



# Bristol Diocesan Board of Finance Ltd

## Data Privacy Notice

### 1. Policy Statement

The Bristol Diocesan Board of Finance Ltd (BDBF) 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 the data protection and data privacy policies that fall within the oversight of the BDBF as a 'Data Controller' and it explains how your personal data is processed by the BDBF and for what purposes.

### 2. Introduction

The BDBF 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; the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

The BDBF 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 BDBF 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 Bristol and the Bristol Diocesan Board of Finance (BDBF)

The Diocese of Bristol has a complex arrangement of Data Controllers, including PCCs, Incumbents, Local Ecumenical Partnerships (LEPs), the Bishop of Bristol's Office, the Cathedral and its Chapter, the Diocese of Bristol Academies Company (DoBAC), the Diocese of Bristol Academies Trust (DBAT) and the Bristol Diocesan Board of Finance Ltd (BDBF). The Diocese has a number of external links to theological education institutions,

chaplains, fresh expressions of church and others, both locally, regionally and nationally, and the Parish Giving Scheme (PGS).

Across this complex picture, the Diocesan Office at Hillside House includes the teams for Education; Finance; Governance and Property, including the Diocesan Advisory Committee for the Care of Churches (DAC); HR and Safeguarding; Ministry Development; Parish and External Relations; and the Archdeacons' administrative staff. All these teams come under the oversight of the Bristol Diocesan Board of Finance (BDBF) as Data Controller.

The Diocesan Office links with internal and external, formal and informal groups and bodies; with our PCCs; clergy; licensed lay ministers; lay leaders; those exploring vocations; those developing their discipleship; parish officers; deanery officers; statutory partners; church networks; our contractors; Board and Committee 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 specific legal bases against which the BDBF 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 BDBF'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 BDBF will fall within the legal and synodical processes of the Church of England, Canon Law, and within the secular legal structures.

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

The BDBF 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 BDBF collects 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 BDBF's possession or likely to come into such possession.

Personal information is collected where the BDBF believes it has lawful reason to do so.

The BDBF will use your personal data for the following purposes;  To administer meetings, elections and other such arrangements as fall within the Synodical governance framework of the Church of England and which ensure ability to meet all legal and statutory obligations, including the Church Representation Rules;

- To keep you informed of the diocesan news/information which you have requested and that may be of interest to you, including diocesan and fundraising activities;
- To keep you informed of diocesan information that is believed to be important to the role you hold within the diocese, either in our parishes and local communities or within our diocesan offices;
- To seek your views and comments;
- To manage BDBF employees and volunteers (including HR records, payroll and pension requirements and records);
- To maintain BDBF accounts and records;
- To process a grant or an application for a role;
- To maintain records of clergy, lay ministers and parish officers (including PCC Secretaries, PCC Treasurers, Churchwardens and those with specifically nominated parish roles);
- To maintain records of Deanery Synod members (and liaise with Deanery Synod Secretaries who are also required to maintain the same records);
- To maintain BDBF records of mandatory training with regard to safeguarding and other safeguarding 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 vulnerable adults 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 BDBF 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 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, criminal records, fines and other similar judicial records.

A very broad list of examples of those with whom the diocesan office is in regular contact, or with whom information may need to be shared, is in section 16 below.

## 7. Sharing personal data

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

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

## 8. Keeping personal data<sup>1</sup>?

The BDBF keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national church eg concerning 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 Commission (including records required to be retained for 6 years after the calendar year to which they relate); current parish officer information; Deanery, Diocesan and General Synod membership; Boards and Councils.

<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>

## 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:

- The right to request a copy of your personal data which the BDBF holds about you;
- The right to request correction of 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 BDBF 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 processing of your personal data by the BDBF;

- The right to lodge a complaint with the Information Commissioner's Office.

## 10. Further processing

If the BDBF wishes to use your personal data for a new purpose, not covered by this Privacy/Data Protection Notice, then you will be provided with a new notice, explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, your prior consent to the new processing will be sought.

