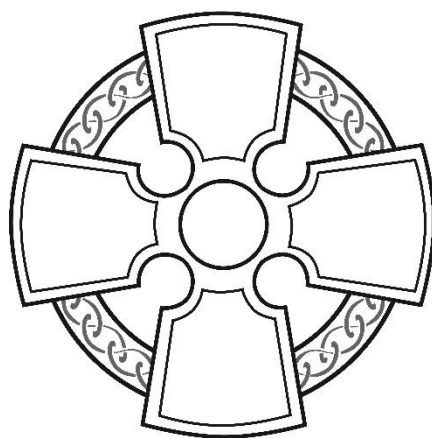


KEEP *or* BIN?

The Care of your Parish, Ministry /Mission Area and Area Deanery Records



**The Church in Wales
2023**

(Updated 2017 and 2023)

Introduction

There are many reasons why your parish now Ministry / Mission Areas (MA's) records are important. Some are open to inspection from outside bodies - for example child protection and safeguarding records and financial records (safeguarding and child protection records should all be with the Provincial safeguarding team) - and have to be maintained properly. Many other documents are important as historical records.

Especially in larger ministry areas the sheer volume of records (whether stored in paper or electronic format) can become overwhelming. If you have too many records then important information can get buried, but if you can't find the information when you need it there is little point in keeping it in the first place. There is also the danger that if records are destroyed before they need to be, then the parish / ministry area might not have the information which is required to deal with problems which arise.

If most of the older parish registers and records have been deposited in an approved repository, most parishes will be responsible only for records in current use. Many of these will be of little or no historical value, but some will be. **The purpose of this booklet is to give guidance to parish / ministry area officers on which records ought to be kept (and for how long) and which may safely be thrown away when they are no longer required for administrative purposes.**

NB: This document is advisory regarding historical records and archiving. It does not supersede the Data Protection/GDPR documents all MAs must produce. This document has been written to work alongside guidance on GDPR issued by the Church in Wales Provincial Office but if a conflict exists between recommendations in this document and the legal paperwork, the legal policies must be adhered to.

In 1995 the Advisory Group of the Church of England Records Centre produced a leaflet on the care and deposit of parish records. A revised edition was published in 2009, and the 2013 and 2017 revisions, adapted to the position in the Church in Wales, were based on that revision, with the enthusiastic approval of the Church of England. A new update has now been prepared to reflect changes, in particular the General Data Protection Regulations and changes to reflect new technology, as well as to ensure that the legal differences between the Church of England and the Church in Wales policies are fully considered.

Parish/MA records in Wales should be deposited, where appropriate, in the local County Record Office (see page 15). All records above parochial level (area deanery, archdeaconry, cathedral, diocese, and province) should be deposited in the National Library of Wales in Aberystwyth. A short section in this booklet (see page 9) gives guidance to area deans or current equivalent on records in their care.

Each diocese has an Adviser on Archives (see page 15), who can give advice and guidance on the care of record material, ancient and modern. Matters relating to records in the Church in Wales in general are dealt with by the Provincial Archives Adviser (see page 15).

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¹ The term "Ministry Area Council" is used within this document to describe the local church trustee body responsible for the management of the hall. These bodies may also be known as the Parochial Church Council, the Local Ministry Area Council, Rectorial Benefice Council, Mission Area Conference, or any other term designated by diocesan policies.

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What to Keep (or not)

CHURCH SERVICES

All registers of baptisms, marriages, and burials need to be kept permanently. This is also true for **registers of banns, confirmations, and services**. It is strongly recommended that parishes keep one copy of any orders for **special services** (e.g. inductions, centenary, or similar, commemorations, dedications of gifts, etc.) and any surveys of church attendance. There is **no** need to keep **baptism certificate counterfoils**, or **banns or burial certificates (green forms)** for more than one year. They should then be sent to the Record Office. Registers that have been in use for more than 100 years should be deposited at the Record Office, even if not full; then start a new register.

NB: The retention schedules for items which contain Personal Data, including the lawful basis for retention and the current policy should appear in the relevant MA's data protection Privacy Notices and documentation. Please see Church in Wales GDPR guidance and policies.

CHURCH BUILDINGS AND PROPERTY

The Constitution of the Church in Wales (Chapter IVC, section 15) requires the incumbent and churchwardens of every parish to complete a **log book** and **terrier** relating to each church and every other building in the parish used for public worship and belonging to the Church in Wales, and also an **inventory** of the contents of each church and every other building in the parish used for public worship, as defined above. Alterations, additions, and repairs to the building(s), and other events affecting the church or the articles or land belonging to it should be noted in the inventory and recorded in the online faculty system.

