



Privacy Notice

The Office of the Bishop of Bristol (the “**Bishop’s Office**”, “**we**”, “**us**”) is committed to protecting and respecting your privacy.

The purpose of this privacy notice is to provide you with information about how the Bishop’s Office deals with information about you (personal data). In particular, this privacy notice sets out how and why we collect your personal data, how we deal with it (including who we may share it with and our purposes for processing). It also outlines your rights and explains what to do if you have any questions or concerns about your personal data.

This privacy notice relates in particular to the way that the Bishop’s Office processes the personal data of prospective, current and retired members of the clergy practicing within the Diocese of Bristol.

Who we are

For the purposes of the UK GDPR and the Data Protection Act 2018, the controller of your personal data is the Rt Revd Lord Bishop of Bristol, acting in her corporate capacity as the Bishop’s Office. We are registered with the Information Commissioner’s Officer under registration number Z555104X.

Our full details are:

- **Address: Bishop’s Office, Church Lane, Winterbourne, BS36 1SG**
- **Email address: Bishopsoffice@Bristoldiocese.org**

Relationships with other entities within the Diocese of Bristol

The Bishop’s Office is part of the Diocese of Bristol, which itself is made up of multiple controllers of personal data. The Diocese of Bristol is made up of a network of different controllers.

While the Bishop’s Office may receive and share your personal data with other entities within the Diocese of Bristol (for further information, please see the sections “***How is your personal data collected?***” “***Who will your personal data be shared with?***” below), this privacy notice relates specifically to personal data processed by the Bishop’s Office.

Why do we process personal data?

The type and amount of personal data we collect depends on the type of individual involved, and the purpose for which the personal data is being provided and processed. We may process your personal data for some or all of the following purposes:

- **To implement robust safeguarding procedures in collaboration with other entities within the Diocese of Bristol (such as complaints handling) in accordance with national guidelines;**
- **To provide pastoral and spiritual care and to perform ecclesiastical services;**
- **Assessing your qualifications and suitability for any particular office or ministry within the diocese;**

- **To maintain general oversight of your ministry and make appropriate arrangements for your ministerial development (including ministerial development review).**
- **Ensuring that individuals are protected from harm and for related safeguarding purposes by ensuring that those who pose a risk or are otherwise unfit for ministerial positions, (due to, for instance, dishonesty, malpractice or other seriously improper conduct) are not able to gain access to ministerial posts.**

What personal data do we collect?

When we refer to personal data, we mean any information that relates to you that may (either on its own or in combination with other information) identify you.

The Bishop's Office processes a range of personal data in relation to members of the clergy, in particular:

- **The majority of personal data held about individual clerics is contained within personal files (see below for further information); Information used to apply for Disclosure and Barring Service ("DBS") checks, for example, identification documents;**
- **Photographs and images, for example those taken at events or services;**
- **Other material relevant to any Clergy Discipline Measure 2003 complaint that falls outside the scope of information stored within personal files (see below); and**
- **Any other information that you choose to share with us (for example, within email or other written correspondence).**

Certain categories of personal data are regarded by data protection law as more sensitive than others. Known as 'special category personal data', this relates to information about your health, racial or ethnic origin, details of sexual life, sexual orientation, religious beliefs, political opinions or any genetic or biometric data that is used to identify you. This information, and any information about criminal offences or convictions (criminal offence data), warrants a higher level of protection under data protection law.

Further details about the special category personal data and criminal offence data processed by us in clergy personal files is set out below.

Clergy Personal Files

In relation to members of the Clergy, the Bishop's Office holds copies of personal files ("clergy personal files", also commonly known as "blue files"). In connection with this, the Bishop's Office therefore holds the following categories of personal data:

- **Biographical: This includes names, date of birth and contact details; evidence of immigration status and permission to work in the UK (if the cleric is not a British Citizen); family and household information relevant to the cleric's ministry or the Bishop's pastoral responsibilities (such as housing needs or pension information); qualifications and supporting evidence; and information about the cleric's career before ordination (usually in the form of a CV).**
- **Ordination and ministry: Information that is necessary to demonstrate the cleric's suitability for admission to holy orders, and may include registration forms and references, reports of the Bishops' Advisory Panel and reports sent to us by the cleric's training institution.**
- **Ministerial development and training: This includes written records of the outcomes of any ministerial development reviews undertaken by an office-holder on Common Tenure, together with any relevant matters relating to the review.**

- **Safeguarding:** Including records of Disclosure and Barring Service (DBS) checks, any safeguarding allegations / concerns and how these have been dealt with (including actions taken, decisions reached, and outcomes); and records of safeguarding training undertaken by the cleric.
- **Complaints under the Clergy Discipline Measure 2003 (CDM):** Records must be retained of any complaints made under the CDM, including copies of the complaint, supporting evidence, relevant reports and decision letters. If misconduct is shown and a penalty is imposed, a record of any penalty will also be held.
- **Capability and health:** We may also hold information relating to a cleric's health and wellbeing. For example, where there are significant issues relating to a cleric's health, evidence as to how such issues have been managed in the context of the cleric's ministry will be held (including copies of occupational health reports and any adjustments made to the cleric's duties or pattern of work to accommodate).
- **Grievances:** Records are retained of any grievances raised under the procedure either by or against the cleric, including details of the grievance, the process followed and the outcome.
- **Finance:** Information about any significant unresolved financial problems will be noted on a cleric's personal file (this is connected with the bishop's ability to refuse to admit or institute a priest to a benefice on the grounds of serious financial embarrassment).

Further information about the way in which the Bishop's Office processes the personal data relating to clergy is set out in the policy documentation approved by the House of Bishops in June 2021 (available [here](#)).

Failure to provide personal data

Where we need to collect personal data by law or in order to perform a contract we have with you and you fail to provide that data when requested, we may not be able to meet our legal obligations or perform the contract we have entered or are trying to enter into with you.

How is your personal data collected?

We collect personal data about you from the following sources:

- **Direct interactions:** We collect personal data that you provide to us directly, this includes information you provide when you communicate with us.
- **Third parties or publicly available sources:** We may also receive personal data from third parties. This may include:

Controllers affiliated with the Church of England:

- **Other controllers within the Diocese of Bristol, including Parochial Church Councils (PCCs) and relevant PCC members, Incumbents, Local Ecumenical Partnerships (LEPs), 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).**
- **Other bodies outside the Diocese of Bristol that form part of the National Church Institutions, including The Archbishops' Council, The Church Commissioners for England, The Church of England Pensions Board, Church of England Central Services, The National Society (Church of England) for Promoting Religious Education, The Archbishop of Canterbury and the Archbishop of York (in their corporate capacity).**

- **Controllers within another Diocese, for example where a Cleric is transferring to a parish within the Diocese of Bristol;**

Other third parties

- **Including legal representatives; regulatory bodies (such as the Information Commissioner's Office); governance bodies and committees; law enforcement and prosecuting authorities; courts and tribunals; and statutory, public, regulatory or other legal or independent reviews or inquiries, including any "lessons learned" reviews.**

Why we process your personal data and our legal bases for doing so

When we collect, use and store your personal data, we will only do so where the law allows us to. Data protection law requires us to have a legal basis for processing your personal data. Depending on the purposes for which we use your data, one or more of the legal bases listed below may be relevant:

- **Consent: Where you have provided your consent for us to use your personal data. For example, if you ask us to share information contained within your personal file with another church body/organisation outside the Church of England or Church in Wales.**
- **Legal obligations: It may be necessary for us to use your personal data to comply with our legal obligations. For example, under the Inquiries Act 2005 which may compel us to provide personal data for the purposes of a statutory inquiry.**
- **Public Task: It may be necessary for us to use your personal data for a task carried out in the public interest or the exercise of official authority vested in the Bishop's Office by the Canons of the Church of England. For example, this covers the Bishop's 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.**

We will only process special category personal data and criminal offence data where we have also identified an appropriate condition for doing so. In particular:

- **You have provided you explicit consent;**
- **The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes.**
- **The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity (for example, providing information to a court where a claim has been made);**
- **The processing is necessary for reasons of substantial public interest, in accordance with Part 2, Schedule 1 of the Data Protection Act 2018 (for example, where this is necessary for the purposes of protecting the physical, mental or emotional wellbeing of an individual, or for the purposes of prevention or detection of an unlawful act).**

Who will your personal data be shared with?

