

## PRIVACY NOTICE – General Synod Office

This privacy notice is provided by the General Synod Office to explain what to expect when we collect and process your personal information with the UK General Protection Regulation (UK GDPR) and the EU GDPR.

### **Data controller**

The data controller is the Archbishops' Council, Church House, Great Smith Street, London SW1P 3AZ  
For more information on the Archbishops' Council, please go to

<https://www.churchofengland.org/about/leadership-and-governance/archbishops-council>

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

#### **Section A – Synod elections and voting**

- (a) To contact you to obtain relevant details of electors and nominees for election from the special constituencies, these being: Suffragan Bishops, Deans, Universities/Theological Training Institutions, and Religious Communities.
- (b) To provide access to Civica Election Services (Civica) to facilitate the collection and processing of electors and candidates' names and details for Synod Elections, and to inform candidates and electors of the results of an election.
- (c) To enter the required details of electors, and nominees into Civica for the purpose of the election.
- (d) To notify the Synod of new members, to administer Synod as described in Section b below.
- (e) To facilitate access to the on-line web based Lumi voting system for the purpose of voting on matters before Synod, and to provide the voting record for publication on the Church of England website.

#### **Section B – Synod administration**

- (a) Your contact details (name, physical address, phone number and email address) are collected by the Synod Office to create and manage the list of Synod members and representatives.
- (b) Your contact details are used for distributing Synod papers and other material of relevance in connection with the business of the General Synod (including on occasion material produced by the NCIs and bodies connected with them).
- (c) Your contact details are used to compile the 'List of Synod members' booklet for distribution to other General Synod members, and for inclusion in the Church of England Yearbook which acts as both a public register and a historical record of Synod membership.
- (d) Your photograph, name, Synod number, and diocese are printed on a security pass issued directly to you. This security pass must be worn at all times and presented to staff when attending a General Synod group of sessions. For security reasons, if you do not have a pass you will not be granted access to the Chamber.
- (e) Your photograph is listed in a booklet produced before each group of sessions for the use of General Synod Chairs and NCIs staff working during the sessions to help identify members during debates.
- (f) Your contact details are shared with the Church of England Communications Office, Church House, Westminster so they can send you correspondence and newsletters (including the Daily Digest) regarding news, events and activities within the Church that are relevant to your role as a Church of England General Synod member.
- (g) For archiving purposes in the public interest, for historical research or statistical purposes.

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

Title, First name, Last name, physical address, email address, age, year of birth, Clergy/Laity,

photograph, and telephone number(s), religious belief.

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

We process your personal data on the following lawful bases:

**Section A – Election Personal Data (Article 6)**

**Legal obligation** (Article 6(c)) to enable the election of new members of Synod:

- The Clergy Election Rules 2020; Canon H2 “Of the Representation of the Clergy in the Lower House of the Convocations” (House of Clergy);
- The House of Laity Election Rules 2020 and Church Representation Rules (CRRs) (House of Laity);
- The Convocations (Election to Upper House) Rules 2020 and Canon H3 “Of the Constitution of the Upper Houses of the Convocation” (House of Bishops);
- The Single Transferable Vote Rules 2020.
- (the “Election Rules”):

The CRRs are primary legislation and are contained in Schedule 3 to the Synodical Government Measure 1969. The various election Rules of the Houses are made under the authority of the CRRs or under the authority of Canons H 2 and H 3. The Canons are also a form of primary legislation.

- The Standing Orders of the General Synod of the Church of England (September 2020 edition)

The Clergy Election Rules 2020; The House of Laity Election Rules 2020 and the Convocations (Election to Upper House) Rules 2020 which appoint the Provincial Registrar as the Presiding Officer in relation to the “special constituencies” (listed above) and authorise the Presiding Officer to process personal data on behalf of the “special constituencies”.

**Section B – Administration Personal Data (Article 6)**

- 1(a), 1(b), 1(c) your personal details are processed according to legal obligation (Article 6(c)) to enable Synod to exercise its functions as a legislature fully and effectively; (Synodical Government Measure 1969 and Standing Orders as updated September 2020, Canon H2 and The Clergy Election Rules 2020 (made under paragraph 6 of Canon H2) for Proctorial elections (the House of Clergy); The Church Representation Rules, as amended and The House of Laity Election Rules 2020 (made under CRR Rules 56 and 59) for House of Laity elections (the House of Laity) and Canon H3 the Convocation (Elections to Upper House) Rules 2020 (made under paragraph 2(b) of Canon H3 (the House of Bishops).
- 1(d), 1(e) and 1(f), and are based on the legitimate interests of the Archbishops’ Council and General Synod (Article 6(1)(f)).

