



Data Retention Policy

Walsgrave Baptist Church (WBC) holds and processes personal data about living individuals for the purpose of general church administration and communication.

As a church we are committed to complying with the current General Data Protection Regulation. Being committed to complying with the original eight principles of the 1998 Data Protection Act, this policy focusses on the fifth principle, which states:

"Personal data must not be kept for any longer than is necessary".

1. Church Services
 - a. Marriage Registers will be retained in the locked church safe permanently.
 - b. Correspondence regarding marriages, funerals, dedications and baptisms will be stored in the church office and destroyed within one year of the event date.
 - c. Track and Trace data will be stored in the church office and destroyed after 21 days.
2. Church Buildings and Property
 - a. Documents concerning the tenancy of the Manse will be kept in a locked church filing cabinet until two years after the tenant(s) leave(s) and then will be destroyed. Financial documents regarding the Manse tenancy will be stored with the finance files and destroyed after seven years.
 - b. Contract details concerning building works will be retained either for seven years with the financial documents, or archived if relating to important changes made to the structure and fabric of the church building, which may have historical significance.
 - c. Communications and documents regarding hiring of the church rooms will be processed and stored in the church office. Requests that have been denied will be erased within two weeks of the final communication. One-off booking information will be destroyed within one month of the booking date. Regular booking information will be destroyed within one year of the final booking date. Copies of invoices and other financial information regarding bookings will be stored with the finance files and destroyed after seven years.
3. Finance and Employment
 - a. Records that could be audited for financial reasons, including Gift Aid information will be retained for seven years, defined by HMRC as "6 years after the last entry in a record followed by first review and/or destruction to be carried out in the additional current (+1) accounting year." See www.gov.uk for more information.
 - b. Records of employees no longer in post, apart from financial records, may be kept up to two years after the final date of employment.
4. Safeguarding
 - a. Documents that come under the category of Safeguarding, such as children's registration forms, group registers, DBS details, incident reports and so on may be retained up to 75 years. We will take advice from official Safeguarding sources on this matter as guidelines are developed and updated. Currently

<http://www.gloucester.anglican.org/2018/gdpr-faqs/#1> provides some useful guidelines. All such documents will be kept securely locked away by designated individuals, as laid out in our Safeguarding policies and procedures.

5. General Administration

- a. Minutes of church meetings will be stored in the church office for up to two years and then archived and retained permanently in the church archives. Members must note that meeting minutes distributed via email or as paper copies are considered to be confidential and should not be shared outside the church membership; should be stored securely; and should be disposed of securely.
- b. The church Members and Friends Database will be accessible by the church Pastors, Trustees, Office Administrator and the person given responsibility by the Trustees. This will be updated regularly and people who have not been attending, have moved away or we have not had contact with for six months will be removed, unless the individual was at one time a church member, and then all of their contact details will be removed after this period, but their name will be retained for church records.
- c. For those who have consented to their contact details being shared, their data will be made available on request to church members in the form of a printed church directory. Members must note that this is a sensitive document, which should be stored securely and routinely destroyed securely on the issue of a newer version.
- d. Contact Cards for visitors will be stored in a locked box until accessed by the Administrator to be copied to the church Members and Friends Database. The card will then be shredded the same day, or kept locked away for up to two weeks if the information on the card is difficult to read. This will give us time to ensure we have the details correct.
- e. GDPR Consent forms will be retained until the individual's consent has changed – where the form will be replaced with a new one – or consent has been withdrawn – where the form will be destroyed, along with the corresponding details we have for that individual. For those no longer in regular attendance at WBC, the same rules apply as in (3b) above.
- f. The list of church group leaders and their contact details will be updated as changes in leadership are made.
- g. Group leaders are responsible for ensuring their group contact lists are kept securely and updated regularly; erasing names and contact details if members withdraw consent, or have left the group up to a maximum of 6 months previously.
- h. Email, post, SMS and telephone enquiries will be processed as quickly as possible and corresponding data will be erased up to a maximum of one month after the date of the final correspondence. The same applies for email addresses auto-saved by Gmail when an enquiry is made.
- i. Photographs of individuals may be retained in printed form in the church archives permanently. Digital copies of photographs may be retained on the church computer until permission is withdrawn for retaining that data. Photographs in use on our website, social media sites, or in printed literature will be withdrawn from those platforms as soon as practically possible if permission is withdrawn for their use.
- j. A list of key-holders will be retained in the church office and updated each time a key is issued or withdrawn.