

Guide to personal data audit for meetings

Before you take any other steps to prepare for GDPR, you should carry out a simple audit of all the personal data your meeting manages. This will make it much easier to understand what actions you need to take to comply with the new Regulation.

We have completed this exercise in BYM for all departments and it helped to create a list of actions we need to take to tighten up our procedures.

Here is the form we filled in for each department (see below and as attached template). There are a couple of examples included to start meetings off (although you may manage this information differently).

| Describe the type of info | Format: paper/digital | How is it collected? | Do you ask for consent ? | Why is it collected? | How is it stored? | How long is it kept? | How is it destroyed ? | Retention decision | Legal basis for processing |
|---------------------------|-----------------------|----------------------|--------------------------|--|---|---|--|------------------------------------|--|
| e.g. Register of members | Digital and paper | Paper forms | No | Qf&p; best practice; historical record | On clerk's PC; paper version in MH safe | Permanently | Digital versions are updated; some info may be removed | Permanent (Qf&p) | Legitimate interests; Historical archiving |
| Members lists | Digital and paper | Paper forms | Yes | For contacts and general admin | On membership clerks' PC and | Printed books are kept permanently; digital | Digital versions are updated; some info | Permanent for historical archiving | Consent; Historical archiving |

| | | | | | | | | | |
|----------------------------|-------------------|---------------------------|----|---------------|--|-------------------|---|-----------|----------------------|
| | | | | | paper in MH | lists are updated | may be removed; one printed version is archived | | |
| Elders & overseers minutes | Digital and paper | Minutes taken at meetings | No | Pastoral care | On cttee members PCs and in paper version in MH safe | Permanently | N/a: archived with meeting records | Permanent | Legitimate interests |
| Etc | Etc | | | | | | | | |

You may also want to create a separate audit with all the legal bases for processing data set out so it is clear what decisions the meeting has taken regarding this, such as below.

Legal bases for processing personal data are set out in article 6 of the EU GDPR (<https://gdpr-info.eu/art-6-gdpr/>); they are the reasons you are collecting and processing data. If none of the first 5 reasons apply to the data activity you are carrying out, you must ask for consent (the sixth basis).

The bases, which are most likely to apply to data in meetings, are:

- Legitimate interests (necessary for the core administrative functions of the organisation, reasonably expected by the data subject, not prejudicial to a person's rights or likely to cause harm)
- Performance of contract (such as employment contract)
- Vital interests (potentially child safeguarding)
- Legal obligation (e.g. you get a court order to hand over data)
- Consent

Legal bases for processing data in meetings

| Type of data | Legal basis for processing under GDPR | Action required |
|--|---------------------------------------|---|
| Members and attenders contact information and membership information | Legitimate interests | Privacy notice to make all aware or guide for members |
| Information for the administration of nominations | Legitimate interests | Privacy notice to make all aware or guide for members |
| Employee data | Performance of contract | None |
| | | |
| | | |