



St Albans Diocesan Board of Finance Ltd (SADBF) Data Privacy Policy

1. Privacy Statement

The SADBF is committed to respecting the privacy of all those for whom we hold personal information/data at any time. If you have any queries please do get in touch. You will find our contact details at the end of this Privacy Notice.

This Privacy Notice sets out the data protection and data privacy policies that fall within the oversight of the SADBF as a 'Data Controller' and it explains how your personal data, as data subjects, is processed by the Diocese of St Albans and for what purposes.

The SADBF, as data controllers of personal data, are under an obligation of transparency concerning the processing of such data, under data protection legislation. Such transparency concerns specifically, the provision of information to data subjects about how their data is being processed, and facilitating individuals to access and understand this information. The SADBF are committed to engendering trust in the processes we undertake with regard to personal data, by enabling data subjects to understand, and if necessary, to challenge these processes, and to empower data subjects to hold us to account and to exercise their control over their personal data.

Adherence to this policy is mandatory for all SADBF employees, contractors, consultants and volunteers who use personal data held by the SADBF.

2. Introduction

The SADBF is committed to processing personal information we hold in accordance with current and developing national data legislation. This includes the General Data Protection Regulation (the "GDPR") which governs the processing of personal data; the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

The SADBF will comply with its obligations under the "GDPR" by processing information in line with the legal bases set out in law (see section 4 below).

The SADBF will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure; and ensure that appropriate technical measures are in place to protect personal data.

3. The St Albans Diocesan Board of Finance (SADBF)

The SADBF has a complex arrangement of Data Controllers, including PCCs, Incumbents, Local Ecumenical Partnerships (LEPs), the Bishops' offices, the Archdeacons' offices, the Diocese of St Albans Multi-Academy Trust (DSMAT) and the Diocesan Board of Finance Ltd (SADBF). The Diocese has a number of external links to theological education institutions, chaplaincies, fresh expressions of church and others, both locally, regionally and nationally, and the Parish Giving Scheme.

Across this complex picture, the Diocesan Office at Holywell Lodge includes the teams for the Diocesan Secretary; the Finance Team; the Mission and Ministry Team, the Estates Team; the Diocesan Pastoral

and Advisory Team; the Communications Team; the Diocesan Safeguarding Team; the IT Team; the Mission and Ministry Team; the Vocations Team, the Schools Team and the Archdeacons' administrative staff. All these teams come under the oversight of the Diocese of St Albans as Data Controller.

The Diocesan Office links with internal and external, formal and informal groups and bodies, as follows: PCCs; clergy; licensed lay ministers; lay leaders; those exploring vocations; those developing their discipleship; parish officers; deanery officers; statutory partners; church networks; our contractors; Board and Committee members; volunteers; and other parties (see Section 16 below) all within the Synodical governance and legal frameworks of the Church of England.

4. The legal basis for processing your personal data

The specific legal bases against which the SADBf will process information are:

- Legitimate Interest
- Compliance with a legal obligation
- To fulfil contractual obligations
- Consent
- Vital interest
- Public task

Most of our data is processed because it is necessary for the SADBf's legitimate interests, or the legitimate interests of a third party (such as another organisation in the Church of England).

Some of the data processing is necessary for compliance with a legal obligation. For example, the work of the SADBf will fall within the legal and synodical processes of the Church of England, Canon Law; and within the secular legal structures.

The SADBf will process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

The SADBf will process your data in order to respond to requests from you to receive particular information.

The SADBf will process your data to assist you in fulfilling your role in the church, including pastoral and administrative support, or if processing is necessary for compliance with a legal obligation. Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

5. Personal Information - what it is, and why the SADBf collects it

Personal information 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 the SADBf's possession or likely to come into such possession.

Personal information is collected where the SADBf believes it has lawful reason to do so.

