

Safeguarding Information Sharing - Privacy Notice

This privacy notice is provided to explain what to expect when we share your personal information in accordance with the UK GDPR and Data Protection Act 2018, the EU GDPR, and relevant data protection legislation in the Isle of Man, Jersey and Guernsey and the Channel Islands.

1. Data controller

The Data Controllers are the Partner Organisations that have signed up to the Safeguarding Information Sharing Agreement. This list is regularly revised to ensure that it is up to date. To obtain a full list please contact the relevant Data Controller using the contact details in Section 8 below.

2. Why we share your personal data:

Personal information is shared for the following purposes:

- 2.1 Promoting and maintaining a safer culture within the Church that protects and promotes the welfare of children, young people and vulnerable adults as required by "Promoting a Safer Church";
- 2.2 creating and maintaining environments that are safer for all, that promote well-being, that prevent abuse, and that create nurturing, caring conditions within the Church for children, young people and vulnerable adults and help identify people who may pose a risk to others and, where possible, work to reduce offending behaviour;
- 2.3 to enable the Pensions Board housing service to put in place safeguarding risk management or support arrangements (with other agencies and Diocesan safeguarding teams as necessary);
- 2.4 to enable Pensions Board housing to support other agencies in carrying out their statutory functions (e.g. prevention of crime), including the need to process criminal offence data to ensure we house you appropriately if you are currently under supervision of a statutory authority.
- 2.5 preventing death or serious harm;
- 2.6 the safer recruitment of all those with any responsibility in a Partner organisation relating to children, young people and vulnerable adults within the Church;
- 2.7 training and equipping Church Officers to have the confidence and skills they need to care for and support children, young people and vulnerable adults including recognising and responding to abuse and identifying low-level concerns that may reveal people at risk of abuse;
- 2.8 responding to every safeguarding concern or allegation appropriately and recording all safeguarding work; coordinating effective and efficient responses and preventing abuse and harm that may increase the need for care and support;
- 2.9 reporting all suspicions, concerns, knowledge or allegations, that reach the relevant threshold, to the appropriate statutory authorities irrespective of the status of the person;
- 2.10 offering care and support to all those who are known to have been abused or allege abuse, or are considered to be vulnerable to abuse regardless of the type of abuse, when or where it occurred and to help people access support to reduce risk and promote wellbeing, including making a suitable apology when required or considered necessary;

- 2.11 offering care and support to all those who are the subject of safeguarding allegations or investigations and help people to access support to reduce risk and promote wellbeing;
- 2.12 taking responsibility for ensuring that steps are taken to protect others when any Church Officer and any individual regularly involved with a Church body is considered a risk to children, young people and vulnerable adults and enabling early interventions to prevent the escalation of risk;
- 2.13 working to mitigate any identified risks in collaboration with the relevant statutory agencies in accordance with relevant law;
- 2.14 providing professional supervision by the National Safeguarding Team to persons with operational responsibility for safeguarding in Partner organisations;
- 2.15 providing reports to local, national or statutory bodies responsible for oversight of safeguarding within Partners;
- 2.16 liaison with internal and external advisers for the purpose of litigation, dispute resolution, judicial process or or to process information related to an insurance claim;
- 2.17 providing anonymised Serious Incident Reports to the National Safeguarding Team;
- 2.18 undertaking investigations and reviews (including lessons learnt reviews) and engaging in peer support to maintain and improve good practice in safeguarding; understanding failings in particular cases or safeguarding practice; improving processes and case management and revealing patterns of abuse that were previously undetected and that could identify others at risk of abuse;;
- 2.19 maintaining accurate and up to date information on: Disclosure and Barring Service (DBS) checks; training and post/positions held by anyone within a Partner organisation with any responsibility relating to children, young people and vulnerable adults;
- 2.20 research purposes in order to quality assure safeguarding practice and inform strategic planning on safeguarding for example the conduct of lessons learnt reviews.

3. The categories of personal data we collect:

The information we share for this these purposes may include:

- Name
- Title
- Marital status
- Gender
- Nationality
- Job title/position
- Employment or work history
- Dates (birth, joined, ordination, education, death, licensed or commissioned etc)
- Contact information – work and personal (addresses; phone numbers; email addresses)
- Honours
- Family names and biographical details, including wider family networks

- Lifestyle (including living conditions, daily habits, interests/hobbies, attitudes and behaviour and social circumstances)
- Family history details
- Previous and current safeguarding concerns
- Socio-economic details
- Employment and appointments
- Education and qualification details
- Training attendance/certification
- Housing needs
- Misconduct and unlawful acts e.g. the nature of any allegations
- Disqualification or suspension from office
- Funding relating to the provision of support

We also process “special categories” of information that may include:

- race;
- ethnic origin;
- religion;
- health;
- sex life or
- sexual orientation.

