

# **Clergy Privacy Notice**

# The Bishop of Guildford's Office

## Introduction

The Church of England comprises many different Charities and Office Holders; it is a community rather than an organisation. The Diocese of Guildford itself is made up of multiple charities, one of which is the Guildford Diocesan Board of Finance ("GDBF", "we", "our"). The GDBF is the legal entity through which many of the diocesan responsibilities and functions are achieved. For personal information held relating to Clergy, the Data Controller is the Bishop of Guildford's Office.

This privacy notice applies to Clergy within the Diocese. This privacy notice does not form part of your statement of particulars.

## What data do we process?

The Bishop of Guildford's Office collects and processes a range of information about Clergy. This can include:

- your name, address and contact details, including email address and telephone numbers
- your date of birth
- details of your education, qualifications, skills, experience and employment history, including start and end dates and notice period
- information about your current level of remuneration, including entitlement to allowances
- details of any gaps in employment.
- details of whether you are a relative or a partner of, or have any close personal relationship with any employee of the GDBF or any person connected with GDBF (e.g. clergy, volunteers).
- details of any conflicts of interest you may have with GDBF, including other employment, voluntary work, and connections with the wider Diocese.
- details of your registration with or membership of any professional bodies required for you
  to be able to practice in your profession or meet the requirements of the role that you have
  applied for, and details of any sanctions or restrictions placed upon you that affect your
  ability to practice in that role.
- information about your identity and entitlement to work in the UK.
- information about your criminal record and conduct towards children, young people and vulnerable adults, or supplied via the Disclosure and Barring Service (DBS).
- whether or not you have a disability for which we need to make reasonable adjustments.
- health information that might be disclosed or submitted associated with maternity or sickness absence.
- equal opportunities monitoring information, including information about your gender, whether you are married or in a civil partnership, ethnic origin, sexual orientation, religion or belief, health and disability.
- where you have applied for a role that would require you to drive on business, we will collect details of your driving licence and any driving offences that you incur and details of your car insurance, tax and MOT.

Registered Address: Church House Guildford, 20 Alan Turing Road, Guildford, Surrey, GU2 7YF **T**: 01483 790300 **E**: <u>data.protection@cofeguildford.org.uk</u> <u>www.cofeguildford.org.uk</u>

The Guildford Diocesan Board of Finance is a registered charity (248245) and a company limited by guarantee and registered in England and Wales (225289).

- Bank details to enable payments to be made
- information associated with performance, grievances raised, complaints, and disciplinary processes related to your time in office.

We will collect this information in a variety of ways. For example, data might be collected through application forms, CVs, obtained from your passport or other identity documents such as your driving licence and qualification certificates, or collected through interviews or other forms of assessment.

We will also collect information about you from third parties, such as references supplied by current and former employers, other organisations in relation to pre-employment checks, such as registration with professional bodies where a requirement of the role and information from criminal records checks permitted by law.

#### Why do we need your personal data and how do we use it?

We use your personal information in order to exercise our legal and pastoral responsibilities as your diocesan bishop. In addition to our general oversight of your ministry, we are responsible for assessing your qualifications and suitability for any particular office or ministry within the diocese, and for making appropriate arrangements for your ministerial development (including ministerial development review) in order to be able to develop, support, administer, regulate and manage licensed ministers.

#### What is the legal basis for processing your personal data?

Processing of the personal data in relation to clergy personal files is necessary for the purposes of legitimate interests in accordance with my responsibilities under the Canons, including my general responsibilities as chief pastor of the diocese and in order to be able to develop, support, administer, regulate and manage clergy through their ministry.

In so far as any personal data relates to "special categories of personal data" or criminal conviction or offence data the processing is a legitimate activity in order to manage and administer internal functions in relation to membership and/or those with whom I have regular contact. It is not shared externally outside the institutional bodies that comprise the Church of England without your consent.

Episcopal References and Clergy Current Status Letter (CCSLs) are processed on the basis that it is a legitimate interest as established by the Promoting a Safer Church (House of Bishops Policy Statement, 2017). However, in so far as the personal data contained within the Episcopal Reference and CCSL relates to "special categories of personal data" and criminal conviction and offence data, this will be processed on the basis that it is necessary for reasons of substantial public interest on the basis of UK law. The Episcopal Reference and CCSL will be disclosed both for posts within the Church of England and externally, where you have applied for a ministerial post in another diocese or a church outside the Church of England and is done so in order to protect members of the public from harm, including dishonesty, malpractice and other seriously improper conduct or safeguarding purposes as established by the Safer Recruitment: Practice Guidance (2016).

#### Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared only when necessary, with institutional bodies that comprise the Church of England for the purposes of administrative functions in connection with your role. Where this is the case, we will abide by the provisions of Church of England National People System and HR Information Sharing Agreement. If we wish to share your personal data outside the Church of England, then we will always seek your consent first.

## How long do we keep your personal data?

The Bishop of Guildford will not keep your personal data any longer than necessary for the periods and proposed set out here: see p.24 at the following link:

Personal Files relating to clergy

#### 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 coordinator. We may need to request specific information from you 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 abroad**

We will not store or send your personal data outside of the European Economic Area (EEA), except in instances where requests for references are sent to referees you have provided who outside of the EEA.

#### **Complaints**

If you have any concerns or queries about how the handle your personal data, please contact our Data Protection Officer at: <u>data.protection@cofeguildford.org.uk</u>.

You have the right to make a complaint at any time to the Information Commissioner online at: <u>Your</u> <u>personal information concerns | ICO</u> or by phone on 0303 123 1113 (local rate).

#### Changes to this privacy notice

We reserve the rights 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 the <u>Diocesan web site</u>.

#### How to Contact us

If you have any questions about this privacy notice or how we handle your personal information, please contact either **Geraldine Newbold**, **Diocesan Secretary** or **Andy Morgan**, **Head of People**.