Coventry Diocesan Board of Finance (CDBF) Safeguarding Privacy Notice

The CDBF are committed to protecting your personal data. Personal data is any information relating to an identified or identifiable person.

This privacy notice explains what to expect when the CDBF collects your personal information. There are several policies and procedures which support this privacy notice, these are listed in **Section 13** below.

1. Data controller(s)

The Coventry Diocesan Board of Finance Limited ("we", "us", "our") are committed to protecting and respecting your privacy. For the purposes of data protection legislation, we are the data controller, and we will process your personal data in accordance with the UK General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. Why we collect and use your personal data

We collect and use your personal information to carry out our safeguarding responsibilities including the following activities:

- Ensuring the safety of those that work for or are employed by the institutional Church of England, including contractors and office holders, members of the Church of England and the public;
- Undertaking risk assessments;
- Investigating safeguarding allegations;
- Maintaining records and case files regarding safeguarding incidents and/or investigations;
- Providing training;
- Providing support to individuals involved in safeguarding cases; including assessing the need for counselling;
- Providing advice to Church of England bodies regarding managing safeguarding incidents or cases;
- Liaising with public, statutory and regulatory enquiries (including legal and independent reviews and inquiries), local authorities and courts and tribunals;
- Being involved in litigation, dispute resolution and judicial process (including liaison with external advisers);
- Publishing resources, reports and reviews;
- Undertaking research and statistical analysis;
- Managing archived records for historical and research reasons, including the management and administration of access to our collections;

3. The categories of personal data we collect:

The types of information we process include:

- Name;
- Title;
- Marital status;
- Gender;
- Nationality;
- Job title/position;
- Dates (birth, joined, ordination, education, death etc.);
- Contact information – work and personal (Address; phone numbers);
- Honours;
- Family names and details, including wider family;
- Lifestyle and social circumstances;
- Socio-economic details;
- Employment and appointments;
- Education details;
- Training attendance/certification; and
- Housing needs;

We also process "special categories" of information that may include:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- health;
- sex life; or
- sexual orientation
- criminal allegations, proceedings or convictions.

We process personal information about:

- current, retired and prospective clergy
- employees (see wording below)
- volunteers
- complaints of misconduct and unlawful acts
- individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution
- professional advisers and consultants
- children and parents/carers

- individuals whose safety has been put at risk
- details of misconduct and unlawful acts e.g. the nature of any allegations
- individuals who may pose a risk.

The following types of documents or correspondence may be processed:

- Records of alerts, notifications, concerns or allegations;
- Disciplinary, case and personal files;
- Risk Assessments;
- Confidential declaration forms;
- Recruitment documentation e.g. DBS checks;
- Training records;
- Referrals;
- Self-referrals;
- Minutes of meetings;
- Correspondence, including letters, emails etc.;
- Telephone call notes;
- Records of enquiries, advice sought or provided;
- Records provided by the police or statutory agencies; and
- Notifications to external parties e.g. police, local authorities, the Charity Commission, insurers etc.

4. The lawful basis for using your information

We collect and use personal data as explained below.

- **Consent** – we will obtain your consent to process your data for assessing and providing counselling and support.
- **Legitimate interest** – we may need to process your information to undertake safeguarding tasks, including doing all that we reasonably can to ensure that no-one is at risk of harm during Church of England activities.

Legitimate Interest Assessment

We have undertaken a Legitimate Interest Assessment which sets out why we have a legitimate interest.

We have a specific purpose with a defined benefit	The processing is an essential part of the Church of England's response to the handling/dealing with safeguarding matters to protect individuals from harm, in particular those that are the most vulnerable, (children and/or vulnerable adults).
The processing is necessary to achieve the defined benefit.	Without processing this data, it would not be possible to manage/deal with safeguarding matters/issues. Such processing is necessary to effectively investigate an allegation/concern or help improve safe working practices in and around Church activities and ensure that the Church is a safe place for everybody.

The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	There is the risk of significant and/or serious harm to others if unsuitable individuals are appointed to positions of authority and responsibility where they can be trusted by others. Similarly, there is a risk of harm to individuals where safe working practices are not adopted or cannot be reviewed and improved, for instance, appropriate training cannot be provided. The duty to protect individuals from harm, overrides any risks to the rights and freedoms of data subjects as appropriate safeguards have been put in place.

For a copy of the full Legitimate Interest Assessment, please contact us (see section 12 for details).

- **Legal obligation** – we may need to process your information in order to comply with a legal obligation, such as under the Inquiries Act 2005 which may compel us to provide personal data for the purposes of a statutory inquiry, or a referral to the Disclosure and Barring Service under the Safeguarding Vulnerable Groups Act 2006, or an order of a court or tribunal.

