

Sample Personal Data Inventory and Action Plan – A Typical Presbyterian Church

No.	Description/ Organisation	What Personal Data do you hold?	How did you obtain the information?	What is it used for?	In what form is it held?	Who has access to this data?	Is it shared with any external 3rd party? (Specify)	How is it kept secure?	How long do you keep it for and how do you dispose of it?	Lawful basis for processing	Actions
1	Members of the Congregation	Details (Contact details, DOB if supplied, WFO details, etc.) of all individuals who are affiliated to this Congregation and their immediate family Some data held may be regarded as sensitive personal data	The individuals themselves	Pastoral care	Mixture of electronic and paper copy. Omega software used to record information. Elders and pastoral visitors may hold personal details on phones, personal computers and in paper form	Ministerial team have access to contact details Elders may have collected personal data that they alone use and have access to Treasurer and Gift Aid Secretary have access to contact details and financial data including WFO details	No	Omega system is tailored restricted access with username and password required. Unclear as to protection at individual elder and pastoral visitor level	Indefinitely – no policy Paper copies shredded once details entered on Omega. Individual's details deleted when they leave. Unclear as to retention at individual elder and pastoral visitor level. Unclear as to means of disposal	6(1)(f) – Necessary for the purposes of the legitimate interests of the congregation, coupled with, 9(2)(d) – Not for profit religious organization processing data for members and past members and with no disclosure to 3 rd parties	1. Is Omega system GDPR compliant? 2. Issue guidance to all relevant leaders on retention period, keeping it secure and disposal
2	Employees – current, previous and potential	Name, address, phone number, date of birth, national insurance number, bank details	The individuals themselves	Payroll purposes	Currently 3 rd party processing by SAGE. Data held on their cloud storage. Older records held in paper form on files in the church office.	Ministerial team have access to contact details Treasurer has access to all employee personal data	Yes – outsourced processing by SAGE	Access is password protected (enforced through SAGE) with limited and specific access (Treasurer). Files are held in a locked cabinet	For staff - until 7 years after leaving. / Paper copies destroyed by shredding 7 years after individual leaves employment. Electronic record deleted through SAGE system For unsuccessful applicants for 1 year. / Paper records for unsuccessful applicants are shredded	6(1)(b) Necessary for the performance of a contract and 6(1)(c) Compliance with legal obligations, coupled with, 9(2)(b) – Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	1. Is SAGE system GDPR compliant
3	Gift Aid	All members who give under Gift Aid - Name, address, date of birth, gift aid envelopes with amount also.	The individuals themselves	Gift Aid claims	Paper form. Held in church office except when in use by Gift Aid Secretary when they are used from home.	Gift Aid Secretary and Treasurer	Yes – Customs and Revenue	Kept locked in cabinet in church office unless being transported by car to GA Secretary's home where they are kept in locked study	Gift aid declaration held indefinitely whilst a member giving under gift aid. Envelopes held for 6 years after gift aid claim. Documents shredded when no longer required.	6(1)(c) – Processing is necessary for compliance with a legal obligation	1. Guidance on keeping data secure and disposal
4	Boys Brigade	Leaders: Name, phone number Members: Name, address, phone number, email, date of birth, permission for images	The individuals themselves For the members - Parent or guardian	Membership of that organization and necessary communication on dates, activities, events	Annual consent forms and roll books with names and addresses	Leader and section leaders	Yes – shared with BB Headquarters via online entry of data to their 'Online Manager' system	Files kept at home - unclear as to security. BB Online Manager system is restricted access with username and password required.	Forms are retained for 2 years and are then shredded. Roll books are retained indefinitely	Consent – not all people attending will be affiliated with the congregation and the data is shared with 3 rd party	1. Is BB Online Manager System GDPR compliant? 2. Guidance on keeping data secure and disposal
5	Parent and Toddlers Group	Parent or Guardian name, phone number, email, child's name and date of birth	Parent or guardian	Membership of that organization and necessary communication on dates, activities, events	Paper form	Group Leader	No	Kept by leader of Mums and Tots. At home usually	Form retained by leader of group for 12 months and then destroyed by shredding	Consent – not all people attending will be affiliated with the congregation	1. On basis of discussion with leader - consider whether it is necessary to collect this data. Sign in sheet is used on the day with first name only and communications can be achieved in other ways

Notes

- 1 This is not a complete inventory and shows only a few examples. You must complete your own audit and inventory based on how your own congregation/presbytery processes personal data
- 2 Completion of this document should lead to some form of Action Plan (see sample attached). Both the Personal Data Register and the Personal Data Action Plan will be key 'living' documents for the congregation/organization.

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No	Action point	Action	By whom and when	Completion Update
1	1.1 Is Omega system GDPR compliant?	Check PCI website to see if this has been confirmed. If not then contact the supplier direct to confirm compliance in writing using template supplied.		
2	1.2 Issue guidance to all relevant leaders on retention period, keeping it secure and disposal	Circulate to all organisation leaders the Kirk Session adopted guidelines on Data Protection policy		
3	2.1 Is SAGE system GDPR compliant	Check PCI website to see if this has been confirmed. If not then contact the supplier direct to confirm compliance in writing using template supplied..		
4	3.1 Guidance on keeping data secure and disposal	Covered under 2 above		
5	4.1 Is BB Online Manager System GDPR compliant?	Check PCI website to see if this has been confirmed. If not then contact the BB direct to confirm compliance in writing using template supplied		
6	4.2 Guidance on keeping data secure and disposal	Covered under 2 above		
7	5.1 On basis of discussion with leader - consider whether it is necessary to collect this data. Sign in sheet is used on the day with first name only and communications can be achieved in other ways	Decide on whether or not it is necessary to collect this information. Are there other ways in which we can promote the church and church activities and communicate with these individuals without collecting personal data?		