

GDPR in the Downs Benefice

Data Audit

1. Each parish audited their data pool –
 - a. identified who is holding what data on individuals associated with the church and the comprehensiveness of that data
 - b. how that data is held and what actions need to be taken forward.
 - c. Several actions result.
2. Policies agreed on how long data should be held, by whom and how securely.
3. For each category of data, it should be determined whether or not the parish has a 'legitimate interest' in holding that data.
 - a. If no legitimate interest, consider ceasing to hold the data.
 - b. If there is a legitimate interest
 - i. If the data **will not** be used for contacting individuals about activities and / or financial needs of the parish; **no further action**
 - ii. If the data **might or will** be used for contacting individuals about activities and financial needs of the parish then a **consent** letter must be sent to them (see below)
4. The Benefice Group have/are attended training and guidance has been taken from the Diocesan Registrar and others' GDPR policies.
5. The PCC of each parish will review and update their Data Audit annually

Consent

6. Consent is needed from each individual to hold data that will be used for contacting individuals about activities and / or financial needs.
7. For those individuals where we already hold data, we will send them a letter which will
 - a. Explain GDPR and its impact on them and the parish
 - b. Refer to the Benefice Privacy policy giving the link to the Web-site.
 - c. Tell them we are holding contact details
 - d. Remind them that we have contacted them in the past and want to continue so to do. No further action is needed by them if they are content with the status quo.
 - e. Invite them to **OPT OUT**, should they so wish. If they do opt out then no further communication will then ensue.

For any future additions to the data categories, the application form will contain a sentence indicating that we will wish to contact them about church activities and asking them to **OPT IN**. This will include all Baptism, Wedding and Funeral contacts made by the Benefice Office.

Privacy Policy

8. Each parish in the benefice has endorsed the Privacy Policy which explains our responsibilities and the rights of those individuals whose data we hold. This is accessible via the benefice web-site: [Data Protection](#)