

# PARISH DATA AUDIT May 2023

## *Getting ready for GDPR*

Review all your databases, email lists, spreadsheets, paper documents and other lists of personal data. If there are any issues, identify what you need to do. If action is not clear, then highlight questions needing further insight. New consent forms, privacy notices, and new or revised policies or procedures may need to be implemented to ensure compliance with GDPR.

Description	Why is the data held and what is it used for	Basis for processing data (e.g. consent, 9(2)d <sup>1</sup> )	Who holds the data and who can access it?	What security controls are in place?	How long is data kept for?	Is this covered by our privacy notice?	ACTION REQUIRED
<b>Baptism bookings</b>	<b>To process the baptism.</b>	<b>Implied consent by seeking those services.</b>	<b>Clergy</b>	<b>On password protected computer.</b>	<b>Clergy copies destroyed after the baptism.</b>	<b>Yes</b>	<b>Possibly providing lockable storage</b>
			<b>Administrator.</b>	<b>On password protected computer. Hard copies kept on a filing cabinet in a locked office.</b>  <b>Copies of current year's baptisms kept in vestry cupboard</b>	<b>Office copies destroyed 2 years after last entry. Ledgers kept indefinitely.</b>  <b>Destroyed after baptism.</b>		

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<sup>1</sup> Section 9(2)d is a special processing basis which allows religious (amongst others) not-for-profit bodies to process data provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent.

			Baptism Co-ordinator.	Baptism co-ordinator keeps copies at home.*	Baptism Co-ordinator keeps copies for up to 5 years to send anniversary cards.		
Church members contact information.	To contact church members.	Consent given to receive texts, emails or to have details entered on Contact sheet for Church member to see.	Held by the Administrator on ChurchSuite. Copies on request to church members.	ChurchSuite is on a secure server with relevant safeguards and password protection. On paper in a cupboard in a locked office.	Until member leaves church or asks for name removed.	Yes	Include a note to ask church members to destroy previous copies.
DBS information	To comply with C. of E. and Diocesan Safeguarding Policy. Used to protect children/vulnerable adults.	Consent forms (Diocesan provides) completed. Implied consent when producing ID for DBS registration	Parish Safeguarding Officer(PSO) keeps a record of DBS cert. nos and dates of renewal only.	On PSO's external hard drive kept in a safe.	Destroyed when DBS expired	Yes	None
Electoral Roll	It's a Membership list only and not used for anything else.	Implied consent.	Held by the Administrator.	On password protected computer. Hard copies kept on a filing cabinet in a locked office.	Until the next revision of the ER.	Yes	None
Employee details	To pay staff, and to communicate effectively.	Necessary for employment	Administrator.	In a locked office.	For 6 years after employment ceases.	Yes	None

Funeral	Provision of funeral and pastoral care.	Supplied by those seeking the service.	Vicar	Password protected computer. Hard copies in a locked filing cabinet.	Destroyed when no longer needed.	Yes	None
			Curate	Electronic only – fingerprint & password protected on separate password protected server	Destroyed when no longer needed.		
			Administrator	On password protected computer. Hard copies kept on a filing cabinet in a locked office.	Destroyed after 3 years. Ledgers kept indefinitely. At home, kept in a lockable box.*		
Gift Aid Declarations	For claiming Gift Aid	Consent given by completion of declaration	Held by Gift Aid Officer.	On paper, kept in at the Planned Giving officer's house in a locked filing cabinet.*	Six complete calendar years after last gift claimed on the declaration	Yes	None
Hall bookings – regular and private booking forms as well as church use request form	To process hall hire effectively.	Implied consent, in order to process the hall hire.	Administrator.	On password protected computer. Hard copies kept on a filing cabinet in a locked office. At home kept in a lockable box*	For 7 years after the hire – including church use.	Yes	None

