



The Peterborough Diocesan Board of Finance General Privacy Policy

Introduction

The Church of England comprises many different charities and office holders; it is a community rather than an organisation. The Diocese of Peterborough itself is made up of multiple charities – one of which is the Peterborough Diocesan Board of Finance (“PDBF”, “we”, “our”, “us”). The PDBF is the legal entity through which many of the diocesan responsibilities and functions are achieved.

This privacy notice applies to all personal data – including special or sensitive personal data – processed by the PDBF in relation to all clergy, licensed and authorised lay ministers, parish officers and role holders, school contacts and other regular contacts (“you”, “your”). Please note that this notice covers a wide range of processing activities and therefore much of its contents may not be relevant to you.

Your personal data may be processed by members of diocesan staff or volunteers for purposes connected with diocesan business, which includes the following:

- To support the mission and ministry of the Church of England, and to enable us to provide charitable services for the benefit of the public in the Diocese of Peterborough
- To administer membership records
- To fundraise and promote the interests of the charity
- To maintain our own accounts and records (including the processing of gift aid applications)
- To inform you of news, events, activities and services happening throughout the diocese.

Appendix 1 sets out in more detail the purposes for which personal data is processed by the PDBF.

A CCTV system is in operation at the diocesan office and some satellite offices for safety and security of visitors and the prevention and prosecution of crime.

What is the legal basis for processing your personal data?

Unless otherwise indicated in Appendix 1, we process your personal data in the course of our legitimate activities as a not-for-profit body with a religious aim.

Sharing your personal data

Contact details for clergy, readers, licensed lay ministers, deanery officers, parish safeguarding officers and General Synod representatives appear in the Diocesan Directory and in the Diocesan Database. In addition contact details for parish officers (Churchwardens and District Churchwardens, PCC and District Secretaries, PCC and District Treasurers, Safeguarding officers), schools (teachers, governors, administrative staff) Multi Academy Trusts (employees) appear in the Diocesan Database to facilitate the administrative obligations of the diocese. We will strive to give people the option to provide contact details they are happy to share (for example a parish email address) for publication purposes.

Your personal data may be shared with other data controllers within the Church of England, such as National Church Institutions, the Bishop of Peterborough, Suffragan and Assistant Bishops (and their staff and advisers), Deanery Officers, the Dean and Chapter of Peterborough Cathedral, Parochial Church Councils within the diocese, and other clergy or lay people licensed or authorised within the diocese. Personal data of stipendiary clergy and lay workers is shared with the National Church for payment of stipend and the Church of England Pension Board for administration of pensions.

Personal data may be shared with third party service providers – principally:

- ADEPT, who manage the diocesan website
- Hunt and Coombes, who fulfil the Diocesan Registry and provide legal advice to the PDBF
- Mail Chimp, through which we coordinate email communications, such as e-bulletins
- Eventbrite, through which events and training are booked
- CoopSys the Managed Service Provider for our IT
- Azets Holdings Ltd who provide our payroll services.
- Worthers Limited, who provide our on line contact management system.

- ‘The Key’ who provide information, help and support on school governance.
- Thirtyone:eight – an independent Christian safeguarding charity, who conduct Disclosure and Barring Service (DBS) checks on our behalf, as well as offering other safeguarding support services
- Agents, contractors or consultants working on behalf of the PDBF – for example, the Property team share relevant personal data relating to clergy who are housed by the PDBF and tenants in PDBF properties with contractors in order for them to fulfil obligations over housing improvements and repairs
- SEIDOR – our financial system support company.

The Diocesan Board of Education may share data with church multi-academy trusts, notably the Peterborough Diocesan Education Trust. They may also share data with their governance consultants.

Personal Data for those in training may be shared with theological colleges by the Diocesan Director of Ordinands (and his team); please refer to the privacy notice on our website.

Otherwise, we will only share your data with third parties with your consent.

How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide “Save or Delete: The Care of Diocesan Records”, which is available from the Church of England website:

<https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>.

Specifically, we retain personal data in accordance with Appendix 2.

Your rights and your personal data

Subject to certain conditions, and in certain circumstances, you have the right to:

- Request access to your personal information – this is usually known as making a ‘data subject access request’ and it enables you to receive a copy of the personal information we hold about you
- Request rectification of your personal information if it is incorrect – this enables you to have any inaccurate or incomplete personal information we hold about you corrected.
- Request the erasure of your personal information – this enables you to ask us to delete or remove your personal information where there’s no compelling reason for its continued processing; e.g. it’s no longer necessary in relation to the purpose for which it was originally collected

- Restrict the processing of your personal information – this enables you to ask us to suspend the processing of your personal information; e.g. if you contest its accuracy and so want us to verify its accuracy
- Object to the processing of your personal information – this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing, and there is something relating to your particular situation which makes you decide to object to processing on this ground.

