

DATA PRIVACY NOTICE

V2 July 2021

This Privacy Notice sets out specifically the data protection and data privacy policies that fall within the oversight of the Office of the Bishop of Gloucester ('the Office'). This privacy notice explains how your personal data is processed by the Office as Data Controller, and for what purposes.

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 Office of the Bishop of Gloucester, the Cathedral and its Chapter, the Gloucester Diocesan Board of Education (DBE), the Diocese of Gloucester's Academies Trust (DGAT), and the Diocesan Board of Finance (GDBF). And it as 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 and teams for Education, Mission and Ministry, HR and Safeguarding, Office Management, Finance, Property & Development, Church Buildings, Secretariat, and Communications & Engagement and may include from time to time project focused volunteers and paid staff. All these departments and teams fall under the oversight of the Gloucester Diocesan Board of Finance (GDBF) as a Data Controller.

The Office of the Bishop of Gloucester also links widely across local, regional, national church bodies and other institutions. It links with 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 members, volunteers, and other parties (please see 13 below) all within the Synodical governance and legal frameworks of the Church of England; with senior church and ecumenical leaders; government offices, and the offices of the diocesan bishops of other dioceses, both within the Church of England and beyond in the wider Anglican Communion, which includes countries and territories outside the European Union.

I. Policy Statement

The Office of the Bishop of Gloucester:

- i. 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 12 at the end of this Privacy Notice.

gloucester.anglican.org

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Diocese of Gloucester | Church House | College Green | Gloucester | GLI 2LY

- ii. is committed to processing personal information we hold in accordance with current and developing national data legislation. This includes the UK General Data Protection Regulation (the UK “GDPR”) which governs the processing of personal data; and the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003.
- iii. will comply with its obligations under the “UK GDPR” by processing information in line with the legal bases set out in law (see section 3 below).
- iv. 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.

2. Personal Information - what it is, and why the Office of the Bishop of Gloucester collects and 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 Office’s possession or likely to come into such possession.

Personal information is collected where the Office believes it has lawful reason for us to do so. This will be for the purposes of keeping you informed of the diocesan news/information that we believe is relevant to you and/or important for the role you hold within the diocese.

The Office will use your personal data for the following purposes: -

1. To administer meetings and other such arrangements as fall within the Synodical governance framework of the Church.
2. To manage clergy personnel data (including application processes for parochial and other clergy roles; pastoral and Episcopal Review meetings, and Clergy Personal Files (sometimes known as ‘blue files’)). This includes transferring a blue file when someone moves to take up a new ministry/role (inc PTO) in another diocese.
3. To pass to the GDBF Department for Mission and Ministry for the management of Readers’ personal files
4. To manage parish files (including correspondence regarding parish matters not directly relating to a specific member of parish clergy)
5. To respond to issues relating to matters of clergy, Reader, or other ministerial discipline.
6. To respond to general correspondence.
7. To communicate with our clergy, Readers, commissioned or authorised lay ministers, and church officers; this includes parishes, Bishop’s Mission Orders and Fresh Expressions, and chaplaincies.
8. To communicate as appropriate with archdeacons, bishops, and archbishops across the Church of England.
9. To communicate as appropriate with regional and national Church of England bodies, committees and networks, including the Central Readers Council (CRC).
10. To communicate as appropriate with House of Lords, committees and associated groups.
11. To communicate as appropriate with Trustee bodies, Governor bodies and other roles that the Office of the Bishop of Gloucester may undertake.
12. To respond to/communicate with senior leaders within and outside the Church of England across communities within the diocese to build networks, relationships and partnerships.
13. To communicate as appropriate with bishops and Archbishops of dioceses and provinces of the Anglican Communion, including countries and territories outside the European Union.

3. The legal basis for processing your personal data:

1. The Office 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
 - a. Legitimate Interest
 - b. Compliance with a legal obligation
 - c. To fulfil contractual obligations
 - d. Consent
 - e. Vital interest
 - f. Public task
2. Most of our data is processed because it is necessary for and set within the GDBF's legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England).
3. Some of the data processing is necessary for compliance with a legal obligation. For example, the work of the Office will fall within the legal and synodical processes of the Church of England, Canon Law; and within the secular legal structures.
4. The Office will process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.
5. The Office will process your data in order to respond to requests from you to receive particular information.
6. The Office 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.
7. Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.
8. Where explicit consent is required the Office will ensure that you are informed about your right to withdraw your consent.
9. Where processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or other statutory reason.
10. Where processing is carried out by the Office as a not-for-profit body religious aim provided:
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 - a. the processing relates only to members or former members or those who have regular contact with it in connection with those purposes (please see 14 below); and
 - b. there is no disclosure to a third party without consent.

4. How the Office collects personal data

In some or all of the following ways;

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

5. Sharing personal data

Personal data will be treated as strictly confidential and will only be shared for lawful purposes and connected to (see 14 below):

1. Diocesan and Episcopal business - we will only share your data with your consent e.g. the Diocesan Directory; working/interest groups
2. A national process or network appropriate to the Office of the Bishop of Gloucester, such as where individuals are part of a process of exploring ordination, Reader ministry, or those whose role is part of a national network of others in a similar role.
3. Where there are employment, social security or social protection, or other statutory reasons.

6. Keeping personal data¹

The Office keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national church e.g. with regards to Safeguarding.

