



UPDATED DATA PROTECTION POLICY

General Data Protection Regulations (GDPR)

Lodge Farm Church, Caerleon

April 2023

This document supersedes the Data Protection Policy adopted by the Church in June 2018. This update takes into account the change in legislation following the UK leaving the EU and has been revised as part of a GDPR review of activities and procedures. As a result, new data protection procedures and forms have been produced for use by the church in fulfilling their GDPR requirements and will be retained and made available as a policy of the Church accordingly. This update has been considered by the Trustees and Leadership of Lodge Farm Church and was brought into use following minuted decisions on 2nd and 7th March 2023.

Lodge Farm Church is committed to protecting all information that we handle about our members, visitors, people we support and work with, and to respecting people’s rights around how their information is handled. This policy explains our responsibilities and how we will meet them.

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Section A – What This Policy Is For

1. Policy Statement

1.1 **Lodge Farm Church** is committed to protecting personal data and respecting the rights of our **data subjects**; the people whose **personal data** we collect and use. We value the personal information entrusted to us and we respect that trust, by complying with all relevant laws, and seeking to adopt best practice.

We process personal data to help us:

- a) maintain our list of church members (and regular attenders);
- b) provide pastoral support for members and others connected with our church;
- c) provide services to the community (e.g. Babies and Toddler Group);
- d) safeguard children, young people and adults at risk;
- e) recruit, support and manage staff and volunteers;
- f) maintain our accounts and records;
- g) promote our activities and services;
- h) maintain the security of property and premises;
- i) respond effectively to enquirers and handle any complaints.

1.2 As such, Lodge Farm Church is a Data Controller within the meaning set out in the General Data Protection Regulations (see Appendix 1 for definition of terms). This updated policy has been approved by the church's Trustees who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we obtain, store or use personal data.

2. Why This Policy Is Important

2.1 The General Data Protection Regulations provide for the fundamental rights of individuals to have their personal information protected and applies to any information concerning an identified natural person. As a church, we are committed to preventing personal data from being misused, getting into the wrong hands as a result of poor security or being shared carelessly, or being inaccurate, as we are aware that people can be upset or harmed if any of these things happen.

2.2 This policy sets out the measures we are committed to taking as an organisation and, what each of us will do to ensure we comply with the relevant legislation.

2.3 In particular, in accordance with the principles of data protection, we will make sure that all personal data is:

- a) processed **lawfully, fairly and in a transparent manner**;
- b) processed for **specified, explicit and legitimate purposes** and not in a manner that is incompatible with those purposes;
- c) **adequate, relevant and limited to what is necessary** for the purposes for which it is being processed;

- d) **accurate** and, where necessary, up to date;
- e) **not kept longer than necessary** for the purposes for which it is being processed;
- f) processed in a **secure** manner, by using appropriate technical and organisational means.

3. How This Policy Applies To You & What You Need To Know

- 3.1 **As an employee, trustee, member or volunteer** processing personal information on behalf of the church, you are required to comply with this policy. If you think that you have accidentally breached the policy, it is important that you contact our Data Protection Representatives immediately so that we can take swift action to try and limit the impact of the breach.

Anyone who breaches the Data Protection Policy may be subject to disciplinary action, and where that individual has breached the policy intentionally, recklessly, or for personal benefit they may also be liable to prosecution or to regulatory action.

- 3.2 **As a church member leading / involved in a particular initiative / ministry:** You are required to make sure that any procedures that involve personal data, that you are responsible for in your area, follow the rules set out in this Data Protection Policy.
- 3.3 **As a data subject of Lodge Farm Church:** We will handle your personal information in line with this policy.
- 3.4 Any organisations or companies who are appointed by us as a data processor are required to comply with this policy under the contract with us. Any breach of the policy will be taken seriously and could lead to us taking contract enforcement action against the company, or terminating the contract. Data processors have direct obligations under the GDPR, primarily to only process data on instructions from the controller (us) and to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk involved.
- 3.5 **Our Data Protection Representatives** are responsible for advising **Lodge Farm Church** and its staff and members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to them at info@lodgefarmchurch.org.uk.
- 3.6 Before you collect or handle any personal data as part of your work (paid or otherwise) for **Lodge Farm Church**, it is important that you take the time to read this policy carefully and understand what is required of you, as well as the organisation's responsibilities when we process data.
- 3.7 Our procedures will be in line with the requirements of this policy, but if you are unsure about whether anything you plan to do, or are currently doing, might breach this policy you must first speak to the Data Protection Representatives.