If you wish to exercise any of these rights, please contact our Data Protection Officer. We may need to request specific information from you in order to verify your identity, and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

Transferring personal information outside the European Economic Area

The PDBF will not transfer your personal information to countries outside the UK or European Economic Area without the safeguards being in place that are compliant with the UK GDPR or the EU GDPR. Where data transfer is required, for example in relation to our international link dioceses, separate consents will be sought.

Complaints

If you believe that the PDBF has not complied with your data protection rights, please contact our Data Protection Officer. You also have the right to complain to the Information Commissioner's Office ('ICO') at any time. The ICO is the UK supervisory authority for data protection issues and contact details can be found on the ICO website – www.ico.org.uk.

Changes to this Privacy Notice

The PDBF reserves the right to update or amend this Privacy Notice at any time. We keep this Privacy Notice under regular review and we will place any updates on this web page – <https://www.peterborough-diocese.org.uk/changes-in-data-protection-/data-protection>.

How to contact us

If you have any questions about this Privacy Notice or how we handle your personal information, please contact our Data Protection Officer, Susan Ratcliffe, through one of the following ways:

Mail: The Peterborough Diocesan Board of Finance, The Palace, Peterborough, PE1 1YB

Telephone: 01733 887039

Email: sue.ratcliffe@peterborough-diocese.org.uk

Appendix 1: Details of purposes for data processing

Clergy, Readers and Licenced Lay Workers and Ministers

- For a record of your appointment to be maintained on the diocesan database
- For the administration of the payroll for stipendiary clergy and stipendiary lay posts;
- To include contact details (addresses, telephone numbers and emails) for clergy, readers and licensed lay ministers in the Diocesan Directory (in printed and online form)
- To fulfil legal obligations relating to Continuing Ministerial Development, such as ministerial development review, training and grants
- To communicate with you information and training opportunities relevant to your role
- To fulfil legal obligations to maintain electoral registers for synodical elections
- To fulfil legal obligations in relation to pastoral reorganisation (including Bishops' Mission Orders and church closure)
- To fulfil legal obligations as housing provider for ecclesiastical office holders, who receive housing in the performance of their duties
- To fulfil legal obligations and our legitimate interests relating to the safeguarding of children and adults at risk, including safer recruitment processes
- To fulfil legal obligations for any clergy or laity sponsored under Tier 2 (Minister of Religion) or Tier 5 (Charity Workers) of the Points Based System.

Authorised Ministers (including Pastoral Assistants, Youth, Children and Families Workers, Evangelism Enablers and Locally Authorised Preachers)

- For a record of your authorisation to be maintained on the Diocesan Database
- To communicate with you information and training opportunities relevant to your role.

Parish Officers (including Churchwardens and District Churchwardens, PCC and DCC Secretaries, PCC and DCC Treasurers and Gift Aid Secretaries)

- For a record of your appointment to be maintained on the Diocesan Database
- To communicate with you information and training opportunities relevant to your role
- To include contact details (addresses, telephone numbers and emails) for the parish officers in the Diocesan Directory (in printed and online form) and the Diocesan Database.
- To fulfil legal obligations of the Archdeacons in relation to their annual Visitations to parishes within the diocese
- To fulfil legal obligations in relation to pastoral reorganisation (including Bishops' Mission Orders and church closure)
- To fulfil legal obligations and our legitimate interests relating to the safeguarding of children and adults at risk, including safer recruitment processes
- To fulfil legal obligations on the PDBF during a vacancy (sequestration)
- To complete data collection exercises carried out in our legitimate interests or at the request of the National Church, such as 'Statistics for Mission' and Parish Finance Returns.

Those who hold elected offices (Deanery Synod, Diocesan Synod and its committees and General Synod)

- For a record of your membership to be maintained on the Diocesan Database

- To fulfil legal obligations to maintain electoral registers for synodical elections
- To administer functions relating to the Diocesan Synod and various committees of the Synod.

Diocesan Board of Education

- For a record of head teachers, clerks and governors of Church of England Schools to be maintained on the Diocesan Database
- To fulfil legal obligations placed on the Diocesan Board of Education by the Diocesan Board of Education Measure (1991)
- For the administration of the committees of the Diocesan Board of Education.
- To provide members of the public access to the Diocesan Board of Education Staff contact details via the Diocesan Website to aid necessary communication.

Diocesan Board of Finance

- For the administration of the DBF
- To allow the administration necessary to a role holder employed by the DBF.
- To provide members of the public access to DBF employee contact details via the Diocesan Website as necessary to fulfil the obligations of the role.

