



Checklist

Data Protection Annual Checklist

and Guidance

Checklist summarising the specific practical steps Managing Trustees must take in order to reaffirm their ongoing duties and liabilities under the Data Protection Act 2018 and the General Data Protection Regulations (GDPR).

 **Updated 28 Feb 2022**

It is now nearly four years since the General Data Protection Regulations (GDPR) came into force on the 25th May 2018 along with the Data Protection Act 2018 which effectively implemented GDPR in the UK.

As the onus of responsibility shifts from implementation to accountability the checklist below summarises the practical steps that all Local Churches, Circuits and Districts must take to ensure their data protection practices are robust. The Checklist should be completed by those responsible for keeping information relating to other people safe.

Your District Data Champions will ensure that all Local Churches, Circuits and the District complete the checklist and hold a signed and dated copy of it by the end of May each year. The District will keep a record of who has completed the checklist and provide a copy of the Data Protection Checklist Annual Return to TMCP. TMCP will be in touch with the Districts and the District Data Champions separately in due course.

Whether the personal information (data) of individuals belongs to Church members, their families, employees or third parties who use church premises it is in the interests of all to ensure that the information is looked after carefully and kept safe. Carrying out the new seven checks of the checklist will assist those that handle personal data to do that. Please note this is not a completely definitive list and there may be other issues that Districts need to consider.

Please read this checklist together with the suite of data protection guidance and policies already available on the [Data Protection page](#) on TMCP's website which will help you understand how to practically comply with the requirements of data protection legislation.

There is also a shortened Word version of the Checklist which can be downloaded [here](#). This should however be read in conjunction with the more detailed Checklist below.

Step 1 - Where to begin?

Before starting to complete the checklist please take this opportunity to review the personal information that your Managing Trustee body i.e. the Local Church, Circuit or District holds. You can only carry out checks 2 to 7 if you first understand what personal information you have and what you do with it. Reviewing the information you hold is called "data mapping" and is effectively an inventory of the information you hold about individuals. Please refer to the guidance and resources accompanying Check 1 to help you. If you carried out this exercise in 2018 and/or when you completed the first Annual Checklist last year, you just need to double check that your records are up to date. For example, do you hold less information than last year due to a dance class no longer using your premises or more data due to a new messy church group starting?

Check 1 – Data Mapping: Have you reviewed the personal information the Local Church, Circuit or District holds (known as “Data Mapping”)?

Carrying out a review of the information you hold about individuals is one of the most important aspects of data protection; knowing what you hold and who is holding it.

The type of personal data and how it is used may change over a period of time. Refer to [Step 2](#) of the **9 Steps for Methodist Managing Trustees to Take Now to Comply with GDPR** to ensure that a correct record (Data Mapping Form of the information processed about individuals is available. Update your Data Mapping Form as necessary.

To assist those that handle personal data, use the [Template Data Mapping Form for Managing Trustees](#) and the [Non-Exhaustive List of Examples](#).

Step 2

Now that you know what information you hold you are ready to complete checks 2 to 7 inclusive.

Check 2 – Data Cleansing: Have you destroyed any privacy information that is no longer required?

During the Data Mapping exercise under Check 1 you will have identified all the personal data that is held and used about individuals connected with your Local Church, Circuit or District.

Under the [Principles of the GDPR](#) you are required to ensure that the information that is processed about individuals is used for the purposes in which it was collected and is kept relevant and up to date.

Where information about individuals is identified as not being required anymore, perhaps because a person is no longer a member of a Local Church, then as much information about that person should be permanently deleted as soon as possible, such as removing them from the members list or the Church Directory.

Check 3 – Managing Trustees’ Privacy Notice: Have you read the current “Managing Trustees’ Privacy Notice” and are you displaying the most up to date version?

The [Managing Trustees’ Privacy Notice](#) available on the TMCP website was last updated on the 28th February 2022 with updated details of the Connexional Team contact. Please ensure that you are displaying this version on the Local Church notice Board or that you have a link on your website to the most up to date version of the privacy notice. Is this version easily available to members of the Local Church and adherents etc?

Check 4 – Accuracy: Is all the contact information you hold still correct?

Principle 4 of GDPR states that the information you are holding about individuals must be relevant, accurate and up to date. TMCP has devised a [Data Collection Form](#) to help you fulfil these requirements.

The [Data Collection Form](#) is designed to enable individuals to ensure that the personal information held about them is correct and also advises Managing Trustees how those individuals wish to be contacted by allowing them to indicate their contact preferences.

Go to the [Data Collection Form](#) and the '[Update to the Managing Trustees' Consent Form and New Data Collection Form](#)' News Hub Article for more information on how and when the [Data Collection Form](#) should be used.

Check 5 – Consents: Do you have all the consents in place that you need and are these up to date?

Where consent is being relied upon as the lawful basis for using an individual's personal information, you need to be aware that consent lasts for no more than two years. You will only need to renew your consents if they are over two years **and** you need to rely on consent as your lawful basis.