Special categories & criminal information

- **Explicit Consent** – we will obtain your explicit written consent to process your data to assess the need for, and the provision of counselling and support, and to share it with 3rd parties.
- **Substantial public interest** (protecting the public against dishonesty etc.) – we may need to process your information where necessary for the protection of members of the public generally against seriously improper conduct, and from any failures in connection with, the Church of England's activities, or for safeguarding purposes.

This lawful basis is applied in the UK only, with reference to the UK GDPR Article 9(2)(g), and the Data Protection Act 2018 Schedule 2, paragraph 11. For those based outside the UK in other jurisdictions, they will have to ensure that their Member State law provides similar or equivalent use of 9(2)(g).

- **Legal claims** – we may need to process your information where there is a legal claim, or in connection with a judicial process.
- **Archiving** - we may keep your information for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

5. Who we collect from or share your information with:

Where necessary (or required), we collect from or share information with:

- Parishes e.g. Parochial Church Councils (PCCs) and relevant PCC members, diocesan bodies, bishops' offices, cathedrals and National Church Institutions;
- candidates, prospective employees, employees or other staff members (including contractors, workers, consultants and volunteers, including members of any "Core Group");
- legal representatives;
- parties and individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution (including mediation and arbitration);
- healthcare, social and welfare organisations or providers of health, social care or welfare services;

- educational institutions;
- governance bodies and committees;
- 3rd party data processors;
- local and central government;
- both houses of parliament and members of parliament;
- regulatory and statutory bodies;
- law enforcement and prosecuting authorities (in line with the NPCC & Church of England Safeguarding Data Sharing Agreement);
- courts and tribunals and providers of legal services;
- members of the judiciary;
- charitable, religious and voluntary organisations;
- survey and research organisations;
- statutory, public, regulatory or other legal or independent reviews or inquiries, including any "lessons learned" reviews.

Once your information has been collected by the CDBF it may be used by other organisations, where necessary, to provide a complete service to you, and we do this on the lawful basis listed above. It is for this reason that we link your information together, for example, to save you providing your information more than once.

6. Data Transfers outside the EEA

The CDBF does not share your information with countries outside of the UK or EEA routinely. If required to do so to meet our purpose, we will put in place the necessary safeguards.

7. How long do we keep your information?

There's often a legal and/or business reason for keeping your information for a set period, as stated in our retention schedule. We retain safeguarding records in line with national guidance**.**

8. Security

We are committed to ensuring that your personal data is secure. We limit access to data on a need-to-know basis and test our security practices and technologies.

Employees and temporary workers are required to follow policies and procedures and complete mandatory training to understand data protection and information security.

If a data breach does occur, we will do everything in our power to limit the damage. In the case of a high-risk data breach, and depending on the circumstances, we will inform you about the breach and any remedial actions to prevent any further damage. We will also inform the Information Commissioner's Office of any qualifying data breaches.

9. Your personal data will not be used for any automated decision making.

10. Your rights

You have the following rights regarding your personal data, subject to exemptions:

1. The right to request a copy of your personal data.
2. The right to rectify your data if you think it is inaccurate or incomplete.
3. The right to request that your data being erased, in certain circumstances.
4. The right to restrict processing of your data, in certain circumstances.
5. The right to request that we transfer your data to you or another organisation, in certain circumstances.
6. The right to object to our processing of your data if the process forms part of our public tasks, or is in our legitimate interests.

To exercise these rights please contact the Data Protection Team using the contact information in section 12.

11. Complaints or concerns

If you have any concerns or queries about how the CDBF handle your personal data, please contact the Director of Operations:

Stephen Davenport
Tel: 024 7652 1346
stephen.davenport@coventry.anglican.org

The complainant can complain to the Charity Commission at any stage.

Information about the kind of complaints the Commission can involve itself in can be found on their website at: **www.charitycommission.gov.uk/publications/cc47.aspx**

12. Contact Us

If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Protection Officer, Stephen Davenport at:

Coventry Diocesan Office
7 Priory Row, Coventry
CV1 5EX
02476 521346

This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at **https://ico.org.uk/global/contact-us/**

13. Reference documents

For further information on our safeguarding policy, please see:

Promoting a Safer Church policy statement

House of Bishops Safeguarding Guidance and Code of Practice

Safer Recruitment and People Management Code of Practice

Working together to safeguard children - GOV.UK

For further information on Safeguarding Record Retention please see:

https://www.coventry.anglican.org/info-for-parishes/safeguarding/

https://www.churchofengland.org/about/libraries-and-archives/records-and-information-management