

DATA PROTECTION IN THE DIOCESE OF TRURO

DATA PRIVACY NOTICE for Clergy

The Truro Diocesan Board of Finance Limited (the Board) is committed to protecting and respecting your privacy. This document sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

1. Your personal data - what is it?

Personal data relates to a living individual who can be identified from that data. Examples include contact details, employment history or bank details. You or another person may give us your personal data in relation to an activity or parish that you are involved in. The processing of personal data is governed by the General Data Protection Regulation (the “GDPR”) and the 2018 Data Protection Act.

2. Who are we?

The Board is the data controller (contact details below). This means it decides how your personal data is used and what for.

Please be aware that clergy, the office of the Bishop and Parochial Church Councils (PCCs) are separate legal entities.

3. How much information do you hold about me?

This will generally be data you have given us, and relevant information relating to your role. This may be from a number of sources including:

- From a previous diocese.
- From your parish.
- From referees, either external or internal.
- From security clearance providers such as for DBS.
- From Occupational Health and other health providers.
- From Pension administrators and other government departments, for example tax details from HMRC.
- From the National Church Institutions relating to matters such as stipend.

This Privacy notice is only for licensed clergy, including non-retired Permission to Officiate (PTO), please see the main Diocesan of Truro Data Privacy Notice for information about how we use data more widely.

We may sometimes hold special categories of personal data such as information about your health and wellbeing, religious beliefs, or in the case of background checks, information about criminal records or proceedings. Our Data Protection Policy, which is also available on our website, gives further details about how we use data including special category data. This represents our

Appropriate Policy Statements regarding when we process data in the “substantial public interest”.

We may also receive personal data about you from third parties, for example, your family members, other parishioners, or external agencies.

4. How do we process your personal data?

The Board complies with its obligations under data protection law by: -

- keeping personal data up to date;
- storing and destroying it securely;
- not collecting or retaining excessive amounts of data;
- enabling you to exercise your rights in regards to your personal data in accordance with requirements of the Data Protection Act 2018;
- protecting personal data from loss, misuse, unauthorised access and disclosure; and
- ensuring that appropriate technical measures are in place to protect personal data.

The legal bases for processing your personal data are:

- **Legitimate interests**, or the legitimate interests of a third party (such as another organisation in the Church of England);
- Compliance with a **legal obligation**;
- Performance of a **contract**, or to take steps to enter into a contract;
- To protect a person’s **vital interests**;
- Where **explicit consent** has been obtained.

Religious organisations are also permitted to process information that reveal a person’s religious beliefs, in order to administer membership or contact details.

We use your personal data for the following purposes:

Overall purposes:

1. To enable us to meet all legal and statutory obligations.
2. To deliver the Church’s mission in our communities and to carry out any other voluntary and charitable activities for the benefit of the public as provided for in our governing documents.
3. To carry out comprehensive safeguarding procedures, including due diligence and complaints handling, in accordance with the best safeguarding practice.

In carrying out our overall purposes:

		Legal basis
Key: LI - Legitimate interest C compliance with contract CO - with consent		
LO - compliance with legal obligation VI - protect person’s vital interests		
1	Information relation to your role	
	Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses.	LI CO LO
	Your date of birth, gender and NI number.	LI CO LO
	Marital status.	LI CO LO
	Next of kin, emergency contacts and their contact information.	VI
	Employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare.	LI CO LO
	Location of work	LI CO LO

	Housing arrangements	LI	CO	LO
	(for some clergy holding additional responsibilities) Details of secondary employment, political declarations, conflict of interest declarations or gift declarations.	LI	CO	LO
	DBS details including basic checks and higher security clearance details according to your job.	LI	CO	LO
	Your responses to surveys if this data is not anonymised.	LI	C	
2	Information related to your stipend (if any), pension and expenses			
	Information about your role and your terms and conditions (SOP) including; your start and leave dates, stipend (if any), any changes to your terms and conditions, working pattern (including any requests for flexible working).	LI	CO	LO
	Details of your expenses or other payments claimed including grants.	LI	CO	LO
	Details of any leave including sick leave, special leave etc but not holiday.	LI	CO	LO
	Pension details including membership of both state and occupational pension schemes (current and previous).	LI	CO	LO
	Your bank account details, payroll records and tax status information.	LI	CO	LO
	Details relating to Maternity, Paternity, Shared Parental and Adoption leave and pay. This includes forms applying for the relevant leave, copies of MATB1 forms/matching certificates and any other relevant documentation relating to the nature of the leave you will be taking.	LI	CO	LO
3	Information relating to your performance and training			
	Information relating to your performance eg MDRs.	LI	CO	LO
	Grievance and dignity at work matters and investigations to which you may be a party or witness.	LI	CO	LO
	Disciplinary records and documentation related to any investigations, hearings and warnings/penalties issued	LI	CO	LO
	Whistleblowing concerns raised by you, or to which you may be a party or witness.	LI	CO	LO
	Information related to your training history and development needs	LI	CO	
4	Information relating to your health and wellbeing and other special category data			
	Health and wellbeing information either declared by you or obtained from health checks, occupational health referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work from your GP or hospital.	LI	CO	LO
	Accident records if you have an accident at work.	LI	CO	LO
	Details of any workplace audits, access needs or reasonable adjustments.	LI	CO	LO
	Information you have provided regarding Protected Characteristics as defined by the Equality Act for the purpose of equal opportunities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.	LI	CO	LO

5. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared between the employees of the Truro Diocesan Board of Finance, in order to carry out our roles and responsibilities in relation to the organisation and to you, and with certain third parties outside of the Diocese as set out in Annex 1.

6. How long do we keep your personal data?

We keep data in accordance with the guidance and legislation relevant to the purpose for which we hold it. For any role which requires a DBS check, which is all licensed clergy and PTO we will retain the relevant data indefinitely.

7. 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: -

- To access information we hold on you with no charge to you.
- To correct and update the information we hold on you.
- To have your information deleted.
- To restrict the processing of your data.
- To moving your data (data portability).
- To withdraw consent, where to object to the processing of your data (where applicable).
- The right to lodge a complaint with the Information Commissioners Office. (ICO)

Rights may only be exercised by the individual whose information is being held by the Board or with that individual's explicit consent.

8. Further processing

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

9. Changes to this Privacy Notice

We will review this Privacy Notice regularly and may update it at any time, for example if the law changes. If there are significant changes to the way in which we use your data we will let you know.

9. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact Kate Cortez, the Diocesan Data Protection Lead on 01872 274351 or via kate.cortez@truro.anglican.org. Alternatively, 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.

Annex 1 - Sharing your data with third parties

Third parties with whom data will be shared: -

- The *Diocesan Database* is a shared resource between: -
 - The office of the Bishop of Truro (at Lis Escop)
 - The Archdeacon of Cornwall
 - The Archdeacon of Bodmin

- The Chancellor for the Diocese of Truro
 - The Diocesan Board of Education
 - The Truro Diocesan Board of Finance Limited at Church House
 - The Property Management Agents (currently Savills)
 - The office of the Diocesan Registrar at Veale Wasbrough Vizards
 - The Legal Advisors to the Truro Diocesan Board of Finance Limited at Veale Wasbrough Vizards
- The information held on this database relating to clergy will be shared with:
 - The Church Commissioners Statistical Office (Statistics for Mission, Return of Parish Finance forms)
 - Clergy Payroll
 - The Pensions Board
 - Oracle (the People System)

The data held on this database relating to clergy links directly to the national Church of England People System database and is synchronised so there is ongoing exchange of data between the two systems.

In addition, data may be shared with PCCs, Deanery officers, and incumbents of parishes in the Diocese of Truro. This data may also be shared, when meeting the requirements of legislation, with the Charity Commission or Companies House.

- The contact details of Petitioners and/or applicants on individual applications relating to Church Buildings (the Diocesan Advisory Committee) will be shared, through the *Online Faculty System* (OFS) with: -
 - The Archdeacon of Cornwall
 - The Archdeacon of Bodmin
 - Office of the Diocesan Advisory Committee Secretary (DAC Secretary)
 - The Chancellor for the Diocese of Truro
 - The office of the Diocesan Registrar
 - Statutory Consultees (The Church Buildings Council, Historic England, national Amenity Societies and local authorities)
 to facilitate the consideration of applications for either a Faculty or a Matter not requiring a Faculty under the Faculty Jurisdiction Rules
- *Clergy details* will be provided: -
 - To the Clergy Payments Department
 - Periodically to Crockford's Clerical Directory (although Crockford's will seek separate consent for inclusion in published directories)
 - When necessary, by the Diocesan Property Management Agents (currently Savills) for the purpose of undertaking works of repair / maintenance of Diocesan parsonages and the letting of Diocesan properties
 - To the relevant local authority (in respect of Council Tax) and utility companies (in respect of supplies of energy to the property)
 - Where necessary with institutional bodies that compromise the Church of England, including other Dioceses, for the purpose of administration and compliance with our legal duties.
- In compliance with our legal responsibilities including safeguarding.
- Specifically named individuals when required for ministry development review, training and support
- Sometimes the Board contracts with third parties whom we ask to process personal data on

our behalf (e.g. IT consultants). We require these third parties to comply strictly with the instructions and with the Data Protection Act 2018. Key data processors are:

- NCI (IT support providers)
 - Worthers (database IT consultants)
 - Pathways recruitment platform
 - SSG (HR and Health and Safety advisors)
 - Thirtyone:Eight (DBS processing)
 - Natwest bank (payments including payroll)
 - Health Assured (occupational health)
 - Great with Talent (exit interviews)
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- In compliance with our legal responsibilities including safeguarding.

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