



LINLITHGOW AND  
AVON VALLEY  
CHURCH OF SCOTLAND

# Record of Processing

The following record of processing sets out the purposes for which the Congregation (Linlithgow and Avon Valley Church of Scotland) collects and uses personal information, the legal bases for the processing, how the information is stored and retained and whether it is shared with any third parties, particularly any based outside of the European Economic Area. The Congregation will only share information with third parties or transfer it internationally in accordance with data protection legislation.

The Congregation is registered with the Information Commissioner's Office through the Presbytery of Edinburgh and West Lothian and collects and uses personal information in accordance with its privacy notice and its legitimate interests assessment. It retains information in accordance with its data retention schedule. The Congregation processes personal information to enable it to:

- administer membership records, including a Communion Roll and Supplementary Roll;
- provide pastoral care purposes;
- support participation in Congregational activities;
- provide members and adherents with information about news, events, and activities within the Congregation or the wider Church of Scotland;
- provide the services of a parish church to the local community; to fulfill contractual or other legal obligations;
- manage employees;
- further its charitable aims, for example through fundraising activities; and to maintain its accounts and records (including the processing of Gift Aid applications).

There is a separate CCTV policy in place, to cover its use at St Michael's at Linlithgow and Avon Valley Church of Scotland. This would be extended to cover any other CCTV installed elsewhere within the properties owned by the Congregation.

**Contact details:** For any queries about this Record of Processing, please contact the Congregational Data Protection Coordinator via the Church Office, email [info@linavonchurch.org.uk](mailto:info@linavonchurch.org.uk) or directly [dataprotection@linavonchurch.org.uk](mailto:dataprotection@linavonchurch.org.uk).

Approved by the Kirk Session, Linlithgow and Avon Valley Church of Scotland

Date: 10 June 2025

Reviewed 10 March 2026

**Scottish Charity No: SC016185**

## Record of Processing

Categories of Data	Categories of Data Subjects	Categories of Personal Data	Legal Basis for Processing	How is information stored?	Is information held in line with Data Retention Schedule?	Is the information shared with third parties?	Transferred Internally?
Congregational Rolls	Members, adherents, former members, former adherents.	Name, Contact Details, gender, date of baptism, admission as member, and date of birth (depending on whether or not it has been disclosed by the member).	Legitimate interests and UK GDPR Article 9(2)(d)	Electronically in office computer system.  Elders hold Session contact details and their District list electronically or on paper.  Visitors hold their District list	Yes	The database is cloud based and administered (including backups, and security) by WorkFlo. GCD is the Roll database software provider.	No
Cradle rolls	Children	Name, date of baptism	Legitimate interests and consent from parents	Within sanctuary or office (St Michael's)  Cradle rolls are not used at Avonbridge, St Ninian's Craigmailen, or Torphichen Kirk.	Yes	On church wall	No
Baptismal Register	Children and their parents	Contact information, date of birth and baptism	Consent when baptism is requested.	Within office	Yes	No	No
Safeguarding records	People approved or being assessed	Contact information, date approved, date of training, date left	Legitimate interests and UK GDPR	Electronically in password protected files.	Yes	No	No

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	for regulated work.	register	Article 9(2)(d)	On paper in locked filing cabinet			
Rotas	People volunteering to undertake duties or help with groups	Name and Contact information	Legitimate interests and UK GDPR Article 9(2)(d)	Group organisers hold lists securely. Copy held in office.  Where rota is on display in church, people acknowledge their consent when they sign the list.	Yes	The public may see rotas in the church.	No
Letting of halls or other property	Third parties	Contact information	Contract	Electronically in password protected files. On paper in locked filing cabinet	Yes	No	No
Employment	Employees	Contact information, bank details, NI numbers, health information (if relevant), PVG certification (if relevant)	Legal requirement	Electronically in password protected files. On paper in locked filing cabinet	Yes	HMRC. A9 accountants. Pension provider.	No