## 11. Marketing permissions and seeking consent

Whilst there may be an expectation that people involved in the life of the Diocese would expect to receive information from the BDBF through email, post, social media etc., the BDBF 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 BDBF will, in the main, require individuals to personally opt in and out of electronically sent information, such as monthly diocesan eNews. This ensures that individuals are able to manage the information they wish to receive.

## 12. Gathering information from external sources

The BDBF 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; 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 BDBF, including:

- GCI – formerly BlueChip Data Systems - for IT help and support to BDBF employees and particularly nominated officers;
- CCPAS - for DBS processes;
- Clergy pensions, stipends and payroll;
- Church Commissioners;
- Standard Life - regarding pension and BDBF employees;
- Barnett Waddingham – regarding closed scheme clergy endowment policies;
- Eventbrite – for booking attendance at diocesan events;

- Survey Monkey – for feedback from diocesan events;
- MailChimp – electronic networking for newsletters and bulletins, where individuals directly manage their own consent and what information they wish to receive from the BDBF.

## 14. Changes to this Privacy Notice

The BDBF 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 an appropriate response. If there are any significant changes in the way the BDBF 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 the BDBF's Data Protection Officer:

**Mrs Sally Moody**

Head of Governance and Property

Diocesan Office Hillside House,

1500 Parkway North

Stoke Gifford

Bristol

BS34 8YU

Tel: 0117 906 0100

email: [sally.moody@bristoldiocese.org](mailto:sally.moody@bristoldiocese.org)

Bristol Diocesan Board of Finance Ltd – Reg. in England: Charity 248502 Company 156243

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

## 16. Examples of those with whom the BDBF is generally in regular contact

**Data Controllers:** The Bishops' Offices, The Dean and Chapter of Bristol Cathedral, PCCs and Incumbents; Diocesan Board of Education, Diocese of Bristol Academies Company (DoBAC), Diocese of Bristol Academies Trust (DBAT), Parish Giving Scheme, National Church Institutions.

**Clergy:** all stipendiary clergy, self-supporting clergy, retired clergy with/without the Bishop's Permission to Officiate and clergy in secular employment.

**Other ministers:** licensed lay ministers.

**Church officers and other church members:** Churchwardens, PCC Secretaries, PCC Treasurers, safeguarding parish representatives/nominated people, church administrators, PCC/DCC members.

**Members of Synods:** Deanery officers and Deanery Synod representatives, Diocesan Synod; General Synod representatives, Bishop's Council.

**Committees/Boards:** Audit Committee, DAC, Diocesan Safeguarding Steering Group, Bishop's Advisory Groups, Patrons.

Particular groups associated with the life of the Diocese eg the Spiritual Directors' network.

Fund applicants and Grant-making bodies: individuals/groups applying for funding for various diocesan and parish projects and initiatives; Trusts and other grant-making organisations.

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 BDBF will share data where this is appropriate

**Clergy details** - with the Bishop's Office in the course of ministry; - periodically with 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; - with the relevant local authority in respect of council tax, relevant water authority, and utility companies in respect of energy supplies to diocesan properties; - National Church offices/Church Commissioners with regard to pensions, stipend and payroll matters.

**Diocesan Directory** - hard copy or password protected on-line versions, to be published with consents where appropriate.

**Specifically named individuals** - clergy/lay minister details where these relate to those undertaking ministerial development reviews and support.

**Online Faculty System (OFS)** - petitioners/objectors 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; others where this facilitates the consideration of applications for either a Faculty or a matter not requiring a faculty under the Faculty Jurisdiction Rules.

**Legal and statutory guidance and others** - in compliance with the range of legal responsibilities, including: 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.

**National Church** - in line with national safeguarding requirements; - Ministry Division and National Church Institutions as appropriate; - stipend/payroll and pensions.

**Church Commissioners** – Pensions Board - BDBF pensions and other pension providers as appropriate.

**CCPAS** - with regard to DBS checking processes.

**Contractors and Insurers** - with regard to BDBF appointed contractors where this relates to the provision of services to properties for emergency and maintenance purposes.