

Privacy Notice

Safeguarding Past Cases Review 2

1. Introduction and data controller:

This privacy notice explains why and how your personal data is processed by the Past Cases Review team commissioned by the National Safeguarding Team (NST) into the handling and managing by the institutional Church of England of abuse allegations and safeguarding practice. The Review team acts as the joint data controller with the NST for the purposes of the review. The Review team is assisted by Andrea Harper, NST officer.

The contact details are:

Andrea Harper

National safeguarding team –
pcr2@churchofengland.org

2. Why the Review Team processes your personal data:

Personal data is to be processed by the Review Team as stated in the PCR2 Protocol and Practice Guidance, which can be found here:

<https://www.churchofengland.org/safeguarding/promoting-safer-church/reviews-and-reports/past-cases-review-2>

The purpose of the processing is in order to identify both good practice and failings in the institutional Church of England's handling of the allegations of abuse. The purpose of the review is to advise and recommend to the institutions that comprise the Church of England improvements to their response to allegations of abuse and their safeguarding working practices, thereby, ensuring a safe environment for all.

There may also be a requirement for the review team within the NST to share or obtain information from other Diocesan Safeguarding Team or the Provincial Safeguarding Advisor (PSA) for the purposes of further investigation or to provide support to survivors.

The information the Review Team will process:

The types of information the Review Team will process include:

- Name
- Title
- Marital status
- Gender
- Nationality
- Job title/position
- Dates (birth, joined, ordination, education, death etc)
- Contact information – work and personal (address; email address, phone numbers)
- Family names and details, including wider family

- Lifestyle and social circumstances
- Socio-economic details
- Employment and appointments
- Education details
- Training attendance/certification

The Review Team may also process “special categories” of information, such as:

- Race
- Ethnic origin
- Religion
- Health
- Sex life, or
- Sexual orientation

The Review team may also process data concerning:

- criminal convictions and offences, including criminal allegations.

The Review Team may process information about:

- Current, former and retired clergy
- Current and former church officers (A church officer is anyone appointed/elected by or on behalf of the Church to a post or role, whether they are ordained or lay, paid or unpaid).
- Current and former employees
- Current and former volunteers
- Individuals who made allegations of abuse
- Current and former professional advisers and consultants
- Individuals whose safety has been/was put at risk
- Children and parents/carers
- Complaints of misconduct and any unlawful acts
- Details of misconduct and any unlawful acts, including the nature of any allegations
- Individuals who witnessed any misconduct or any unlawful acts or were alleged to witness such acts

The Review Team may process the following types of documents or correspondence:

- 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 any enquiries, advice sought or provided
- Records provided by the police or statutory agencies
- Any notifications provided to external parties e.g. police, local authorities, Charity Commission, insurers etc.

3. The lawful bases for processing your personal information

The Review Team will process your personal data on the following lawful bases:

Personal data

- **Legitimate interest** – the Review Team will need to process personal data to undertake the review, in order that the institutional Church of England can take steps to enhance and improve its response to allegations of abuse and working practices, thereby ensuring a safe environment for all.
- **Consent** – we may need to process additional information held by the police and law enforcement agencies where your consent is required, and you have consented to us doing so for the purposes of the Review. **You have the right to withdraw consent at any time by contacting us using the contact details provided in section 9 below.**

Legitimate Interest Assessment

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

We have a specific purpose with a defined benefit	The purpose of the review is to advise and recommend to the institutional Church of England improvements to its response to allegations of abuse and its safeguarding working practice, thereby ensuring a safe environment for all.
The processing is necessary to achieve the defined benefit.	The institutional Church of England would be unable to address any failings as these would not be known or understood, and would be less able to improve practice, or to address the concerns and needs of survivors.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	Data subjects have a joint interest in learning from the review and understanding what happened and what needs to be done to improve practice and survivor support. Data subject involvement is a key component of the review, and measures are in place to protect their rights and freedoms.

For a copy of the full Legitimate Interest Assessment, please contact [*insert name/job title*] whose contact details are set out at section 10 below.

Special categories and information relating to criminal convictions and offences

- **Consent** - we may need to process additional information held by the police and law enforcement agencies where your consent is required, and you have given explicit consent to us doing so for the purposes of the Review. **You have the right to**

withdraw consent at any time by contacting us using the contact details provided in section 9 below.

- **Substantial public interest** (protecting the public against dishonesty etc.) – the Review Team 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 institutional Church of England’s activities, or for safeguarding purposes.

4. Who the Review Team collect your information from:

The Review Team will process personal data that comes from various sources including:

- Former and current archbishops/diocesan/suffragan bishops and staff in the archbishop’s/bishop’s office;
- Former and current provincial/diocesan registrars and diocesan safeguarding advisors;
- Former and current office holders or members of staff in the diocese or parishes
- Volunteers in the diocese or parishes;
- The National Church Institutions, Theological Training Institutions, Religious Communities, and other Church of England organisations;
- Victims/survivors and those who have made allegations of abuse;
- Advocates, parents or guardians of those who have made allegations of abuse;
- Members of the clergy (serving and retired);
- Current and former members of the PCCs;
- Witnesses to any unlawful behaviour or other misconduct;
- Charities and volunteer organisations;
- The police and other statutory or regulatory agencies.

Some information will come directly from the individuals concerned and some will come from other sources, (e.g. case files), (see section 3 above for further information).

5. Sharing your information:

All personal data provided will be treated as strictly confidential and may be shared only with the Diocesan Safeguarding Team or PSA. Data may also be shared with the Diocesan PCR2 Reference Group, and the National PCR2 Management Board for the purposes of validation, oversight and independent scrutiny, and the National Safeguarding Team’s (NST) independent reviewer for the purposes of collating a final report and recommendations.

Data may also be shared with the NST, police or other statutory or regulatory agencies both during and after the Review if necessary, in order to undertake any investigation of allegations.

When the review is completed the data will be anonymised for the purpose of a report and recommendations for improving the Church of England’s safeguarding procedures, including the response to allegations and safer working practices.

6. How long does the data controller keep your information?

We will keep your information in accordance with the Safeguarding Retention Schedule.

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 all electronic transfer and storage is encrypted.

8. Your rights

You have the following rights regarding your personal data:

- The right to be informed about any data we hold about you;

- The right to request a copy of your personal data which we hold about you;
- The right to withdraw your consent;
- The right to request that we correct 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 us 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 to object to the processing of your personal data

To exercise these rights please contact *[insert name/job title]* using the contact information provided below.

9. Complaints or concerns

If you have any concerns or queries about how the Reviewer handles your personal data, please contact the *[insert name/job title]* at:

[insert email address and/or postal address]

If you have any concerns or queries about how the Review team has handled your complaint or query, please contact *[insert DPO/data protection lead details]*

You have the right to make a complaint at any time to the Information Commissioner at <https://ico.org.uk/concerns/>