4. Training and Guidance

- 4.1 We will provide general training annually for all members of Lodge Farm Church who are required to implement this policy in the carrying out of their services to the church and wider community. This will ensure awareness of the church's obligations and our individual responsibilities, as well as to outline the law.
- 4.2 We may also issue new or revised procedures, guidance and / or instructions from time to time. The Data Protection Representatives will ensure that the implications of any such new or revised documents are communicated to those to whom they will apply.

Section B – Our Data Protection Responsibilities

5. What Personal Information Do We Process?

- 5.1 In the course of our activities, we may collect and process information (personal data) about many different people (data subjects). This includes data we receive straight from the person it is about, for example, where they complete forms or contact us. We may also receive information about data subjects from other sources including, for example, previous employers. The personal data should be adequate, relevant and limited to what is necessary for the purposes for which it is processed.
- 5.2 We process personal data in both electronic and paper form and all this data is protected under data protection law. The personal data we process can include information such as names and contact details, education or employment details and visual images of people.
- 5.3 In some cases, we process types of information that are called “**special categories**” of data in the GDPR. This personal data can only be processed under strict conditions.

‘Special categories’ of data (as referred to in the GDPR) or ‘sensitive processing’ includes information about a person’s: racial or ethnic origin; political opinions; religious or similar (e.g. philosophical) beliefs; trade union membership; health (including physical and mental health, and the provision of health care services); genetic data; biometric data; sexual life and sexual orientation.

- 5.4 In such circumstances, the relevant section of the Lodge Farm Church Privacy Notice and relevant accompanying procedures set out further details of how we will ensure compliance with the data principles set out above.
- 5.5 We will not hold information relating to criminal proceedings or offences or allegations of offences unless there is a clear lawful basis to process this data such as where it fulfils one of the substantial public interest conditions in relation to the safeguarding of children and of individuals at risk or one of the additional conditions relating to criminal convictions set out in either Part 2 or Part 3 of Schedule 1 of the Data Protection Act 2018. This processing will only ever be carried out on the advice of the Trustees.

- 5.6 Other data may also be considered ‘sensitive’ such as bank details, but will not be subject to the same legal protection as the types of data listed above.

Children and Vulnerable Adults

- 5.6 Children (below the age of 16) require additional safeguards in terms of data processing as they may be less aware of the risks and consequences relating to the use of their personal data. We will ensure that a parent or guardian gives explicit consent to any data collection and processing in such circumstances. These procedures will also apply where we are aware that such safeguards would be appropriate for vulnerable adults within our membership and that we serve in our community.

6. Making Sure Processing Is Fair And Lawful

- 6.1 Processing of personal data will only be fair and lawful when the purpose for the processing meets a legal basis, as listed below, and when the processing is transparent. This means we will provide people with a clear explanation of how and why we process their personal data at the point we collect data from them, as well as when we collect data about them from other sources. Such explanation will be in an easily accessible form, easy to understand, in plain language and concise, particularly in the case of any information addressed to a child.

How can we legally use personal data?

- 6.2 Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the GDPR, is met:
- a) the data subject has **given consent** to the processing of his or her personal data for one or more specific purposes;
 - b) processing is **necessary for a contract** with the data subject;
 - c) the processing is **necessary for us to comply with a legal obligation**;
 - d) the processing is necessary to protect someone’s life (this is called “**vital interests**”);
 - e) the processing is necessary for us to perform a task in the **public interest**, and the task has a clear basis in law;
 - f) the processing is **necessary for legitimate interests** pursued by Lodge Farm Church or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject.

How can we legally use ‘special categories’ of data?

- 6.3 Processing of ‘special categories’ of personal data is only lawful when, in addition to the conditions above, one of the extra conditions, as listed in Article 9 of the GDPR, is met. These conditions include where:
- a) the data subject has given **explicit consent** to the processing of personal data for one or more specified purposes;

- b) the processing is necessary for **carrying out our obligations under employment and social security and social protection law**;
- c) the processing is necessary for **safeguarding the vital interests** (in emergency, life or death situations) **of an individual** and the data subject is incapable of giving consent;
- d) the processing is carried out in the **course of our legitimate activities** and only relates to our members or persons we are in regular contact with in connection with our purposes;
- e) the processing is necessary for **pursuing legal claims**.

