



**King's Church, Cockermouth**  
**Data Protection Policy**

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<b>Reviewed:</b>	November 2023		Lorna Casson Stephen Arnold Paul Mogford
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## 1. General Statement

King's Church Cockermouth, being a registered charity number 1191009, operates as King's Church Cockermouth and is referred to as such throughout this policy. King's Church Cockermouth is committed to working with personal information lawfully and correctly. To this end King's Church Cockermouth adheres to the eight principles detailed in the *Data Protection Act 1998* and the *General Data Protection Regulation 2018 (GDPR)*. These principles require that personal information shall:

- be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions be met
- be obtained only for one or more of the purposes specified in the Acts, and shall not be processed in any manner incompatible with that purpose or those purposes
- be adequate, relevant and not excessive in relation to those purpose(s)
- be accurate, and where necessary, kept up to date
- not be kept for longer than is necessary
- be processed in accordance with the rights of the data subjects under the Acts
- be kept secure by the Data controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information
- not be transferred to a country or a territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information

Our statement of general policy is to comply with our legal duties specified in the Acts, and specifically:

- ✓ to inform potential data subjects of the lawful basis for processing their personal data, their individual rights, and how to contact us – whenever information is requested
- ✓ to obtain informed consent from data subjects for all information requested, except where one of the other lawful ground applies (a) contracts e.g. for the supply of goods or services; (b) legal obligations e.g. safeguarding; (c) vital interests e.g. when it will protect physical integrity or life
- ✓ to collect the minimum information required to provide the service or information requested
- ✓ to keep good quality information securely in the right hands
- ✓ to fully support the rights of data subjects concerning information held about them
- ✓ to be committed to protecting the privacy of data subjects
- ✓ to provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently.



Signed:

Mr Stephen Arnold on behalf of Kings Church Cockermouth

Date.....

## 2. Data Protection Responsibilities

The CIO and church leadership (normally recognised as the Church Elders) recognises its overall responsibility for ensuring that King's Church Cockermouth complies with its legal obligations.

The Data Protection Officer is currently Paul Mogford, and undertakes the following day to day responsibilities:

- Briefing the CIO on Data Protection responsibilities
- Reviewing Data Protection and related policies
- Advising other staff on Data Protection issues
- Ensuring that Data Protection induction and training takes place
- Notification
- Handling subject access requests
- Approving unusual or controversial disclosures of personal data
- Approving contracts with Data Processors
- Approving Data-Protection-related statements on publicity materials, letters, etc.

All trustees and staff (including volunteer staff) are required to read and understand the King's Church Cockermouth Data Protection Policy. Where a department handles personal information, the manager is responsible for using operational procedures that ensure good Data Protection practice is established and followed by staff and volunteers.

All staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their work.

## 3. Confidentiality

King's Church Cockermouth has a privacy statement (see Appendix A) which outlines how the information it holds on individuals is used. This is made available on the King's Church Cockermouth website [www.kingscc.org](http://www.kingscc.org)

Where anyone within King's Church Cockermouth feels that it would be appropriate to disclose information in a way contrary to the privacy statement, or where an official disclosure request is received, this will only be done with the authorisation of the Data Protection Officer. All such disclosures will be documented.

Information security is the responsibility of every member of staff, church member and volunteer using Church data on but not limited to the Church information systems. Any person using the IT systems for unauthorised purposes may be subjected to disciplinary and/or legal proceedings.

All staff working for Kings Church Cockermouth are asked to sign a short statement (see Appendix B) indicating that they accept their responsibilities regarding confidentiality and personal information.

## 4. Data Recording

King's Church Cockermouth will only record, store and process personal data that is required for the purposes to which it was obtained. Any secondary purposes, e.g. for direct marketing, will be clarified on the sign-up mechanism (see section six).

Prospective data subjects will be asked to consent to King's Church Cockermouth holding and processing the information being requested.

Forms for collecting personal information (e.g. employment application forms, online order forms, event registration forms) will be reviewed by the Data Protection Officer to ensure that the information requested from individuals is adequate, relevant and not excessive for its purpose.

