

# PRIVACY NOTICE – GENERAL SYNOD

This privacy notice is provided by the Synod Team to the General Synod to explain what to expect when we collect and process your personal information with the UK General Protection Regulation (UK 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 administration**

- (a) Your contact details (name, postal address, phone number and email address) are used by the Synod Team to create and manage the list of Synod members and representatives.
- (b) Your contact details are used for distributing Synod papers and other material relevant to the business of the General Synod (including on occasion material produced by the NCIs and bodies connected with them). Most materials will be distributed electronically; hard copies are available if requested.
- (c) We compile the 'List of Synod members' booklet for distribution to other General Synod members, this contains your name, House, Synod number, Diocese/constituency, and email address. Your name, Diocese and constituency are also included 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/constituency are printed on a security pass issued directly to you. This security pass must be worn at all times during a group of sessions. For security reasons, if you do not have a pass, you will not be allowed into the Chamber.
- (e) Your photograph, name, Synod number, and diocese/constituency are included 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 email address is shared with the NCIs Communications Team so they can invite you to receive 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) You may provide us with information about reasonable adjustments if those are required.
- (h) For archiving purposes in the public interest, for historical research or statistical purposes.

### **Section B – 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 Office of new members, to administer Synod as described in Section A above.
- (e) If it is necessary hold a remote group of sessions again, we will need to use an on-line voting system for the purpose of voting on matters before that group of sessions. If so, we will provide

names, Synod numbers, email addresses, and diocese/constituencies to Lumi Global to enable members to vote and to provide the voting record for publication on the Church of England website

### ***Section C – Synod experience, expressions of interest and church tradition***

This is to assist the Appointments Committee or others who have the power of appointment by giving them information about the experience of potential appointees. For elected positions, people put themselves forward for nomination and so can provide supporting data at the time of nomination, but in the case of appointments, the Committee, or persons with power of appointment must seek out nominations, and may try to identify people who have not put themselves forward but who may nevertheless be suitable

### ***Section D – Demographic details***

This is used to produce anonymised statistics about the demographic make-up of the General Synod. However, once your data has been analysed and reports have already been written, we will be unable to remove your data if they have been anonymised, or reports containing your data have already been published.

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

When you are elected, the presiding officer for your electorate will provide us with your first name, last name, email address, Diocese, or constituency, and whether you are clergy or laity. We input that data into a database, and then email you a link which enables you to input the further categories of data. You can retain this link and alter the further categories of data at any time. The further categories which we collect are:

1. Title
2. Name/s
3. 'Known as' name
4. Contact details and postal address
5. Photograph
6. Previous membership of the General Synod and of Boards and Committees appointed or elected from General Synod
7. Expressions of interest for those who wish to be considered for membership of the Committees and Boards of General Synod, and relevant experience
8. Church tradition
9. Demographic data – year of birth, race and ethnicity, gender, disability.
10. Health data to make reasonable adjustments to support your membership of General Synod.

## ***2. The lawful basis for using your information***

We process your personal data on the following lawful bases:

### **Section A – Administration Personal Data (Article 6)**

- **Consent** - 1(g) we will obtain your consent to use this data to make reasonable adjustments requested by you.
- **Legal obligation** - 1(a), 1(b), 1(c) and 1(h) 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).
- **Legitimate interests** - 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.

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| 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. | Membership of 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.

## **Section B – 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 C - Synod experience, expressions of interest and church tradition (Article 6)**

### **Legitimate interest**

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.

|  |  |
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| We have a specific purpose with a defined benefit  | This is to assist the Appointments Committee or others who have the power of appointment by giving them information about the experience of potential appointees. The processing means that Committees will constitute a diverse and experience membership to ensure that appropriate advice is given to Synod.  |
| The processing is necessary to achieve the defined benefit.  | This processing will significantly improve the appointments process by ensuring that the Appointments Committee have a comprehensive view of potential candidates. Without the processing of this data, suitable candidates may not be selected.   |
| The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms. | The processing is in the interests of both the data subject and the Appointments Committee. The processing allows candidates to express their interest and provide their experience to get themselves appointed to relevant Committees. It also ensures that as many members of Synod get onto a Committee that is relevant to them. The processing means that Committees will constitute a diverse and experience membership to ensure that appropriate advice is given to Synod. |

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

#### **Section D – demographic data (Article 6)**

**Consent** - we will obtain your consent to use your demographic data to produce anonymised statistics about the demographic make-up of the General Synod.

You have the right to withdraw your consent at any time by contacting the Synod Team using the contact details in Section 7 below. However, once your data has been analysed and reports have already been written, we will be unable to remove your data if they have been anonymised, or reports containing your data have already been published.

#### **Special category data (Articles 9 and 10)**

**Sections A and B:** religious belief and health data:

- Explicit consent (Article 9(2)(a)) - processing of health data to provide reasonable adjustments
- Legitimate activity (Article 9(2)(d)) - processing is carried out during the Archbishops' Council and the Synod Team's legitimate activities as stated above; and
- 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).
- For archiving purposes (Article 9(2)(j)) as stated above.

**Section C:** religious belief, health, sexual orientation, race and ethnic origin, criminal offence data

- **Legitimate activity (Article 9(2)(d))** - This is to assist the Appointments Committee or others who have the power of appointment by giving them information about the experience of potential appointees. For elected positions, people put themselves forward for nomination and so can provide supporting data at the time of nomination, but in the case of appointments, the Committee, or persons with power of appointment must seek out nominations and may try to identify people who have not put themselves forward but who may nevertheless be suitable.

## **Section D: race and ethnic origin, health**

- **Explicit consent (Article 9(2)(a))**- we will obtain your consent to use your demographic data to produce anonymised statistics about the demographic make-up of the General Synod.
- You have the right to withdraw your consent at any time by contacting the Synod Team using the contact details in Section 7 below. However, once your data has been analysed and reports have already been written, we will be unable to remove your data if they have been anonymised, or reports containing your data have already been published.

### **3. 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 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.
- If you are a representative of the Armed Forces, your data is provided by the Armed Forces Synod.

We share your information:

- Within the Synod Team,
- With the Appointments Committee, and other persons with power of appointments, and the Communications Team.
- With the following 3<sup>rd</sup> party processors to give you access to the relevant electronic system:

- Civica Election Services,

[Civica Election Services privacy policy | Civica](#)

- Lumi Global

[Privacy Policy | Lumi \(lumiglobal.com\)](#)

- Salesforce

<https://www.salesforce.com/privacy/overview/>

### **4. 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 any online group of sessions 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 (using the Salesforce database) until such a time that you cease to be a member of the General Synod and it will then be archived for permanent preservation to maintain an historical record of Synod membership. Data for which you have provided consent will not be archived.

### **5. 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 withdraw consent (limited, as stated above)

- 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 Commissioner's Office.

## **6. 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 [clerk@churchofengland.org](mailto:clerk@churchofengland.org).

If you have any concerns or queries about how the Synod Team handles 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's Office (ICO) online at: [Your personal information concerns | ICO](#), or by phone on 0303 123 1113 (local rate).