Previous **log books, terriers, and inventories** should be retained, as should paper **faculties**, (the current faculty system is online only) **archdeacon's certificates**, and accompanying **papers or digital documents, photographs, plans and drawings**. **Plans, correspondence, accounts and photographs** relating to major repairs or alterations should also be retained. Many parishes keep, or have kept in the past, a **log book or scrapbook** recording parish events over the years, and these should be retained as very valuable records for historians. (It is strongly recommended that all parishes maintain some similar type of document.)

NB: The retention schedules for items which contain Personal Data, including the lawful basis for retention and the current policy should appear in the relevant MA's data protection Privacy Notices and documentation. Please see Church in Wales GDPR guidance and policies.

PARISH ADMINISTRATION

The core documents are the **minutes** of the Parochial Church Council/Ministry Area Council or equivalent and its committees, if any. Where these are no longer written by hand in bound volumes, it is important that the **signed copies of minutes** are properly kept. Pasting or sticking typed copies in bound volumes is not recommended because of the generally unsafe archival quality of glues and adhesives. Care must be taken too with ring binders because of the metal parts, which may rust. Loose minutes should either be properly bound into volumes or kept in an archival box, in which the pages should be consecutively numbered, and all pages signed.

One archive set, preferably bound, of all **parish magazines** should be kept with the other parish records in the local record office. An archive set of the **weekly notice sheets** should also be kept.

Correspondence relating to routine parish or ministry area administration need **not** be kept, (it is a matter for the ministry area) but **letters** or **reports** relating to major developments in a parish should be retained if they contain important information. Parishes or ministry areas should retain an archive copy of important **circulars** or **questionnaire forms**, and should also retain any **statement** ('parish / ministry or mission area profile') as to the condition, needs and traditions of the parish produced when a parish is vacant, together with any other documents relating to the vacancy and the appointment of a new parish priest. Other important documents which should be kept are **maps** of the parish specially prepared for church purposes, **church electoral rolls**, and **parish audits**. All documents should be dated. A copy should also be kept of all **printed items**, such as **booklets** and **guidebooks** to the church(es).

PARISH FINANCE

Most parishes produce a considerable quantity of financial records, but **not** all of these documents need be kept permanently. The **annual accounts** of all Parochial Church Council (see footnote on page 1 for definition) funds should be kept in perpetuity. Other supporting documents, including **cash books**, **bank statements**, **wages records**, **vouchers**, and **routine correspondence** should be kept for at least seven years. NB they do not need to be in hard copy, the retention period also applies to digital copies. **Planned giving** and **covenant records** should be retained for at least seven years after the end of the covenant. **Gift Aid / Gwadd (Giving with a Direct Debit) records** should be kept for at least seven years following cessation of giving.

PARISH ORGANISATIONS

Where separate organisations in MA's maintain their own records, the general guidance in the above sections should be applied.

PASTORAL CARE

In most parishes the clergy have **records dealing with pastoral matters**, many of which are likely to be highly confidential. (and include Special Category Personal Data) Any such records which are deposited in an approved repository should not be made accessible for at least 70 years after the death of the relevant Cleric.

Authority on these matters relating to Clergy and others can be found in the RB Clergy Personal Files Policy and the policy regarding Pre-Ordination discernment and LLMs, both of which are published at <https://www.churchinwales.org.uk/en/privacy-notice/>

SAFEGUARDING

All safeguarding matters and files should be passed to the Provincial Safeguarding team and under no circumstances kept at Ministry/Misson area level. The Provincial Safeguarding Team will advise as to which records should be kept at MA level. Records of DBS checks and the cycle of renewal are now kept centrally with the Representative Body and not at Ministry/Misson area level.

OTHER RECORDS

There are some records of limited historical value, but of considerable bulk. Examples are **public notices, rota duty lists, offertory accounts** and **preliminary drafts of minutes or accounts**. Samples might be kept, e. g. one month's records in every year or one year's records in every ten years. The Archives Adviser will give guidance. Care should be taken to ensure that such samples do not include any significant sensitive personal information.

It is important to keep a copy of all **printed service books, hymn books, Psalters Bibles**, etc., when they are replaced by new versions. One copy of each should be kept in the vestry.

Photographs, for example of previous incumbents and other photographs and records of parish information, together with digital sets of photographs taken for faculties are all of importance for historians and should be retained or sent to the local record office.

