guidelines)

Signed: _____ Dated: _____

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent, we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm. You can find out more about how we use your data from our Privacy Notice, which is on display in the corridor and available from our website or from the Parish Office.

You can withdraw or change your consent at any time by contacting the Parish Administrator at Christ the King's Church Office, Deeble Road, Kettering, NN15 7AA or office@ctk.org.uk ☎ 01536 517553.

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.

The Church of Christ the King Registration & Consent form.

This consent form is for all the activities for children and young people at the Church of Christ the King for the current academic year (2017/18). **These include: weekly activity based groups, Children's and Youth Roots/ Small Groups, also our work with young adults.** Completing this consent form will entitle your child to attend the age appropriate group and/or serve on a team. *(To be completed as appropriate by the adult, or parent/carer of the child or young person under 18, annually for church groups).*

Section1. Family contact details:

This information will help us contact you should we need to. Please check or complete the details where appropriate:

Child's first name	
Child's last name	
Date of Birth	
Address Line 1	
Address Line 2	
Town	
County	
Postcode	
Name of Parent(s) or Guardian(s)	
Parent / Guardian Home telephone	
Parent / Guardian Mobile	
Parent / Guardian Email	
If appropriate, Child's Mobile	
If appropriate, Child's Email	
Family Doctors Details	
School	
School Year	

About your child:

Does your child have any food allergies? (please specify)	
Does your child have any medical conditions? (please specify)	
Does your child take any medication? (please specify)	
Date of last anti-tetanus injection	
Does your child have any additional needs? (please specify)	
Is there anything else you would like us to know about you/your child?	

Alternative emergency contact details for parents/guardians:

Contact name for carer/ an alternative adult in case of emergencies

Tel no Relationship to you/your child

Arrangements for collection: church groups (please delete as appropriate)

I will bring and collect my child to and from the group **Yes/No**

Or My child will be collected by..... Relationship to you/your child.....

Name of anyone **NOT** allowed to collect my child Relationship to child.....

My child has permission to travel to and from the group without me (*children over 11years*) **Yes/No**

Section 2 Permission and Specific Consent:

Here at the Church of Christ the King we take the safeguarding of children and young people and your privacy seriously and we will only use your personal information to serve you and to protect your child whilst they are a member of a group and take part in the activities and services at the Church of Christ the King. Please note that by signing this form you are confirming that you are consenting to the PCC of Christ the King Church, Kettering holding and processing your personal data for the following purposes; (please tick the boxes where you grant consent)

I consent to the church contacting me by: Post Phone Email Social Media

- I give my consent to any medical treatment that may be required in an emergency by either a qualified medical practitioner or a qualified first aider. I agree to inform the youth at Ctk team of any changes to the medical information supplied overleaf. (*see note below);
- I give my permission for my son/daughter to be photographed or filmed when taking part in Ctk children and youth activities and the pictures and film footage used for Ctk publicity (inc social media, online, & Print); (please note this will be done in accordance to our privacy and using images and video policy & guidelines)
- I give permission for Church of Christ the King to communicate with my child using the following form(s) of communication, in line with the Social Media practice guidance (available on request). Please tick those to be used:
 Facebook Twitter Email WhatsApp Text Messaging
- I give permission to add my and my child’s details to ChurchSuite (web based directory and administration tool) to enable the church to communicate with us and register my child.
- keeping me informed about news, events, activities and services at Christ the King;
 (please note that you can unsubscribe from Ministry Update messages at any time)

You can grant consent to all the purposes; one of the purposes or none of the purposes. Where you do not grant consent, we will not be able to use your personal data; (so for example we may not be able to let you know about forthcoming services and events); except in certain limited situations, such as where required to do so by law or to protect members of the public from serious harm. You can find out more about how we use your data from our Privacy Notice, which is on display in the corridor and available from our website or from the Parish Office.

You can withdraw or change your consent at any time by contacting the Parish Administrator at Christ the King’s Church Office, Deeble Road, Kettering, NN15 7AA or office@ctk.org.uk ☎ 01536 517553. 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.

Section 3. Further information to be read and signed by an adult with parental responsibility.

By signing this I give permission for my son/daughter to become a member of the Children’s and Youth work at the Church of Christ the King and take part in the weekly activities they run for children and young people for the current academic year. Transport to and from these activities and meetings (*unless otherwise stated*) is the group member’s parent’s or guardian’s responsibility.

When an activity is away from the usual premises, I agree to my child travelling by private transport in accordance with the Church of Christ the King’s transport policy (*available on request*).

I acknowledge that expensive personal possessions are my son/daughter’s responsibility and that leaders cannot be held responsible for any loss or damage to my child’s property and that the Ctk team recommend leaving these possessions and devises at home.

I understand that if my son or daughter grossly misbehaves at any group or activity the organisers may forbid them from continuing to take part and may be asked to leave/ be collected by their parents or guardians. I agree to pay for any deliberate damage caused by my son/daughter.

Signed (parent/guardian) Date

Name (parent/guardian)

* Note: The medical profession takes the view that a parent’s consent to medical treatment cannot be delegated. This view is explicit in the Children Act 1989. Medical consent forms have no legal status and a doctor has the right to insist on parental consent to treat a child. However it can be of comfort to medical staff to have general consent in advance from parents or have a leader on hand to sign forms.

5 Reporting Incidents & requests for data disclosures

In the event of a data protection breach, e.g. loss, theft or unauthorised access to personal details, this report form must be completed and returned to the PCC via the Church Office.

Data Protection Incident Report Form	
Your name	
Your contact details	
Was the personal information lost, stolen or accessed by unauthorised individual(s)? Please provide details.	
Please provide details of the type of personal information and number of records involved.	
Please provide details of the circumstances of the loss/theft/access.	
Please provide details of action taken to minimise or mitigate the effect on individuals involved, including whether they have been informed.	
Please provide details of how or if the loss is being investigated.	
Please provide details of remedial action taken to prevent any future occurrence and any other information you feel may assist the PCC Projects Group in making an assessment on how the matter should be followed up.	

6 Definitions

- Data: is recorded information, whether stored electronically on computer or in paper based filing systems.

- Personal: means that the information is about an identifiable living individual.
- Personal data can be factual, such as a name, address or date of birth, or it can be an opinion, such as how a manager thinks an employee has performed at an appraisal. It can even include a simple email address.
- Processing: is any activity that involves the data. This includes collecting, recording or retrieving the data, or doing work on the data such as organising, adapting, changing, erasing or destroying it.
- Sensitive personal data: includes information about someone's racial or ethnic origin, political opinions, and religious or other beliefs, trade-union membership, health, sexuality, or criminal proceedings or convictions. Sensitive personal data can only be processed under strict conditions. In most cases, this means getting permission from the person the information is about. They decide how and why the information is used. As data controllers, employers have a responsibility to establish workplace practices and policies that are in line with the act.
- Data users: include employees and volunteers whose work involves processing personal information. As a data user, you have a legal duty to protect the information you handle. You must follow your employer's data protection and security policies at all times.
- Data subjects: are the people the information is about. Within the church family, they may be current members or people applying for volunteer roles. Data subjects might also be customers, suppliers, clients, patients or other people about whom information is held. All data subjects have certain legal rights in relation to their personal information.
- Data processors: may be separate organisations that process information on behalf of data controllers. They must also follow the act and make sure information is handled properly.