No personal data is allowed to be shared with any 3<sup>rd</sup> party for any reason, including marketing and research.

### **Sensitive personal data**

King's Church Cockermouth does, for specified purposes, process 'sensitive personal data' relating to applications, event booking provisions and records on staff members. 'Sensitive personal data' is information as to a data subject's racial or ethnic origin, political opinions, religious beliefs or beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life, offences or alleged offences, and information relating to any proceedings for offences committed or allegedly committed by the data subject, including the outcome of those proceedings.

As King's Church Cockermouth is a charity that exists for religious purposes, it can legitimately process sensitive information regarding the belief of King's Church Cockermouth's members in accordance with its activities.

In circumstances where other forms of sensitive personal data are to be held or processed, King's Church Cockermouth will seek explicit consent of the subject unless one of the limited exemptions provided in the Data Protection Act 1998 or GDPR applies such as:

- To perform a legal duty regarding employees or
- To protect the data subject's or a third party's vital interests

## 5. Data Accuracy

King's Church Cockermouth will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- Information and Communication Technology systems will be designed, where possible, to encourage and facilitate the entry and maintenance of accurate data
- Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets
- Effective procedures will be in place so that **all** relevant systems across bases are updated when contact information about any individual changes

## 6. Data Subject Rights

Individuals have the following rights concerning information that King's Church Cockermouth holds about them:

- Request confirmation that their personal data is being processed
- Request access to a copy of information including the source and recipients of their data
- Request the correction of any information
- Request the deletion/erasure any information
- Restrict the processing of their data when the accuracy, legitimacy or legality of the data or processing is being investigated
- Object to the processing of their data based on legitimate interests or the performance of a task in the public interest

All such requests must be enacted as soon as possible. All requests must be logged in the data Subject Rights Request Register.

Requests for copies of personal data, deletion of personal data, the restriction of processing, or objection to processing must be brought to the attention of the data protection officer.

Requests for the correction of data or confirmation of processing do not need to be brought to the attention of the data protection officer unless the person handling the request isn't certain they can fully complete the request.

Although data subjects have the right to a copy of all the information King's Church Cockermouth holds about them – there are a few things which King's Church Cockermouth may be obliged to withhold because they concern other people as well as them.

To obtain a copy of the information King's Church Cockermouth holds about them (subject access request), data subjects need to write to the Data Protection Officer at King's Church Cockermouth's registered address, which is shown on the website.

This is free of charge for electronic copies of information, but an admin fee may be charged for hardcopies of information, or where a request is manifestly unfounded or excessive.

If the data subject is not known to the Data Protection Officer their identity will need to be verified before handing over any information.

King's Church Cockermouth must reply within the legal maximum of one month, and more promptly if possible.

Rights relating to data portability and automated decision making do not apply as King's Church Cockermouth does not carry out automated processing or decision making.

## 7. Data Retention

King's Church Cockermouth will keep personal information for no longer than is necessary. The data retention requirements vary according to type and may be governed by statutory regulations.

Based on legal requirements and good practice, the following sets out the length of time personal data will be retained by King's Church Cockermouth. On an annual basis staff will seek to dispose of the data that has outlived its retention period. Paper based documentation will be shredded.

### HR Records

Record	Retention period	Basis for retention period
Application forms, interview notes and references for unsuccessful candidates	12 months	Because of the time limits in the various Discrimination Acts, minimum retention periods for records relating to advertising of vacancies and job applications should be at least 6 months.
Application forms, interview notes and references for successful candidates. Personnel files and training records (including disciplinary records and working time records).	6 years after employment ceases	Limitation Act 1980
DBS numbers / dates	3 years	Period of a disclosure
Parental leave	Five years from birth/adoption of the child or 18 years if the child receives a disability allowance.	Limitation Act 1980
Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence.	6 years following the end of the financial year.	Form part of financial records – Companies Act 1985 as modified by the Companies Acts 1989 and 2006
Statutory Sick Pay records, calculations, certificates, self-certificates	6 years following the end of the financial year.	Form part of financial records – Companies Act 1985 as modified by the Companies Acts 1989 and 2006
Redundancy details, calculations of payments, refunds.	6 years from the date of redundancy (12 years if more than 20 staff were made redundant).	Limitation Act 1980