If there is a **parish devotional library**, advice should be taken from the Archives Adviser & the Representative Body if it is decided to dispose of the books. A list of the books should be made and kept with the parish papers.

REDUNDANT CHURCHES

If a church building is to be permanently closed or made redundant, the Archives Adviser must always be consulted for guidance on the preservation of records. Remember that churches and their contents belong to the Representative Body, which must always be consulted before any disposals take place.

ACTION

We suggest that all records must be examined, and the appropriate action be taken in accordance with the Tables below, as soon as possible after the receipt of this updated

Guide. Thereafter it would be useful to repeat the exercise annually on the anniversary of the date of first action.

The essential responsibility is to ensure the permanent safety of all records. It is important to have one person in charge of the records of the parish. The records need to be kept in one place, not in that person's house, but best in a parish office if there is one.

STORAGE / CONSERVATION / PRESERVATION

Paper records will last better if looked after properly. Avoid steel pins for fastening papers together, and cheap brown paper, envelopes or newspapers for wrapping up records. Coloured or recycled paper is not suitable for records which are likely to be retained as permanent archives. Good quality ink should be used in preference to pencil or ballpoint pen. It is especially important to avoid damp storage conditions. Try to avoid the use of post-it notes wherever possible, particularly on material which might eventually be archived, as the adhesive can remain on the paper and cause long-term degradation.

YOUR PARISH RECORDS: A GUIDE TO WHAT YOU SHOULD KEEP

The following table gives suggested minimum periods for keeping each type of parish record less than 100 years old. Consult your Archives Adviser if you are in any doubt.

KEY:

PRESERVE Important material which needs to be kept permanently. It is acceptable to deposit originals in the County Record Office and keep photocopies for parish use. Documents containing Personal data/Special Category Data should not be copied unless necessary, to comply with the GDPR principle of data minimisation.

In all cases where 'Preserve' (meaning keep forever) is recommended, this needs to be referenced and justified in the individual MAs data protection policies.

DESTROY Ephemeral material which can be discarded once its purpose has been served. Do not destroy if there is any possibility that the document might be required as evidence.

REVIEW/SAMPLE Material where a proportion needs to be kept, either by reviewing its value after an agreed period, or by taking a sample.

TYPE OF RECORD	KEEP IN MA's [MINISTRY AREA]	FINAL DECISION
	(Number of years after completion)	

Completion is defined as the time when the whole document ceases to be current (e.g. when work is finished and paid for, when the register/terrier, etc. has been replaced.)

CHURCH SERVICES

1.	Baptism, banns, marriage, burial, and confirmation registers	1	Preserve
2.	Service registers	5	Preserve
3.	Orders of Service	5	Preserve
4.	Baptism certificate counterfoils; banns and burial certificates, applications for baptisms and banns	1	Destroy
5.	Intercession lists	5	Review/sample

CHURCH BUILDINGS AND PROPERTY (see also Legal Documents, p. 9)*Church, furnishing and contents:*

6.	Paper faculties, citations, archdeacon's certificates and accompanying material	5	Preserve
7.	Terrier and inventory, logbook	1	Preserve
8.	Architect's quinquennial reports	5	Preserve
9.	Minutes, accounts, specifications, tenders, contracts, plans, photographs, drawings and other papers relating to major works to the church (especially if a liturgical re-ordering is involved)	5	Preserve
10.	Contracts, tenders, specifications for minor works	6	Preserve
11.	Organ specifications, contracts, papers (visitors may appreciate having details of the specifications on view in the church porch)	5	Preserve

Parsonage house:

12.	Plans, photographs, drawings	5	Preserve
13.	Papers re major works (as in 9)	5	Preserve
14.	Papers re minor works (as in 10)	6	Preserve
15.	Quinquennial reports	5	Preserve

Churchyard:

16.	Plans, registers of graves, paper faculties, citations, etc.(as in 6)	5	Preserve
17.	Agreements concerning maintenance of churchyard graves and memorials	5	Preserve
18.	Papers re major works (as in 9)	5	Preserve
19.	Papers re minor works (as in 10)	6	Preserve

Church hall:

20.	Plans, architect's reports	5	Preserve
21.	Music, dancing, and PRS licences	5	Review/sample
22.	Agreements for use of hall	7	Review/sample
23.	Papers re major works (as in 9)	5	Preserve
24.	Papers re minor works (as in 10)	6	Preserve

