

Data Protection Guidance and Checklist

The following data protection activities need to be carried out by the Managing Trustees to ensure the church is compliant in their data protection practices and procedures to protect the rights and freedoms of the data subjects data that they are processing.

The TMCP have produced a checklist that all local churches, circuits and districts need to carry out **annually**. It is in the interests of all to ensure that personal data is looked after carefully and kept safe. Carrying out the 11 checks will assist Managing Trustees to do that.

Check 1 Review the personal information the church holds (data mapping)

There is a need to recognise that the type of personal data and the use of it by Managing Trustees may change over a period of time. An audit for Kenn Road has been completed and a Record of Processing has been created.

Future Action: The audit form needs to be updated with any changes in officers.. An annual check of the ROPA is needed to make sure the church is still carrying out the activities and to add any new processing.

Check 2: Conduct a Data Cleansing exercise to destroy any information that is no longer required

Under the principles of the GDPR Managing Trustees are required to ensure that the information they process about individuals is used for the purposes in which it was collected and is kept relevant and up to date. A review of the audit that was carried out in March 2021 to check it is still update and correct.

Where personal data about individuals is identified as being no longer require then it should be permanently deleted. Membership lists of groups should be reviewed and any members who have left the group should be deleted.

Future Action: An annual check of our membership lists of various activities (identified in the ROPA) need to take place and any who have left removed. Make sure all those who have left office have passed on all personal data to the new officer and that no copies are still held.

Check 3: Review the Managing Trustees' Privacy Notice

Managing Trustees should note that the Managing Trustees' Privacy Notice available on the TMCP website was last updated on the 3rd August 2020 with updated details of the Connexional Team contact. Please ensure that you are displaying this version on the Local Church notice Board or that

you have a link on your website to the most up to date version of the privacy notice. Is this version easily available to members of the Local Church and adherents etc?

Further Action: Can we make sure that the following privacy notice is displayed in the church and that a link appears on the home page of our website (if there is a footer then a link entitled Privacy Notice could be placed there.. [Managing Trustees' Privacy Notice - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk/Managing-Trustees-Privacy-Notice-Trustees-for-Methodist-Church-Purposes)

Check 4 – Ensure your contact information is correct

Principle 4 of GDPR requires Managing Trustees to ensure that the information they are holding about individuals is relevant, accurate and up to date.

Further Action: Make sure our various membership and contact lists are up to date.

Check 5 – Review & Renew Consents

Where Managing Trustees have relied on consent as the lawful basis for using an individual's personal information, Managing Trustees need to be aware that consent lasts for no more than two years and now needs to be renewed.

Further Action: Every two years (from mid 2022) the Methodist Church wishes that consents need to be renewed. Check the ROPA for any processing activities that rely on consent (see legal basis column) and contact those that it is applicable asking for consent to continue. Your church data protection advisor can support with appropriate privacy collection wording.

Check 6 – Review the “Processor Record” of the Local Church, Circuit or District

Article 30(2) of GDPR includes a requirement for processors (those within the Church who handle personal information), to keep records about the personal information that is processed (dealt with). Completion of the ROPA is also required in order to comply with the “accountability” principle in Article 5(2) of GDPR.

Further Action: Make an annual check of your ROPA (and audit form)

Check 7 – Review your Data Security

Data Security needs to be ongoing and regularly reviewed. Managing Trustees must ask themselves if the information which they hold about individuals is held as safe and secure as possible. Managing Trustees must familiarise themselves with the Data Security Policy and ensure that the following minimum measures are undertaken:

- Ensure all software updates are installed as soon as it becomes available;
- Ensure all Malware and Antivirus software is updated are installed as soon as available;

- Ensure all electronic devices are password protected and / or encrypted at all times;
- Ensure a 'clean desk' policy is in place where all papers files are locked away when not in use; Ensure that work emails are kept separate from their own personal emails and accounts.

The use of personal email accounts, especially those which are shared with other people, should be actively discouraged. Poor data security is one of the main causes of data breaches which could be very costly to the Methodist Church from a financial perspective and a reputational one

Further Action: Remind all those that are storing personal data of the above guidance. Anyone who is maintaining hard copies that they are done so on the agreement that they will be locked away. When someone is standing down from a role that includes processing of personal data make sure that all personal data is passed on to the successor and that any personal data does not continue to be held by the anyone who no longer is in a role.

Check 8 – Ensure Managing Trustees are aware of their Data Protection Obligations.

Over time, different people are appointed to positions within the Church who handle personal data about individuals. It is also the case that people need to be provided with reminders and refresher training on the requirements of Data Protection legislation. Ensure that people consider and regularly refer to the following resources to help Managing Trustees with their ongoing training and encourage them to sign up to the [News Hub - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk) so that they can be alerted to any updates as soon as they become available. Here are some good documents and videos:

- [Data Protection Responsibilities in a Nutshell - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk)
- [9 Steps for Methodist Managing Trustees to Take Now to Comply with GDPR - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk)
- [Data Protection Do's and Don'ts Focus Note - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk)
- [Video - Trustees for Methodist Church Purposes \(tmcp.org.uk\)](https://www.tmcp.org.uk)

Further Action: Keep a record of who has accessed what training and when. A sample Training Record is now available for Managing Trustees here.

Check 9 – Identify Training Needs.

As Managing Trustees work through the various training resources and put this into practice, it will become apparent where additional training needs are required. These will become especially apparent if, and when, a data breach is experienced. Please contact TMCP if there are any specific training requirements Managing Trustees would like to see featured in the next round of data protection training.

Further Action: Encourage and identify any training needs of members who are processing personal data.

Check 10 – Liaise with your District Data Champions ('DDC').

For Local Churches and Circuits that have a District Data Champion, they are a crucial point of contact for Managing Trustees to discuss routine data protection matters. They have received additional data protection training, which is ongoing, and are equipped to assist Managing Trustees navigate the requirements of data protection legislation.

Check 11 – Sign-Off the Checklist.

Once you have completed all the checks on the Checklist, this must be printed off, signed, dated and returned to the District Data Champion, or the District Office if your District does not have a DDC.

Signed:

Dated: