NCIs Data Protection Team Privacy Notice

This privacy notice explains how the Data Protection Team collects and uses your personal data when handling individual rights requests, enquiries, and complaints on behalf of the National Church Institutions (NCIs).

The Data Protection Team sits within the Church of England Central Services and provides a centralised service to the data controllers listed below. This means that whether you contact us directly or contact a member of the NCIs staff or a department, in most cases your request or query will be handled by the Data Protection Team.

We are committed to protecting your personal data and processing it in accordance with the UK GDPR.

1. Data controller(s)

The NCIs consist of seven separate legal entities which are the data controllers:

- The Archbishops' Council
- The Church Commissioners for England
- The Church of England Pensions Board
- Church of England Central Services
- The National Society (Church of England) for Promoting Religious Education

Church House
Great Smith Street
London
SW1P 3AZ

For further information about these NCIs please go to:

https://www.churchofengland.org/about/leadership-and-governance/national-church-institutions

- The Archbishop of Canterbury (in their corporate capacity)
  Office of the Archbishop of Canterbury
  Lambeth Palace
  London
  SE1 7JU

For further information about the Archbishop of Canterbury please go to: **The Archbishop of Canterbury | Archbishop of Canterbury**

- The Archbishop of York (in their corporate capacity)
  Office of the Archbishop of York
  Bishopthorpe Palace
  Bishopthorpe

York
YO23 2GE

For further information about the Archbishop of York please go to: **About the Archbishop | Archbishop of York**

2. Personal information is processed for the following purpose/s, to:

a. Respond to data subject rights requests, in accordance with our **data subject rights policy**
b. Investigate and manage data breaches in accordance with our data breach management policy
c. Investigate and handle complaints, in accordance with the **data protection complaints policy**
d. To approve internal NCI access to mailboxes and data repositories to ensure appropriate organisational and technical security measures are in place
e. To obtain legal advice
f. To undertake necessary checks when procuring suppliers and processors
g. Provide advice, guidance and training to NCI staff and relevant stakeholders
h. Send communications and guidance to data protection leads in dioceses, cathedrals and bishops' offices
i. Provide data protection guidance and undertake compliance activity bodies within the Institutional Church of England
j. Provide guidance to members of the public where appropriate
k. Maintain records of decisions, actions and compliance activity
l. Anonymise case data to provide statistical information to NCI governance bodies
m. Liaise with and comply with requests from regulatory or statutory bodies, including the Information Commissioner's Office (ICO) the Charity Commission, or other statutory bodies
n. Share the data of children and vulnerable adults who indicate they are at risk of harm with the National Safeguarding Team in accordance with Safeguarding Policy.

3. Types of personal data

Depending on your interaction with us, the data we may collect and process for these purposes is:

- Name and contact details
- Identification information to verify your identity, including photographs, such as a driver's licence, passport or utility bill etc

Information about you:

- in correspondence, requests or complaints
- contained in our responses to requests (such as Subject Access Requests) or complaints
- when managing complaints, such as investigation notes or interviews
- when managing data breaches
- when providing approval, advice, guidance and support
- when obtaining legal advice
- when liaising with regulators

We may also process “special categories” of information:

- race
- ethnic origin
- political opinion
- religious belief
- trade union membership
- health
- sex life
- sexual orientation
- criminal allegations, proceedings or convictions

4. The lawful basis for using your information

Personal data

We collect and use personal data under the following lawful bases to achieve our purposes as listed in Section 2 above:

Purposes: (a) (b) (c) (d) (f) (g) (j) (k) (m) (n) - **Legal obligation (Article 6(1)(c)):**

- UKGDPR and related data protection law
- Managing Safeguarding Concerns and Allegations Code of Practice

Purpose (e**) Legitimate interests (Article 6(1)(f))** - to establish, exercise or defend legal claims.

Purpose (i) **Public task (Article 6(1)(e)** - Articles of Association of Church of England Central Services, clause 4 - facilitating the provision of cost-effective shared financial, legal and other services to the charitable national institutions of the Church by providing such services and acting as the managing employer of the staff providing those services.

Purpose (h) **Consent (Article 6(1)(a))**

Purpose (l) **Legitimate interests (Article 6(1)(f)** - to anonymise data for the purposes of sharing or publishing reports.

Legitimate Interests Assessment - Anonymisation

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.