PARISH ADMINISTRATION*Incumbent and other clergy:*

25.	Institutions, admissions, licences	6	Review/sample
26.	Correspondence concerning appointments	6 after end of appointment	Review/sample
27.	Grouping and uniting of parishes; creation of Rectorial benefices; joint PCCs / MACs or Church Meetings, and relevant papers and correspondence	5	Preserve
28.	Clergy papers relating to major parish developments; parish audits	5	Preserve
29.	Clergy correspondence and other papers on routine administration	6	Review/sample
30.	Maps of parish boundaries, street lists	5	Preserve
31.	Copies of replies to questionnaires or important Circulars	5	Preserve

Parochial Church Councils, MACs Congregational Meetings, etc.; Churchwardens and other parish officers:

32.	Minutes of Councils and Committees, Parochial Church Council Meetings, Annual and other Vestry Meetings, Congregational Meetings and Church Committees in parishes with more than one church.	5	Preserve
33.	Electoral Rolls	5	Preserve
34.	'Parish Profiles' on vacancy in benefice	5	Preserve
35.	Visitation papers	5	Destroy
36.	Copies of replies to Articles of Enquiry	5	Preserve
37.	Parish Magazines	5	Preserve
38.	Parish histories, scrapbooks, newspaper cuttings, brochures, record of gifts, photographs with appropriate context (names, dates, significance)	5	Preserve

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39.	Sequestration records	7	Review/sample
40.	Visitors' books	6	Preserve*
41.	Routine correspondence	6	Review/sample
42.	Copies of circulars sent by other organisations, non-local material	1	Review/sample

* Visitors books of 80 – 100 years old are likely to include only people who are now deceased on the basis they would probably be at least in their teens or early twenties when they made the entry, which means the data is outside the scope of GDPR in any event as it relates only to the living.

More recent entries would have to be shown to be of historical interest in order to qualify for the research exemption and in either case if they are not to be archived, should be destroyed on the regular retention schedule of the institution concerned, which is likely to be a limit of 20 years or so.

PARISH FINANCE

43.	Annual audited accounts	7	Preserve
44.	Ledgers	7	Preserve
45.	Cash books, bills, vouchers, bank statements, other subsidiary financial records, cheque book stubs (includes digital)	7	Destroy
46.	Planned giving schemes	7	Review/sample
47.	Insurance policies	2 or whilst current	Destroy (40 years, in case of policies in respect of employers' liability)

PARISH ORGANISATIONS

48.	Parish organisations: Mothers' Union, youth clubs, choir, bellringers, etc. Minutes, reports, accounts Membership lists Correspondence and contracts	5 5 6	Preserve Review/sample Review/sample
49.	Choir register	3	Destroy
50.	Music lists	5	Review/sample

SAFEGUARDING, PASTORAL CARE AND HEALTH AND SAFETY

Any retained safeguarding records should be transferred to the Provincial Safeguarding Team for assessment and advice. The records should not be held at MA level.

51.	Accident books	40 years after incident	Destroy
52.	Risk assessment recommendations and management plan following an unclear or blemished DBS disclosure	Retained by Province until subject deceased	
53.	Any sex offender risk assessments and monitoring agreements	Retained by Province until subject deceased	
54.	Records of any children's activities	50 years after activity ceases	Destroy

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55.	Personnel records relating to lay employees not working with children or vulnerable adults	6 years after employment ceases Destroy
56.	Personnel records relating to lay employees having contact with children or vulnerable adults including all documentation concerning any allegations and findings	Records retained by the Provincial Safeguarding Officer
57.	Records relating to radiation	50 years Destroy
58.	Records relating to asbestos	40 years Destroy

LEGAL DOCUMENTS

59.	Deeds, statutory documents, etc.; title deeds, other documents relating to title, acquisition disposal, or rights over a property; statutory notices, orders, etc., including Orders in Council for closure of churchyard; and relevant correspondence	For all documents in this category, consult your Diocesan Registrar Preserve
60.	Charities: deeds, schemes, orders, minutes, accounts, distribution lists, benefactions	Consult Trustees' solicitor Preserve

BOOKS

61.	Bibles, hymn books, Psalters, Prayer Books, service books	Replace with new versions Keep one sample copy
62.	Altar and desk editions of the Bible and Book of Common Prayer	Replace with new versions Keep in parish permanently

AREA DEANERY OR EQUIVALENT RECORDS

(Closed Area Deanery records should be deposited in the National Library of Wales and not in the County Record Office)

1.	Area Deanery Conference minutes and reports	Preserve
2.	Area Deanery annual accounts	Preserve
3.	Area Deanery commissions, minutes and reports	Preserve
4.	Area Deanery Chapter minutes	Preserve

DIGITAL RECORDS

General Advice

Whilst information technology has made parish administration much easier, digital records need to be subject to the same rules of management as traditional paper records, particularly in regard to retention and destruction.

