

**The Bishop of Peterborough**  
**Data Privacy Notice –October 2023**

This notice explains how the information about you which I hold is used, managed and your rights with respect to that data. For groups of people where I hold substantial amounts of data there are separate privacy notices which are referred to in this document. I am the data controller for any data processed by myself, my office, the Bishop of Brixworth, the Archdeacons of Oakham and Northampton and bishop's officers for retired clergy and clergy widows, spirituality, self supporting clergy, healing ministry, women's ministry, wardens of lay ministry, pastoral care and counselling, deliverance and conflict resolution. I do not collect any data about you from this website. For details of data gathered by this website please see the Diocese of Peterborough's privacy notice <https://www.peterborough-diocese.org.uk/main/privacy-policy>

**Your personal data – what is it?**

Personal data 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 my possession or likely to come into such possession. The processing of personal data is governed by the UK General Data Protection Regulation 2016/679 (the "GDPR" and the Data Protection Act 2018, (the "DPA 2018")

**Who am I?**

The Bishop of Peterborough. I am the data controller (contact details below). This means I decide how your personal data is processed and for what purposes and I am regulated under UK GDPR by the Information Commissioners.

**How do I gather data?**

I may gather data about you from emails or written correspondence you send to me or those listed above who process data on my behalf. I may also collect data from telephone calls you make to me or those listed above.

I work closely with other Church of England bodies including The Archbishop's Council, The Church Commissioners for England, the Church of England Central Services ("National Church Institutions" or "NCIs"), and the Diocesan Registry. I, and those who process data on my behalf, will only request data from these organisations when it is necessary to fulfil my role in providing a service to you.

**How do I process your personal data?**

I comply with my obligations under the UK GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

You are responsible for ensuring the accuracy of all the personal data you supply to me and I will not be held liable for any errors unless you have advised me previously of any changes in your personal data.

**I use your personal data for the following purposes: -**

I use the data which I hold to exercise my legal and pastoral responsibilities as diocesan bishop. This includes:

- oversight of and responsibility for clergy and licensed lay ministers in the diocese (see Privacy notices Licensed Clergy, PTO Clergy, Inactive Clergy, LLM for specific details of how I manage the data of each group)

- maintaining records of churchwardens and other bishop's officers
- the pastoral care of people within the diocese, including clergy and their families
- carrying out comprehensive safeguarding procedures in accordance with best safeguarding practice
- carrying out procedures in relation to the clergy discipline measure
- managing employment records of those who work in the bishops' office
- maintaining my own accounts and records
- maintaining records and correspondence linked to my responsibilities within the House of Lords or as a trustee, patron or vice president of other bodies.

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

Most of the data I hold is processed under the lawful reason of legitimate interest, that is that I need to process the data in order to fulfil my responsibilities as bishop and chief pastor to the Diocese of Peterborough. An example of this would be the pastoral care of a clergy widower living in the diocese or to look into a complaint made about a priest in the diocese.

Some of our processing is to comply with legal obligation. An example of this would be to fulfil my duties under Canon Law to ensure that those I ordain have received the appropriate training.

I may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be a priest applying for a parochial vacancy.

I may process information about your religious beliefs. This is permitted for religious organisations to administer membership or contact details.

I may also need to process (and share with certain 3<sup>rd</sup> parties listed below) special category data (most likely health data, data relating to religious and/or philosophical beliefs) to comply with my safeguarding duties and obligations. I would process this only if it is necessary for reasons of Substantial Public Interest (under Article 9(g)). When processing and/or sharing any special category data all efforts will be made to ensure appropriate measures are put in place regarding security of data and adherence to the requirements of Schedule 1 of the DPA 2018

If I wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then I will provide you with a new notice explaining this new use prior to commencing the processing of your personal data and setting out the relevant purposes and processing conditions. Where and whenever necessary, I will seek your prior consent to the new processing.

### **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 or the third parties listed below. The exception to this is for licensed clergy and clergy with permission to officiate who are required to have public contact details (see licensed clergy privacy notice and permission to officiate privacy notice)

If I wish to share your personal data in any other way outside the Church of England, or in any other means, then I will always seek your consent first. The exception to this is where it is in the public interest and is necessary for the purposes of:

- protecting an individual from neglect or physical, mental or emotional harm; or

- protecting the physical, mental or emotional well-being of an individual where that individual is a child or is an adult at risk.

### **Third parties**

- Anna Spriggs, a freelance solicitor, who fulfils the Diocesan Registry and provide legal advice to the Bishop
- Legal advisers who provide specialist, non ecclesiastical, legal advice to the Bishop. Currently this is Howes Percival LLP.
- Eventbrite, through which events and training may be booked
- Optimity the Managed Service Provider for the office IT
- Amperative Limited, who provide an online contact management system.
- Microsoft Online Services, through use of Microsoft 365, Office 365, and Sharepoint
- Thirtyone:eight – an independent Christian safeguarding charity, who conduct Disclosure and Barring Service (DBS) checks on my behalf, as well as offering other safeguarding support services
- Church Edit – who host the Diocese of Peterborough’s website

### **Transferring personal information outside the UK**

I will not transfer your personal information to countries outside the United Kingdom, except where I or my office use the services of a third party (listed above) who host data outside the UK. I and my office will only use third parties who ensure that data hosted outside the UK is held in accordance with UK GDPR. Where data transfer is required outside these third parties, for example in relation to our international link diocese, separate consent will be sought.

### **How long do I keep your personal data?**

I keep your personal data for no longer than reasonably necessary for the periods and purposes as set out in the [Bishops’ Office Retention Policy](#)

### **Your rights and your personal data**

Unless subject to an exemption under the UK GDPR or DPA 2018, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which I hold about you;
- The right to request that I correct 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 me 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 to object to the processing of personal data, (where applicable)
- The right to lodge a complaint with the Information Commissioner who may be contacted at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone 0303 1231113

### **Further processing**

If I wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then I will update this privacy notice on the Bishops’ Office page of the Diocese of Peterborough’s website, and where practicable alert you to this new notice prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, I will seek your prior consent to the new processing.

## Contact Details

To exercise all relevant rights, queries or complaints please contact Alex Tolley, PA to the Bishop of Peterborough, The Bishops' Office, The Palace, Peterborough PE1 1YA, [alex.tolley@peterborough-diocese.org.uk](mailto:alex.tolley@peterborough-diocese.org.uk) You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

## Privacy Notice - Legitimate Interest Assessments

Where the legal basis under which I hold your data is legitimate interest I am required to justify that it is appropriate to use the lawful basis 'legitimate interest'. To do this I complete a legitimate interest assessment. A summary of each of these assessments which relate to this privacy notice is below. For a copy of the full Legitimate Interest Assessment, please contact [alex.tolley@peterborough-diocese.org.uk](mailto:alex.tolley@peterborough-diocese.org.uk)

### Pastoral care of clergy widow(er)s

I have a specific purpose with a defined benefit	To provide pastoral care to the widow(er)s of clergy who I am aware are either resident in the diocese or whose spouse had a strong link with the diocese
The processing is necessary to achieve the defined benefit.	Yes
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The widow(er)s rights and freedoms are overridden, but with the benefit to them of providing pastoral care and support. Strict procedures are in place to ensure that contact details are not shared outside the Church of England.

### Interviews for parochial posts and employment within the bishops' office

I have a specific purpose with a defined benefit	To appoint the most suitable candidate to a post
The processing is necessary to achieve the defined benefit.	Without processing it would not be possible to ensure that an appropriate candidate was being appointed
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The processing does legitimately override the rights and freedoms of the candidate, but this is important to ensure that the right candidate is placed in the right parish

### Temporary mailing lists for events, communications and Christmas cards

I have a specific purpose with a defined benefit	To form temporarily held mailing lists to allow for invitations to events, sending of Christmas Cards or other communications from the bishops.
The processing is necessary to achieve the defined benefit.	Yes. It would not be possible to complete this defined purpose without creating temporary lists.

The purpose is balanced against, and does not override, your the interests, rights and freedoms.	The processing does legitimately override the subjects rights and freedoms, however without this it would not be possible to make appropriate invitations or contact which may well be of benefit to the data subject. There is a procedure in place to ensure that only up to date contact information is kept for an appropriate length of time.
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### Parish files

I have a specific purpose with a defined benefit	To ensure completion of regulatory responsibilities connected to parishes and also pastoral care of parishes.
The processing is necessary to achieve the defined benefit.	Without processing of data it would not be possible to fulfil the defined purpose
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	Any personal data is held securely and procedures limit access appropriately.

### Churchwarden's contact details

I have a specific purpose with a defined benefit	Maintenance of an accurate list of current churchwardens contact details, and those to be admitted to the office.
The processing is necessary to achieve the defined benefit.	Without processing it would not be possible for the Archdeacon to comply with his duties.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The rights and freedoms of the churchwardens are legitimately overridden. Without such records it would not be possible to support the churchwardens in their role.

### General correspondence

I have a specific purpose with a defined benefit	Processing general correspondence received in the office
The processing is necessary to achieve the defined benefit.	It is not possible to respond appropriately to correspondence without this processing
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The interests, rights and freedoms of the data subjects are not overridden as it is reasonable to assume that correspondence sent to and responded to by an office will be kept for an appropriate amount of time.