The SADBf will use your personal data for the following purposes: To administer meetings, elections and other such arrangements as fall within the Synodical governance framework of the Church of England and which ensures the SADBf's ability to meet all legal and statutory obligations, including the Church Representation Rules;

- To keep you informed of the diocesan news/information which you have requested and that may be of interest to you, including diocesan and fundraising activities;
- To keep you informed of diocesan information that is believed to be important to the role you hold within the diocese, either in our parishes and local communities or within our diocesan offices;
- To seek your views and comments;

- To manage SADBf employees and volunteers (including HR records, payroll and pension requirements and records);
- To maintain SADBf accounts and records;
- To process a grant or an application for a role;
- To maintain records of clergy, lay ministers and parish officers (including PCC Secretaries, PCC Treasurers, Churchwardens and those with specifically nominated parish roles);
- To maintain records of Deanery Synod members (and liaise with Deanery Synod Secretaries who are also required to maintain the same records);
- To maintain SADBf records of mandatory training with regard to safeguarding and other safeguarding records as set out in law and the Church of England's national requirements;
- To manage safeguarding including DBS and safer recruitment, working with individuals within a safeguarding context within the church and within statutory and legislative requirements;
- To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and vulnerable adults are provided with safe environments;
- To notify you of changes to our services and offices;
- To enable us to provide a church body voluntary service for the benefit of the public within the Diocese;
- To enable us to collect Mission Statistics and Finance Returns.

6. What personal data is collected by the SADBf?

In some or all of the following information:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, postal and email addresses;
- Where they are relevant, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, ethnicity, education/work histories, academic/professional qualifications.

The data we process is likely to constitute sensitive personal data, because the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data, racial or ethnic origin, and, where this is relevant, mental and physical health, details of injuries, medication/treatment received, criminal records, fines and other similar judicial records.

7. Sharing personal data

Personal data will be treated as strictly confidential and will only be shared for lawful purposes and (see Section 16 below) connected to:

- Diocesan business - we will only share your data with your consent e.g. the Diocesan online and printed Directories;
- The Bishop of St Albans;
- A national process or network– e.g. where individuals are part of exploring ordination, or those whose role is part of a national network of others in a similar role;
- Employment, social security, social protection, or other statutory reasons.

8. Keeping personal data ¹

The SADBf keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national church e.g. concerning safeguarding. Specifically, we retain personnel information as appropriate to centrally employed staff and volunteers; safeguarding data; financially required data e.g. by HMRC and the Charity Commission (including records required to be retained for 6 years after the calendar year to which they relate); current parish officer information; Deanery, Diocesan and General Synod membership; Boards and Councils. Unless required for record keeping, personal data is deleted when a data subject no longer holds a role/position within a parish, deanery or Diocese.

9. Individual rights and personal data

Unless subject to an exemption under Data Protection law, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which the SADBf holds about you;
- The right to request correction of 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 the SADBf 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 at any time to withdraw your consent to processing of your personal data by the SADBf;
- The right to lodge a complaint with the Information Commissioner's Office.

10. Further processing

If the SADBf wishes to use your personal data for a new purpose, not covered by this Privacy/Data Protection Notice, then you will be provided with a new notice, explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, your prior consent to the new processing will be sought.

11. Marketing permissions and seeking consent

Whilst there may be an expectation that people involved in the life of the Diocese would expect to receive information from the SADBf through email, post, social media etc., the SADBf is required through data regulations to ensure that it asks for your permission to do so in certain circumstances and to ensure that it makes you aware of your rights in doing so.

Email and text - We will ask for your permission to contact you in this way.

Postal marketing - From time to time we may send you information about the Diocese and its work, unless you have told us you would prefer not to receive this information by post.

Bulletins and newsletters - The SADBf will, in the main, require individuals to personally opt in and out of electronically sent information, such as monthly diocesan SeeRound/Alban Life. This ensures that individuals are able to manage the information they wish to receive.

12. Gathering information from external sources

The SADBf from time to time may undertake research to enable it to develop its work. Any information, whether personal or of a quite general nature, will be from publicly available sources, such as: Companies House; information published in articles/papers etc.; social media which is viewed publicly; through the privacy notices of social media; messaging services e.g. LinkedIn; or through national and regional bodies or authority's information such as the census data.