The use of established standard file formats (Word, Excel, PDF etc) will better enable future access. Avoid use of unique or specialist file formats.

The National Library of Wales advises “that it is helpful if documents are in established file formats, and that NLW has permission to copy files for digital preservation purposes and future access.”

If your parish already has digital record keeping or is moving towards it, please consult the county record office as well as the diocesan adviser to ensure that systems are consistent.

It is recommended that parishes seriously consider the long term preservation of digital records which are of permanent historical value. Robust document management systems are commercially available and many of them are ‘cloud-based’, meaning that they run over the internet with files stored on servers held at locations around the world. A full document management system is a gold-plated storage option because almost all available systems provide for the data to be backed up on a routine basis.

Document management systems are expensive and will not be affordable for some parishes. If you are storing records on the hard drives of computers, it is vital that you back up this data. You may wish to consider purchasing an external hard drive as an option for your back-up, which you can plug in to a computer, copy files, remove and then store in a safe place. External hard drives are relatively cheap and, for peace of mind, it is possible to use multiple devices which can be stored in different physical locations.

It is important to remember that all computer devices can be corrupted. Hard drives are vulnerable to damp and physical storage units like CDs and DVDs can become damaged. You can mitigate against these risks by deploying multiple storage devices and regularly upgrading your devices. We recommend replacing devices ever four years at minimum.

Another option is to purchase cloud-based storage. This can be secured for relatively small monthly fees and files can be copied and stored to the cloud. Good options here include Microsoft’s OneDrive and SharePoint applications, available through the Office 365 licensing model.

If you are using physical storage, on external hard drives, disks or tapes, please remember to store these securely in a location physically separate from where the master records were created or stored. This offers a back-up in the event that the original computer system becomes inaccessible. Cloud storage is safest, see above paragraph.

Finally, it is always a good idea to keep a hard copy of all files you hold. Print off records and store these as a paper record.

Document management advice

1. Naming files and folders

All documents (e.g. a report, spreadsheet or PowerPoint presentation) in Microsoft Office are called files and are stored in folders. You should have a well-organised file plan - a documented arrangement of all your folders. You can give names to files and folders and the combination of file and folder name should clearly indicate the subject content. For example:

Minutes - name of the group or committee and meeting date in a recommended format (yyyymm or yyyymmdd), e.g. PCC Minutes 202205.doc or Fabric Committee minutes 20220512.doc, rather than simply May.doc. Having year then month in number format in the file title means any file list on screen will be in a helpful and logical order. Store files in appropriately named folders, e.g. PCC Minutes 2023 or Fabric Committee Minutes 2023.

Reports – name of the report, date and version number if applicable e.g. Fabric Committee Minutes 2021 v1.doc

Filenames – add the filename and filepath to the footer of every document you create once it has been saved, to enable anyone with a paper copy to identify what it is and where the electronic copy can be found.

Folders should carry a readily identifiable name that indicates their purpose. Always try to put documents into global or shared folders and have a clear policy on folder names.

Consider:

Is there a recognised term for the subject? Use this for preference.

Is the term likely to be recognised in the future? Try not to use current buzz words which may have passed out of use in the future when the folders have not.

Try not to use abbreviations unless they are very obvious.

Can a complete newcomer understand the subject from the folder name and find the information quickly using the folder name?

2. Storing files and folders

Within shared drives create individual folders for each activity or function. If there are lots of files in a folder, it can be hard to find specific information. Use additional folders to structure this as a hierarchy – general activities first, then more specific folders and files as you move down the hierarchy. If you already have a paper filing structure that people are familiar with then look at replicating that for your shared folders rather than trying to create something new. Put yourself in the shoes of someone trying to find a document in the future who is not familiar with the files: what folder and file titles will make it easiest for them to find the right document or file?

3. Version control

Where a document goes through a number of changes and earlier copies are kept, it is essential that version control be applied. This can be of two types.

Version 0.1, Version 0.2, etc. – where small changes are being made to an existing document.

Version 2, Version 3 Final – where a major revision is made and a new revised version will replace an earlier version.

