



Crockford Privacy Notice

Crockford's Clerical Directory is a long-established listing of Anglican clergy and their churches, it is compiled and maintained by Church House Publishing on behalf of the Archbishops' Council.

This privacy notice is provided by the Archbishops' Council who are one of the National Church Institutions (NCIs) to explain what to expect when we collect and process your personal information in accordance with the UK Data Protection legislation that includes the UK General Data Protection Regulation (UK-GDPR) and the Data Protection Act 2018.

The privacy and security of data is very important to us. This notice explains what data is held, how that data is obtained, why we process it, if and where that data is shared and how long we keep your data on the Crockford database. and the people you should contact if you have any queries.

What data we collect, and why

The following tables set out the information that is required to be processed and the conditions under which it is processed in order to maintain:

1. The Directory database - the data we *collect* (on a Legitimate Interest basis)
2. The Published Directories - the data we *publish* (with the subject's consent)
3. Communications – the way we, and others, may occasionally *contact* you (with the subject's consent)

Providing consent

We may not and will not use your data for purposes outlined below in sections 2 and 3 without receiving your explicit consent. It is important to note that if we do not receive such consent relating to purpose 2, **then your information will not appear in Crockford's Clerical Directory.**

Please note that, even if you are happy for your biographical entry to appear in *Crockford's Clerical Directory*, you can still request that certain contact information or your date of birth be excluded from publication. In such cases, please inform the Crockford team at crockford@churchofengland.org

In accordance with the UK-GDPR you have the right to withdraw your consent at anytime, although with respect to the consent provided in Section 2.1 in this is can only be until the point of publication, with regards to Section 2.2 we will remove your data from the published webpage.

Important Contacts

The Archbishops' Council is the primary data controller of any personal information provided to, or gathered by, Church House Publishing. The address is:

Archbishops' Council
Church House
Great Smith Street
London SW1P 3AZ

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our Data Protection Officer at gdpr@churchofengland.org or the postal address above.

In any event, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO can be contacted on their helpline number which is 03031-231113 or by other contact methods as set out on their website (www.ico.org.uk).

Individual Rights

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 we hold about you (typically this will be name, contact details and if you've chosen to provide it, denomination);
- 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 at any time to withdraw your consent to our processing of your personal data;
- The right to lodge a complaint with the Information Commissioner's Office.

Please read the notice and complete the form below to inform us of your preferences.

Please return this slip to inform us of your wishes regarding the use of your data			
Please tick the relevant box(es)		PLEASE USE BLOCK CAPITALS	
2.1	I give consent for my biography to appear in Crockford's Clerical Directory (printed book) <input type="checkbox"/>	Full Name:	<input type="text"/>
2.2	I give consent for my biography to appear in Crockford's Clerical Directory on the Internet <input type="checkbox"/>	Address:	<input type="text"/>
3.1	I give my consent to receive occasional mailings by the National Church Institutions <input type="checkbox"/>	<input type="text"/>	Telephone: (for any queries) <input type="text"/>
3.2	I give my consent to receive occasional Third Party mailings that may be of interest to clergy <input type="checkbox"/>	Signed:	Date: <input type="text"/>
Additional information may be entered below:			
<input type="text"/>			
I have read and understood the Crockford Privacy Notice		<input type="checkbox"/>	
<p>Return this form to: The Compiler, Crockford, Church House, Great Smith Street, London SW1P 3AZ. Alternatively, you can scan and email it to crockford@churchofengland.org</p>			

1. Directory database

This is the secure electronic database that is used to maintain the directory. This access is limited to those that work within the Crockford team.

1.1 Active Current Clergy

Ref	Data item	Reason for processing	Condition for processing
1	Name	As an identity characteristic to provide a list of Clergy active in the Church	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...”
2	Church appointments (current)	As a record of the positions held in the Church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...” Article 9 UK GDPR – “Processing of special categories of personal data” - 2(d) “processing is carried out in the course of its legitimate activities with safeguards by a foundation, association or any other not-for-profit body with a...religious...aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purpose and that the personal data are not disclosed outside that body without consent of the data subjects...”
	Church appointments (past)	As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...” Article 9 UK GDPR – “Processing of special categories of personal data” - 2(j) “processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)...” (i.e. that the information must be safeguarded with appropriate technical and organisation measures).
3	Date of Ordination	As a record of the positions held in the church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...” Article 9 UK GDPR – “Processing of special categories of personal data” - 2(d) “processing is carried out in the course of its legitimate activities with safeguards by a foundation, association or any other not-for-profit body with a...religious...aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purpose and that the personal data are not disclosed outside that body without consent of the data subjects...”
4	Theological Training/Theological Education	To provide relevant theological background of those appointed to positions in the church	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...” Article 9 UK GDPR – “Processing of special categories of personal data” - 2(j) “processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical

			<i>purposes in accordance with Article 89(1)...</i> (i.e. that the information must be safeguarded with appropriate technical and organisation measures).
5	Address	To provide contact details for the individual	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller ...”</i>
6	Telephone Number	To provide contact details for the individual	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i>
7	E-mail Address	To provide contact details for the individual	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i>
8	Additional biographical details	To provide additional useful information relating to the individual who has been appointed to positions within the church	Article 6 UK GDPR – “lawfulness of Processing” - 1(a) <i>the data subject has given consent to the processing of his or her personal data for one or more specific purposes”</i> Article 9 UK GDPR – 2(a) <i>“the data subject has given explicit consent to the processing of those personal data for one or more specified purposes...”</i>

1.2 Non-Active or Former Clergy

When clergy retire or leave the Church the following information is retained on the secure database

Ref	Data item	Reason for processing	Condition for processing
1	Name	As an identity characteristic to provide a list of Clergy were active in the Church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i>
2	Church appointments	As a record of the positions held in the Church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i> Article 9 UK GDPR – “Processing of special categories of personal data” - 2(j) <i>“processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)...”</i> (i.e. that the information must be safeguarded with appropriate technical and organisation measures).
3	Date of Ordination	As a record of the positions held in the church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i> Article 9 UK GDPR – “Processing of special categories of personal data” - 2(j) <i>“processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)...”</i> (i.e. that the information must be safeguarded with appropriate technical and organisation measures).
4	Theological Training/Theological Education	To provide relevant theological background of those appointed to positions in the church As an historical record	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) <i>“processing is necessary for the purposes of the legitimate interests pursued by the controller...”</i> Article 9 UK GDPR – “Processing of special categories of personal data” - 2(j) <i>“processing is necessary for archiving purposes in the public interest,</i>

			<i>scientific or historical research purposes or statistical purposes in accordance with Article 89(1)...” (i.e. that the information must be safeguarded with appropriate technical and organisation measures).</i>
5	Address	To provide contact details for the individual to ensure that the database can be kept up to date and accurate in accordance with data protection legislation Only a preferred option will be retained	Article 6 UK GDPR – “Lawfulness of Processing” - 1(f) “processing is necessary for the purposes of the legitimate interests pursued by the controller...”
6	Telephone Number		
7	E-mail Address		
8	Additional biographical details	To provide additional useful information relating to the individual who has been appointed to positions within the church	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes” Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes...”

Legitimate Interest Assessment

The following relates to Items 1, 2, 3, 4, 5, 6 & 7 in tables I.1 and I.2

We have a specific purpose with a defined benefit	The purpose is to ensure that a Clerical directory can be maintained as an up to date directory of clergy and can also provide an historical record of clergy for the Church of England.
The processing is necessary to achieve the defined benefit.	The benefit is to ensure that the communications can be effective and that the Church of England can preserve part of its history.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	In capturing this information in the way it is doing so the Archbishops Council is minimising the data which is required and ensuring that the interests and rights and freedoms of the data subjects are maintained.

For a copy of the full Legitimate Interest Assessment, please contact crockford@churchofengland.org

2 Published Directories – Includes

2.1 Crockford’s Clerical Directory in printed form;

2.2 Crockford’s Clerical Directory on the Internet;

Ref	Data item	Reason for processing	Condition for processing
1	Name	As an identity characteristic to provide a list of Clergy active in the Church	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
2	Church appointments (current and past)	As a record of the positions held in the Church As an historical record	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes” Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes...”
3	Date of Ordination	As a record of the positions held in the church As an historical record	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”

			Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,…”
4	Theological Training/Theological Education	To provide relevant theological background of those appointed to positions in the church	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes” Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,…”
5	Address	To provide contact details for the individual	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
6	Telephone Number	To provide Contact details for the individual	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
7	E-mail Address	To provide contact details for the individual	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
8	Additional biographical details	To provide additional useful information relating to the individual who has been appointed to positions within the church	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes” Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,…”

Note: that by agreeing to the publication of your personal information in the directory your information is being placed into the public domain and as such for the purposes of GDPR from that point forward the condition for processing of special category data will change from the use of **Article 9 UK GDPR – 2(a)** “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,…” to **Article 9 UK GDPR 2(e)** “processing relates to personal data which are manifestly made public by the data subject”

3. Communications

- 3.1 Occasional use by the NClS (for example, mailing of their Annual Reports, communications from Boards or Councils, surveys regarding the Church’s life);
- 3.2 Occasional mailings by other (principally church-based) organisations that may be of interest to clergy (e.g. RSCM, ROOTS for Churches Ltd, Hymns Ancient & Modern Ltd).

Ref	Data item	Reason for processing	Condition for processing
1	Name	As an identity characteristic	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
2	Church appointments	To enable the correct title to be used when contacting the individual.	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes” Article 9 UK GDPR – 2(a) “the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,…”

3	Address	To provide contact details for the individual	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
4	Telephone Number	To provide Contact details for the individual	Article 6 UK GDPR – “lawfulness of Processing” – 1(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes”
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