

## WINCHESTER DIOCESAN BOARD OF FINANCE SAFEGUARDING PRIVACY NOTICE

Winchester Diocesan Board of Finance (WDBF) is 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 Safeguarding Team collect your personal information.

### Data controller(s)

Winchester Diocesan Board of Finance is the data controller. This means it decides how your personal data is processed and for what purposes.

Contacts:

Winchester Diocesan Board of Finance, Diocesan Office, Old Alresford Place, Alresford, Hants, SO24 9DH [www.winchester.anglican.org](http://www.winchester.anglican.org) tel: 01962 737300

All General Data Protection Regulation (GDPR) enquires to:

The Head of Operations, Colin Harbidge

[colin.harbidge@winchester.anglican.org](mailto:colin.harbidge@winchester.anglican.org) tel:01962 737307

The Head of HR, Susan Beckett

[susan.beckett@winchester.anglican.org](mailto:susan.beckett@winchester.anglican.org) tel: 01962 737307

### 1. Why we collect and use your personal data

We collect and use your personal information to carry out our safeguarding responsibilities including, but not limited to, the following activities:

- Ensuring the safety of those who work for or are employed by the Diocese of Winchester (Church of England Diocese), including contractors and office holders, members of the Church of England within the Diocese of Winchester and the public
- Investigating safeguarding allegations
- Undertaking risk assessments
- Maintaining records and case files regarding safeguarding incidents and/or investigations
- Providing training and keeping records of attendance
- Providing support to individuals involved in safeguarding cases
- Providing advice to Diocesan (Church of England) bodies such as parishes, deaneries, cathedral, 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

## 2. The categories of personal data we collect:

The types of information we process include:

- personal details
- contact information
- family details
- lifestyle and social circumstances
- employment and education details
- housing needs
- details of misconduct and unlawful acts e.g. the nature of any allegations

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
- individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution
- professional advisers and consultants

- children and parents
- individuals whose safety has been put at risk

### 3. The lawful basis for using your information

We collect and use personal data as explained below.

- **Public task** – we may need to process your information to undertake a duty or task in the public interest. This includes making sure that Diocesan (Church of England) activities are safe for everybody.
- **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 Diocesan (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 consideration of matters which are brought to our attention in order that, amongst other things, we can identify any potential wrongdoing, inappropriate behaviour, or unlawful conduct, and put in place a safer way of working across the whole of the Church of England.
The processing is necessary to achieve the defined benefit.	Unless we properly appreciate the detail of the matters to which you refer we cannot take steps to ensure that we have provided the most appropriate safeguarding response.
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. This risk is greatest where allegations are not properly addressed. This is balanced against, and does not override, your interests, rights and freedoms.

- **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

- **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 Diocesan’s (Church of England’s) activities, or for safeguarding purposes.

- **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.

#### 4. 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, incumbents, diocesan bodies, bishops' offices, cathedrals and national church institutions.
- candidates, prospective employees, employees or other staff members (including contractors, workers, consultants and volunteers). This may also include members of any "Support and Monitoring Group" and "Core Group" where required)
- 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 including the Safeguarding Strategic Panel, Safeguarding Casework Group and Safeguarding Training Group
- local and central government
- regulatory and statutory bodies
- law enforcement and prosecuting authorities
- courts and tribunals and providers of legal services
- members of the judiciary
- charitable, religious and voluntary 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 Safeguarding Team it may be used, where necessary, to carry out our duty to make the Church safe for all.

#### 5. Your personal data will not be sent to countries outside the EEA without your consent, and with necessary safeguards.

The WDBF does not share your information with countries outside of the UK or EEA without your consent and necessary safeguards.

#### 6. How long do we keep your information?

There's often a legal and/or business reason for keeping your information for a set period. Our safeguarding data is managed in accordance with the retention instruction from the National Church (Church of England) and currently linked to the IICSA investigation. Our understanding of the NC instruction is that we do not place a retention period on safeguarding data.

## 7. 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 contractors are required to follow policies and procedures and complete mandatory annual 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.

## 8. Your personal data will not be used for any automated decision making without access to human intervention.

## 9. 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 request that the Diocese corrects any personal data if it is found to be inaccurate or out of date;
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 use the contact information provided below.

## 10. Complaints or concerns

To exercise all relevant rights, queries or complaints please contact:

- The Head of Operations, Colin Harbidge  
([colin.harbidge@winchester.anglican.org](mailto:colin.harbidge@winchester.anglican.org) / 01962 737307)
- The Head of HR, Susan Beckett  
([susan.beckett@winchester.anglican.org](mailto:susan.beckett@winchester.anglican.org) / 01962 737307)

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.

The Diocese of Winchester is the operational name of the Winchester Diocesan Board of Finance, a registered charitable business by guarantee.

## **11. Reference documents**

For the WDBF's Privacy Notice please go to:

<https://www.winchester.anglican.org/privacy/>

For further information on retention please see Safeguarding Records Retention Toolkit December 2015:

[Records management guides | The Church of England;](https://www.churchofengland.org/sites/default/files/2017-10/Safeguarding%20Records-%20Retention%20Tool%20kit%20-Dec%2015.pdf)

<https://www.churchofengland.org/sites/default/files/2017-10/Safeguarding%20Records-%20Retention%20Tool%20kit%20-Dec%2015.pdf>

For further information on our safeguarding duties and responsibilities, please see Practice Guidance: Safer Recruitment 2016 policy:

[https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer\\_recruitment\\_practice\\_guidance\\_2016.pdf](https://www.churchofengland.org/sites/default/files/2017-11/safeguarding%20safer_recruitment_practice_guidance_2016.pdf)

Practice Guidance: Responding to, assessing and managing safeguarding concerns or allegations against church officers (2017):

<https://www.churchofengland.org/sites/default/files/2017-12/Responding%20PG%20V2.pdf>

Responding to Safeguarding Concerns or Allegations that relate to Children, Young People and Vulnerable Adults Practice Guidance (2018):

<https://www.churchofengland.org/sites/default/files/2018-11/Responding%20to%20Safeguarding%20Concerns%20or%20Allegations%20that%20relate%20to%20Children%20Young%20People%20and%20Vulnerable%20Adults.pdf>

**SB**  
**Agreed May 2019**