Legitimate Interest Assessment

Because we consider that we have a legitimate interest in processing your personal data, we have undertaken a Legitimate Interests Assessment which sets out why we consider such processing is justified.

We have a specific purpose with a defined benefit	The purposes are outlined in 1(d), 1(e) and 1(f) above. The benefit is the data subjects’ full participation in the General Synod’s proceedings and the activities of the wider Church.
The processing is necessary to achieve the defined benefit.	Without 1(d) and 1(e), staff members and Chairs would suffer substantial difficulties in engaging Synod member’s participation, and the security of Synod venues may be

	compromised. Without 1(f), Synod members would be unable to receive General Synod correspondence essential for their work.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	The General Synod is a public office; as such, the processing of their personal information and their limited disclosure are balanced against their public responsibilities. The Business Committee has approved this use of personal data.

For a copy of the full Legitimate Interest Assessment, please contact us using the details provided in Section 7 below.

**Sections A and B: Special category data - religious belief data:**

- Legitimate activity (Article 9(2)(d)) - processing is carried out in the course of the Archbishops' Council and the Synod Team's legitimate activities as stated above; and
- For archiving purposes (Article 9(2)(j)) as stated above.
- Substantial Public Interest (Article 9(2)(g) – the publication of the voting record is carried out in the public interest, in accordance with Schedule 1, Part 2, paragraph 6 - the exercise of this function as required by Standing Order 38(9).

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

From you directly when you complete the contact details form; and

From third parties:

- If you are a representative of your diocese, your data is provided by your Diocesan Synod offices.
- If you are a representative of Deaf Anglicans Together, your data is provided by Deaf Anglicans Together.
- If you are a representative of committees that grant you ex-officio standing at the Synod and Archbishops' Council, your data is sent to us from the respective committees.
- If you are a representative of ecumenical partner churches, your data is sent to us from the office of the Church of England Council for Christian Unity.
- If you are a representative of the Church of England Youth Council, your data is sent to us from the Church of England Education Office.
- If you are a representative of the Armed Forces, Prisons, Religious Communities, Universities and TEIs, Deans or are a Suffragan Bishop your information is provided to the Synod Office when you stand for office.

We share your information with:

- Individuals outlined in section 1 above.
- The following 3<sup>rd</sup> party processors in order to give you access to the relevant electronic system:
- Civica Election Services,  
[Civica Election Services privacy policy | Civica](#)
- Lumi Global  
[Privacy Policy | Lumi \(lumiglobal.com\)](#)

**5. How long do we keep your personal data?**

- Civica will hold your data for 2 years, to allow the casual vacancies that occur during this time to be filled.
- Lumi will hold your voting data for the period of Synod only, and will delete that data once the voting records have been received by the Synod team and published.

The Synod Team will hold your data until such a time that you cease to be a member of the General Synod. Your name and diocese will be held by the National Church Institutions indefinitely in order to maintain an historical record of Synod membership.

## **6. What are your rights?**

Unless subject to an exemption under the UK GDPR or the Data Protection Act 2018, you have the following rights with respect to 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 the Archbishops' Council holds about you;
- the right to request that the Archbishops' Council corrects 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 Archbishops' Council to retain such data;
- the right to obtain and reuse your personal data for your own purposes, and the right to receive your personal data in a structured, commonly used and machine-readable format, known as data portability;
- 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 personal data; and
- the right to lodge a complaint with the Information Commissioners Office.

## **7. Concerns or Queries**

To exercise all relevant rights, or for concerns or queries please in the first instance contact:

The Synod Team at [synod@churchofengland.org](mailto:synod@churchofengland.org); or

The Clerk to the Synod, Dr Jacqui Philips at [jacqui.philips@churchofengland.org](mailto:jacqui.philips@churchofengland.org).

If you have any concerns or queries about how the People Systems team handle your personal data, please contact the Data Protection Officer at: [gdpr@churchofengland.org](mailto:gdpr@churchofengland.org), or online at: [National Church Institutions data protection | The Church of England](#)

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).