The Data (Use and Access) Act 2025 – Brief update for Churches

Following the introduction of the **Data (Use and Access) Act 2025**, churches should be aware that it amends (rather than replaces) the UK GDPR, Data Protection Act 2018, and PECR rules. The changes are being introduced in phases between June 2025 and June 2026. [ico.org.uk], [gov.uk]

What churches should do:

1. Review your data protection policies

Churches that hold personal data on members, volunteers, donors, children, pastoral contacts, and event attendees should review existing privacy notices and data protection policies to ensure they reflect the updated legislation. [ico.org.uk], [ico.org.uk]

2. Introduce a clear complaint process

The DUAA creates new requirements around handling complaints about personal data. Churches should make it easy for people to complain about data handling, acknowledge complaints promptly, and respond without undue delay. [gov.uk].

3. Update Subject Access Request procedures

The Act clarifies that organisations only need to conduct searches that are reasonable and proportionate when responding to Subject Access Requests. It also allows organisations to pause the response period while seeking clarification of unclear requests. [gov.uk]

4. Review church website cookies

If your church website uses analytics or functionality cookies, some categories may no longer require consent, although transparency and opt-out mechanisms may still be needed. [ico.org.uk], [gov.uk]

5. Check children's ministry data

Churches running Sunday schools, youth groups, holiday clubs, or online activities involving children should pay particular attention to the Act's strengthened emphasis on considering children's needs when processing data. [gov.uk]

6. Assess any automated decision-making

Most churches are unlikely to use significant automated decision-making, but if software is used for membership, safeguarding, recruitment, or grant decisions, the revised rules and safeguards should be reviewed. [gov.uk], [ico.org.uk]

Practical church checklist

- Review privacy notices.
- Update data protection and retention policies.
- Add a formal data complaints process.
- Review Subject Access Request procedures.
- Audit website cookies and consent banners.
- Ensure children's data is handled appropriately.
- Train church officers, trustees, and administrators on the changes.
- Monitor ICO guidance as further updates are published. [ico.org.uk], [ico.org.uk]

ICO: https://ico.org.uk/about-the-ico/what-we-do/legislation-we-cover/data-use-and-access-act-2025/the-data-use-and-access-act-2025-what-does-it-mean-for-organisations/

The Parish Resources website has a page dedicated to GDPR, they will be updating it soon: https://parishresources.org.uk/the-pcc-as-a-charity/parishes-and-gdpr/