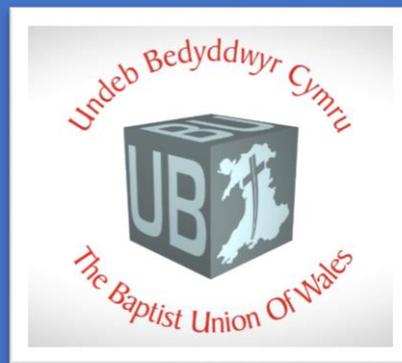


BAPTIST UNION OF WALES

GDPR GUIDANCE PACK



YOUR CHURCH GDPR GUIDANCE PACK

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Please note: These notes are offered as basic guidance and cannot be a substitute for detailed professional or legal advice. It is the responsibility of the Church to ensure that they comply with the data protection regulations. The Baptist Union of Wales cannot accept responsibility for the data protection arrangements of each individual Church.

1. WHAT'S HAPPENING AND WHY IS IT IMPORTANT?

On 25th May 2018 the current data protection law will be replaced by the new General Data Protection Regulation (GDPR). The new legislation upholds and enforces the individual's rights concerning their personal information. All organisations, including churches are legally obligated to comply.

This guide gives you some general information on GDPR and what your church needs to do in order to comply. We have also included several template documents which can be adapted and adopted by your church. However, please note that it is the responsibility of each individual church to coordinate its own response and ensure that it complies with the new legislation.

Useful Terms

Personal data is information relating to a living individual, who can be identified directly from that data or indirectly by reference to other data held.

Processing is anything done with/to personal data, including storing and using it.

The data subject is the person about whom personal data are processed

The data controller is the person or group of persons responsible for processing personal data.

What Is GDPR?

The General Data Protection Regulation (GDPR) will take effect in the UK in May 2018. It replaces the existing Data Protection Act 1998 and gives individuals more protection and enhanced rights concerning how their personal data is used by organisations. The GDPR is founded on several important principles as outlined below.

Lawfulness, fairness and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary, kept up to date
Storage limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
Accountability	The controller shall be responsible for, and be able to demonstrate compliance with the GDPR

What Is Personal Data and Special Personal Data?

As noted above, personal data is any information relating to a living individual, who can be identified directly from that data or indirectly by reference to other data held. Whilst all personal information is classed as “personal data” certain elements are considered to be highly sensitive and therefore require further protection. This data is referred to as “Special Personal Data” and 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.

The amount of personal and special personal data held will vary from church to church. However, most churches will hold at least some personal / special personal data. This may include information such as; members contact details, membership registers, dedication & baptism registers, safeguarding information, pastoral records, Gift Aid and bank details, ministerial employment details etc.

Who Does This Affect?

GDPR is designed to protect all living individuals and their personal details. All organisations that hold personal data, including churches, are legally obligated to comply.

How Does This Affect Your Church?

GDPR also introduces a stronger accountability for the Data Controller – the person / persons responsible for handling and using personal data. As Data Controllers, churches are accountable for the personal data they process and must comply with the principles of GDPR. Churches should also be able to demonstrate their efforts to ensure compliance by providing evidence of actions taken in relation to GDPR. As noted, this pack has been designed to help BUW churches coordinate and manage their response. We suggest that each church takes time to study these guidelines and follow the steps outlined in the section entitled “What Your Church Needs To Do”.

Grounds for Processing Personal Data

It is essential that churches hold and use certain personal data such as names, contact details, pastoral records in order to fulfil the work of the church. Whilst GDPR does not prohibit the storage and use of personal data, it is designed to strengthen regulations concerning how and why data is obtained, stored and used.

When dealing with personal data, you will need to be clear on your legal basis for processing that data. There are several legal bases for processing data, these include:

1. **Legal Obligation** (e.g. processing Gift Aid or Safeguarding information.)
2. **Contract** (e.g. letting out the church hall / vestry to individuals and groups.)
3. **Legitimate Interest** (Routine church administration, such as publishing membership rolls for internal use, rotas, pastoral notes etc.)
4. **Consent** (If you do not have legal, contractual or legitimate reason for holding or using personal data then you will need to obtain consent from the individual whose data you wish to use. Consent should be obtained in a clear manner, appropriately recorded and updated as necessary. Individuals should be made aware of the procedure for withdrawing consent.)