**Address:** The Hub, 2 Market Street, Cockermouth, CA13 9NJ

**Tel** 01900 821100 / **Email** [admin@kingscc.org](mailto:admin@kingscc.org) / **Web** [www.kingscc.org](http://www.kingscc.org)

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### Financial Information

Record	Retention period	Basis for retention period
Accounting records	6 years following the end of the financial year.	Companies Act 1985 as modified by the Companies Acts 1989 and 2006.
Gift aid declarations	7 years after the last transaction (dependent on the wording of the declaration).	Based on inspection and the possible follow up of enquiries by HMRC.
Wage/salary records (also overtime, bonuses, expenses)	6 years following the end of the financial year.	Taxes Management Act 1970
Income tax and NI returns, records and correspondence with the Inland Revenue	6 years following the end of the financial year.	Companies Act 1985 as modified by the Companies Acts 1989 and 2006

### Health and Safety Information

Record	Retention period	Basis for retention period
Accident books, Accident records/reports.	3 years after the date of the last entry.	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).
Medical records	40 years from the date of the last entry.	The Control of Substances Hazardous to Health Regulations 1999 and 2002.
Any documentation relating to incidents involving under 18s	Until the young person reaches the age of 21.	Limitation Act 1980

### Volunteer and Short-Term Mission Participants Information

Record	Retention period	Basis for retention period
Volunteer application forms	Six years after service ceases.	Limitation Act 1980
DBS numbers/dates	3 years	Period of a disclosure

### Supporter Information

Record	Retention period	Basis for retention period
Mailing list data within database	Indefinitely until supporter opts out.	Data is held until a request is given to cease communication. The details will then be removed from the database asap.
Subject access requests	Three years following the last action.	Data Protection Act 1998

### Event and Training Information

Record	Retention period	Basis for retention period
Events for U19's (e.g. Newday)	3 years following the event (registration, leader information, personal information) unless there is a greater reason as above.	Limitation Act 1990
Booking information	6 months following event	Data Protection Act

## 8. Data Retention

Data security involves preserving confidentiality, preventing unauthorised access and disclosure, maintaining the integrity of information, safeguarding accuracy and ensuring access to information when required by authorised users.

King's Church Cockermouth is committed to maintaining a secure information environment and applies appropriate technical and organisational measures to maintain data security. All paper-based documents are secured in a locked non-portable filing cabinet or safe with access to authorised personnel only.

All electronic files are held in password protected folders or computers, or in secure online file systems, restricted to authorised personnel only.

The following table details the type of personal data held:

### Mailing Lists

Format	Type of information
Electronic Documentation	Contact details e.g. email address, name

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### HR Records

Format	Type of information
Paper based files	Employment application forms, contracts, JDs, sickness absence forms, training records, DBS disclosures, disciplinary information, appraisals, payroll information, emergency details.
Electronic documentation	Employment application forms, contracts, JDs, sickness absence forms, training records, DBS disclosures, disciplinary information, appraisals, payroll information, emergency details.

### Finance Records

Format	Type of information
Paper based files	Gift aid declarations, donor standing order forms, donor credit/debit card donation forms.
Electronic documentation	Gift aid declarations, donor standing order forms, donor credit/debit card donation forms.

### Personal Information about Supporters

Format	Type of Information
Paper based files	Application forms, DBS numbers/dates, feedback forms, general contact details.
Electronic documentation	Application forms, consent forms, emergency details, volunteer contact lists, general contact details.

