

# Cumbria District Data Protection Bulletin 5

## Annual Checklist Responses

Data protection is one aspect of our caring for people, and it's part of our protection for people inside the church community and for those outside too. But apart from that, it's a legal requirement as well.

If you have a circuit role, please read 'circuit' as well as 'church', every time I mention 'church' in this bulletin. Every church holds some personal data - see Bulletin 2 on this link:

<https://www.cumbriamethodistdistrict.org.uk/resources/gdpr.html>.

The annual checklist has prompted me to cover four related issues in this bulletin:

1. From the responses of all the churches/circuits that responded to the annual checklist, it is clear that many more churches than last year have carried out data mapping (See Bulletin 3 on the above link), so that's a big improvement – **congratulations** to all churches that have done this.
2. Inevitably, there are still some areas we need to work on, and it is clear that a number of churches have not yet completed a 'processor record'. The purpose of this record is to provide a central record of the different data protection documents and records used by your church to show that you are complying with the requirements of data protection legislation. It's part of the so called "accountability" principle in GDPR. While it may sound difficult, most of the boxes (cells) in the template form have already been completed, leaving relatively few boxes for each church to complete. Guidance and the template are available here: <https://www.t MCP.org.uk/about/data-protection/resources/standard-documents-and-forms/processor-record>. Feel free to contact me if you get stuck when completing the form.
3. One church, in response to the annual checklist, said that it was closing so they weren't going to fill it in. However, a church closure is a classic case in which office holders may fail to handle personal data properly, for example by not destroying or archiving records. If you don't do this properly at the time of closure, you may never do it, because you won't be prompted again from the District following church closure. Standing Order 015 requires that minute books, account books, and baptismal, burial and marriage registers are archived. There may be other records worthy of permanent preservation - please consult the District Archivist if you're unsure. Be aware that Local Authority Archivists will not accept financial records for the previous six years, as we are meant to hold them for that period. When handing over records to Local Authority Archivists, it's good to remove any unnecessary personal data, and they should not release records of a confidential nature for 75 years.
4. All this reminds me that any of us, even if we have not been involved with a church closure, may have retained old records, perhaps when we finished a church role. We may have done a handover that didn't involve destroying all the old records. We may think it's good to retain some records 'for a while', but at some point (and maybe after not that long), it will be appropriate for that data now to be destroyed or handed over, and not retained indefinitely. It could be that we will never think again about those old records, whether they are in paper or electronic format. Please try to recall anything in this category and remedy the situation. And when we finish a church role in future, let's remember to destroy (or archive) old records containing personal data!



If you have any views on this bulletin, or you have any queries about data protection, please do get in touch with me, and I'll see what I can do. The answer may well be available on <https://www.t MCP.org.uk/about/data-protection>.

**Alec Bounds,**

**Cumbria District Data Champion,**

boundsalec@gmail.com