2. WHAT YOUR CHURCH NEEDS TO DO

Hold a meeting to discuss your Church's response

We suggest that church officers read these guidelines and hold a meeting to discuss the church's response. The church may wish to consider appointing an individual officer or group of officers to oversee GDPR within the church. This person / group of persons should be the primary contact for all matters concerning GDPR and will be responsible for ensuring the church's continuing compliance. The name and contact details of the designated person / persons should be inserted in the Church's Data Protection Policy and Privacy Notice as required.

As explained, this guidance pack has been designed to help you organise your GDPR response. This section outlines the necessary steps churches should take in order to comply with the new legislation. In addition, we have also included a checklist and notes section at the rear of this booklet. However, we also suggest that the church keeps a record of meetings, discussions and actions taken in relation to GDPR. This will serve as a written record to demonstrate that your church has taken appropriate action in the event of a complaint.

Adopt a Data Protection Policy

Your church should adopt a Data Protection Policy confirming the church's principles and practices in relation to the processing of personal data. A model Church Data Protection Policy is provided in this pack which can be adapted and adopted (please see Document 5a).

It is important that all individuals involved in the administration of your church (e.g. officers, deacons, trustees) have a copy of this document and are familiar with its contents. All data processing should be undertaken in accordance with the principles outlined in the Church's Data Protection Policy.

Adopt and display a Data Privacy Notice

In addition to the Data Protection Policy your church should also adopt a Data Privacy Notice. This document publicises the ways in which you process (e.g. obtain, use, manage and disclose) the personal data you hold. A model Church Data Privacy Notice is provided in this pack which can be adapted and adopted (please see Document 5b). This Data Privacy Notice should be publicly displayed (e.g. on the church notice board and church website) and available on request.

Complete a Data Audit

We advise that every church should undertake a Data Audit to review the data held. This audit should consider the following questions:

- What personal data is being held?
- Why the personal data is being held?
- On what basis is the personal data held? (legal, contractual, legitimate reason or specific consent)
- Who is responsible for processing the personal data?
- What action is needed in order to comply with GDPR?

This can be done using the Data Audit table provided on page 6.

Further Action

Having adopted your Data Protection Policy and Privacy Notice and completed your Data Audit, you should proceed to address any issues that have been identified.

These points may include practical measures such as:

- Password protecting electronic devices and individual documents
- Ensuring all paperwork is stored appropriately in locked cabinets
- Requesting specific permission for the publication of personal data (please see advice concerning annual reports, church magazines)
- If necessary contacting individuals to request / update permission to hold their details and contact them regarding church matters etc.

Dealing with requests and complaints

All individuals for whom you hold personal data are legally entitled to request a copy of the personal data you hold and information on how this is processed. This is known as a Subject Access Request (SAR). As a Data Controller the church is legally obligated to respond to such a request within a period of one month. Subject Access Requests should be directed to the person / group appointed to oversee GDPR and processed in accordance with your Church Privacy Notice. Please be aware, that whilst legally required to respond to a SAR, there are certain circumstances where it may be appropriate to refuse to disclose data (e.g. when concerning safeguarding issues). We suggest that the appointed person / persons visit the Information Commissioner's Office website or telephone helpline directly for further advice as necessary.

It is important to remember that if personal data is not handled correctly, individuals have the right to submit a complaint to the church as the data controller. The church complaints procedure is detailed in the church Privacy Notice and should be handled accordingly. If the person is unsatisfied they have the right to refer their complaint to the Information Commissioner's Office. Any organisation failing to comply may be liable to various penalties, including investigation by the Information Commissioners Office and fines.

Ongoing responsibilities

It is important to remember that Data Protection is an ongoing obligation. Once you have adopted your Church Data Protection Policy and Privacy Notice you should endeavour to adhere to the principles and practices outlined in all aspects of church life.

We also suggest you undertake an annual Data Audit to ensure that your church is up date regarding what data is held and aware of any action that is needed in order to remain fully compliant.

