

**Appendix A**  
**Legal basis and associated rationale for data processing**  
**May 2018**

<b>Data set</b>	<b>What is collected and how</b>	<b>How it is stored/who is it shared with</b>	<b>How it is kept up to date</b>	<b>Retention period</b>	<b>Is this Special Category Data (yes/no)</b>	<b>If Special Category Data, condition for processing</b>	<b>Legal basis</b>	<b>Reasons why processing is necessary</b>
Membership Roll	Name, address and telephone numbers are collected when people join the church.	Data is stored on the Church Secretary's personal computer and printed records are produced for the Minister. Data is also shared with the Assistant Secretary.	Members are contacted annually and given the opportunity to update their contact details	Indefinitely	Yes – all members of the church have made a declaration of faith	Legitimate activities	Legitimate interest Test: 1. Legitimate interest – maintaining a record of members 2. Processing necessary – see next column 3. Balance – Minimum essential data is provided.	Membership statistics need to be provided to Synod/National URC. Contact details are needed for pastoral work.
Community Roll	Former church members who wish to remain in contact with the church can request to have their details transferred to the Community Roll. This Roll is also used for non-members who wish to receive the Contact magazine.	Data is stored on the Church Secretary's personal computer.	A notice is posted annually in the Contact Magazine reminding members to update their contact details	Indefinitely	No	N/A	Consent	To give people the opportunity to remain in contact with the church.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Elders Districts	Elders are provided contact details for members in their pastoral district. This is drawn from the Membership Roll.	Elders retain printed copies at home, subject to good practice on data storage. This data is not shared.	Via the membership roll	12 months – old lists are destroyed when new lists are issued.	Yes (see Membership Roll)	Legitimate activities	Consent	To enable pastoral elders to make contact with church members in their district and provide pastoral case
Keyholder information	Details of keyholders are collected on a proforma at the time a key is issued	A printed copy is retained by the Church Secretary. This data is not shared.	Keyholders are asked to ensure that we are informed of changes to information	12 months after key has been returned	No	N/a	Legitimate interest Test: 1. Legitimate interest – security 2. Processing necessary – see next column 3. Balance – Minimum essential data is provided.	To ensure that the church has a record of who has access to the building.
Cradle Roll	Contact details of the family and the child's date of birth	Paper records are kept by the Cradle Roll secretary at home, and are also stored in church. They are shared with the Church Secretary.	Any amendments to contact details are updated as and when advised by the family.	Indefinitely	Yes – the family have made a declaration of faith as part of the baptism process	Consent	Consent	To maintain contact with the family after baptism.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Accident book	Details of the injured person, caregiver(s)/person reporting and the injury.	Entries from the accident book are stored securely in the church office.	N/a	7 years	No	N/a	Legitimate interest. Test: 1. Legitimate interest – Health and Safety 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary, using a standard proforma	We need to hold this information on record to help ensure that we meet requirements regarding health and safety.
Lettings	Names, addresses and confirmation of compliance with safeguarding requirements. Collected on booking form.	Paper records stored in the church office in a locked cupboard. Lettings information is shared with the Church Secretary (for the purposes of the URC Trust return) and the Treasurer (to reconcile payments)	N/a	12 months	No	N/a	Legitimate interest. Test: 1. Legitimate interest – hall lettings 2. Processing necessary – see next column 3. Balance – minimum essential data is collected.	To facilitate hall lettings and ensure compliance with Safeguarding Policy. We need to take hirers contact details in case of changes to booking arrangements, damages etc.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
List of Hirers and Hall Users	Details of all people hiring the halls, taken from the lettings booking form. This information is shared with Synod every 6 months.	Paper copies or URC Trust return are stored in church office with limited key access. Also stored electronically on Church Secretary's personal computer and backed up to One Drive.	N/a	12 months	No	N/a	Legitimate interest. Test: 1. Legitimate interest – compliance with URC governance 2. Processing necessary – see next column 3. Balance – we rely on the URC Trusts' own GDPR compliance for collection/processing. Minimum essential data is provided.	To meet requirements of URC Trust
Contact magazine distribution	Names are drawn from the Membership Roll, email addresses are also provided to the Contact Editor by members wishing to receive the magazine electronically	Paper files and electronically by the Contact Editor	Membership Roll is maintained as above. Email addresses are updates as and when advised by members.	Retained on an ongoing basis	No	N/a	Consent	To ensure that all members and wider church contacts are kept informed of church news