6.4 Before deciding which condition should be relied upon, we may refer to the original text of the GDPR as well as any relevant guidance, and seek legal advice as required.

What must we tell individuals before we use their data?

6.5 If personal data is collected directly from the individual, we will inform them about; our identity/contact details (and those of the Data Protection Representative), the reasons for processing, and the legal basis, [including explaining any automated decision making or profiling], explaining our legitimate interests, and explaining, where relevant, the consequences of not providing data needed for a contract or statutory requirement; who we will share the data with; if we plan to send the data outside of the UK; how long the data will be stored and the data subjects' rights including the right to withdraw consent and / or lodge a complaint.

This information is commonly referred to as a 'Privacy Notice'.

This information will be given at the time when the personal data is collected and, along with this policy, is freely available via the church's webpages.

6.6 If data is collected from another source, rather than directly from the data subject, we will provide the data subject with the information described in section 6.5 as well as: the categories of the data concerned; and the source of the data.

This information will be provided to the individual in writing and no later than within **1 month** after we receive the data, unless a legal exemption under the GDPR applies. If we use the data to communicate with the data subject, we will at the latest give them this information at the time of the first communication.

6.7 If we plan to pass the data onto someone else outside of Lodge Farm Church, we will give the data subject this information before we pass on the data.

Covid 19, Monitoring Epidemics and Humanitarian Emergencies

6.8 The processing of personal data is considered lawful in circumstances where it is necessary to protect the life of the data subject or another natural person, for example in monitoring epidemics such as Covid -19.

7. When We Need Consent To Process Data

- 7.1 Where none of the other legal conditions apply to the processing, and we are required to get consent from the data subject, we will clearly set out what we are asking consent for, including why we are collecting the data and how we plan to use it. Consent will be specific to each process we are requesting consent for and we will only ask for consent when the data subject has a real choice whether or not to provide us with their data. Consent will be requested by the completion of a clear affirmative act e.g. ticking a box in response to a clearly written statement including the identity of the Data Controller (Lodge Farm Church) and the purposes for which data is requested. Silence, pre-ticked boxes or inactivity will not constitute consent having been given. We will retain clear records of consent having been given as appropriate.
- 7.2 Consent can be withdrawn at any time and if withdrawn, the processing will stop. Data subjects will be informed of their right to withdraw consent and it will be as easy to withdraw consent as it is to give consent.

8. Processing For Specified Purposes

- 8.1 We will only process personal data for the specific purposes explained in our privacy notices (as described above in section 6.5.) or for other purposes specifically permitted by law. We will explain those other purposes to data subjects in the way described in section 6, unless there are lawful reasons for not doing so.

9. Data Will Be Adequate, Relevant And Not Excessive

- 9.1 We will only collect and use personal data that is needed for the specific purposes described above (which will normally be explained to the data subjects in privacy notices). We will not collect more than is needed to achieve those purposes. We will not collect any personal data “just in case” we want to process it later.

10. Accurate Data

- 10.1 We will make sure that personal data held is accurate and, where appropriate, kept up to date. The accuracy of personal data will be checked at the point of collection and at appropriate points later on. Inaccurate data will be rectified or securely destroyed.

11. Keeping Data And Destroying It

- 11.1 We will not keep personal data longer than is necessary for the purposes that it was collected for. We will comply with official guidance issued to our sector about retention periods for specific records.
- 11.2 Information about how long we will keep records for can be found in our Data Retention Schedule appended to this Policy. Data held will be reviewed in accordance with the timescales set out in the Schedule and data that is no longer required for the specified purpose will be securely destroyed.

12. Security Of Personal Data

- 12.1 We will use appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage.
- 12.2 We will implement security measures which provide a level of security which is appropriate to the risks involved in the processing.

Measures will include technical and organisational security measures. In assessing what measures are the most appropriate we will take into account the following, and anything else that is relevant:

- a) the quality of the security measure;
 - b) the costs of implementation;
 - c) the nature, scope, context and purpose of processing;
 - d) the risk (of varying likelihood and severity) to the rights and freedoms of data subjects;
 - e) the risk which could result from a data breach.
- 12.3 Measures will be reviewed (and updated where necessary) and may include:
- a) technical systems security;
 - b) measures to restrict or minimise access to data;
 - c) measures to ensure our systems and data remain available, or can be easily restored in the case of an incident;
 - d) physical security of information and of our premises;
 - e) organisational measures, including policies, procedures, training and audits;
 - f) regular testing and evaluating of the effectiveness of security measures.