Doing this will make it easier to track changes as a document develops. The version information should appear in the file name and on the front page of the document (e.g., Mission Policy Version 3 Final 2021). Consider whether you want to retain or delete earlier versions. If a version represents a significant change in policy, thought or expression from its predecessor, and vice versa, it should be retained.

4. Templates and styles

If you often have to produce the same type of documents it makes sense to have standard templates that new versions can be copied from - this saves time formatting documents and helps consistency. Structuring documents using Word styles also makes it easy to format documents and maintain consistency throughout them, particularly standard ones such as letters, reports, minutes etc.

5. Security and access

The greatest risk to your records is misplacement, loss and unauthorised access. Consequently it is vital that you properly control access to and use of your records. In an office or on shared computers, store documents on shared drives so that they can be readily accessed by colleagues – better one copy in a shared drive than several all in personal drives or folders. Where necessary, access to shared folders can be limited to those who have a need to access the contents. This can be done on a folder by folder basis. Alternatively an individual document can be password protected. However, if you forget the password recovering the contents may be extremely difficult.

In the absence of a computer network, where shared drives are available, a good option is a cloud-system, for example Microsoft. SharePoint provides similar functionality and allows documents to be accessed by multiple people using passwords and encryption.

6. Retention and deletion

Shared folders are like physical filing cabinets – they take up space and cost money. The difference is that you cannot see the space, but you still need to clear them out and weed them in exactly the same way you would a filing cabinet. You need to have a clear policy on what you keep and for how long. For specific guidance about the retention or disposal of records not included in this guide, and in the absence of a diocesan policy, please contact your Diocesan Adviser on Archives (contact details are given on page 15 of this document).

7. Back ups

It is essential to make regular back ups of files on your computer. One way of doing this is to buy an external hard drive - these are now cheap (well under £100), reliable and easy to use. Many broadband and email providers now also offer free or cheap online storage of documents, including back ups. Avoid saving only onto memory sticks or flash drives – it isn't safe or secure! Obviously this will sometimes be unavoidable, so do transfer files to a computer as soon as possible.

8. Emails

When naming an email, always use the subject box to give a proper title to the email that describes what it is about. Limit each email exchange to one clear subject wherever possible – do not reply to a previous email to start a new topic, instead start a new email with its own clear subject heading - it makes it easier to find them later. Parish related e-mails that you need to keep as part of the corporate information of the parish should be treated in the same way as any other electronic or paper record and stored in a way that provides security and access to those who need it.

When saving emails, create a hierarchical structure of folders (as you would with Word and Excel files, etc.) in which to save those messages that need to be retained. The same retention and deletion principles apply to emails as apply to normal electronic records. Regularly delete unwanted messages (such as confirmations of attending a meeting, travel arrangements, etc.) as these can soon clog up your email inbox and make it harder to manage important information.

9. Dates

Always date documents. Do not use the “date” field option as it enters the current date and automatically updates every time the document is opened.

10. Master Copies

The master copy of any digital document or file should be kept by the creator or the main contributor to its creation. If several people hold copies of documents then decide who is the master copy owner – they are responsible for ensuring a complete set of records, e.g., of a series of meetings, so that the parish has a full set and everyone else can dispose of theirs and not have to keep their own duplicate copies. This applies to paper as well as electronic records. For example, the master copy of the PCC Minutes would usually be held by the PCC Secretary.

The General Data Protection Regulations – (GDPR)

The purpose of data protection legislation is to prevent the unauthorised use of personal information and for wrong decisions to be made about people based on inaccurate data. The Data Protection Act 2018 ('the Act') gives individuals the right to know what information is held about them and provides a framework to ensure that personal information is handled properly.

All MA's collect personal information and are subject to the 2018 Act. A statutory requirement is that every organisation that processes personal information must notify the Information Commissioner's Office (ICO), unless it is exempt. Failure to notify is a criminal offence. Notifications have to be renewed annually and this can be done online on payment of a fee of £35. PCCs will be able to claim the exemption from notification for small not for profit organisations in the very unlikely event that they ONLY process data on the following list:

1. Church Membership list (where members provided their own details)
2. Gift Aid information
3. Payroll and Accounting records

NB: Any PCC which operates a CCTV system or keeps Personal Data for Pastoral Care purposes must register with the Regulator and pay the Fee.

Personal data can be said to be 'Any information which identifies a living human person'. This means the Data Subject's details, name, address etc. Their image, say on a CCTV record and more widely any code or reference number from which their identity can be established. NB. It does not apply to the deceased.