Questions and concerns

If you have any general questions regarding GDPR and your church, please contact Dr Christian Williams at the BUW office. Alternatively, churches are also able to contact the Information Commissioner's Office directly. The Information Commissioner's Office, 2nd Floor, Churchill House, Churchill Way, Cardiff. CF10 2HH 02920 2067 8400; e-mail: wales@ico.org.uk

The following websites also contain useful information regarding GDPR and its implications for churches:

- **Information Commissioner's Office website - ico.org.uk**
- **Baptist Union of Great Britain GDPR Advice - www.baptist.org.uk/gdpr**

3. BUW CHURCH DATA AUDIT

Completed by _____ on _____.

Description of Data	Why is the data held and what is it used for?	Who holds the data and who can access it?	Do you have necessary consent or legitimate reason for holding this data?	What security controls are in place?	How long is the data kept?	Action Required

4. GENERAL ADVICE

- **Annual Reports**

In accordance with charity law, every church (as a charity) is required to produce an annual report reviewing the finances of the church. This report should be appropriately audited and distributed to all church members. In many churches the annual report also contains the names and contributions of all members. In some cases, additional contact details such as addresses, telephone numbers and email addresses are also included.

Whilst all churches must continue to produce an annual financial report, the new legislation means that serious consideration should be given to the way in which such reports are published and what information is contained. Although there is legitimate reason to publish the names and contact details of church officers such as the minister and deacons for the purpose of church administration, churches must no longer assume that members, friends and contributors are willing for their details to be published as this information - regarding a person's religious beliefs - constitutes Special Personal Data.

We therefore advise that church officers discuss this topic and consider the following options. Please see Appendix 1 for examples of each option outlined below.

- 1) Publish a **Financial Report** containing no personal information such as names, addresses, contact details or details of individual contributions. Please note that financial contribution information will need to be retained and audited. (Should you wish to verify the contributions of individual members, you should adopt a confidential system e.g. Providing each individual member with a confidential summary of their contribution.)
- 2) Adopt an alternative system such as a **Membership Numbers System**, whereby every member is given a membership number. The individual membership number replaces the members name in the annual report. This enables the individuals to verify their contribution but ensures confidentiality on the understanding that no-one other than the individual member and relevant church officer is aware of personal details.
- 3) Seek explicit consent to continue to publish **full membership and contribution details**. If the church wishes to continue to publish any personal details, (e.g. members name, contact details, annual contribution details) specific written consent should be sought. This consent should be securely stored in accordance with your Data Protection Policy and regularly renewed (e.g. 1-3 years).

Whatever method of publication the church chooses it is important that the appropriate consent is obtained, and members are aware of what details are to be published. When a person ceases to be a member, personal details should no longer be held or published.

- **Gifts and Legacies**

When receiving a gift (e.g. from a friend, general donation or gift in memory) consent should be sought to publish the donors name along with the donation. If no consent is received no personal details should be published. However, when receiving a legacy or bequest permission is not required as GDPR only applies to living persons.

- **Church Records**
Church officers have legitimate interest to hold the names and contact details of all church members. All church records that contain personal data (e.g. names, contact details, financial information) should be treated in accordance with your Data Protection Policy and Privacy Notice.
- **Pastoral Records**
In the interest of providing pastoral care, those with pastoral responsibility (e.g. minister, deacons, pastoral worker) are deemed to have legitimate reason for holding personal data. This data should be used solely for the purpose of providing pastoral care and should not be shared with any other individual or organisation, unless required to do so by law. As with church records, all personal pastoral information should be held in accordance with your church Data Protection Policy and Privacy Notice.
- **Safeguarding**
It is the responsibility of church officers to ensure that all relevant safeguarding checks (including DBS checks) are carried out and updated as required. This is a legal requirement and should be undertaken through the Interdenominational Protection Panel. All safeguarding /DBS information should be stored and used in accordance with your church Data Protection Policy and Privacy Notice. If you require further information regarding safeguarding responsibilities, please contact the Interdenominational Protection Panel.
- **Office Holder / Employee Details**
All office holder / employee information should be treated as strictly confidential and not shared with any other parties, other than when required to do so for other legitimate reasons. When employment ceases, personal data should not be held for longer than legally / legitimately necessary.
- **Contact Detail Enquiries**
If a church officer receives a request for personal information such as name, address or contact details of a church member the request should be refused. In such circumstances, we suggest that the church officer should offer to forward the request directly to the individual or alternatively contact the individual to request permission to share their information.
- **Communicating with church members**
As a church you have legitimate justification for holding contact details of members for church purposes. All personal data (e.g. names, contact details, financial information) should be treated in accordance with your Data Protection Policy and Privacy Notice and should not be shared outside of the church. When a person ceases to be a member of a church, personal information should be appropriately deleted.
- **Communicating with non-church members and the wider community**
It is acceptable to hold and use the details of non-members, if you have legitimate interest to contact them regarding an activity or service (e.g. to arrange a wedding or funeral service, to contact a parent who attends a Parent and Toddler Group, or a person wishes to be included on a church flower rota). However, the information held should be used only for that purpose and should not be shared in any other way.