The [Data Consent Form](#) has been updated to include specific scenarios where consent is likely to be required. Go to [Data Consent Form](#) for more information on how and when the [Data Consent Form](#) should be used.

The lawful bases are also included in the Annex to the [Managing Trustees Privacy Notice](#) for further information.

Check 6 – Records: Is the Church body's 'Processor Record' up to date?

[Article 30\(2\) of GDPR](#) includes a requirement for processors (those within the Church who handle personal information), to keep records about the personal information that is processed (dealt with).

You should have by now completed the [Template Processor Record for Managing Trustees](#), with the assistance of the worked example, to provide a central record of the different data protection documents and records that is used by the church. If you have not done this already please ensure it is in place without delay.

Check that all the details you have entered on your Processor Record are still correct including your local contact and storage locations of the different data protection records referred to.

Completion of the Processor Record is also required in order to comply with the "accountability" principle in [Article 5\(2\)](#) of GDPR.

☐ Check 7 – Security: Is all the personal information you hold secure?

Data Security needs to be ongoing and regularly reviewed. Managing Trustees must ask themselves if the information which they hold about individuals is held as safe and secure as possible.

People who handle personal data must familiarise themselves with the [Data Security Policy](#) and ensure that the following minimum measures are undertaken:

- Ensure all software updates are installed as soon as it becomes available;
- Ensure all Malware and Antivirus software is updated are installed as soon as available; Ensure all electronic devices are password protected and / or encrypted at all times;
- Ensure a 'clean desk' policy is in place where all papers files are locked away when not in use;
- Ensure that work emails are kept separate from their own personal emails and accounts. The use of personal email accounts, especially those which are shared with other people, should be actively discouraged.

Poor data security is one of the main causes of data breaches which could be very costly to the Methodist Church from a financial perspective and a reputational one.

Once you have completed all the checks on the Checklist, this must be signed, dated and returned to the District Data Champion, or the District Office if your District does not have a DDC.

Signed:

Dated:

Follow up actions

A – Use the guidance available

Make sure those handling people's information are aware of their data protection responsibilities.

Over time, different people are appointed to positions within the Church who handle personal data about individuals. It is also the case that people need to be provided with reminders and refresher training on the requirements of Data Protection legislation.

Ensure that people consider and regularly refer to the following resources to help Managing Trustees with their ongoing training and encourage them to sign up to the TMCP Newshub so that they can be alerted to any updates as soon as they become available:

- [Data Responsibilities in a Nutshell](#) – this is a good place to start if you are new to data protection;
- [Data Protection Toolkit](#);
- [9 Steps for Managing Trustees to take now](#);
- [GDPR Do's & Don'ts](#);
- Review the Data Protection Policies and ensure you understand the GDPR Principles;
- Watch the [Data Protection Training webinar](#) on the TMCP website;
- Access and watch additional training material as and when it becomes available.

B - Know who your District Data Champion is and go to them for help

For Local Churches and Circuits that have a District Data Champion, they are a crucial point of contact for Managing Trustees wanting to discuss routine data protection matters. They have received additional data protection training,

which is ongoing, and are equipped to assist Managing Trustees navigate the requirements of data protection legislation.

Please find out who your Data Champion is and contact them if you have any data protection questions.

For the Districts which have not yet appointed a DDC, we kindly ask that this is made a priority over the New Year. There are still 11 Districts who have not yet appointed a DDC and to ensure that, as a Church, we have complied with the legal responsibilities upon us, demonstrate commitment to the data protection responsibilities and be seen as a Church which cares about their members and associates, we strongly urge those Districts to take action to make such an appointment.

C - Let us know if you have any training needs and make use of the resources available on TMCP's website to help you

Ongoing training is a requirement of the GDPR and Managing Trustees must be able to demonstrate this in order to comply with the Accountability Principle. Keep a record of who has accessed what training and when. A sample [Training Record](#) is now available for Managing Trustees here.

As Managing Trustees work through the various training resources on TMCP's website and put this into practice, it will become apparent where additional training needs are required. These will become especially apparent if, and when, a data breach is experienced.

Please [contact TMCP](#) if there are any specific training requirements Managing Trustees would like to see featured in the next round of data protection training.

Additional material to help Managing Trustees to take these steps will continue to appear on TMCP's website. Sign up to receive the [News Hub](#) alerts to keep a pace with what is available. Alternatively, please do not hesitate to [contact TMCP](#) if you have any general data protection queries and the [Conference Office](#) for enquiries relating to safeguarding and complaints and discipline issues.

© 2022 TMCP
Registered Charity No. 1136358
A body corporate established by
the Methodist Church Act 1939

Trustees For Methodist Church Purposes
Central Buildings, Oldham Street, Manchester, M1 1JQ

[Privacy Notice](#) [Cookie Policy](#)

Telephone:
Fax: