

Providing 360 feedback - Privacy Notice

This privacy notice is provided by the Archbishops' Advisers for Appointments and Development (AAAD) to explain what to expect when we collect and process your personal information in accordance with the UK GDPR [and the EU General Data Protection Regulation (GDPR)].

Data controller(s)

The data controller is:

The Archbishop of Canterbury in his corporate capacity
The Office of the Archbishop of Canterbury
Lambeth Palace
SE1 7JU

For further information on the Archbishop of Canterbury please go to:

<https://www.archbishopofcanterbury.org/>

1. Why we collect and use your personal data

Personal information is collected in the form of a 360-feedback questionnaire (ratings and comments) for the following purpose/s:

- To support senior clergy to reflect on their work and ministry.
- To collect feedback for senior clergy from selected colleagues, partners and others.
- The ratings you provide, and any comments made will be used to develop a 360 report that will be seen and used by the reviewee to support their reflections and inform their ministerial development review (MDR). Comments will not be attributed to any individual and will be grouped by working relationship categories in the report seen by the reviewee. If you are the only person in a particular category to provide feedback your comments will be merged with another category to ensure the comments are not attributable to you and so that the reviewee will not know how each person completing the 360 questionnaire has responded. **Note:** this will not apply where there can only be one person in a category e.g. the Archbishop, or the Diocesan Bishop for any Suffragan Bishop or Dean that is the subject of the 360 review.
- To understand the training and development needs of senior clergy.

2. The categories of personal data we collect:

The information we process for this purpose is:

Reviewee (the subject of the 360 review):

- Your name
- Your ratings and comments on key areas of your work.

Reviewers (those invited by the reviewee to provide feedback):

- Your name
- Your working relationship with the person being reviewed (i.e. line manager, direct report, diocesan colleague, external colleague, peer, bishop)
- Your ratings and comments on key areas of the work and ministry of the person being reviewed.

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

- Religious belief - (the 360 process may capture information regarding the mission, vision or theology of the reviewee).

3. The lawful basis for using your information

We collect and use personal data under the following lawful bases:

Personal data

- **Reviewees - Legal obligation** (as stated in Part IV, Paragraphs 18 and 19 of The Ecclesiastical Offices (Terms of Service) Regulations 2009 – Ministerial Development Review) [The Ecclesiastical Offices \(Terms of Service\) Regulations 2009 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- **Reviewees - Consent** – we process your feedback on the reviewee with your consent when you agree to participate in the 360-feedback process. Your feedback will be non-attributable and will not identify you by name.

You have the right to withdraw your consent at any time by contacting the AAAD office using the contact details provided in Section 7 below.

Special category data

- **Legitimate activity** – the processing is carried out in the course of our legitimate training and development activities with appropriate safeguards on condition that the processing relates solely to the members of the Church of England or to persons who have regular contact with us in connection with our purposes. The personal data are not disclosed outside the Church of England without the consent of the data subjects.

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

We collected your information from:

- **Reviewees** - your name and self-reflection is collected from you when you participate in the 360-degree process.
- **Reviewers** - your name is collected from the online questionnaire you use to provide your feedback online.
- **Reviewers** - your relationship with the reviewee is collected from the information provided by the reviewee. This confirms they have asked you to participate in their 360 review, that you have consented and advises the relationship category you have with them in respect of their work and ministry.
- **Reviewee and reviewer ratings /comments** provided on the reviewee as part of the 360 are captured from the on-line system and are held securely with only the Development Team, who administer the 360 process, having access to this information to enable them to collate the information and produce the 360 report for the reviewee.
 - i. The reviewee may share elements of their feedback and their reflections on it with others as part of their MDR process.
 - ii. The Development Team will use 360 feedback to identify broad themes to inform the identification of development needs and the provision of future development interventions. Anonymised 360 data may be aggregated with other 360 reports and the themes shared with the Development and Appointments Group, Archbishops' Project Review Group and Bishops and Cathedrals Committees who oversee the work of the Archbishops' Advisers for Appointments and Development in the process of identifying learning and development needs.
 - iii. Where any feedback provided raises concerns around safeguarding practice or highlights possible issues around the safeguarding of vulnerable children or

adults this will be flagged with the Church of England's National Safeguarding Team.

- iv. Where any feedback provided highlights concerns around any illegal activity this will be flagged with the relevant body or team in the diocese or at the National Church Institutions.

5. How long do we keep your information?

We will keep your data:

- On the 360 online system until the 360 report has been generated and used by the subject of the review to support their reflections and Ministerial Development Review (MDR).
 - a. In line with the timescales for the new MDR process being rolled out for diocesan bishops your data will only be kept for two years.
 - b. For other clergy - your data will be kept for a maximum of two years.
- The 360 reports or extracts from them (that contain non-attributable comments), may be retained with other MDR paperwork in the individual's blue file at Lambeth or Bishopthorpe Palace or at the diocese as appropriate for their role.

6. 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 (where applicable);
- 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
- The right to obtain and reuse your personal data to move, copy or transfer it from one IT system to another. *[only applicable for data held online]*

To exercise these rights, please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

7. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, [insert name and contact details].

If you have any concerns or queries about how the AAAD office handle your personal data, please contact the Data Protection Officer at:

gdpr@churchofengland.org

or online at: [National Church Institutions data protection | The Church of England](#) or Tel: 020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner online at: [Your personal information concerns | ICO](#), or by phone on 0303 123 1113 (local rate).