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Weddings	Members, members of the local community	Contact information, date of wedding, people participating (organist, etc)	Contract or legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. On paper in locked filing cabinet	Yes	Information will be shared with participants.	No
Funerals	Members, members of the local community	Contact information, date of funeral, people participating (organist, etc)	Contract or legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. Held securely on paper.	Yes	Information will be shared with participants.	No
Donations and gift aid	Donors	Contact information, donations received, gift aid form	Legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. Held securely on paper. Historical information held in office.	Yes	Clydesdale Bank, A9 accountants, HMRC.	No
Pastoral support	Members, adherents, members of the community	Contact information, health information	Legitimate interests and UK GDPR Article 9(2)(d) or consent	Electronically in password protected files. Held securely on paper.	Yes	No	No
Minutes of meetings	Members, attendees, contractors, members of the	Name	Public domain if the meeting is public otherwise Legitimate	If not public domain, held securely electronically	Kirk Session minutes sent to	Minutes of public meetings are made available	No

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	community		interests and UK GDPR Article 9(2)(d)	and/or on paper	National Office after 50 years	to the public on request.	
Sunday Club, Bible Class, Messy Church  Seedlings, Toddlers, Jolly Babies, Jesus Factor, Holiday Club	Children, parents, emergency contact.	Contact information, child's date of birth, health information (if relevant)	Legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. On paper in locked filing cabinet	Yes	No	No
Singalong for Memory	Only with consent, attendee, and/or carer	Contact information	Consent	Held securely on paper	Yes	No	No
Open Church, St Michael's	Volunteer guides	Contact information	Legitimate interests and consent	Held securely on paper.  'Emergency' contact list held out of sight in St Michael's Church.	Yes	No	No
Boys' Brigade	Children, parents, emergency contact.	Contact information, child's date of birth, health information (if relevant)	Legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. Held securely on	Yes	BB nationally	No

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				paper.			
Girls' Brigade	Children, parents, emergency contact.	Contact information, child's date of birth, health information (if relevant)	Legitimate interests and UK GDPR Article 9(2)(d)	Electronically in password protected files. Held securely on paper.	Yes	GB nationally	No
Guild	Guild members	Contact information	Legitimate interests	Held securely on paper	Yes	No	No
Church Choir	Choir members	Contact information	Legitimate interests	Held securely on paper	Yes	No	No
Parish card distribution	Volunteer delivery people	Contact information	Legitimate interests	Held securely on paper	Yes	No	No
Contractors	Contractors, their agents	Contact information, financial and contractual information	Contract	Held securely electronically or on paper	Yes	No	No
Congregational events and initiatives	People taking part (such as stallholders), volunteers	Contact information	Contract, legitimate interests and UK GDPR Article 9(2)(d)	Held securely electronically or on paper	Yes	Where required, information may be shared with third parties assisting with events.	No
Published media such as Parish Newsletter,	People whose name, photo or contact details	Name, image, contact information	Consent	Information usually held only	Yes	Publisher and then available publicly	No

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website, Facebook or any other social media, YouTube, Church noticeboards	appear in publications or broadcasts of Linlithgow and Avon Valley Church of Scotland at any or all of the worship centres (St Michael's, Springfield, St Ninian's Craigmalen, Avonbridge, or Torphichen Kirk			until publication. If held longer-term then held securely electronically or on paper.			
CCTV at Cross House	Images of people recorded on the CCTV cameras at Cross House Yard and Cross House Crush Hall	Image	Legitimate Interests	Images are stored remotely on a cloud based server, accessible by the Property Team Leader, and Health and Safety Officer. Data is automatically deleted after 30 days. There are	Yes	When required CCTV recordings may be shared with Police Scotland	No

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				visible notices advising users of the facilities that CCTV is in operation.			

Approved by the Kirk Session, Linlithgow and Avon Valley Church of Scotland  
 Date: 10 June 2025  
 Reviewed 10 March 2026