If your church wishes to use non-members contact details to promote other services and events, consent is required. We suggest that you seek confirmation that individuals are happy to be contacted for such purposes. Consent should be recorded and stored in accordance with your church Data Protection Policy and Privacy Notice. A sample personal data consent form is provided in this pack (please see document 5c).

- **Email Communication**

It is important to remember that a personal email address is also classed as personal information. When sending emails, it is important that due care is taken to avoid sharing personal email addresses. When sending emails to more than one recipient, the sender should use the BCC option or send emails individually in order to prevent sharing the email addresses of other recipients.

- **Websites & Social Media**

Personal information should not be published on a website or social media unless relevant consent has been received. If your website processes personal data, users should be made aware of this when visiting the site.

It is becoming increasingly popular to take photographs of church events and record church services. Many of these images and films are then uploaded to church websites and social media accounts. If your church wishes to photograph or record public services or events, notice should be given in the form of a public announcement or poster informing people that photographs / recordings are to be taken and used. Appropriate provision should be made for those who do not wish to participate in such photographs or recordings.

- **Church Newsletters & Magazines**

Churches should make every effort to avoid including personal data such as names, contact details and information regarding sensitive personal circumstances. If personal information is to be included specific consent should be obtained prior to publication.

5. MODEL DOCUMENTS FOR BUW CHURCHES

This section contains the following model documents that can be adapted and adopted for use by your church:

- 5a. Model Church Data Protection Policy
- 5b. Model Church Privacy Notice
- 5c. Model Data Consent Form for General Communication

Churches should insert their individual information where necessary.

Digital copies of these documents are available on the BUW Website:

www.buw.org.uk

5a. MODEL CHURCH DATA PROTECTION POLICY

Please insert your church's details where necessary

Baptist Church Data Protection Policy

Policy Statement

The Trustees/Deacons of _____ Baptist Church are committed to ensuring that it complies with the legal requirements of the Data Protection Act 1998 and General Data Protection Regulations 2018.

We have appointed _____ (Name of Trustee/Deacon/ Group of Officers) to oversee Data Protection for _____ Baptist Church. Any questions that arise in relation to Data Protection issues should in the first instance be referred to _____ (Name of Trustee/Deacon/ Group of Officers and contact details).

This policy sets out the measures that we are committed to taking as a church and how we comply with the relevant legislation.

The Data Protection Act is underpinned by eight principles which state that personal data:

- must be processed fairly and lawfully
- must be obtained only for specified and lawful purposes
- must be adequate, relevant and not excessive
- must be accurate and kept up to date
- must not be held for any longer than necessary
- must be processed in accordance with the rights of the data subjects
- must be held securely
- must be properly protected when transferred overseas

Why is this important?

This policy is important as we are committed to protecting personal data 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.

What is the legal basis for processing personal information?

We process personal information on behalf of the members, employees and friends of _____ Baptist Church and others in connection with the activities of the church on the following bases:

1. **Legal Obligation** (e.g. processing Gift Aid or Safeguarding.)
2. **Contract** (e.g. letting out the church hall to individuals and groups.)
3. **Legitimate Interest** (routine church administration, such as publishing membership rolls for internal use, rotas, pastoral notes etc.)
4. **Consent** (If we do not have legal, contractual or legitimate reason for processing personal data then we will seek to obtain consent from the individual whose data we wish to process.)

