

DATA PROTECTION IN THE DIOCESE OF TRURO

DATA PRIVACY NOTICE

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 “UK 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?

It is likely that for most people we will hold only a small amount of your personal data. This will generally be data you have given us, and relevant information collected mostly from parishes to enable you to carry out your role.

However, because this Notice is for everyone, the list under section 4 about the purposes for which we use personal data is rather long. There are separate privacy notices for staff and clergy available on our website.

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, other dioceses 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 LO - compliance with legal obligation VI - protect person’s vital interests CO - with consent		
1	To administer records of:	
	All Authorised Ministers to include Licensed Clergy, Retired Clergy, Clergy with Permission to Officiate; Curates and Ordinands	LI LO C CO
	Lay Readers	LI LO C CO
	Local Worship Leaders and Local Pastoral Ministers and Safeguarding Children and Adults Coordinators	LI LO C CO
	Retired clergy with Permission to Officiate	CO
	Deanery, Benefice, Cluster, PCC (Parochial Church Council) & DCC (District Church Council) Officers (including but not limited to Secretaries, Treasurers and Churchwardens)	LI LO
	General, Diocesan & Deanery Synod members	LI LO
	Truro Diocesan Board of Finance and Diocesan Board of Education Committees	LI LO
	Church School staff and governors including Head Teachers, Chair	LI LO

	of Governors, Clerks to Governors, Community Clerks, Community Governors, Deputy Head Teachers, Education Consultants, Heads of School, CEOs of MATs, MAT Trustees, MAT members, School Secretary's and School Governors	
	Chaplains	LI LO
	Patrons of benefices	LI LO
	The Diocesan Registrar	LI LO
	Members of the Truro Diocesan Synod, the Bishop's Diocesan Council and members of other boards and committees to include: <ul style="list-style-type: none"> ▪ Diocesan Board of Education ▪ Askel Veur ▪ Property Management ▪ Glebe ▪ Investment ▪ Diocesan Advisory Committee (DAC) ▪ And other service committees 	LI LO
2	To enable provision of pastoral care	LI
3	To promote the interests of the Diocese and to share information on how the income (Mission and Ministry Fund - MMF) is used to support the work of the church and to aid ministry	LI C
4	To manage our employees, contractors and volunteers	LI LO C CO
5	To process grants or applications	CO LI
6	To maintain our own accounts and records (including the processing of gift aid applications and giving)	LO C
7	We may process special categories of data in order to meet legal requirements (such as safeguarding) and obligations to third parties	LO Significant public interest
8	To inform relevant people of updates on financial matters and legal matters; training events such as safeguarding and data protection; news, events, activities and services running either within the Diocese of Truro or further afield through: <ul style="list-style-type: none"> ○ Mailings (by email &/or hard copy) ○ Newsletters (subscription services to which you must opt in to receive and from which you can unsubscribe at any time) 	CO

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 a service to other church members or for purposes connected with the Diocese, and with certain third parties outside of the Diocese as set out in Annex 1.

In order to enable members of the public and colleagues to contact licensed clergy, clergy with Permission to Officiate (PTO) and Readers we will share limited contact details via the directory

on our website. However, those with PTO or Readers can choose to not appear in the directory and licensed clergy can limit the details to name, email address and contact number.

6. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide “Save or Delete: the Care of Diocesan Records” which is available from the Church of England website at <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

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.
- 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. Children from 13 years upwards are entitled to make their own requests (where the Board is of the reasonable view that they have an appropriate understanding of the request they are making) and parents/carers do not have an automatic right to see information about their children or prevent their child from making a request.

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.

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:
 - Clergy Payroll
 - The Pensions Board
 - Oracle (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. In particular case data for safeguarding will be held on My Concern.

- 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)
- Savills (Property and Glebe Management)
- Cornwall Payroll (Lay payroll)
- Natwest bank (payments including payroll)
- Health Assured (occupational health)
- Great with Talent (exit interviews)