13. Keeping Records Of Our Data Processing

- 13.1 To show how we comply with the law we will keep clear records of our processing activities and of the decisions we make concerning personal data (setting out our reasons for those decisions).

Section C – Working With People We Process Data About (Data Subjects)

14. Data Subjects' Rights

- 14.1 We will process personal data in line with data subjects' rights, including their right to:
- a) request access to any of their personal data held by us (known as a Subject Access Request), details of how and why we have processed the data and how long we intend to retain the data;

- b) ask to have inaccurate personal data changed or removed;
- c) have personal data erased where it is no longer necessary for the purposes for which it was collected or where consent for processing is withdrawn;
- d) restrict processing in certain circumstances, including where the accuracy of data is contested, the processing is unlawful, and the purpose has expired;
- e) object to processing, in certain circumstances, including preventing the use of their data for direct marketing;
- f) data portability, which means to receive their data, or some of their data, in a format that can be easily used by another person (including the data subject themselves) or organisation;
- g) not be subject to automated decisions, in certain circumstances; and
- h) withdraw consent when we are relying on consent to process their data.

14.2 If a colleague receives any request from a data subject that relates or could relate to their data protection rights, this will be forwarded to our Data Protection Representatives **immediately**.

14.3 We will act on all valid requests as soon as possible, and at the latest within **one calendar month**, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

14.4 All data subjects' rights are provided free of charge.

14.5 All information provided to data subjects will be concise and transparent, using clear and plain language.

15. Direct Marketing

15.1 We will comply with the rules set out in the GDPR, the Privacy and Electronic Communications Regulations (PECR) and any laws which may amend or replace the regulations around **direct marketing**. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, telephone (both live and recorded calls) and fax.

Direct marketing means the communication (by any means) of any advertising or marketing material which is directed, or addressed, to individuals. "Marketing" does not need to be selling anything, or be advertising a commercial product. It includes contact made by organisations to individuals for the purposes of promoting the organisation's aims.

15.2 Any direct marketing material that we send will identify Lodge Farm Church as the sender and will describe how people can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing we will stop the direct marketing as soon as possible.

Section D – Working With Other Organisations & Transferring Data

16. Sharing Information With Other Organisations

- 16.1 We will only share personal data with other organisations or people when we have a legal basis to do so and if we have informed the data subject about the possibility of the data being shared (in a privacy notice), unless legal exemptions apply to informing data subjects about the sharing. Only authorised and properly instructed personnel are allowed to share personal data.
- 16.2 We will keep records of information shared with a third party, which will include recording any exemptions which have been applied, and why they have been applied. We will follow the ICO's statutory [Data Sharing Code of Practice](#) (or any replacement code of practice) when sharing personal data with other data controllers. Legal advice will be sought as required.

17. Data Processors

- 17.1 If required, before appointing a contractor who will process personal data on our behalf (a data processor) we will carry out due diligence checks. The checks are to make sure the processor will use appropriate technical and organisational measures to ensure the processing will comply with data protection law, including keeping the data secure, and upholding the rights of data subjects. We will only appoint data processors who can provide us with sufficient guarantees that they will do this.
- 17.2 If required, we will only appoint data processors on the basis of a written contract that will require the processor to comply with all relevant legal requirements. We will continue to monitor the data processing, and compliance with the contract, throughout the duration of the contract.

18. Transferring Personal Data Outside The United Kingdom (UK)

- 18.1 Personal data cannot be transferred (or stored) outside of the UK unless this is permitted by the GDPR. This includes storage on a “cloud” based service where the servers are located outside the UK.
- 18.2 We will only transfer data outside the UK where it is permitted by one of the conditions for non-UK transfers in the GDPR.

Section E – Managing Change & Risks

19. Data Protection Impact Assessments

- 19.1 When we are planning to carry out any data processing which is likely to result in a high risk to the rights and freedoms of individuals, we will carry out a Data Protection Impact Assessment (DPIA). These include situations when we process data relating to vulnerable people, trawling of data from public profiles, using new technology, and transferring data outside the UK. Any decision not to conduct a DPIA will be recorded.