¹ Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

13. Data processors

A number of bodies process data for the SADBf, including:

- Buzzacott;
- Chapel Studios;
- Alberon;
- claireLOGIC;
- Advanced;
- National Church Institutions;
- Eventbrite;
- SurveyMonkey;
- Mailchimp;
- SendGrid.

14. Changes to this Privacy Notice

The SADBf will review this privacy policy regularly and may update it at any time - for example in the event of legal changes, to improve how we manage data, or where an issue or concern has come to light that needs an appropriate response. If there are any significant changes in the way the SADBf processes your personal information we will provide a prominent notice on our website or send you a notification.

15. Contact details and reporting concerns

To exercise all relevant rights, queries or complaints, please in the first instance contact the SADBf's Data Protection Officer: dpo@stalbans.anglican.org or for clergy, the Diocesan Bishop's office.

The St Albans Diocesan Board of Finance Reg. in England: Charity 248887 Company 145227.

You can also contact the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

16. Examples of those with whom the Diocese of St Albans is generally in regular contact

- **Data Controllers:** The Bishops' Offices, The Dean and Chapter of St Albans Cathedral, PCCs and Incumbents; Diocesan Board of Education, Diocese of St Albans Educational Trust (the "Umbrella" Trust), Diocese of St Albans Multi-Academy Trust (DSMAT), Parish Giving Scheme, National Church Institutions.
- **Clergy:** all stipendiary clergy, self-supporting clergy, retired clergy with/without the Bishop's Permission to Officiate and clergy in secular employment.
- **Other ministers:** licensed lay ministers.
- **Church officers and other church members:** Churchwardens, PCC Secretaries, PCC Treasurers, safeguarding parish representatives/nominated people, church administrators, PCC/DCC members.
- **Members of Synods:** Deanery officers and Deanery Synod representatives, Diocesan Synod; General Synod representatives, Bishop's Council.
- **Committees/Boards:** General Committee, Assets Committee, Audit Committee, Diocesan Advisory Committee (DAC), DMPC Executive Committee, Diocesan Safeguarding Advisory Panel, Board for Mission and Ministry, Property Committee, Glebe Committee, Bishop's Advisory Groups, Patrons.
- Fund applicants and Grant-making bodies: individuals/groups applying for funding for various diocesan and parish projects and initiatives; Trusts and other grant-making organisations.
- Professionals, professional bodies/organisations and contractors: relating to contracts for goods and services; individuals in their professional capacity.

17. Examples of third parties with whom the SADBf will share data where this is appropriate

- **Clergy details** - with the Bishop's Office in the course of ministry; - periodically with Crockford's Clerical Directory; - by the Property team where this links to works of repair and maintenance to diocesan clergy housing and the letting of diocesan properties; - with the relevant local authority in respect of council tax, relevant water authority, and utility companies in respect of energy supplies to diocesan properties; - National Church offices/Church Commissioners with regard to pensions, stipend and payroll matters.
- **Diocesan Directory** - hard copy or on-line versions, to be published with consents where appropriate for certain roles.
- **Specifically named individuals** - clergy/lay minister details where these relate to those undertaking ministerial development reviews and support
- **Online Faculty System (OFS)** - petitioners/objectors will be shared as appropriate with: the offices of the Diocesan Registrar; the offices of the Chancellor of the Diocese; statutory consultees e.g. Historic England; others where this facilitates the consideration of applications for either a Faculty or a matter not requiring a faculty under the Faculty Jurisdiction Rules.
- **Legal and statutory guidance and others** - in compliance with the range of legal responsibilities, including: land/glebe; property purchases and sales; tenancy arrangements; employment; HMRC; those involved with safeguarding issues, including Police, Probation, Social Care and Children's Services; Charity Commission; Insurers; Legal advisers.
- **National Church** - in line with national safeguarding requirements; - Ministry Division and National Church Institutions as appropriate; - stipend/payroll and pensions.
- **Church Commissioners** – Pensions Board - SADBf pensions and other pension providers as appropriate.
- **CCPAS** - with regard to DBS checking processes.
- **Contractors and Insurers** - with regard to SADBf appointed contractors where this relates to the provision of services to properties for emergency and maintenance purposes.

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