In addition we will process criminal offence data where required:

- criminal allegations, proceedings or convictions, including DBS or other criminal records checks

4. The lawful basis for using your information:

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

4.1 Personal data (see Section 2 above)

UKGDPR	<p>Consent (Art 6(1)(a)) – for the sharing of data for the purpose of providing pastoral or therapeutic support; for requesting data from the police where consent is required; to share information from Pensions Board housing where required with local Diocesan Safeguarding teams.</p> <p>Legal obligation (Art 6(1)(c)): The Safeguarding and Clergy Discipline Measure 2016 Church of England Canon C30 “Of Safeguarding” Safeguarding (Clergy Risk Assessment) Regulations 2016 Safeguarding (Code of Practice) measure 2021:</p> <ul style="list-style-type: none"> • Safeguarding in Religious Communities – effective from 17 May 2021 • Declaration of Conflict of Interest Policy – effective from 8 November 2021
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	<ul style="list-style-type: none"> • Safer Recruitment and People Management – effective from 4 January 2022 • Safeguarding Learning and Development Framework – effective from 4 January 2022 • Responding Well to Victims and Survivors of Abuse – effective from 4 April 2022 • Safeguarding Children, Young People and Vulnerable Adults – effective from 4 July 2022 <p>Episcopal Endowments and Stipends Measure 1943</p> <p>Chapter IX of the Constitution of the Church in Wales and the Clergy Terms of Service Canon 2010</p> <p>Public task (Article 6(1)(e)): Church of England: House of Bishops’ Safeguarding Guidance (see Appendix B for details) Canon C30 “Of Safeguarding”; Safeguarding (Clergy Risk Assessment) Regulations 2016 Diocesan Safeguarding Advisors Regulations 2016;</p> <p>Canon C4 “Of the quality of such as are to be ordained deacons or priests” paragraph 2 (safer recruitment);</p> <p>Canon C7 “Of examination of holy orders” – BAP process which requires sharing of information between DDO and Bishop and BAP</p> <p>Canon C8 “Of ministers exercising their ministry” paragraph 8, sub-para 1 and 2 – requirement to undertake training – allows for training completion to be checked and shared.</p> <p>Canon C10 “Of admission and institution” paragraph 2 (safer recruitment); paragraph 3(a) (safeguarding risk assessment/investigation);</p> <p>Canon C12 “Of the licensing of ministers under seal” paragraph 2 (provision of Clergy Current Status Letter and clergy personal files (commonly referred to as “clergy blue files”), which could include safeguarding data);</p> <p>Canon C18 “Of diocesan bishops” paragraphs 2 (jurisdiction); 3 (delegation of authority); 7(correction and punishment);</p> <p>Canon C26 “Of the manner of life of clerks in holy orders” paragraph 2 (applying safeguarding requirements);</p> <p>Canon E5 “Of the licensing of readers”;</p> <p>Canon E8 “Of the admission and licensing of lay workers”;</p> <p>The Churchwardens Measure 2001;</p>
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	<p>The Church Representation Rules made under the Synodical Government Measure 1969.</p> <p>The Church of England Pension Measure 2018 Schedule 1, Part 2, (5)(1);</p> <ul style="list-style-type: none"> • The Church of England Pensions Board Safeguarding Policy and Guidance issued from time to time. <p>Multi-Agency Public Protection Arrangements (MAPPA Guidance Updated November 2021); Criminal Justice Act 2003.</p> <p>Vital interest (Art 6(1)(d)) – to protect someone from immediate risk where capacity to consent is lacking, or due to age/infirmary, or where there is the need to undertake investigations to protect individuals from immediate risk where the relationship with the respondent may prevent consent.</p>
<p>Isle of Man - Data Protection (Application of GDPR) Order 2018;</p>	<p>Text of GDPR as applied to the Island in Annex to 2018 Order</p> <p>Consent (Art 6(1)(a)) – for the sharing of data for the purpose of providing pastoral or therapeutic support; for requesting data from the police where consent is required; to share information from Pensions Board housing where required with local Diocesan Safeguarding teams.</p> <p>Legal obligation (Art 6(1)(c)) The Safeguarding and Clergy Discipline Measure (Isle of Man) 2017 Church of England Canon C30 “Of Safeguarding”; Safeguarding (Clergy Risk Assessment) Regulations 2016</p> <p>Public task (Art 6(1)(e)) House of Bishops’ Safeguarding Guidance (see Appendix B for details) Canon C30 “Of Safeguarding”; Safeguarding (Clergy Risk Assessment) Regulations 2016 Diocesan Safeguarding Advisors Regulations 2016;</p> <p>Canon C4 “Of the quality of such as are to be ordained deacons or priests” paragraph 2 (safer recruitment);</p> <p>Canon C7 “Of examination of holy orders” – BAP process which requires sharing of information between DDO and Bishop and BAP</p> <p>Canon C8 “Of ministers exercising their ministry” paragraph 8, sub-para 1 and 2 – requirement to undertake training – allows for training completion to be checked and shared.</p>

