



## GDPR RETENTION POLICY

Guidance on the best practice for retaining records

“In each parish there is to be an archive, in which the parochial books are to be kept, together with episcopal letters and other documents which it may be necessary or useful to preserve.”

Canon 535 §4

### 1. The purpose of this document

- 1.1 The legal and Internal reasons for holding data are outlined in Principle 5 of the General Data Protection Regulations (GDPR). As the legislation applies to physical as well as electronic storage this requires the implementation of a uniform diocesan retention policy. The purpose is to ensure that we do not retain data for longer than is required and to mitigate the risk of losing sensitive data. This specific requirement is referred to in the diocesan [Privacy Notice](#).
- 1.2 The secure holding and disposal of data is a key requirement of GDPR. This policy is designed to help us mitigate the risks of data being misused for fraudulent purposes; for identifying theft; or in other ways that could either damage an individual data subject personally or financially.
- 1.3. The retention of unnecessary data takes up both physical and electronic space, means that we are holding data for longer than legislation requires, exposes us to censure and runs the risk of data being held insecurely.
- 1.4 Undertaking routine reviews on the records held will also mitigate the risk of the data held going out of date and provide an on-going assurance that the data is being held securely.
- 1.5 This document is primarily designed for routine use at the parish level (a supplementary version will be provided for Curial activities).

### 2. Why have a retention schedule?

- 2.1 The purpose of this retention schedule is to help us to comply with GDPR, prescribed legal requirements, operational needs and to ensure that any destructions are undertaken in accordance with proper procedures and requirements. A retention schedule helps promote consistency across the diocese by ensuring that we keep the same type of record for the same amount of time no matter where the record is held.



- 2.2 This retention policy is designed to ensure that there is control over the data held by the diocese, to have confidence that records are disposed of when no longer required and that disposal is recorded and undertaken securely.
- 2.3 Responsibility for managing the retention schedule rests at either parish or curial activity area using the data audit information held on the Data Management System (DMS). The Diocesan retention schedule is designed to reflect regulations, legal, legislation, or canonical requirements that affect the length of time data is held.
- 2.4 We would stress that a record should be retained of the data being destroyed, the disposal decision (i.e. disposal, or is the data being transferred to the diocesan archive); the decision for the destruction, and how the data was destroyed.

### **3. Review of the Retention Schedule**

- 3.1 This document will be subject to review every three years to ensure that the following conditions are met: to ensure that it captures any operational, regulatory or legislative changes; process changes and how data is used.

### **4. Canonical requirements**

- 4.1 Canon law explicitly mentions the keeping of certain types of records, which are listed below:
- baptism, marriage and death registers (Canon 535 §1 and 895)
  - register of foundation Masses and other obligations (Canon 1307 §2)
  - parish account books (Canon 1284 §7)
  - register of catechumens (Canon 788 §1)
  - title deeds, insurance policies and other papers relating to temporal goods (Canon 1284 §9)
  - papers relating to marriage preparation (Canon 1066-1070)
- 4.2 In compiling this document we recognise that the priest and the parish, as custodians under Canon Law, have a duty of care for the records and are responsible for their safekeeping and for preserving the patrimony of the parish (i.e. sermons, architectural plans, those which tell the story of the parish and its members etc.). The management of these types of documents is not covered in this policy and is left to local practice.

### **5. Other record types**

- 5.1 Curial Offices and parishes hold a variety of other records and data, which periodically requires either secure storage or disposal. Managing data to comply with GDPR will be an on-going process but one that together we can manage effectively. It is also useful to have guidance to help ensure that we do not hold onto things longer than required, or become overwhelmed with either physical or electronic records.



5.2 Simply remembering that we are custodians of the data we hold and remain accountable to “data subjects” is an easy way of understanding our joint responsibilities.

5.3 Where records are transferred to the curial or parish archive secure access arrangements need to be in place to ensure that entry is controlled. Where data is held electronically arrangements should be made to ensure that these are backed up using a secure provider.

## **6. Disposal process**

6.1 A record may not be destroyed if any litigation, claim, negotiation, audit, freedom of Information request, administrative review, or other action involving the record is initiated before the expiration of the retention period. The record must be retained until completion of the action and the resolution of all issues that arise from it, or until the expiration of the retention period, whichever is later.