- 19.2 We may also conduct a DPIA in other cases when we consider it appropriate to do so. If we are unable to mitigate the identified risks such that a high risk remains we will consult with the ICO.
- 19.3 DPIAs will be conducted in accordance with the ICO's Code of Practice '[Conducting privacy impact assessments](#)'.

20. Dealing With Data Protection Breaches

- 20.1 Where members, volunteers or contractors working on our behalf, think that this policy has not been followed, or data might have been breached or lost, this will be reported **immediately** to the Data Protection Representative.
- 20.2 We will keep records of personal data breaches, even if we are not required to report them to the ICO.
- 20.3 We will report all data breaches which are likely to result in a risk to the rights and freedoms of any person, to the ICO. Reports will be made to the ICO within **72 hours** (or as soon as possible with reasons for delay) from when someone in the church becomes aware of the breach.
- 20.4 In situations where a personal data breach causes a high risk to any person, we will (as well as reporting the breach to the ICO), inform data subjects whose information is affected, without undue delay.

This can include situations where, for example, bank account details are lost or an email containing sensitive information is sent to the wrong recipient. Informing data subjects can enable them to take steps to protect themselves and/or to exercise their rights.

21. Lodging a Complaint

- 21.1 Any data subject has the right to lodge a complaint against the Data Controller with a supervisory body, in this case, the ICO.

Appendix 1 Definitions and useful terms

The following terms are used throughout this policy and have their legal meaning as set out within the GDPR. The GDPR definitions are further explained below:

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data controller means any person, company, authority or other body who (or which) determines the means for processing personal data and the purposes for which it is processed. It does not matter if the decisions are made alone or jointly with others. The data controller is responsible for the personal data which is processed and the way in which it is processed. Lodge Farm Church is the data controller for the data which we process.

Data processors include any individuals or organisations, which process personal data on our behalf and on our instructions e.g. an external organisation which provides secure waste disposal for us. This definition will include the data processors' own staff (note that staff of data processors may also be data subjects).

Data subjects include all living individuals who we hold or otherwise process personal data about. A data subject does not need to be a UK national or resident. All data subjects have legal rights in relation to their personal information. Data subjects that we are likely to hold personal data about include:

- a) church members and regular attenders;
- b) attendees at church run community events;
- c) the people we care for and support;
- d) our employees (and former employees);
- e) consultants/individuals who are our contractors or employees working for them;
- f) volunteers;
- g) tenants;
- h) trustees;
- i) complainants;
- j) supporters;
- k) enquirers;
- l) friends and family;
- m) advisers and representatives of other organisations.

ICO means the Information Commissioners Office which is the UK's regulatory body responsible for ensuring that we comply with our legal data protection duties. The ICO produces guidance on how to implement data protection law and can take regulatory action where a breach occurs.

Personal data means any information relating to a natural person (living person) who is either identified or is identifiable. A natural person must be an individual and cannot be a company or

a public body. Representatives of companies or public bodies would, however, be natural persons. Personal data is limited to information about living individuals and does not cover deceased people. Personal data can be factual (for example, a name, address, date of birth, reference to the physical, physiological, genetic, mental, economic, cultural or social identity of a person) or it can be an opinion about that person, their actions and behaviour.

Privacy notice means the information given to data subjects which explains how we process their data and for what purposes.

Processing is very widely defined and includes any activity that involves the data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing can also include transferring personal data to third parties, listening to a recorded message (e.g. on voicemail) or viewing personal data on a screen or in a paper document which forms part of a structured filing system. Viewing of clear, moving or stills images of living individuals is also a processing activity.

Special categories of data (as identified in the GDPR) includes information about a person's:

- a) Racial or ethnic origin;
- b) Political opinions;
- c) Religious or similar (e.g. philosophical) beliefs;
- d) Trade union membership;
- e) Health (including physical and mental health, and the provision of health care services);
- f) Genetic data;
- g) Biometric data;
- h) Sexual life and sexual orientation.