In certain circumstances we may pass your personal data to third parties. We will never pass your personal data unless you have allowed us to do so or we are allowed or required to do so by law. For example, we may share your personal data with:

- **Other controllers within the Diocese of Bristol or another Diocese in England (please see the section entitled “*How is your personal data collected?*”);**
- **Other bodies outside the Diocese of Bristol that form part of the National Church Institutions (please see the section entitled “*How is your personal data collected?*”);**
- **The Church in Wales and other churches outside the institutional Church of England;**
- **Educational institutions;**
- **Parties and individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution (including mediation and arbitration);**
- **Charitable, religious and voluntary organisations;**
- **Other relevant third parties, including legal representatives; regulatory bodies (such as the Information Commissioner’s Office); governance bodies and committees; law enforcement and prosecuting authorities; courts and tribunals; and statutory, public, regulatory or other legal or independent reviews or inquiries, including any “lessons learned” reviews.**

International transfers

Rarely we may need to transfer your personal data outside the UK. For example, where a member of the clergy is relocating abroad and information needs to be transferred to a new employer based overseas.

If we do transfer your personal data outside of the UK, we will put in place appropriate legal mechanisms and safeguards to ensure that your personal data is transferred and processed in compliance with data protection law.

Any transfers of personal data outside the UK are subject to special rules under the UK GDPR. If we do transfer your personal data outside of the UK therefore, we will put in place appropriate legal mechanisms and safeguards to protect your personal data.

If you would like more information about how we protect your personal data if it is transferred outside the UK please contact: Bishopsoffice@Bristoldiocese.org

How long we hold your information

We will only store your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for us to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

When determining how long to store personal data, we consider the amount and nature of the data, the purposes for which it is kept, the sensitivity of the data and the potential risk of harm from unauthorised use or disclosure.

We continually review what information we hold and will securely delete or anonymise personal data which is no longer required. For further information about how long we store your personal data, please contact us.

Control over your personal data

Your rights

Data protection law provides individuals with various legal rights, which may be exercised in certain circumstances. You have the following legal rights over your personal data:

- **The right of access** (commonly referred to as a “subject access request” or “SAR”): This right enables you to obtain a copy of the personal data we hold about you as well as other information about how we are processing your personal data.
- **The right to rectification:** This right enables you to require us to correct the personal data we hold about you if it is inaccurate or incomplete.
- **The right to erasure** (also known as the right to be forgotten): In certain circumstances, you have the right to request that personal information we hold about you is erased (such as where we no longer need your personal data for the purpose it was originally collected for).
- **The right to restrict processing of your personal data:** You may ask us to restrict the use of your personal data in certain circumstances (such as where you believe your personal data is incorrect and we need to verify the accuracy of the personal data we hold)
- **The right to object:** You may object to our processing of your personal data in certain circumstances, such as where we are processing your personal data on the basis of “public task” or “legitimate interests”. Please note, you always have the right to object to processing of your personal data for direct marketing purposes.
- **The right to data portability:** This right allows you to request that we transfer your personal data to you or another third party in a commonly used, machine-readable format. Please note, this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.

The right to withdraw consent: Where we are relying on your consent to process your personal data, you have the right to withdraw your consent at any time, and may do so by contacting us via Bishopsoffice@BristolDiocese.org. If you decide to withdraw your consent, that does not mean that our use of your personal data before you withdrew your consent is against the law.

Please note, some of your legal rights are subject to safeguards, limitations or exemptions.

If you wish to exercise your rights, please contact us via Bishopsoffice@BristolDiocese.org and we will respond within the time limits set out in data protection law.

Automated decision-making and profiling

Automated decision-making is when a computer or similar electronic system uses personal information to make decisions about people without any human involvement. Profiling is a type of automated decision-making process that takes place when different aspects about a person (such as their behaviour, interests or personality) are analysed in order to make predictions or decisions about them.

We do not carry out automated decision making (including profiling). If that changes we will update this privacy notice and notify you in writing (where appropriate).

Complaints

If at any time you are not happy with how we are processing your personal information then you may raise the issue with bishopsoffice@bristolDiocese.org in the first instance.

If you are not satisfied with the handling of your issue, you may raise a complaint with the Information Commissioner’s Office, which regulates and enforces data protection law in the UK.

Details of how to do this can be found at <https://ico.org.uk/make-a-complaint/>.

Changes to this privacy notice

This privacy notice was published on 6th April 2022. We will update and change this privacy notice from time to time to reflect changes to the way we handle your personal data or changing legal requirements.