

Cumbria District Data Protection Bulletin 2

“We don’t have any personal data in our church.”

I hope that by now your church/circuit has a ‘Fair Processing Statement’ that refers on to the national Privacy Notice for the Methodist Church. If not, please see [Bulletin 1](#).

Thank you to everyone who completed the District Questionnaire. We sent off the District summary spreadsheet to the Trustees for Methodist Church Purposes at the end of August. On the basis of that questionnaire, there seems to be a reasonably widespread view that some churches don’t have any personal data, so they don’t need to comply with the UK General Data Protection Regulation (GDPR). I think this makes us consider the question ‘What is personal data?’ So, **how many of these four photos contain personal data?:**



Have a go now at answering the question. Answers within this bulletin below.

Personal data is information about a living human being, and that includes names. I think that means that minutes of a Church Council meeting contain personal data if the names of those attending are recorded.

The head-and-shoulders photo of a person contains personal data (i.e. what they look like); the tree doesn’t; the mobile does even if there are no contacts stored on it because it has a MAC address which is generally linked to the registered owner; the dog probably does because by law all dogs must be microchipped, and the microchip contains the personal data of its owner.

I hope this helps us all to recognise that personal data is very common. Of course some personal data, such as your credit card number, is more sensitive than others, and it’s important to be proportionate about personal data. But every church has some personal data, so GDPR cannot be ignored by saying “We don’t have personal data in our church.”

Do you ever write emails to a large number of people? If you put everyone’s email addresses in the ‘To’ line of an email, then everyone’s email addresses are visible to everyone else, which is not good data protection practice, unless you’ve got agreement from everyone on the list. That’s why more and more people are using the ‘blind carbon copy’ (bcc) option instead. One problem with this is that the people who receive the email don’t know who else your email has gone to, which can cause confusion. So, here’s a tip: include something in your opening greeting that helps people know who your email has gone to, e.g. ‘Dear Church Council members’. Of course, you still have that list of email addresses, so here’s another tip: write a ‘note to self’ that you have all this personal data (the email addresses), so that when you do ‘Data Mapping’, you’ve got a head start.

If you have any views on this bulletin, or have any queries about data protection, please do get in touch with me, and I’ll see what I can do.

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