

## **DATA PRIVACY NOTICE**

### **v1 April 2018**

#### **1. Policy Statement**

The Gloucester Diocesan Board of Finance (GDBF) is committed to respecting the privacy of all those for whom we hold personal information/data at any time. If you have any queries please do get in touch. You will find our contact details in section 15 at the end of this Privacy Notice.

This Privacy Notice sets out specifically the data protection and data privacy policies that fall within the oversight of the GDBF as a 'Data Controller', and it explains how your personal data is processed by the GDBF and for what purposes.

#### **2. Introduction**

The GDBF is committed to processing personal information we hold in accordance with current and developing national data legislation. This includes the General Data Protection Regulation (the "GDPR") which governs the processing of personal data; and the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003.

The GDBF will comply with its obligations under the "GDPR" by processing information in line with the legal bases set out in law (see section 4 below).

The GDBF will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure and ensure that appropriate technical measures are in place to protect personal data.

#### **3. The Diocese of Gloucester and the Gloucester Diocesan Board of Finance.**

The Diocese of Gloucester is a complex arrangement of Data Controllers, including PCCs, Incumbents, Local Ecumenical Partnerships (LEPs), the Bishop's Office, the Cathedral and its Chapter, the Diocesan Board of Education (DBE), the Diocese of Gloucester Academies Trust (DGAT), and the Gloucester Diocesan Board of Finance (GDBF). And it has a number of external links to theological education institutions, chaplaincies, fresh expressions of church, and others, both locally, regionally and nationally, and the Parish Giving Scheme (PGS).

Across this complex picture the central diocesan offices based in College Green include the departments for Education, Mission and Ministry, HR and Safeguarding, Office Management, Finance, Property & Development, Church Buildings, Secretariat, and Communications & Engagement. All these departments come under the oversight of the Gloucester Diocesan Board of Finance (GDBF) as Data Controller.

These central offices link with internal and external, formal and informal groups and bodies; with our PCCs and incumbents, other clergy, readers, lay leaders, those exploring vocations, those developing their discipleship, church officers, statutory partners, church networks, our contractors, Board and Committee

[gloucester.anglican.org](http://gloucester.anglican.org)

☎ 01452 410022 ✉ [church.house@glosdioc.org.uk](mailto:church.house@glosdioc.org.uk)

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members, volunteers, and other parties (see section 16 below) all within the Synodical governance and legal frameworks of the Church of England.

#### **4. The legal basis for processing your personal data:**

The GDBF will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure and ensure that appropriate technical measures are in place to protect personal data. The specific legal bases against which the GDBF will process information are

- Legitimate Interest
- Compliance with a legal obligation
- To fulfil contractual obligations
- Consent
- Vital interest
- Public task

Most of our data is processed because it is necessary for the GDBF's legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England).

Some of the data processing is necessary for compliance with a legal obligation. For example, the work of the GDBF will fall within the legal and synodical processes of the Church of England, Canon Law; and within the secular legal structures.

The GDBF will process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

The GDBF will process your data in order to respond to requests from you to receive particular information.

The GDBF will process your data to assist you in fulfilling your role in the church including pastoral and administrative support or if processing is necessary for compliance with a legal obligation.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

#### **5. Personal information: what it is, and why the GDBF processes it.**

Personal information relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the GDBF's possession or likely to come into such possession.

Personal information is collected where the GDBF believes it has lawful reason for us to do so (see 2 above). The GDBF will use your personal data for the following purposes:

- For the purposes of sending you/keeping you informed of the diocesan news/information which you have requested and that may be of interest to you including diocesan campaigns, activities, fundraising activities.
- For the purposes of keeping you informed of diocesan information that we believe is important to the role you hold within the diocese either in our local communities, or within our central diocesan offices.
- For the purposes of administering meetings and other such arrangements as fall within the Synodical governance framework of the Church and which ensure we are able to meet all legal and statutory obligations including the Church Representation Rules.
- To seek your views or comments.
- To manage GDBF employees and volunteers (including HR records and payroll and pension requirements and records).
- To process a grant or application for a role
- To maintain GDBF accounts and records (including the processing of gift aid applications)
- To maintain our records of all clergy and readers, and parochial Church Officers (including PCC secretaries, treasurers, churchwardens, those with a specifically nominated parish roles)