Appendix 2: Data Retention Schedule

Section	Documents	Retention period	Reason	Action after Retention Period
Employment	All information relating to recruitment, selection and development whilst in post	6 years after post-holder has left your employment	Limitation Act 1980 ⁽¹⁾	Destroy
	Information on any disciplinary or grievance matter that is still 'live' on the individual's personnel file, including information on any penalty or warning imposed	6 years after post-holder has left your employment	Limitation Act 1980 ⁽¹⁾	Destroy
	Information on an individual's health and sickness record, including information on any adjustment made to their working pattern, either on a temporary or permanent basis	6 years after post-holder has left your employment	Limitation Act 1980 ⁽¹⁾	Destroy
	Information on any safeguarding concern or matter in which the employee was involved in any way	75 years after employment/role ceases (see Safeguarding Retention Schedule under Safeguarding below)	Requirements of the Independent Inquiry into Child Sexual Abuse (IICSA)	Not applicable
	Parental leave records	18 years from the date of the birth of a child	To enable future employers to check entitlement	Destroy
	Payroll records including correspondence with HMRC	6 years from the end of the financial year the records	Charities Act and HMRC Rules	Destroy

		relate to.		
	Pensions Records	According to the schedules set by the Pension provider	Destroy	
	Application forms and interview notes for unsuccessful candidate	6 months to a year	2010 Equality Act recommends six months. One year limitation for defamation actions under Limitation Act.	Destroy

(1) Six years is generally the time limit within which proceedings founded on contract may be brought

Finance	All financial records – invoices, bills, bank statements, paying in books etc	6 years from the end of the financial year the record relates to	Charities Act and HMRC Rules	Destroy
	Gift Aid declarations	6 years after the last payment was made	HMRC Rules	Destroy
	Legacy information (i.e. documents which relate to a legacy received by the church)	6 years after the deceased's estate has been wound up	In line with requirements for other financial information	Destroy
	Church Annual Accounts and Reports	10 years ⁽²⁾	Good practice	Archive (e.g. County Archive Office)

(2) These should be kept permanently somewhere. 10 years is the suggested minimum period the information is held by the church before sent to archives.

General	Correspondence (including emails)	Unless this relates to any other category of data listed here (e.g. finance, employment, safeguarding etc) correspondence should be kept for as long as is relevant. Churches
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		might find it helpful for staff and volunteers to have an annual 'purge' of all correspondence and destroy any which is no longer relevant.		
Health and Safety	Reportable accidents / accident book	3 years after date of entry or end of any investigation if later	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013	Destroy
	Records documenting external inspections	3 years after date of inspection	Good practice	Destroy
Meetings	Church Meeting Minutes	10 years from the date of the meeting ⁽³⁾	Good practice	Archive (e.g. County Archive Office)
	Trustee Meeting Minutes	10 years from the date of the meeting ⁽³⁾	Good practice	Archive (e.g. County Archive Office)
	Minutes of internal groups	5 years from the date of the meeting	Good practice	Destroy unless of particular value in which case send to Archive

(3) These should be kept permanently somewhere. 10 years is the suggested minimum period the information is held by the church before sent to archives.

Membership	Church Membership List (Names)	Permanent but reviewed and updated regularly	Good practice	To Archive if church closes
	Contact details of Church Members and regular attenders	6 months after individual has ceased to be a member or stopped attending church. ^[4]	Good practice	Destroy

	Church Contact list or Directory	1 year after publication	Good practice	Destroy
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(4) Unless individual asks for their details to be removed immediately

Property	Title Deeds for property (where church holds their own)	Permanently or until property is disposed of	Limitation Act 1980	Keep copy for 6 years after property has been disposed of
	Leases	12 years after lease and liabilities under the lease have terminated	Limitation Act 1980	Destroy
	Final plans, designs and drawings of the building, planning consents, building certifications, collateral warranties, records of major refurbishments and redevelopments.	Permanently or until six years after property is disposed of	Limitation Act 1980	Destroy 6 years after property is disposed of

Appendix 3: Lodge Farm Church GDPR Representatives and Information Commissioners Office Contact Details

Data Controller: Lodge Farm Church

Data Protection Representative: Rachel Standfield

Address: c/o Lodge Farm Church, Lodge Hill, Caerleon NP18 3DL

Telephone: 01633 420800

Email: info@lodgefarmchurch.org.uk

ICO Wales contact details:

Information Commissioner's Office – Wales

2nd Floor, Churchill House

Churchill Way

Cardiff CF10 2HH

Telephone: 0330 414 6421

Email: wales@ico.org.uk

The ICO welcome calls in Welsh. Rydym yn croesawu galwadau yn Gymraeg.