Why do we process personal data?

We process personal data to help us:

- Maintain our list of church members
- Pay our Minister's stipend
- Provide pastoral support
- Provide services to the community
- Safeguard children, young people and vulnerable adults

(Please list any other purposes below.)

How do the data protection principles guide us?

Lawfulness, fairness and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
Data minimisation	Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary, kept up to date
Storage limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
Accountability	The controller shall be responsible for, and be able to demonstrate compliance with the GDPR

Privacy Notice: In accordance with this policy we have also adopted a Privacy Notice which sets out what information we hold, how we store that information and how that information is processed along with the legal basis for doing so.

5b. MODEL CHURCH PRIVACY NOTICE

Please insert your church's details where necessary

_____ Baptist Church Privacy Notice

Introduction

From 25th May 2018 the new General Data Protection Regulations come into force which essentially give individuals more rights over how information is stored and used by a church or any organisation. In particular, we are required to tell our members, office holders, employees and friends of this church what information we hold, how we store and use it.

The Trustees/Deacons of _____ Baptist Church are the data controller and one of their number _____ acts as the designated Data Protection Trustee/Deacon/Officer.

1. What Information do we hold?

Please list all the information that you hold, e.g.

We hold the names, addresses, telephone numbers, e-mail addresses of our members.

We hold bank details of those members who contribute by bank transfer.

We hold safeguarding information in relation to children youth and vulnerable adults.

(Please list any other personal information that you hold.)

2. How do we store your information?

Paper information is held securely in locked cabinets and the keys are also held securely.

Electronic information is password protected and/or encrypted

3. How do we process your personal data?

A. Member Details: The Trustees/Deacons/Church officers hold contact details (name, address, telephone, number, e-mail) for the Members in order to:

- keep in touch (e.g. send you a newsletter)
- notify you of services, events and meetings, courses, training
- provision of pastoral support
- circulate prayer requests
- request assistance from you in the running of the church (e.g. rotas)
- administer member records, including the processing of gift aid
- refer to you in our newsletter, e.g. in case of a celebration, illness

(This list is not exhaustive, please add as appropriate.)

How long will they be kept for?

Necessary information will be held for so long as you are in membership with _____ Baptist Church. However, Gift Aid Declarations will be kept for up to 6 years after the calendar year to which they relate. Information relating to dedication registers / marriage registers will be kept permanently.

What is the legal basis for processing this data?

We process this information, including any sensitive personal data (which includes an individual's religious belief/affiliation) on the following grounds:

1. Legal Obligation (e.g. processing Gift Aid or Safeguarding.)
2. Contract (e.g. letting out the church hall to individuals and groups.)
3. Legitimate Interest (routine church administration, such as publishing membership rolls for internal use, rotas, pastoral notes etc.)
4. Consent: If we do not have legal, contact or legitimate we will secure your written consent in a clear manner, appropriately recorded and updated as necessary.

B. Friends of the Church: The Trustees/ Deacons/Church Officers hold contact details (name, address, telephone, number, e-mail) for Friends of the Church in order to:

- keep in touch (e.g. send you a newsletter)
- notify you of services, events and meetings, courses, training, holiday clubs, lunch clubs

(This list is not exhaustive, please add as appropriate.)

How long will they be kept for?

The information will be kept until you tell us that you do not want to receive any further contact and will be reviewed every 2 years.

What is the legal basis for processing this data?

As a Friend of the Church (e.g. non-member, attending luncheon club, mothers and toddlers) we will only hold your contact details if you are in regular contact with us or if we have secured your written consent to hold this information. We will not share your information with anybody else.

C. Annual Report

_____ Baptist Church is required by law to publish an Annual Report. Copies of the Annual Report are only distributed to Members and to the Welsh Baptist Union Corporation (if it acts as a Trustee for _____ Baptist Church)

We will only publish the following personal details _____
(please specify) in the Annual Report if we have obtained written consent. A request to renew the consent will be updated on a regular basis _____ *(please specify)*.

What is the legal basis for processing this data?

If we publish personal details and sensitive information we will secure your written consent.