### Event Records

Format	Type of information
Paper based files	Booking info including name, church, email, DOB, fees, dietary requirements
Electronic documentation	Booking info including name, church, email, DOB, fees, dietary requirements

## Training Records

Format	Type of information
Paper based files	Application forms, References
Electronic documentation	Application forms, References, Fees, Personal contact information, attendance information relevant to the course e.g. experience, age, occupation, qualifications

General policy to ensure the information security for all departments is as follows:

- Only members of staff who need to have access to records for the purpose of carrying out their roles are given access to the data. This is achieved through appropriate use of usernames and passwords for electronic records and online banking systems, and lockable filing cabinets and drawers for manual and paper-based records
- Offices/buildings are secure, and locked overnight
- Any paper records (including print-outs) containing personal data are shredded once they are no longer needed
- Any data exported from central databases to excel (or similar) files are held in password protected folders and computers. These will be deleted once they are no longer needed
- All forms of data must be managed in line with the data retention policy
- Any data processing undertaken by a third party will be arranged contractually and with due consideration. The third party will be obliged to commit in writing that they meet all requirements of the relevant data protection Acts
- Staff and relevant volunteers will be appraised of the need for security and maintaining the security of access information
- Specific policies will apply to data relating to the use of debit and credit cards
- Staff members who use a laptop to process King's Church Cockermouth data must do all that is reasonable to keep their laptop, associated media (including USB sticks) and the data they contain, secure at all times. This is particularly true when laptops are taken out the UK, especially if they leave the EU
- Data should not be processed over unsecured WiFi connections. Ensure that other devices cannot access King's Church Cockermouth devices remotely
- 3<sup>rd</sup> party event booking and data management systems must meet or exceed King's Church Cockermouth security levels and all requirements of data protection Acts
- All laptops must have an up-to-date anti-virus and security software installed
- To ensure the on-going security of electronic data in the event of equipment failure or loss, regular back-ups must be taken

All suspected or confirmed losses of hardware or data must be reported immediately to the Data Protection Officer.

Personal data breaches must be quickly investigated, and, contained as soon as possible.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Personal data breaches can include:

- Access by an unauthorised third party
- Deliberate or accidental action (or inaction) by a controller or processor
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission
- Loss of availability of personal data

The likelihood and severity of the resulting risk to people's rights and freedoms must be established.

The data breach procedure in the Data Protection Procedures guide must be followed.

## 9. Consent

Consent is one of six lawful grounds for processing data. The other lawful grounds are:

- **A contract with the individual:** for example, to supply goods or services they have requested, or to fulfil an obligation under an employee contract.
- **Compliance with a legal obligation:** when processing data for a particular purpose is a legal requirement.
- **Vital interests:** for example, when processing data will protect someone's physical integrity or life (either the data subject's or someone else's).
- **A public task:** for example, to complete official functions or tasks in the public interest. This will typically cover public authorities such as government departments, schools and other educational institutions; hospitals; and the police.
- **Legitimate interests:** when a private-sector organisation has a genuine and legitimate reason (including commercial benefit) to process personal data without consent, provided it is not outweighed by negative effects to the individual's rights and freedoms.

King's Church Cockermouth is not required therefore to obtain consent for contractual, employment and other legal information such as that required to meet Health & Safety legislation or for Gift Aid. No consent is needed for information required by law for Safeguarding children and adults with support and care needs.

Consent requests will be:

- **Unbundled:** separate from other T & Cs; not a precondition of signing up to a service unless necessary for that service

- **Granular:** include a thorough explanation of options to consent to different types of processing wherever appropriate
- **Named:** state which organisations and third parties will be relying on consent
- **Documented:** record what the individual has consented to, including what they were told, and when and how they consented
- **Easy to withdraw:** inform people they have the right to withdraw their consent at any time, and how to do this simply
- **Without an imbalance in the relationship:** e.g. employer and employee

Consent is required for the information requested for all other types of King's Church Cockermouth activities, including:

- Mailing lists
- Event bookings
- Training course applications
- Volunteering at events or for short-term missions

(Note: this is not an exhaustive list)

Consent is also required for King's Church Cockermouth to pass on personal details to any 3<sup>rd</sup> party, including church leaders, staff, or volunteers.