6.2 Destroy records using appropriate methods:

- All confidential records must be cross-shredded or otherwise rendered unreadable.
- Non-confidential records can be disposed of by putting them in recycling bins.
- When you delete an electronic file, ensure that it has been deleted from your electronic recycle bin and from any local backup sources (eg USB memory sticks etc) and third party processors.



Type of Record	Nature of data	How long to keep	What actions to take after this
Marriage key paperwork	Completed Marriage Information form; baptism certificate of Catholic and other Christian party; letters of freedom; Marriage course certificate and permission from bishop if required e.g. convalidation, mixed marriage, disparity of cult, canonical form. There may also be a letter from the priest if there are any concerns regarding the state of the marriage.	Permanently	Held securely in parish archive
Marriage - general	Arrangements for the wedding and related general communication	1 year	Destroy securely
Financial records	This includes gift aid; cash books; bank statements; financial returns; accounting records and subsidiary financial records; insurance policies	Current financial year + 6 Gift Aid Declarations 6 years after last used	Destroy securely
Finance - Parish Committee	Records of meetings and decisions	Permanently	Held securely in parish archive
Records relating to bequests. legacies	Documentation from bank or solicitors	Permanently	Held securely in parish archive
Documents relating to maintenance or development works	As these form part of the parish history and may be required at a later date there are clear reasons to retain such documentation	Permanently	Held securely in parish archive
CCTV recording	Tapes and other recording devices (NB: storage tapes and/or backs up encrypted and password protected; held securely in accordance with diocesan guidelines	Max. of 30 days before deletion	Destroy securely
Baptisms – preparation	Completed baptism enquiry forms, proof of baptism or confirmation (God-Parent); contact details of families; arrangements for the day	1 year	Destroy securely
Confirmation	Completed confirmation	1 year	Destroy securely



Type of Record	Nature of data	How long to keep	What actions to take after this
- preparation	enquiry forms; consents; sensitive data (i.e. family, medical or behavioural); attendance records; catechist notes; retreat (where applicable); sponsors		
Weddings - preparation	Correspondence relating to the wedding service; third party contacts;	1 year	Destroy securely
First Holy Communion - preparation	Completed registration forms; parental consents; sensitive data (i.e. family, medical or behavioural); general communications; attendance records;	1 year	Destroy securely
Parish Registers	Baptism, First Communion, Confirmation, Marriage, Catechumens, Death, and any others kept by the parish	Permanently	Held securely in parish office and/or archive
Weddings – Civil Registers	Marriage Registrar entries	Permanently	Held securely
Safeguarding	Volunteer applications; DBR processes; requests for advice; investigation records including email trails; training course records;	75-100 years	Held securely
Parish Census data	Physical or electronic application forms;	Destroy when no longer required	Held securely
Church rotas	Physical and/or electronic forms;	Destroy records when no longer required	Destroy obsolete records securely
Altar Servers	Signing in sheets for altar servers;	75-100 years	Held securely in parish archive (links to Safeguarding)
Databases, mailing and emailing contact lists	Review on a routine basis and retain the most up to date version	Destroy records when no longer required	Destroy obsolete records securely
Live streaming	To be confirmed		
Cemetery records	To be confirmed		
Youth Groups (i.e. CathSoc etc..)	Records of attendance and membership; general communication	Destroy records when no longer	Destroy obsolete records securely



Type of Record	Nature of data	How long to keep	What actions to take after this
		required	
Parish census database	Records of registered parishioners; general information; volunteering	Destroy records when no longer required	Held securely
Human Resources	To be confirmed		
Property Management	Deeds;	Permanently	Held securely in parish office and/or archive
Parish Organisations	Minutes General correspondence	Permanently 2+ current year	Held securely in parish office and/or archive Retain key correspondence in archive and destroy general correspondence securely
Parish Committees (i.e. Pastoral, Fabric & Finance, Evangelisation)	Minutes	Permanently	Held securely in parish office and/or archive
Priest's Official correspondence	Letters, key communications etc..	Permanently	Held securely in parish office and/or archive