- To maintain GDBF required records of mandatory training with regard to safeguarding, and other safeguarding and personnel records as set out in law and the Church of England's national requirements.
- To manage safeguarding including DBS and safer recruitment, working with individuals within a safeguarding context within the church; and within statutory and legislative requirements.
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- To fundraise and promote the interests of the charity;
- To notify you of changes to our services and offices.
- To enable us to provide a church body voluntary service for the benefit of the public within the diocese.

## 6. How the GDBF collects personal data

In some or all of the following ways;

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications.

The data we process is likely to constitute sensitive personal data because, as central diocesan offices the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin. And, where this is relevant, mental and physical health, details of injuries, medication/treatment received, and criminal records, fines and other similar judicial records. (A very broad list of examples of those for whom we are in regular contact, or may need to share information is in 16 below).

## 7. Sharing personal data

Personal data will be treated as strictly confidential and will only be shared for lawful purposes and connected to (see section 16 below):

- Diocesan business - we will only share your data with your consent eg the Diocesan Directory; working/interest groups
- A national process or network– eg where individuals are part of exploring ordination; those whose role is part of a national network of others in a similar role.
- Where there are employment, social security or social protection, or other statutory reasons.

## 8. Keeping personal data!

The GDBF keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national church eg with regards to safeguarding.

Specifically, we retain personnel information as appropriate to centrally employed staff and volunteers, safeguarding data; financially required data eg by HMRC, and the Charity Commissioners; and current parochial Church Officer information (this includes parish, deanery, synods, boards and councils); gift aid declarations and associated paperwork for 6 years after the calendar year to which they relate.

## 9. Individual rights and personal data

Unless subject to an exemption under Data Protection law, you have the following rights with respect to your personal data: -

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<sup>1</sup> Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right at any time to withdraw your consent to our processing of your personal data.
- The right to lodge a complaint with the Information Commissioners Office.

## **10. Further processing**

If the GDBF wish to use your personal data for a new purpose, not covered by this Privacy/Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

## **11. Marketing permissions and seeking consent**

Whilst there may be an expectation that people involved in the life of the diocese in many ways would expect to receive information from the GDBF through email, post, social media etc; the GDBF is required through data regulations to ensure that it asks for your permission to do so in certain circumstances; and to ensure that it makes you aware of your rights in doing so.

### **Email and text**

- We will ask for your permission to contact you in this way.

### **Postal marketing;**

- From time to time we may send you information about the diocese and its work unless you have told us you would prefer not to receive this information by post.

### **Bulletins and newsletters**

- The GDBF will, in the main, require individuals to personally opt in and out of electronically sent information such as diocesan newsletters. This ensures that individuals are able to manage the information they wish to receive.

## **12. Gathering information from external sources**

The GDBF may from time to time undertake research to enable it to develop its work. Any information, whether personal or of a quite general nature, will be from publicly available sources such as Companies House, information published in articles/papers etc, social media which is viewed publicly through the privacy notices of social media and messaging services eg LinkedIn; or through national and regional bodies or authorities information such as the census data.

## **13. Data processors**

A number of bodies process data for the GDBF.

- CIT (for IT help and support to GDBF employees and particularly nominated officers)
- CCPAS (for DBS processes)
- Clergy Pensions, stipend and payroll
- Church Commissioners (pension for GDBF employees)
- Canada Life (regarding pension and GDBF employees)
- MailChimp – electronic networking for newsletters and bulletins; where individuals directly manage their own consent and what information they wish to receive from the GDBF.

## **14. Changes to this Privacy Notice**

The GDBF will review this privacy notice regularly and may update it at any time - for example in the event of legal changes; to improve how we manage data; or where an issue or concern has come to light that needs appropriate response. If there are any significant changes in the way the GDBF processes your personal information we will provide a prominent notice on our website or send you a notification.