Diocesan Advisory Committee (DAC)

- For the administration of the DAC
- For the provision of advice from members and advisers of the DAC
- For the legal obligations placed on the DAC by the Care of Churches and Ecclesiastical Jurisdiction Measure (1991)
- For the maintenance of an approved list of architects
- For the maintenance of a list of contractors who have carried out work to church buildings.

Those serving in parish roles which require a DBS check

- To fulfil legal obligations and our legitimate interests relating to the safeguarding of children and adults at risk, including safer recruitment processes
- As necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

Those in training

- To support procedures relating to discernment and training for vocations to ordained and lay ministries
- For administrative purposes in relation to courses and other optional training opportunities – for example, Course in Christian Studies.

Tenants in PDBF properties

- To fulfil legal obligations as housing provider for tenants in DBF properties, including Glebe property.

Recipients of grants

- For payment of the grants
- To maintain a record of grant applications
- To evaluate the projects to which grants have been awarded.

Communications contacts

- For the distribution of diocesan publications (a distributors list)
- For resourcing parish magazine editors to provide content for publications.

Appendix 2: Retention Schedules Category (for full details see https://www.churchofengland.org/more/libraries-and-archives/records-management-guides .)	Retention Period
Benefice and Licensed Clergy, Licensed Lay Workers and Clergy with Permission to Officiate	Until notice of death
Licence Lay Ministers and Readers and Laity with Permission to Officiate	For duration of licence/ permission to officiate + 10 years
Parish Officers (Churchwardens/District Wardens, PCC/DCC Secretaries, PCC/DCC Treasurers and Gift Aid Secretaries)	For term of office
Members of Diocesan Synod and Deanery Synod	For duration of membership
Youth, Children and Families Workers	For duration of appointment
Parish Safeguarding Officers	For duration of appointment
Licensed Lay Ministers (Readers, Pastoral Ministers, Parish Evangelists)	For duration of authorisation + 10 years
Those in training for Licensed Lay Ministry	For duration of training + 10 years
Students on diocesan training courses	For duration of the course + 5 years
Candidates for Ordination	For duration of training + 10 years or 10 years from the last time of contact
Diocesan Advisory Committee Members and Advisers	For duration of term or appointment + 7 years since last expense claim
DAC Contractors list	For as long as they wish to remain on the list
Architects (approved list)	For as long as they wish to remain on the list + 7 years from last fee paid
Church School Governors	For duration of appointment
Church School Clerks	For duration of appointment
Church School Head Teachers	For duration of appointment
DBS applicants	5 years or until DBS renewal is complete (whichever comes first)
DBS Trace Risk assessments	Until data subject is deceased
DBS church workforce database	Until data subject leaves the organisation
Clergy Personnel records – safeguarding allegations	70 years from the cleric's death ¹ (para 30 and 56)
Lay Workers' personnel records where working with children and vulnerable people	75 years after employment ceases
Disclosure and Barring Services (DBS) disclosures obtained as part of vetting process	DBS certificate – 6 months after issue ²

¹ Personal Files Relating to Clergy, Policy for Bishops and their staff; Approved by the House of Bishops May 2018

² Ibid 1 (para 28–29)

<p>Appendix 2: Retention Schedules Category (for full details see https://www.churchofengland.org/more/libraries-and-archives/records-management-guides.)</p>	Retention Period
Records of cleric's criminal record check history	70 years from the date of the cleric's death ³
Evidence of independent scrutiny of Clergy Personnel File under Past Cases Review Protocol, and any action taken	70 years from the cleric's death ⁴
Record of Clergy Current Status Letters	70 years from the date of the cleric's death ⁵
Record of Clergy Discipline Measure complaint – full file	70 years from date of cleric's death ⁶
Record of Clergy safeguarding training	70 years from date of cleric's death ⁷
Commercial Tenants in PDBF properties	For duration of tenancy + 10 years
Parish Magazine Editors	For as long as they wish to remain on the list

Privacy Notice - Legitimate Interest Assessment

We have a specific purpose with a defined benefit	Which is to communicate in the most efficient, effective and appropriate means with officers staff and clergy within the Peterborough diocese on issues relating to administrative, legislative and regulatory matters.
The processing is necessary to achieve the defined benefit.	It is not possible to achieve the purpose without the processing of the information which is limited on the basis of need to fulfil the purpose.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The purpose of the processing allows the staff, clergy, officer to successfully fulfil the obligations of their role. Access to the data being processed is restricted to those who need it.

For a copy of the full Legitimate Interest Assessment, please contact The Data Protection Officer sue.ratcliffe@peterborough-diocese.org.uk

³ Ibid 1 (para 29)

⁴ Ibid 1 (para 33)

⁵ Ibid 1 (para 24)

⁶ Ibid 1 (para 36–37)

⁷ Ibid 1 (para 32)