**Personal Data Audit**

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| **Source** | **Type of data held** | **Reason for holding data** | **Lawful basis for holding data 1 – 6:**  (definitions at foot of table) | | **Does it Apply to us?** |
| **Consent not required** | **Consent required** |  |
| **Church leadership and members** | | | | |  |
| Pastor, supply ministers | Name, address, telephone, email, d.o.b, bank details, tax information, passport, National Insurance, PAYE | To fulfil role, to provide pastoral care, to complete contract details, pay salary, fulfil tax obligations, comply with insurance | 2,6 |  |  |
| Supply ministers | Name, address, telephone, email, bank details | To liaise with supply ministers concerning preaching engagements, to remunerate them | 2,6 |  |  |
| Deacons, Church members | Name, address, telephone, email, bank details | To fulfil role, to provide pastoral care, to share information about preaching engagements and service arrangements, circulate agendas and minutes from meetings, to reimburse for expenses | 6 |  |  |
| **Other office holders** | | | | |  |
| Secretary, Treasurer, Correspondent | Name, address, telephone, email, bank details | To fulfil role, to share information concerning the chapel, to reimburse for expenses, to conduct other business on behalf of the Chapel | 6 |  |  |
| Trustees, Responsible people for marriage register | Name, address, telephone, email, | To fulfil role, to comply with legal requirements | 3,6 |  |  |
| **Finances** | | | | |  |
| Gift aid donors | Name, address, bank details | To comply with legal requirements, to provide information to HM Revenue and Customs requirements | 2,3 |  |  |
| Other financial donors | Name, address, telephone, email, bank details | To receive regular monthly donations and one-off donations | 6 |  |  |
| Cheque signatories | Name, address, telephone, email, d.o.b, proof of address | To effect transactions, to conduct business on behalf of the chapel | 6 |  |  |
| Accountant | Name, address, telephone, email, bank details, professional affiliation no. | To assist in regulating and overseeing financial accounts, to provide advice | 2,3,6 |  |  |
| **Sunday school** | | | | |  |
| Safeguarding coordinator | Name, address, telephone, email, passport information, proof of address, DBS information | To fulfil role, provide safeguarding care to congregation, comply with legal, insurance and charity commission requirements | 2,3,6 |  |  |
| Leaders and assistants | Name, address, telephone, email, DBS information | To further the ministry of the chapel, to fulfil role, to liaise concerning the work and organisation of the Sunday School, to comply with safeguarding and insurance requirements | 2,3,6 |  |  |
| Parents | Name, address, telephone, email | To comply with safeguarding requirements, to liaise concerning Sunday School arrangements, changes to session times | 2,3,6 |  |  |
| Children | Child registration information | To enrol in Sunday School, to comply with safeguarding requirements | 3, 6 |  |  |
| **Members of congregation** | | | | |  |
| Members of congregation | Name, address, telephone, email | To share information about changes to service times, cancelations, road closures, changes to parking facilities, any event which may adversely affect the normal running of the chapel | 6 |  |  |
| Members of congregation | Name, address, telephone, email | To circulate newsletters, printed sermons, provide information on activities and events relating to the chapel or other organisations, to promote charitable giving |  | 1 |  |
| Rotas: organ, cleaning, gardening, hospitality, door keeping etc | Name, address, telephone, email | To facilitate smooth running of the normal activities of the chapel, provide practical support to chapel | 6 |  |  |
| **Other activities, employees and voluntary workers** | | | | |  |
| External speaker | Name, address, telephone, email, bank details | To provide service to chapel, enhance activities of chapel, to reimburse expenses or pay fee where appropriate | 2,6 |  |  |
| Contacts in other chapels and organisations | Name, address, telephone, email | To arrange visits, meetings | 6 |  |  |
| Cleaner, Gardener, Other maintenance | Name, address, telephone, email | To provide service to chapel | 2 |  |  |
| **Other service providers** | | | | |  |
| Architect, Builder, Plumber, heating engineer, Electrician, Window cleaner, Cleaner, Gardener, fire extinguisher engineers, fire alarm engineers, security system engineers, other trades people | Name, address, telephone, email, bank details | To provide advice, practical support and services to chapel, to comply with health and safety regulations, building regulations, to comply with insurance requirements | 2,3,6 |  |  |

**The six lawful bases for holding personal data:**

**1. Consent:**the individual has given clear consent for you to process their personal data for a specific purpose.Consent must be freely given and individuals must be able to withdraw consent without detriment to the running of the organisation.

**2. Contract:**the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**3. Legal obligation:**the processing is necessary for you to comply with the law (not including contractual obligations).

**4. Vital interests:**the processing is necessary to protect someone’s life. (E.g. in a life or death situation it is permissible to use a person’s medical or emergency contact information without their consent).

**5. Public task:**the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**6. Legitimate interests:**the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests.

**Sensitive personal data)** which the GDPR refers to as ‘special category data’, means information about a person’s racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, sexual life, criminal history and allegations. The GDPR adds the following new additional categories: genetic data, biometric data and sexual orientation. It must be held first on a lawful basis 1-6 (see above) and second, at least one of the following must apply (in a religious context, most likely 1 and 4):

1. **Explicit consent of the data subject** has been obtained (which can be withdrawn).

2. **Employment Law** – if necessary for employment law or social security or social protection.

3. **Vital Interests** – e.g. in a life or death situation where the data subject is incapable of giving consent.

4. **Charities, religious organisations and not for profit organisations** – to further the interests of the organisation on behalf of members, former members or persons with whom it has regular contact such as donors. Note, however, that explicit consent is required for the personal data to be shared with a third party.

5. **Data made public by the data subject** – the data must have been made public ‘manifestly’.

6. **Legal Claims** – where necessary for the establishment, exercise or defence of legal claims or for the courts acting in this judicial capacity.

7. **Reasons of substantial public interest** – where proportionate to the aim pursued and the rights of individuals are protected.

8. **Medical Diagnosis or treatment** – where necessary for medical treatment by health professionals including assessing work capacity or the management of health or social care systems.

9. **Public Health** – where necessary for reasons of public health e.g. safety of medical products.

10. **Historical, Statistical or scientific purposes** – where necessary for statistical purposes in the public interest for historical, scientific research or statistical purposes.