Further details are available on the Information Commissioner's website, <http://www.ico.gov.uk/>

The Act is based around Seven Data Protection Principles and all personal data must be managed according to these principles:

The UK GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

The implication of these principles is that organisations should have procedures in place to cover the review of personal information held on files and databases. This means organisations must assess how long they need to keep information for, the purpose for which they are holding it and when it will be destroyed.

Keeping records for historical and research purposes is a legitimate reason for retaining personal data. You should contact your Diocesan Adviser on Archives if you

require any advice on this. The research provisions are complex but the lawful basis of Legitimate Interest and the various exemptions under the Act are useful in this. The ICO has prepared a detailed document regarding research provisions generally which will answer most questions, see <http://www.ico.gov.uk/>. If there are any specific questions about what may or may not be acceptable, please contact dataprotection@churchinwales.org.uk for advice on a case by case basis.

The Act also provides individuals with the right to find out what personal information is held on computer and in most paper records. To do this a person must make what is known as a subject access request in writing. The organisation holding the data must respond as soon as possible and in any event within one month without charging the enquirer. Should an individual or organisation feel they are being denied access to personal information to which they are entitled, or feel their information has not been handled according to the seven principles, they can contact the Information Commissioner's Office for help. Complaints are usually dealt with informally, but if this isn't possible, enforcement action can be taken. Further information can be found on the Information Commissioner's web site.

Whether a PCC or other organisation within the Church is required to pay a registration fee to the ICO or not, they must comply with the other data protection law requirements.

Briefly these requirements are:

1. Appoint a responsible person as Data Manager/Administrator and conduct a Data Audit of the Personal Data under their control within the Organisation.

The key legal point is all data audits must be made bespoke to their organisation and their specific policies created under their audit not copied from another place. A template document to assist with the process has been provided from the RB Data Protection Manager to all dioceses and MA's.

2. Allocate each piece of Personal Data to one of the six 'Lawful Bases':

- i) Consent;

(Consent is usually given by a person when they contact an organisation via the Website or personally when discussing products or advice with the person.)

- ii) Contract;

(This occurs when a person purchases products or services from an organisation.)

- iii) Legal Obligation;

(When the processing is necessary for an organisation to comply with the Law)

- iv) Public Task;

(When the processing is necessary for an organisation to perform a task in the public interest or for an official function and the task or function has a clear basis in Law.)

- v) Vital Interests;

(When the processing is necessary to protect someone's life)

- vi) Legitimate Interests;

(When the processing is necessary for an organisation's 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. N.B. Legitimate Interests can only be used following the application of the prescribed three part Legitimate Interests Assessment Test and then only when a positive outcome is indicated by the conclusions of the test. All Legitimate Interests Assessment Tests will be documented, recorded and retained).

3. Prepare and publish bespoke documents based on the Data Audit covering the actions and policies of the organisation.
4. Conduct Data Processing Impact Assessments (DPIAs) when certain changes are planned.
The ICO has prepared a template – please see <http://www.ico.gov.uk/>
5. Issue Privacy Notices where applicable.
6. If a Website is used, ensure that a Cookie Banner is installed if Cookies are used, compliant Privacy Notices are published on the Website, contact forms and related emails.
7. Train relevant staff and volunteers in Data Protection law relevant to their role.

The independence of the various parts of the Church which are legally distinct entities must be acknowledged but the point of this new template document on GDPR (see reference on page 15) and associated training and support is that it is now available where required for all dioceses and ministry / mission areas.

Further advice and information on these matters is available on request from the Representative Body's Data Protection Officer (DPO) on dataprotection@churchinwales.org.uk

DIOCESAN ADVISERS ON ARCHIVES

- St. Asaph** Dr Elisabeth Parfitt Diocesan Office, High Street, St Asaph LL17ORD
Phone: 0789 6330858 / Email eaparfitt17@gmail.com
- Bangor** Susan Ellis (also Conwy Archives)
Conwy Culture Centre, Conwy County Borough Council, PO Box 1
Conwy LL30 9GN
Phone: 01492 577550 Email: archifau.archives@conwy.gov.uk
- St. Davids** The Revd. Canon Philip Wyn Davies, Brynheulog, Buarth Road,
Aberystwyth SY23 1NB. Phone: 01970 627303. E-mail:
philipwyn@btinternet.com
- Llandaff** Martyn Jones, Llandaff Diocesan Office, The Court, Coychurch,
Bridgend CF35 5HF. Phone: 07494 222688.
Email: martynjones@churchinwales.org.uk
- Monmouth** The Revd. Canon Andrew Willie, 6 Cordell Close, Llanfoist, Abergavenny
NP7 9FE. Phone: 01873 852063. Email: andrewwillie@btinternet.com
- Swansea & Brecon** Andrew Dulley, West Glamorgan Archives, Civic Centre, Oystermouth
Road, Swansea SA1 3SN.
Phone: 01792 636760. Email: andrew.dulley@swansea.gov.uk