Privacy Notice - Legitimate Interest Assessment

We have a specific purpose with a defined benefit	To anonymise identifiable data for the purpose of compliance reporting, to ensure relevant data subjects cannot be identified, protecting their privacy and rights and freedoms.
The processing is necessary to achieve the defined benefit.	Anonymisation protects the privacy of data subjects, and once the data has been anonymised their rights and freedoms are not affected. Poorly redacted or anonymised reports which identify data subjects may cause harm or distress if shared or published, particularly where data subjects have been informed

	that they will not be identifiable. Data subjects would expect that their data will be anonymised where necessary.
The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms.	The removal of names, or other contextual, biographical or other details from a document ensures no re-identification is possible and thereby protects the rights and freedoms of data subjects.

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

Special Category data

Where we process special category and criminal conviction data we rely on additional conditions:

Purposes (a) (b) (c) (d) (g) (j) (k) (l) (m):

Substantial public interest (Article 9(2)(g)) Data Protection Act 2018 Schedule 1, Part 2, para 6 Statutory etc or government purposes – processing is necessary to fulfil our obligations under the UKGDPR and related data protection law.

Purpose (e) **Legal claims (Article 9(2)(f))** – processing is necessary to or the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

Purpose (h) **Explicit consent (Article 9(2)(a))** - to process name and contact details where religious belief may be disclosed by Title.

Purpose (i) **Legitimate activity (Article 9(2)(d)** - processing is carried out in the course of our legitimate activities

Purpose (n) **Substantial public interest (Article 9(2)(g))** Data Protection Act 2018 (Schedule 1 (Part 2) para 18 Safeguarding of children of individuals at risk – processing is necessary for the purpose of protecting an individual etc.

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

We collect your information from:

- You when you submit a request, enquiry or complaint
- NCIs staff or internal systems where relevant to a case
- Other third parties (e.g. legal representatives) here necessary to investigate or respond to a request made on your behalf
- Diocesan or other church bodies when providing guidance or undertaking compliance activities
- Other 3rd parties requesting data from us
- Regulatory bodies or statutory authorities

We will not share your data with any other third parties except where specified here:

- Relevant teams within the NCIs

- External organisations, regulatory bodies and statutory authorities
- Legal advisers and professional service providers
- Bodies within the Institutional Church of England
- Processors who host and maintain our systems:
    - Fivium – hosts eCase, our data protection case management system
    - Microsoft – our primary IT systems provider

We will only share your information where it is lawful and necessary to do so.

6. International transfer

We do not send your personal data to countries outside the UK/EEA.

7. How long do we keep your information?

We will keep your information in accordance with our retention schedule. Retention periods usually begin from the closure of the case or the end of the relevant activity. In some cases, records may be retained for longer where required for legal or regulatory purposes.

For 1 month

- Identification data

For 1 year

- Records of access approval

For 3 years:

- Standard data subject rights requests case files
- Data breach reports and investigation files
- Supplier assessments and correspondence
- General advice and guidance correspondence
- Consent forms or record of consent

For 6 years:

- Complaints and reviews relating to data protection matters
- Records of data breaches and investigations
- Disclosures of personal data
- Safeguarding-related data subject rights requests or complaints records
- Legal advice and correspondence

Permanently

- Register of data subject rights requests
- Register of data breaches
- Register of disclosures
- Anonymised statistical reports

8. Automated decision-making

We do not undertake automated decision-making.

9. Security of your personal data

We take appropriate technical and organisational measures to protect personal data, including:

- Data protection policies and procedures
- Controlled access to systems and information
- Secure and encrypted storage and handling procedures
- Staff training and confidentiality obligations
- On-going monitoring of our processes

10. 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 at any time (if 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 (if applicable).
- The right to obtain and reuse your personal data to move, copy or transfer it from one IT system to another (if applicable).

To exercise these rights, please contact the Data Protection Team:

Online: **Data protection | The Church of England**

By email: **gdpr@churchofengland.org**

By phone: 020 7898 1344 or 020 7898 1114

- On social media (direct messaging only) via:
- X - @churchofengland
- Instagram - @thechurchofengland

If you use a direct message on these social media channels to make a request, please be aware we will not respond by message, so please provide an alternative contact method when contacting us.

- Write to us at: Data Protection Team, Church House, Great Smith Street, London SW1P 3AZ

11. Concerns or complaints

If you have any concerns or complaints about how we handle your personal data, please follow our **Data Protection Complaints Policy**.

You have the right to make a complaint at any time to the Information Commissioner's Office online at: **Data protection and personal information complaints tool | ICO**, or by phone on 0303 123 1113 (local rate).

Under current requirements, complainants are generally expected to raise complaints with the organisation first before approaching the ICO.