	<p>Canon C10 “Of admission and institution” paragraph 2 (safer recruitment); paragraph 3(a) (safeguarding risk assessment/investigation);</p> <p>Canon C12 “Of the licensing of ministers under seal” paragraph 2 (provision of Clergy Current Status Letter and clergy personal files (commonly referred to as “clergy blue files”), which could include safeguarding data);</p> <p>Canon C18 “Of diocesan bishops” paragraphs 2 (jurisdiction); 3 (delegation of authority); 7(correction and punishment);</p> <p>Canon C26 “Of the manner of life of clerks in holy orders” paragraph 2 (applying safeguarding requirements);</p> <p>Canon E5 “Of the licensing of readers”;</p> <p>Canon E8 “Of the admission and licensing of lay workers”;</p> <p>The Churchwardens Measure (Isle of Man) 2013</p>
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4.2 Special category data (see Section 2 above)

<p>UKGDPR</p> <p>Data Protection Act 2018</p>	<p>Explicit consent (Art 9(2)(a)) - for the sharing of data for the purpose of providing pastoral or therapeutic support; for requesting data from the police where consent is required.</p> <p>Vital interests (Art 9(2)(c)) - to protect someone from immediate risk where capacity to consent is lacking, e.g. due to age/infirmity, or where there is the need to undertake investigations to protect individuals from immediate risk where the relationship with the respondent may prevent consent.</p> <p>Legal claims (Art 9(2)(f)) - processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.</p> <p>Substantial Public interest (Art 9(2)(g)): Data Protection Act 2018 s. 10(3) and Schedule 1:</p> <ul style="list-style-type: none"> • Necessary for the exercise of a function conferred on a person by an enactment/rule of law (Schedule 1, Part 2 (6)) – sharing within the Church of England in order to provide information to e.g. an inquiry • Preventing or detecting unlawful acts (Schedule 1, Part 2 (10)) • Protection the public against dishonesty etc (Schedule 1, Part 2 (11)) • Safeguarding of children and individuals at risk (Schedule 1, Part 2 (18)) • Insurance (Schedule 1, Part 2 (20)) <p>Archiving, research and statistics (Art 9(2)(j))</p>
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<p>Isle of Man - Data Protection (Application of GDPR) Order 2018</p> <p>Isle of Man- GDPR and LED Implementing Regulations 2018</p> <p>Isle of Man - Data Protection (Application of GDPR) Order 2018</p>	<p>Text of GDPR as applied to the Island in Annex to 2018 Order</p> <p>Legal claims (Art 9(2)(f))</p> <p>Substantial Public Interest (Art 9(2)(g)):-</p> <ul style="list-style-type: none"> • GDPR and LED Implementing Regulations 2018 reg. 12(3):- • Necessary for reasons of substantial public interest (Schedule 2, Part 2 (5) and Part 4 (30)):- • Necessary for the exercise of a function conferred on a person by an enactment (Schedule 2, Part 2 (6)); • Preventing or detecting unlawful acts (Schedule 2, Part 2 (8)); • Protecting the public against dishonesty etc. (Schedule 2, Part 2 (9)); • Safeguarding of children and natural persons at risk (Schedule 2, Part 2 (22)); <p>Archiving, research and statistics (Art 9(2)(j))</p>
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4.3 Criminal Offence data

<p>UKGDPR Data Protection Act 2018</p>	<p>Data Protection Act 2018 s 10(5)and Schedule 1:-</p> <ul style="list-style-type: none"> • Necessary for the exercise of a function conferred on a person by an enactment/rule of law (Schedule 1, Part 2 (6)) • Preventing or detecting unlawful acts (Schedule 1, Part 2 (10)) • Protecting the public against dishonesty etc (Schedule 1, Part 2 (11)) • Safeguarding of children and individuals at risk (Schedule 1, Part 2 (18)) • Legal claims (Schedule 1, Part 3 (33)) • Extension of conditions in Part 2 of this Schedule referring to substantial public interest (Schedule 1, Part 3 (36))
<p>Isle of Man - Data Protection (Application of GDPR) Order 2018</p> <p>Isle of Man - GDPR and LED Implementing Regulations 2018</p>	<p>Article 10</p> <ul style="list-style-type: none"> • GDPR and LED Implementing Regulations 2018 reg. 12(5):- • Public Interest (Schedule 2, Part 2 (5); Part 4 (30)) • Preventing or detecting unlawful acts (Schedule 2, Part 2 (8)); • Protecting the public against dishonesty etc. (Schedule 2, Part 2 (9))

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

We collect your information from:

- You (the Data Subject)
- Church of England records
- Partner Organisations

6. Your data will be transferred outside the UK

Your personal data once received may be transferred between the Isle of Man, Jersey, Guernsey and the European Union, and is protected by adequacy arrangements with those jurisdictions.

7. How long do we keep your information?

The information will be retained in accordance with the purpose for which it is used, please contact the relevant Partner Organisation to obtain a copy of their retention schedule.

8. 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 controller using the contact information provided below.

8. Complaints or concerns:

If you have any queries regarding the data sharing please contact the relevant data controller using the contact information below.

Data Controller for Peterborough Cathedral: Janet Armitage

Email: data@peterborough-cathedral.org.uk

You have the right to make a complaint at any time to:

UK - Information Commissioner's Office (ICO) online at:

Your personal information concerns | ICO, or by phone on 0303 123 1113 (local rate).

Sodor & Man - refer to Isle of Man Information Commissioner 01624 693 260