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Youth/Junior Church roll	Names and attendance data. Any young person attending has their name added to the register so that their attendance is recorded. Parents/carers of regular attendees are asked to complete a registration form. Old registers include address information but this is no longer recorded in the register.	Stored in the church office. All junior/youth church leaders have access.	It is updated weekly. When a new register is started, names are removed of any child that is no longer attending.	Indefinitely	No	N/a	Legitimate interest. Test: 1. Legitimate interest – Safeguarding 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	We need to hold this information on record to help ensure that the child is properly cared for, and to meet URC requirements regarding safeguarding.
Youth/Junior Church and registrations	Registration form for all regular attendees of youth/junior church, or related youth events (e.g. youth project). Collected via completion of paper form by parent/carer.	Paper copies currently kept in Manse. To be moved to secure storage within the church. Copies are not made, but Youth/Junior Church leaders have access to this data when required.	Parents to be asked to confirm information is up to date on an annual basis	24 months after last contact	No	N/a	Legitimate interest. Test: 1. Legitimate interest – Safeguarding 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	We need to hold this information on record to help ensure that the child is properly cared for, and to meet URC requirements regarding safeguarding.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Safe recruitment documentation	Application forms and references are collected when people are applying to take on a church role that may involve working with children or vulnerable adults.	Paper copies of safe recruitment exercises are kept in the Manse. To be moved to secure storage within the church as soon as this is available. Shared with people involved in recruitment for the relevant role.	N/a	Indefinitely for successful applicants  3 months after the end of the recruitment process for unsuccessful applicants	No	N/a	Legitimate interest. Test: 1. Legitimate interest – Safeguarding 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	We need to hold this information on record to help ensure that we meet URC requirements regarding safeguarding.
Safeguarding records	Details of any safeguarding incidents, safeguarding training record for volunteers.	Paper copies retained by Safeguarding Officer but to be moved to safe storage within the church	N/a	Indefinitely	No	N/A	Legitimate interest. Test: 1. Legitimate interest – Safeguarding 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	We need to hold this information on record to help ensure that we meet URC requirements regarding safeguarding.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Family outreach event data	Sign in sheets for Saturday zone and other family events, collected from parents/carers upon arrival at events.	Paper records stored in Manse office. To be moved to secure storage within the church. This data is only accessed by the lead organiser.	N/a	24 months after last contact	No	N/a	<p>Legitimate interest. Test:</p> <ol style="list-style-type: none"> <li>1. Legitimate interest – Safeguarding</li> <li>2. Processing necessary – see next column</li> <li>3. Balance – we only ask for the information that is necessary</li> </ol> <p>Consent is required for the use of contact details to keep members informed of other church events, and for photographs.</p>	<p>We need to hold this information on record to help ensure that the child is properly cared for, and to meet URC requirements regarding safeguarding.</p> <p>We also use this data to communicate with families who wish to be informed of future events, provided they have given consent.</p>

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Little Fishes roll	Parent/carer names and contact details (address, telephone number, email). Child's name, birthday and details of any allergies. A register is maintained.	Stored by the Little Fishes coordinator, and shared by email with two members of the Little Fishes team.	Data is updated as new families join/other families leave.	Contact details to be kept for 2 years after last contact. Register to be kept indefinitely.	No	N/a	<p>Legitimate interest. Test:</p> <ol style="list-style-type: none"> <li>1. Legitimate interest – Safeguarding</li> <li>2. Processing necessary – see next column</li> <li>3. Balance – we only ask for the information that is necessary</li> </ol> <p>Consent is required for the processing (sharing) of dates of birth. Consent is also obtained for the use of contact details to keep members informed of other church events, and for photographs.</p>	We need to hold this information on record to help ensure that the child is properly cared for, and to meet URC requirements regarding safeguarding. It is also to inform families in the event that a Little Fishes session has to be cancelled.
Finance data	The Treasurer holds data concerning individual donations (name and amount donated), lettings donations (name and amount paid) and supplier contact details/invoice data. These are collected via online banking access.	Electronic accounting records are maintained by the Treasurer on home PC. Subsets of data are shared with the Church Secretary, Assistant Treasurer and Gift Aid Secretary.	As per standard accounting practices	6 years from the end of the financial year in which the transaction took place.	No	N/a	<p>Legitimate interest Test:</p> <ol style="list-style-type: none"> <li>1. Legitimate interest – Accountancy</li> <li>2. Processing necessary – see next column</li> <li>3. Balance – we only ask for the information that is necessary</li> </ol>	To comply with standard accounting practices



Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Free Will Offering data	Names and addresses of people using FWO envelopes. Provided by people when they join the FWO scheme.	Stored electronically and in paper form, by Assistant Treasurer. It is shared with the Gift Aid Secretary and the Treasurer.	New list is produced annually.	7 years	No	N/a	Legitimate interest Test: 1. Legitimate interest – Accounting practices and Gift Aid 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	The information is used to provide numbered envelopes for weekly offerings and to cross reference with the Gift Aid Coordinator and Treasurer for accountancy and Gift Aid purposes.
Gift Aid	Donors names, addresses and amounts donated. This data is collected from the Free Will Offering records and church bank statements/paying in slips. Copies of claims to HMRC are also retained.	Stored electronically and in paper form, by the Gift Aid secretary.	Any amendments are recorded as they occur, and the most up to date data is used from the FWO scheme.	7 years	No	N/a	Legitimate interest Test: 1. Legitimate interest – Gift Aid 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	The information is necessary to enable the church to claim Gift Aid.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
DBS	CRB and DBS records and online record link for church members/volunteers in church roles where this is a requirement. Application identification documents are not retained.	Paper file kept by DBS verifier. Both the DBS verifier and the Church Secretary (who is also a verifier) have access to the online link for Due Diligence Checking Ltd which is password protected	New checks carried out every 5 years.	Indefinitely	No	N/a	Legitimate interest Test: 1. Legitimate interest – Safeguarding 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary	Records are kept to ensure that DBS checks are carried out and renewed appropriate intervals in accordance with Safeguarding Policy
Email addresses (and other contact details) for ordinary church business purposes	Ad-hoc retention of email addresses (and other contact details) amongst members for the purposes of church business, including rotas, church meetings and organisation of events.	Stored by church members in email address books/email records. These are shared with other members of the same rota/committee to facilitate communication where necessary.	Details are changed when advised by members.	Indefinitely unless otherwise advised	No	N/a	Legitimate interest 1. Legitimate interest – Ordinary church business 2. Processing necessary – see next column 3. Balance – we only ask for the information that is necessary and information is obtained direct from the individuals concerned  Where personal contact details are to be shared outside of the church membership (e.g. inclusion in Contact Magazine/on website), consent is required.	Contact details are shared informally between members to facilitate the ordinary business of the church – arranging rotas, meetings etc.

Data set	What is collected and how	How it is stored/who is it shared with	How it is kept up to date	Retention period	Is this Special Category Data (yes/no)	If Special Category Data, condition for processing	Legal basis	Reasons why processing is necessary
Minute books	Minutes of church meetings and committees inevitably include reference to individual church member	Data is stored on the Church Secretary's personal computer, with hard copies stored in her home.	N/a	Indefinitely	Yes	Legitimate activities	Legitimate interest 1. Legitimate interest – Ordinary business of the church 2. Processing necessary – see next column 3. Balance – we only record the information that is necessary	To facilitate church business and retain a record of decision making and church governance.
Photographs and video	Collected on church camera	Kept in church, shared only with permission via contact magazine, church website and church social media pages.	N/a	24 months, although some images are kept as a permanent record	For activities that infer a Christian faith, Yes  For social functions and non-religious events/activities, No	Consent (where applicable)	The church is a 'public place' but consent is needed to take photographs of activities where people would have a reasonable expectation of privacy or where the activity infers a Christian faith and is to be shared outside church membership	As a record of church events
Baptism record	Parents names, occupations, places of birth and contact details are collected via emails and on proforma.	Data is collected by the Minister and forwarded to the Church Secretary, who uses it to complete the Baptism Register, which is kept in the Church office.	N/a	Indefinitely	Yes	Legitimate activities	Legitimate interest 1. Legitimate interest – To facilitate baptisms and produce baptism certificate 2. Processing necessary – see next column 3. Balance – we only record the information that is necessary	To produce baptism certificate