



The Parish of
All Saints with St Margaret
Upper Norwood



Parish Policy on Digital Archives and Records Management

Preliminary: Theological Rationale

The Church's care for its records is not merely administrative or legal, but theological. The records entrusted to the Parish represent the lives, stories, gifts, and vulnerabilities of God's people, and therefore demand reverent, careful, and loving stewardship.

Stewardship of records reflects the Church's calling to faithfulness in small things, recognising that what is held on behalf of others is ultimately held before God. Trust is sustained when information is handled with integrity, discretion, and transparency, enabling the Church to serve without fear or misuse of power.

Safeguarding, in particular, is an expression of the Gospel itself. The careful protection of information, especially where vulnerability is present, witnesses to Christ's concern for the least, the wounded, and the entrusted. Proper records management is therefore an act of pastoral care, justice, and love in truth and action.¹

This policy must be read alongside the Parish Safeguarding Policy and the Church of England's national safeguarding guidance. Where records relate to safeguarding concerns, this policy defers to safeguarding procedures, which take precedence in matters of access, retention, disclosure, and information sharing. The protection of children and vulnerable adults is paramount and overrides all other considerations.

This theological approach to stewardship, trust, and care for the vulnerable also informs the Parish's Safeguarding Policy and Data Protection Policy. Across all policies, the Parish seeks not only legal compliance, but a faithful, transparent,

¹ See Micah 6:8 (justice and faithful stewardship); Luke 16:10 (faithfulness in small things); John 10:11 (the Good Shepherd who protects those entrusted to him).

and compassionate practice that reflects the Gospel and builds trust within the Body of Christ.

1. Introduction

This policy explains how the Parish manages, stores, protects, and provides access to its records, both digital and paper. It is designed to ensure lawful, secure, and transparent record-keeping, while supporting the mission and governance of the Church.

2. Scope

This policy applies to all parish records, including PCC minutes and papers, the Terrier and Inventory, logbooks, registers where digitised, safeguarding records, financial and Gift Aid records, electoral roll data, pastoral and administrative correspondence, and compliance documentation.

3. Legal and Ecclesial Framework

The Parish holds records as a data controller under UK GDPR and the Data Protection Act 2018. It is also bound by the Canons of the Church of England, the Church Representation Rules, the Churchwardens Measure 2001, and national safeguarding policies and guidance.²

4. Records Management Principles

All records are managed according to the principles of lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; security; and accountability.³

² cf. *Promoting a Safer Church* and national safeguarding guidance. See: <https://www.churchofengland.org/safeguarding>

³ cf. UK GDPR and Data Protection Act 2018.

5. Digital Storage and Backup

Authoritative digital copies of parish records may be stored in a secure, password-protected cloud system with access restricted to authorised officers. A secondary encrypted digital copy shall be kept on a dedicated hard drive stored off-site as a disaster-recovery measure.

6. Paper Records

Original signed documents and other core parish records, including the Terrier and Inventory and safeguarding files, shall be stored in a locked, fire-resistant church safe. Access is limited to those lawfully entitled.⁴

7. Safeguarding Records

Safeguarding records are subject to enhanced security. They must be stored separately from general records, with access strictly limited to safeguarding officers and clergy, and retained in line with national Church guidance.⁵

8. Access to Records

Access to records is granted only to those entitled under Church law or data protection legislation. Individuals may request access to their personal data in accordance with UK GDPR.

9. Retention and Disposal

Records are retained in line with Church of England Records Management Guidance. Permanent records are preserved, while time-limited records are securely destroyed once retention periods expire.

⁴ cf. Churchwardens Measure 2001.

⁵ see note 1.

10. Responsibilities

The Incumbent has overall responsibility for records management. The PCC oversees policy compliance. Churchwardens are responsible for the Terrier, Inventory, and safe custody of documents.

11. Data Breaches

Any actual or suspected data breach must be reported immediately to the Incumbent and managed in accordance with diocesan and statutory procedures.

Appendix A - Records Access Request Form

Name of requester: _____

Contact details: _____

Description of records requested:

Reason for request (if applicable):

Signature: _____ Date: _____

Appendix B - Records Retention Schedule

- (i) PCC Minutes and Papers - Permanent
- (ii) Terrier and Inventory - Permanent
- (iii) Safeguarding Records - As per national safeguarding guidance
- (iv) Electoral Roll - Until superseded plus one year
- (v) Financial Records - Minimum six years after financial year end
- (vi) Pastoral Correspondence - Review after seven years