Lawful consent requests must be given with clear affirmative action, in other words, a mechanism that requires a deliberate action to opt-in. Consent requests must not rely on silence, inactivity, default settings, taking advantage of inattention or inertia, or default bias in any other way.

The requirements for explicit consent are:

"any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her."

An explicit consent statement will also need to specify the nature of data that's being collected, the details of the automated decision and its effects, or the details of the data to be transferred and the risks of the transfer.

Examples of King's Church Cockermouth consent requests will include:

- Signing a consent statement on a paper form
- Clicking an opt-in button or link online
- Selecting from equally prominent yes/no options
- Responding to an email requesting consent
- Volunteering optional information for a specific purpose (such as optional fields in a form)

## 10. Privacy

King's Church Cockermouth is absolutely committed to protecting the privacy of individuals. The King's Church Cockermouth privacy policy is available on its website.

All event and training booking website pages, and online application forms, will contain a link to the privacy policy, as will all electronic mailing.

Any activity that uses paper-based application will include a copy of the privacy policy as part of the application process.

All requests for personal information will clearly state the nature of the data being collected, and why, and ask the recipient to opt-in by a clear affirmative action e.g. clicking an opt-in button or check box or signing a consent statement.

### **11. Direct Marketing, and Automated processing, Decision making & Profiling**

The marketing activities that King's Church Cockermouth undertakes are as follows:

- promoting King's Church Cockermouth services, resources and events
- seeking donations and other financial or voluntary support

King's Church Cockermouth will request consent whenever any personal information, including email addresses, is requested, and the purpose will be made clear. No personal data is shared with a 3<sup>rd</sup> party for any reason including marketing and research.

King's Church Cockermouth does not operate automated processing, decision making or profiling.

Following a request by the individual to be removed from future communication, data will be flagged to suppress it from future campaigns. If direct marketing is the only purpose for which the data for this individual is held, it will be deleted as soon as possible.

### **12. Data Transfer outside European Union**

In certain circumstances, specific personal data may need to be shared with members of King's Church Cockermouth in different parts of the world e.g. in order to enable safe short-term mission team programmes. This information will not include financial details and is only ever shared in this way for defined purposes.

King's Church Cockermouth recognises that countries outside the European Union have differing approaches to data privacy laws, and that enforcement may not be as robust as it is within the European Union. King's Church Cockermouth will try to ensure that data is only stored in countries which provide an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

### **13. Training and Induction**

All staff having access to any kind of personal data will be trained during their induction process and have access to all data protection policies and procedures.

### **14. Reference to other Policies, Procedures and Documents**

This policy should be read in conjunction with related documents, including:

- Data Protection Procedures
- Data Subject Rights Request Register
- Data Breach Register
- Data Reporting Formats
- Privacy Policy
- Confidentiality Statement for Staff and Volunteers
- Safeguarding Children and Vulnerable Adults Policy



## **Appendix 1 - Privacy Statement**

### **Kings Church Cockermouth Privacy Policy**

Kings Church Cockermouth (KCC) processes Personal Data both as a Processor and as a Controller, as defined by the GDPR 2018. This privacy notice informs you the types of personal data that CCC holds, the processing we carry out, your rights under data protection legislation, and how to contact us.

#### **Our principles**

We are absolutely committed to protecting your privacy, and our legal duties under the Data Protection Act and the General Data Protection Regulation.

We have established the following two principles:

- KCC will process and control all data on the basis of informed consent, except where one of the other lawful grounds applies (a) contracts e.g. for employment; (b) legal obligations e.g. safeguarding; (c) vital interests e.g. when it will protect physical integrity or life; (d) legitimate interests
- We will respect your privacy. You will only be contacted in regard to KCC related matters

#### **What information do we collect?**

At KCC, we collect different types of information about our users for the following main reasons:

- To be able to communicate with users by email and other means
- To be able to register users into events and training programs
- To be able to collect donations and claim gift aid
- To help us to improve the service we offer

We collect information on our users through email sign-up, contact forms, donation forms, training application forms, registration at an event, safeguarding requirements and/or legal proceedings.