D. Church Directory

The Church Directory is the primary reference point for members, regular attenders and those who organise the running of _____ Baptist Church to find contact details. This directory is widely available to Church Members and regular attenders and a copy is also kept in the church. We do not give copies to anyone else, but it is widely available. We very much hope that you will give us your written consent to include your details in the directory.

What is the legal basis for processing this data?

As we are publishing your personal details, we will seek your written consent to do so.

E. Safeguarding Information

This includes references for those who are working with children and vulnerable adults, parental consents, emergency contact information, medical information and medical contacts.

How long will this information be kept for?

For so long as the individual is participating in church activity.

What is the legal basis for processing this data?

The church has a legal obligation to hold this information in order to meet its safeguarding responsibilities.

Further Information

Sharing your Personal Data

We will not share your personal data with third parties unless we have secured your consent beforehand or are required to do so by law.

Your rights

You have a number of rights in relation to the personal data that is held about you. You can request a copy of the personal data held and how this is processed. You also have the right to update, amend, restrict or withdraw consent to the processing of your data along with the right to erase your data. Should you wish to exercise your rights then please contact _____
(insert name of deacon/trustee responsible for subject access requirement).

Subject Access Requirements

Requests for information will be processed within one calendar month. The church should be aware that there are occasions when it would be inappropriate to release information. If any such reservations arise (e.g. in relation to safeguarding) advice can be sought from the Information Commissioner on 0303 123 1113 or the website: www.ico.org.uk

Complaints

If you are concerned about the way your information is being handled then please contact in the first instance *(insert name of nominated Trustee with contact details)* and if you remain unsatisfied with the outcome then you can refer the matter to the ICO via the website:

<https://ico.org.uk/concerns/handling/> or you can call the helpline on 0303 123 1113

5c. MODEL DATA COLLECTION CONSENT FORM

_____ Baptist Church Data Consent Form for General Communication

In accordance with current UK Data Protection law, we require your consent to hold and use personal data such as your name and contact details.

If you are happy for the church to hold your details in order to communicate with you, please fill in the appropriate details below:

Name _____

Address _____

Telephone Number _____

Email Address _____

Please tick the appropriate box confirming the ways in which you wish us to use your information to contact you:

I consent to the above church contacting me by

<input type="checkbox"/>	Mail	<input type="checkbox"/>	Telephone	<input type="checkbox"/>	Email
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for the purpose of informing me about church news, services and events

<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Signed: _____

Dated: _____

Please note that all personal data will be processed in accordance with our Church Data Protection Policy and Privacy Notice which is available via _____

Consent can be withdrawn at any time by contacting _____

6. BAPTIST CHURCH GDPR CHECKLIST

Please use this GDPR to help coordinate your GDPR response and ensure that you have taken the necessary steps.

<u>CHURCH GDPR CHECKLIST</u>	
Have you met to discuss GDPR and what it means for your church?	
Have you appointed a GDPR officer or team?	
Have you adopted a Church Data Protection Policy and familiarised yourself with its contents?	
Have you adopted and displayed a Church Privacy Notice and familiarised yourself with its contents?	
Have you undertaken your Church Data Audit?	
Have you addressed any issues?	
Have you planned for handling Subject Access Requests, complaints and other individual rights?	

7. GDPR NOTES

8. Appendix 1.

Church Annual Reports

Please find below examples of the three options noted on page 7.

CHURCH REPORT 1

Financial report including no personal details.

Income 2018	Total
Members Contributions (Envelopes)	£10,500.00
Free Collection	£1,500.00
Gifts	£750.00
Gifts in memory	£350.00

CHURCH REPORT 2

Members names replaced with membership numbers.

Membership number	Total Contribution 2018
1	£250.00
2	£100.00
3	£198.00
4	£50.00

CHURCH REPORT 3

Specific consent must be obtained for the publication of any Personal details such as a member's name, contact details and contribution information.

Members Details	Total Contribution 2018
Mrs May Jones, 14 Wern Road (01268 446233)	£250.00
Mr David Thomas, Bryn (01268 763200)	£100.00
Miss Mair Edwards, 34 High Street (01973 885723)	£198.00