

DATA PRIVACY NOTICE DIOCESE OF BATH AND WELLS - SAFEGUARDING

1. Who are we?

The Bath and Wells Diocesan Board of Finance (DBF) is a company limited by guarantee and a registered charity. The objects of the Board include to promote and assist the work and purposes of the Church of England in the Diocese of Bath and Wells, and to organise and provide funds in aid of the work of the Church for the essential departments of the Church's work. This Notice sets out what data we hold and the purposes for which we hold it. This notice relates specifically to information held in relation to Safeguarding.

For the purposes of data protection, the DBF is the data controller. This means that the DBF decides how your personal data is processed and for what purposes.

2. Your personal data.

Personal data means any information relating to an identified or identifiable natural person (known as the "data subject"). The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

3. Why do we hold your personal data?

- To enable us to support the mission of the Church of England in this Diocese.
- To consult with office holders such as clergy, Churchwardens, PCC Secretaries.
- To promote education in the diocese which is consistent with the faith and practice of the Church of England;
- To provide support for ministry and mission, including mission, evangelism, discipleship, vocations and training.
- To manage our employees and volunteers
- To manage records of pastoral schemes (eg changes in parish structures).
- The management of safeguarding and the provision of safeguarding training and advice
- To inform the people listed in paragraph 4 below of news, events, training, and services running either within the Diocese of Bath and Wells or further afield through: -
 - Mailings (by email &/or hard copy)
 - Newsletters sent to Parish Safeguarding Officers
- To enable us to provide a voluntary service for the benefit of the public within this Diocese, and to respond to enquiries or complaints from members of the public who approach the Diocese for any reason.
- To protect the interests of children, young people and adults who may be at risk of or subject to abuse and neglect, or who may be the victims of crime.

4 What data do we hold?

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The Old Deanery, Wells, Somerset, BA5 2UG

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To enable us to support the mission of the Church of England in this Diocese, including ensuring that Safer Recruitment and Safeguarding Training procedures are appropriately followed according to Church of England Practice Guidance, we have a legitimate interest in holding the personal data of: -

- Clergy
- Lay ministers
- Parochial Church Council members, officers and volunteers
- Deanery Synod members and officers
- Members of General Synod and Diocesan Synod
- The Diocesan Board of Finance and its Committees and working groups
- The Diocesan Board of Education and its Committees and working groups
- Staff employed by the Diocesan Board of Finance
- Job applicants
- DBF contractors
- DBF volunteers

We hold the following personal data:

- Personal and contact details
- Office or role in the Diocese (eg vicar; PCC Secretary; Parish Safeguarding Officer, deanery treasurer; member of diocesan synod)
- Courses or training events attended
- Information disclosed on the confidential declaration form
- Disclosure and Barring Service (DBS) check outcomes, and any risk assessment information arising from an assessment of any caution, conviction or Police intelligence shown on the DBS Certificate.

In order to protect the legitimate interests of children, young people and adults who may be subject to or at risk of abuse or neglect, we also hold data regarding:

- Members of the congregation and church officers who due to criminal convictions are believed or known to pose a risk to children, young people or adults
- Members of the congregation or church officers against whom allegations of harm or abuse have been made.
- Members of the congregation or church officers where concerns have been raised regarding their behaviour such that it may pose a risk to others attending church.
- Children, young people or adults who may be at risk of or subject to abuse or neglect, where a referral for advice or assistance has been made to us by a family member or friend, church officer, or by a Statutory Authority.

We hold the following personal data on these cases:

- Personal and contact details

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- Family information where relevant
- Details of criminal convictions
- Risk assessments and risk management plans
- Details of those who may be specifically at risk
- Safeguarding arrangements that may have been put into place.

5 How do we comply with the GDPR?

The Bath and Wells Diocesan Board of Finance complies with its obligations under the GDPR by: -

- keeping personal data up to date (we rely on you to help us do that by letting us know of changes locally);
- storing it securely;
- only collecting the data we need for specific purposes and not using it for any other purpose without consent;
- only collecting the data we need for the purpose we are using it;
- protecting personal data from loss, misuse, unauthorised access and disclosure;
- ensuring that appropriate technical measures are in place to protect personal data.

6. What is the legal basis for processing your data?

We hold your data for one or more of the following reasons:

- For the purposes of “legitimate interests” to enable us to promote and assist the work of the Church of England in this Diocese eg carry out our obligations under ecclesiastical offices terms of service and employment law; to contact PCC officers about safeguarding, data protection and other matters; to keep PCC’s and Clergy informed about news, events, training and services; to promote education in the diocese which is consistent with the faith and practice of the Church of England; to provide support for ministry and mission, including mission, evangelism, discipleship, vocations and training.
- To comply with our legal obligations.
- For the performance of a contract to which you are a party.
- To protect the vital interests of the data subject or where that person is incapable of giving consent.
- For the performance of a task carried out in the public interest.
- Consent: where your data is used other than in accordance with one of the above reasons, we will first obtain your consent to that use.
- As a not-for-profit religious organization the DBF is permitted to process information about your religious beliefs to administer membership or contact details, or data relating to criminal allegations, proceedings or convictions, provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with its purposes); and
 - there is no disclosure to a third party without consent except as set out set out in paragraph 7 below.

7. Sharing your personal data

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The DBF holds data on the following systems where processing is necessary for the purposes of legitimate interests pursued by the DBF. We may need to share your personal data within the Bath and Wells Diocesan Board of Finance; with other bodies within the Church of England; and with other individuals or bodies as set out below, to carry out our legitimate interests as a Board of Finance or where necessary to discharge our legal obligations.

The Diocesan Contact Management System (CMS) is an online Church of England Portal which includes personal data (contact details) of clergy and PCC office holders; PCC volunteers; DBF committee members and church records. The Diocesan Board of Finance shares personal data via the Diocesan Contact Management System (CMS) between the following: -

- Staff of the Bath and Wells Diocesan Board of Finance
- Trustees and Directors of the Bath and Wells Diocesan Board of Finance
- The office of the Bishop of Bath and Wells and the Bishop of Taunton
- The Archdeacon of Bath
- The Archdeacon of Taunton
- The Archdeacon of Wells
- The Diocesan Registrar
- The Chancellor for the Diocese of Bath and Wells
- The Diocesan Advisory Committee
- The Bath and Wells Diocesan Board of Education
- The Bath and Wells Multi-Academy Trust
- Wells Cathedral
- Clergy within the diocese
- PCC officers and volunteers within the Diocese

Information relating to those who may pose a risk of harm to others, or those who may be at risk of harm may be shared with the statutory authorities including Police, Probation and Social Services where to do so will aid in the prevention or detection of crime, or protect the legitimate interests of children, young people or adults who may be subject to or at risk of harm, abuse or neglect.

Information relating to those who may pose a risk of harm to others, or those who may be at risk of harm may be shared with the Diocesan Safeguarding Panel, an advisory committee of the Diocesan Board of Finance who role is to oversee the safeguarding activities of the Diocese, and which is answerable to Bishops Council. Members of the Panel are:

- employed in a professional role in the Diocese
- office holders in the Diocese
- volunteers in relevant roles in the Diocese
- professionals who are employed by external organisations in a safeguarding role.

This Panel has a working group that reviews and quality assures the work of the Safeguarding Team and which may therefore review Safeguarding information. There are specific confidentiality and data management arrangements in place to ensure that data is shared securely and is not available to Panel members outside of the Panel meetings.

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8. How long do we keep your personal data?

We keep data in accordance with our legal requirements and the guidance set out in the guide “Save or Delete: the Care of Diocesan Records” which is available from the Church of England <https://www.churchofengland.org/sites/default/files/2017-11/Save%20or%20Delete%20-%20The%20Care%20of%20Diocesan%20Records.pdf>

Safeguarding Records are kept indefinitely as required by the Independent Inquiry into Child Sexual Abuse <https://www.iicsa.org.uk/key-documents/115/view/retention-instructions-and-data-protection-requirements.pdf>

9. Your rights and your personal data

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

- The right to request a copy of your personal data which the Diocese of Bath and Wells holds about you (this is called a “data subject access request”, for which we have a separate policy;
- The right to request that the Diocese of Bath and Wells corrects 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 the Diocese of Bath and Wells to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and, where possible, to transmit that data directly to another data controller, (known as the right to data portability).
- 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 to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the Information Commissioners Office.

10. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy 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. Contact Details

If you want to contact us about data protection please contact Peter Evans at this address: data.protection@bathwells.anglican.org

or by calling 01749 685108.

You can contact the Information Commissioners Office on 0303 123 1113 or via email

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<https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office,
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