We collect the minimum information required to provide the service requested. We will ask you to consent to KCC holding and processing the information we are requesting.

- For email sign-up and contact forms - to identify you and be able to communicate with you
- For donations - to verify payments and claim Gift Aid
- For training applications - to book church members on third party training courses as agreed with the individual.
- For event registration – contact details, payment details, church, access and dietary needs
- For children – to identify them, age, access and dietary needs
- For safeguarding and legal proceedings, the information held is governed by law

- We only keep other personal information where it was supplied by you for other reasons

#### **Marketing, Research and Automated processing, decision making & profiling**

- No personal data is shared with a 3<sup>rd</sup> party for any reason including marketing and research
- KCC does not operate automated processing, decision making or profiling

#### **Who will have access to my information?**

Your personal information will be visible to our internal, authenticated users. Such personnel are only allowed to use that data for KCC purposes.

Information will only be, or outside the EU, on the basis of informed consent, or for the performance of a contract, to protect the data subject or other persons, for important reasons of public interest, or for legal reasons.

#### **How long does KCC keep my information?**

Different types of information are subject to different retention periods. Specific data retention periods relating to your data can be supplied with a subject access request.

#### **What are my individual rights?**

Individuals have the following rights concerning information that KCC holds about them:

- Request confirmation that your personal data is being processed
- Request access to a copy of information including the source and recipients of your data
- Request the correction of any information
- Request the deletion/erasure any information
- Restrict the processing of your data when the accuracy, legitimacy or legality of the data or processing is being investigated
- Object to the processing of your data based on legitimate interests or the performance of a task in the public interest

Rights relating to data portability and automated decision-making do not apply as KCC does not carry out automated processing or decision-making.

You have the right to a copy of all the information we hold about you (apart from a few things which we may be obliged to withhold because they concern other people as well as you).

#### **How can I exercise my rights?**

To exercise any of your individual rights, including obtaining a copy of the information KCC holds about you, write to the Data Protection Officer at the KCC registered address, which is shown on the web site, or via the email address shown below.

[admin@kingscc.org](mailto:admin@kingscc.org)

This is free of charge for electronic copies of information, but an admin fee may be charged for hardcopies of information, or where a request is manifestly unfounded or excessive.

If you are not known to the Data Protection Officer your identity will need to be verified before handing over any information. We will reply as promptly as we can and within the legal maximum of one month.

### **What else should I know about privacy?**

Like many websites, KCC uses tiny computer files called 'cookies' to enhance your browsing experience. We do not identify you through the use of cookies or information sent by your computer except where you have asked us to remember your details. Our pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.

Remember to close your browser when you have finished your user session. This is to ensure that others cannot access your personal information and correspondence if you share a computer with someone else or are using a computer in a public place like a library or Internet cafe. You as an individual are responsible for the security of, and access to, your own computer.

Please be aware that whenever you voluntarily disclose personal information over the Internet that this information can be collected and used by others. In short, if you post personal information in publicly accessible online forums, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the secrecy of your information.

### **Any Questions or Concerns?**

If you have any additional questions about KCC's collection and storage of data, please contact us at:

[admin@kingscc.org](mailto:admin@kingscc.org)

If you have a concern about the way we are collecting or using your personal data, you should raise this with our Data Protection Officer in the first instance or to the Information Commissioner's Office at:

<https://ico.org.uk>



## **Appendix 2 – Staff Agreement Statement**

I agree that Kings Church Cockermouth can retain information about me for legal obligations, vital interests (where appropriate), contractual reasons or legitimate reasons. I understand that, in accordance with the church's Data Protection Policy, this information will be held for various lengths of time. I understand that I can:

- 1) Request a copy of all such information, including all electronic and paper copies, at no cost to my self at any time
- 2) Kings Church Cockermouth may have to pass on information to legal bodies for legal obligations (e.g. to HMRC for tax obligations)

I understand that a copy of the policy has been given to me on ..... and that I can access of it at any point by request.

I understand that I too have obligations as described in the policy, and for which I am required to sign for acknowledgement.