## **15. Contact details and reporting concerns**

To exercise all relevant rights, queries or complaints please in the first instance contact

Canon Judith Knight  
Deputy Diocesan Secretary  
The Gloucester Diocesan Board of Finance  
Church House, College Green. Gloucester GL1 2LY  
Tel: 01452 410022

Charity number: 252234

You can also contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

<b>Examples of those with whom the GDBF is generally in regular contact</b>
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**Data Controllers:** The Bishop's Office, the Board of Education, the Parish Giving Scheme, Gloucester Cathedral's Dean and Chapter, PCCs and Incumbents; national Church Institutions as appropriate.

**Clergy;** all stipendiary, non-stipendiary, retired clergy with/without the Bishop's Permission to Officiate; where clergy are locally employed by a PCC, and those in secular employment.

**Other ministers;** pioneers, locally licensed lay people.

**Church officers;** churchwardens, PCC secretaries, treasurers, safeguarding parish representatives/nominated people, church administrators.

**Other church people;** Members of PCCs/DCCs.

**Synodical arrangements;** deanery officers and representatives, Resources Committee, Bishop's Council, Diocesan Synod; General Synod representatives

**Committees/Groups/Boards:** Audit Committee, the DAC, DPMG, Glebe Committee, Nominations Committee, the Diocesan Safeguarding Board. Ad hoc diocesan central working groups as may be determined for specific purposes; Readers' Committee, Bishop's Advisory Groups; Board of Patronage; the Diocesan Trust.

**LIFE vision priority interest groups;** those who have consented to be part of a range of working or interest groups.

**Particular groups associated with the life of the diocese** eg the Spiritual Directors' network; The Company of St Kyneburga

**Fund applicants;** information of individuals/groups applying for funding for various diocesan projects and initiatives.

**Professionals, professional bodies/organisations and contractors;** relating to contracts for goods and services; individuals in their professional capacity.

**Examples of third parties with whom the GDBF will share data where this is appropriate.**

- **Clergy details**
  - with the Bishop's Office in the course of ministry;
  - periodically to Crockford's Clerical Directory;
  - by the Property team where this links to works of repair and maintenance to diocesan clergy housing; and the letting of diocesan properties;
  - The relevant local authority in respect of council tax and utility companies in respect of direct energy supplies to the property;
  - national Church offices/Church Commissioners with regard to pensions, stipend and payroll issues.
  
- **Diocesan Directory**, published with consents where appropriate, available to purchase within the diocese.
  
- **Specifically named individuals**, clergy/reader/ details where these related to those undertaking ministerial development reviews and support.
  
- **Online Faculty System (OFS)** – petitioners/objectors as it is developed within the diocese will be shared as appropriate with
  - the offices of the Diocesan Registrar,
  - the offices of the Chancellor of the Diocese,
  - statutory consultees eg Historic England, CBC;
  - others where this facilitates the consideration of applications for either a Faculty of a matter not requiring a faculty under the Faculty Jurisdiction Rules.
  
- **Legal and statutory guidance and others**, in compliance with the range of our legal responsibilities; including those involving
  - land/glebe, property purchases and sales, tenancy arrangements
  - employment, HMRC
  - those involved with safeguarding issues, including Police, Probation, Social Care and Children's Services.
  - Charity Commission, insurers.
  - Legal advisers as appropriate.
  
- **National Church**
  - in line with national safeguarding requirements;
  - Ministry Division and national Church Institutions as appropriate;
  - stipend/payroll and pensions.
  
- **Church Commissioners** – Pensions Board re GDBF pensions and other pension providers as appropriate.
  
- **CCPAS** – with regard to DBS checking processes.
  
- **Contractors and insurers** – with regard to GDBF appointed contractors where this relates to the provision of services to properties for emergency and maintenance purposes.
  
- In the course of volunteering or employment – with GDBF contracted **IT providers** for general technical support.