



## Checklist

# Data Protection Annual Checklist

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 19 Mar 2021

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**This Data Protection Annual Checklist was last updated on 5th March 2021 to include space to insert the name of the Local Church and Circuit at the foot of the form**

It is now some 30 months 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.

In the run up to GDPR, Local Churches, Circuits and Districts worked tirelessly with TMCP and the Connexional Team in order to meet the requirements and whilst the last 7 or 8 months have been tricky given the situation with COVID-19, data protection requirements still need to be complied with.

As GDPR has been in force for some time now, and with our local Churches closed for many activities under National and local lockdown restrictions, Managing Trustees may be able to give time to reviewing their data protection practices and procedures.

The checklist drafted by TMCP and found below summarises the practical steps that all Local Churches, Circuits and Districts must take to ensure their data protection practices are robust. District Data Champions should ensure that all Local Churches, Circuits and the District complete the checklist and hold a signed and dated copy of it. The District will need to keep a register of who has completed the checklist and provide a copy to TMCP each year in May, to coincide with the anniversary of GDPR.

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 11 checks in the checklist will assist Managing Trustees 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 Managing Trustees understand how to practically comply with the requirements of data protection legislation.

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## Check 1 – Review the personal information the Local Church, Circuit or District holds (known as “Data Mapping”)

There is a need to recognise that the type of personal data and the use of it by Managing Trustees 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 of the information processed about individuals is available. Update your Data Mapping record as necessary.

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

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## Check 2 – Conduct a “Data Cleansing” exercise to destroy any information that is no longer required

During the Data Mapping exercise under Check 1 Managing Trustees will have identified all the personal data they hold and use about individuals connected with their Local Church, Circuit or District.

Under the [Principles of the GDPR](#) Managing Trustees are required to ensure that the information they process 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 possible, such as removing them from the members list or the Church Directory.

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## Check 3 – Review the Managing Trustees’ Privacy Notice

Managing Trustees should note that the [Managing Trustees’ Privacy Notice](#) available on the TMCP website was last updated on the 3rd August 2020 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?

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## Check 4 – Ensure your contact information is correct

Principle 4 of GDPR requires Managing Trustees to ensure that the information they are holding about individuals is relevant, accurate and up to date. TMCP has devised a new [Data Collection Form](#) to help Managing Trustees 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](#)’ Newshub Article for more information on how and when the Data Collection Form should be used.

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## Check 5 – Review & Renew Consents

Where Managing Trustees have relied on consent as the lawful basis for using an individual's personal information, Managing Trustees need to be aware that consent lasts for no more than two years and now needs to be renewed.

The [Data Consent Form](#) has been updated to include specific scenarios where consent is likely to be required and to include a key code so that recording the consents on the Consents record is easier. Go to [Data Consent Form](#) for more information on how and when the [Data Consent Form](#) should be used.

More information about the changes can be found in the '[Update to the Managing Trustees' Consent Form and New Data Collection Form](#)' Newshub Article.

You should also refer to Step 6 and 7 on the [9 Steps for Methodist Managing Trustees to Take Now to Comply with GDPR](#).

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## Check 6 – Review the “Processor Record” of the Local Church, Circuit or District

[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).

Managing Trustees 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 used by Managing Trustees. 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 the updated Connexional Team contact details (refer to the updated [Template Processor Record for Managing Trustees](#)), 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](#).

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## Check 7 – Review your Data Security.

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.

Managing Trustees 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.

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## Check 8 – Ensure Managing Trustees are aware of their Data Protection Obligations.

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 News Hub](#) so that they can be alerted to any updates as soon as they become available:

- [Data Responsibilities in a Nutshell](#);
- [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.

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](#).

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## Check 9 – Identify Training Needs.

As Managing Trustees work through the various training resources 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.

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## Check 10 – Liaise with your District Data Champions ('DDC').

For Local Churches and Circuits that have a District Data Champion, they are a crucial point of contact for Managing Trustees 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.

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.

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## Check 11 – Sign-Off the Checklist.

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

**Name of Local Church:**

**Circuit name and number:**

**Signed:**

**Dated:**

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*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.*

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