Helping Hands	To facilitate the help requested. To invite them to further appropriate events.	Implied by giving contact details to Louise and team.	Helping Hands co-ordinator	On computer.	Deleted after the job is completed.	Yes	None
Holiday club	To facilitate the running of Holiday Club.	Implied by completion of the booking form.	Holiday Club organisers	During the event details held on a computer at their home, along with paper copies. After event, computer details deleted and paper copies passed to Administrator.	During event.	Yes	None
			Administrator	Paper copies held in a filing cupboard in a locked office. Computer details will be held on ChurchSuite (cloud based system).	50 years.		
In our Back Yard (IOBY)	To facilitate the running of IOBY	Implied by parents completing the form.	Administrator	ChurchSuite is on a secure server with relevant safeguards and password protection. Hard copies in the locked office.	Kept for six years in the office.	Yes	None

Men's Munch	To notify of forthcoming events.	Verbal consent is given.	Men's Munch organisers' home.	On password protected computer.	Whilst Men's Munch continues	Yes	None.
Pastoral visits	To provide requested visits	Implied consent.	Pastoral Visiting Co-ordinator (PVC)	Referral info, and info about visitor and dates on PVC's external hard drive kept in a safe.	50 years. When visitor ceases doing the role, paperwork should be returned to the office for scanning and storage on the cloud.	Yes	Visitors to be reminded to keep visit records secure*, and return to office, for scanning and retention.
			Clergy	Clergy notes kept on password computer			
			Pastoral visitors	visitors keep own information regarding visit at home.			
PCC Membership details	As Trustees, notified to Charity Commission. Emails shared with each other	Implied by standing for PCC	PCC Secretary.	On computer protected with a password.	Whilst the person remains on the PCC	Yes	None
Regular Giving	Recording who gives regularly.	Consent given by completion of declaration or implicit by filling in details on envelope.	Held by Regular Giving Officer (RGO). Bank payments and totals accessed by treasurer.	On paper at RGO home, kept in a locked filing cabinet.* Bank payments on computer.	Six complete calendar years after last gift claimed on the declaration.	Yes	None

Safeguarding Training	To comply with C. of E. and Diocesan Safeguarding Policy. Used to protect children/vulnerable adults.	Implied consent when they complete training	PSO keeps a record of what training is done, and expiry date.	On PSO's external hard drive kept in a safe.	Until the person the Safeguarding training has expired	Yes	None
Social Events	To notify future events	Implied consent, and then asked when phoned with info regarding future events.	Paul and Laura.	At Paul and Laura's house.*	Destroyed after the event.	Yes	None
			Other social event organisers	Kept at social event organiser's house.*	Returned to Administrator to consider whether to keep or destroy.		
Sunday School	For Health & Safety and Safeguarding purposes. To ensure the safe running of Sunday School.	Implied consent	Sunday School leaders, and Administrator	In filing cabinet in a locked office, taken out for Sunday School.	50 years.	Yes	Enrolment form and procedure to be implemented.
Wedding bookings	To process the wedding.	Implied consent by seeking those services.	Vicar  Curate	Hard copies kept in locked filing cabinet. Electronic only – fingerprint & password protected on separate password protected server	Clergy copies destroyed when no longer needed.	Yes	None

			<b>Administrator.</b>	<b>On password protected computers in the office. Hard copies kept in a filing cabinet in a locked office.</b>	<b>Office copies destroyed 2 years after last entry. Ledgers kept indefinitely.</b>		
			<b>Wedding Co-ordinator.</b>	<b>Wedding Co-ordinator keeps copies at home*.</b>	<b>Destroyed after 1 year.</b>		
<b>Youth work – Curate’s diary, permission forms for activities &amp; weekly meetings</b>	<b>To ensure safe running of Youth Work, Safeguarding etc.</b>	<b>Implied consent.</b>	<b>Curate</b>	<b>Finder fingerprint &amp; password protected on separate password protected server</b>	<b>50 years</b>	<b>Yes</b>	<b>Procedure to be implemented.</b>

\*Documents kept at individual’s homes will be kept in locked boxes / cabinets / rooms.

Please note that the vicar can have access to any documents, but they will be kept on a password protected computer or lockable storage, and will be destroyed when no longer needed.