Specifically, we retain personnel information as appropriate to all clergy within the diocese – stipendiary, self-supporting, retired, clergy with the Bishop's Permission to Officiate; deceased; those in secular employment – as well as all employed staff and volunteers.

7. Individual rights and personal data

Unless subject to an exemption under the UK GDPR, you have the following rights with respect to your personal data: -

1. The right to request a copy of the personal data which the Office holds about you;
2. The right to request that the Office corrects any personal data if it is found to be inaccurate or out of date;
3. The right to request your personal data is erased where it is no longer necessary for the Office to retain such data;
4. The right to withdraw your consent to the processing at any time
5. The right to request that the Office provides you the data subject with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable.
6. 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;
7. The right to object to the processing of personal data, where applicable. [*This only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics*]
8. The right to lodge a complaint with the Information Commissioners Office.

8. Further processing

If the Office 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.

9. 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 diocesan office through email, post, social media etc.;

¹ 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 Office 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/social media marketing:

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

Postal marketing;

2. 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

3. The Office 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.

10. Gathering information from external sources

The Office 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 e.g. LinkedIn; or through national and regional bodies or authorities information such as the Census data.

11. Data processors

A number of bodies process data for the Office or in work linked to the Office.

1. Gloucester Diocesan Board of Finance (including all departments and the offices of the Archdeacons of Gloucester and Cheltenham)
2. Complete IT ((our Information Technology contractors) for IT help and support to Office & GDBF employees, and particularly nominated officers)
3. CCPAS (for DBS processes)
4. Clergy Pensions, stipend and payroll
5. Church Commissioners (who employ Office staff not employed through the GDBF)
6. MailChimp – electronic networking for newsletters and bulletins; where individuals directly manage their own consent and what information they wish to receive from the Office.

12. Changes to this Privacy Notice

The Bishop's Office 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, where an issue or concern has come to light that needs appropriate response. If there are any significant changes in the way the Bishop's Office processes your personal information we will provide a prominent notice on the Diocese of Gloucester website or send you a notification.

13. Contact details and reporting concerns

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

The Revd Jason Taylor
Chaplain to the Bishop of Gloucester
The Bishop's Office
No 2, College Green, Gloucester GL1 2LR
Tel: 01452 835 513
Email: jtaylor@glosdioc.org.uk

You can contact the Information Commissioners 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

14.

Those with whom the Office of the Bishop of Gloucester is in regular contact:

1. **Data Controllers:** The Gloucester Diocesan Board of Finance, The Gloucester Diocese Board of Education, Gloucester Cathedral's Dean and Chapter, PCCs and Incumbents, the Diocese of Gloucester Academies Trust; National Church Institutions; Members of the House of Bishops and College of Bishops, The Offices of the Archbishops of Canterbury and York; Veale Wasbrough Vizards (our Registrars)
2. **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.
3. **Other ministers;** Pioneers, locally licensed lay people including Readers
4. **Church Officers;** Churchwardens, PCC Secretaries, Treasurers, Safeguarding Parish representatives/Nominated People; Church Administrators.
5. **Other church people;** Members of PCCs/DCCs, Deanery Lay Vice Chairs, members of Diocesan Synod, Diocesan members of the General Synod of the Church of England.
6. **Synodical arrangements;** deanery officers and representatives, Resources Committee, Bishop's Council, Diocesan Synod; General Synod representatives;
7. **Committees/Groups/Boards:** Bishop's Council, Diocesan Synod
8. **LIFE** - vision priority interest groups; those who have consented to be part of a range of working or interest groups.
9. **Professionals, professional bodies/organisations and contractors** – relating to contracts for goods and services; individuals in their professional capacity.

15.

Third parties with whom the Office of the Bishop of Gloucester will share data:

1. **Clergy details** – with the GDBF in the course of ministry; periodically to Crockford's Clerical Directory in regards to appointments or changes of clergy details; national church offices/Church Commissioners with regard to employment of Office staff and other operational matters; The House of Lords, the office of the Appointments Secretary for senior ecclesiastical appointments.
2. **Diocesan Directory**, published with consents where appropriate, available to purchase within the diocese.
3. **Specifically named individuals**, clergy/Reader/other licenced minister details where these are related to those undertaking ministerial development reviews and support.
4. **Legal and statutory guidance and others**; In compliance with the range of our legal responsibilities; including matters relating to ministry, through legal advisers as appropriate.
 - a. And with safeguarding issues, including GDBF Safeguarding Team, the GDBF Safeguarding Board, Police, Probation, Social Care and Children's Services.
5. **National church** – in line with national safeguarding requirements, Ministry Division and National Church Institutions as appropriate.
6. **International church bodies** – in line with national safeguarding requirements.
7. **Theological Education Institutions** – with regard to ordinands, potential ordinands, training, support and development.
8. **Church Commissioners** – Pensions Board re GDBF pensions; other pension providers as appropriate.
9. **CCPAS** – with regard to DBS checking processes.
10. In the course of volunteering or employment – with GDBF contracted **IT providers** for general technical support.
11. **Central Readers Council (CRC)** – who maintain a register of Readers and also distribute 'The Reader' magazine. In the normal course of duties, the CRC will normally receive information from the GDBF Department for Mission and Ministry, who maintain Reader files, however it may occasionally be necessary for the Bishop's Office to contact the CRC directly.