THE PROVINCIAL ADVISER ON ARCHIVES

The Rt. Revd. Dr J Wyn Evans, FSA, FRHistS. 12 Ffordd Caerfai. Ty Ddewi / St Davids,
SA62 6QT Phone : 07960420720 Email: jwynevens.evans@gmail.com

The Provincial Office contact for Archives is John Richfield, Governing Body Officer,
4th Floor, 2 Callaghan Square, Cardiff, CF10 5BT
Phone: 029 20 348200 Email: johnrichfield@churchinwales.org.uk

THE COUNTY RECORD OFFICES

(Parish records are kept in Record Offices according to the Area Deanery in which the parish is situated. In certain cases this is not the Record Office of the county in which the parish is situated. The staff of the County Record Office or the Diocesan Adviser will provide details. It is stressed that records deposited in a County Record Office remain the property of the parish.)

Anglesey Archives, Industrial Estate Road, Bryn Cefni Industrial Estate, Llangefni,
Anglesey LL77 7JA. Phone: 01248 751930. Email: archives@anglesey.gov.uk

Carmarthenshire Archive Service, Carmarthen Library, St Peter's Street,
Carmarthen SA31 1LN. Phone: 01267 228232. Email:
archives@carmarthenshire.gov.uk

Ceredigion Archives, Old Town Hall, Queen's Square, Aberystwyth, Ceredigion
SY23 2EB. Phone: 01970 633697. Email: archives@ceredigion.gov.uk

KEEP or BIN?

Conwy Archive Service, Conwy Culture Centre, Town Ditch Road, Conwy LL32 8NY.
Phone: 01492 577550. Email: archifau.archives@conwy.gov.uk

Denbighshire Record Office, 46 Clwyd Street, Ruthin, Denbighshire LL15 1HP.
Phone: 01824 708250. Email: archives@denbighshire.gov.uk

North East Wales Archives, The Old Rectory, Rectory Lane, Hawarden, Flintshire CH5 3NR. Phone: 01244 532364. Email: archives@flintshire.gov.uk
Also The old Goal 46 Clwyd Street Ruthin LL15 5HP

Gwynedd Archives Service, Caernarfon Record Office, Victoria Dock, Caernarfon, Gwynedd. (Correspondence to County Record Office, County Offices, Shirehall Street, Caernarfon, Gwynedd LL55 1SH) Phone: 01286 679091.
Email: archives-caernarfon@gwynedd.gov.uk

Gwynedd Archives Service Meirionnydd Archives, Ffordd y Bala, Dolgellau, Gwynedd LL40 2YF. Phone: 01341 424682. Email: archives.dolgellau@gwynedd.gov.uk

Glamorgan Archives, Clos Parc Morgannwg, Leckwith, Cardiff CF11 8AW. Phone: 029 2087 2200. Email: GlamRO@cardiff.gov.uk

Gwent Archives, General Offices, Steelworks Road, Ebbw Vale, Blaenau Gwent NP23 6HA. Phone: 01495 766261. Email: enquiries@gwentarchives.gov.uk

Powys Archives, Unit 29 Ddole Road Enterprise Park, Llandrindod Wells, Powys LD1 6DF. Phone: 01597 826088. Email: archives@powys.gov.uk

Pembrokeshire Archives and Local Studies, Prendergast, Haverfordwest, Pembrokeshire SA61 2PE. Phone: 01437 775456. Email: record.office@pembrokeshire.gov.uk

Wrexham Archives, Wrexham County Borough Museum and Archives, Regent Street, Wrexham LL11 1RB. Phone: 01978 297460. Email: archives@wrexham.gov.uk

West Glamorgan Archive Service, Civic Centre, Oystermouth Road, Swansea SA1 3SN. Phone: 01792 636589. Email: westglam.archives@swansea.gov.uk

THE NATIONAL LIBRARY OF WALES

Lorena Troughton, Archives, Manuscripts and Contemporary Records, The National Library of Wales, Aberystwyth, Ceredigion SY23 3BU
Phone: 01970 632574. Email: lorena.troughton@llgc.org.uk

