**People and HR 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.

**Data controller**

The Data Controllers are the Partner Organisations that have signed up to the People and HR 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.

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

Personal information is collected for the following purposes:

1.1 Ensuring and maintaining a single, accurate and up to date person record of potential, current and retired clergy across the Church for the purposes of:

* publishing a National Register of Clergy;
* publishing the Crockfords Clerical Directory; and
* workforce planning.

1.2 Recruiting the most suitable individuals to any position in the Church, and carrying out appropriate and proportionate pre-appointment checks to determine the suitability of any candidate, including checking the work history and confidential references from previous organisations; carrying out and renewing Disclosure and Barring Service checks, and where necessary carrying out risk assessments to fulfil the Church’s safeguarding obligations;

1.3 Monitoring the inclusivity and diversity of the recruitment processes and appointments, and the selection and training of ordinands;

1.4 Ensuring appointments to senior leadership positions in the Church are inclusive and diverse;

1.5 Carrying out all functions relating to the full lifecycle of employment/appointment e.g. salary, pension, leave, retirement or other exit from the appointment or organisation;

1.6 Transferring records when appointment changes occur;

1.7 Administering Bishops’ Advisory Panels for the selection of ordinands;

1.8 Enabling the payment of grants to dioceses to support ordinands;

* 1. Enabling and supporting the training of ordinands;

1.10 Enabling and supporting the training of senior leaders and clergy;

1.11 Enabling and supporting the provision of professional supervision by the National Safeguarding Team to persons with operational responsibility for safeguarding in Partners;

1.12 Supplying aggregated and anonymised data for long term research projects;

1.13 Establishing an accurate ‘cradle to grave’ people master data set to create a single person record which is derived from an aggregation of the data from multiple sources governed by the rules and standards, and which utilises a unique identifier to ensure integrity for other systems to draw on and is the people master data source for the Church of England.

1.14 Maintaining a real-time and accurate representation of where clergy and other personnel are deployed and their posts or positions, and provide useful and reliable management information that will help us understand:

* + - Who are active clergy – are they paid, unpaid, retired, or working elsewhere;
    - The profile of those being recruited and to track when they stay in ministry and for how long;
    - The trajectory of growth and its impact on housing, pensions and other services; and
    - The profile and numbers of those in other licensed ministries.
  1. Providing efficient and effective systems to support standard and repeatable people and payroll administrative processes in the NCIs and across the wider Church (improving operational effectiveness and reducing spend on maintaining inefficient processes).
  2. 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.
  3. To monitor use of and support IT systems, to:
* ensure that procedures, policies and contracts are adhered to;
* comply with any legal or regulatory obligations;
* prevent or detect unauthorised use of IT systems or criminal activities;
* maintain the effective operation of IT systems.

1. **The categories of personal data we collect:**

The information we process for these purposes may include:

* Name and title/s
* Marital status
* Gender
* Nationality
* Job title/position
* Dates (birth, ordination, education, death, licensed or commissioned etc)
* Contact information – work and personal (addresses; phone numbers; email addresses)
* Honours
* Recruitment, employment and appointments
* Education and qualification details
* Training attendance/certification
* Emergency contact details
* Referees
* Pension Scheme membership and related pensions payments
* Salary, stipend and benefits data
* Licensing and authorisation of clergy data
* Diversity / demographic data
* Absence where not related to health/sickness (e.g. holiday, compassionate leave; childcare; maternity/paternity leave; long term service award etc.)

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

* Race
* Ethnic origin;
* Religion;
* Trade Union membership (in limited circumstances)
* Health/Sickness Absence;
* Sex life; or
* Sexual orientation

In addition we will process criminal offence data where required:

* Criminal allegations, proceedings or convictions, including DBS checks and other criminal records checks

1. **The lawful basis for using your information:**

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

**3.1 Personal data (see Section 2 above)**

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| UKGDPR | **Consent** **– (Art 6(1)(a))** - for the processing of medical data and race and ethnicity data for the purposes of making senior appointments in the Isle of Man  **Contract (Art 6(1)(b))** – where processing is necessary to enter into an employment contract or other agreement for example, recruitment or post appointment data  **Contract – (Art 6(1)(b))** - where processing is necessary for the purpose of HR system development and maintenance by external contractors.  **Contract – (Art 6(1)(b))** - where processing is necessary to provide and undertake professional supervision as required by the employment contract of a person with operational responsibility for safeguarding in Partners.  **Public task – (Art 6(1)(e))** - necessary for the performance of a task carried out in the public interest or the exercising of official authority   * The Church Dignitaries (Retirement) Rules 1986 r. 1(1) * The National Ministry Register (Clergy) Regulations 2020 * The Ecclesiastical Offices (Terms of Service) Measure 2009 * The Ecclesiastical Offices (Terms of Service) Regulations 2009 * C4 – C12 and C18 * Canon E6 “Of the licensing of readers”; * Canon E8 “Of the admission and licensing of lay workers”; * The Churchwardens Measure 2001;   **Legal obligation (Art 6(1)(c))**   * The Church Dignitaries (Retirement) Measure 1949 * The Church of England (Miscellaneous Provisions) Measure 1992 section 11 (a formal notice of resignation and date) * The Church of England (Miscellaneous Provisions) Measure 2020 Section 2 National Ministry Register and the National Ministry Register (Clergy) Regulations 2020 * The Ecclesiastical Offices (Terms of Service) Measure 2009 * The Ecclesiastical Offices (Terms of Service) Regulations 2009 - Ministerial Development Reviews (MDR) and continuing ministerial education – r. 18 and r 19 * Episcopal Endowments and Stipends Measure 1943 * Health & Safety at Work etc. Act 1974 and related legislation * The Equality Act 2010 * Various Employment, Pension, Trust and Tax legislation, regulation or codes of practice   **Legitimate Interest (Art 6(1)(f))** – the inclusion of clergy from the Isle of Man and Channel Islands in the National Clergy Register ([Appendix B Legitimate Interests Assessment](#_Appendix_B_)) |
| Isle of Man - Data Protection (Application of GDPR) Order 2018  Isle of Man- GDPR and LED Implementing Regulations 2018 | Text of GDPR as applied to the Island in Annex to 2018 Order  **Consent (Art 6(1)(a)) -** for the processing of medical data and race and ethnicity data for the purposes of making senior appointments in the Island  **Contract (Art 6(1)(b))**  **Legal obligation (Art 6(1)(c))**   * The Church (Miscellaneous Provisions) (Isle of Man) Measure 1993 section 11 (a formal notice of resignation and date) * The Church (Miscellaneous Provisions) Measure (Isle of Man) 2021 Section 2 National Ministry Register * The Ecclesiastical Offices (Terms of Service) (Isle of Man) Measure 2012 * The Ecclesiastical Offices (Terms of Service) (Isle of Man) Regulations 2012 - Ministerial Development Reviews (MDR) and continuing ministerial education – r. 18 and r 19 * Health & Safety at Work etc. Order 1998 and related legislation * The Equality Act 2017   **Public task (Art 6(1)(e))**   * The Ecclesiastical Offices (Terms of Service) (Isle of Man) Measure 2012 * The Ecclesiastical Offices (Terms of Service) (Isle of Man) Regulations 2012 - Ministerial Development Reviews (MDR) and continuing ministerial education – r. 18 and r 19 * C4 – C12 and C18 * Canon E6 “Of the licensing of readers”; * Canon E8 “Of the admission and licensing of lay workers”; * The Churchwardens Measure (Isle of Man) 2013   **Legitimate Interest (Art 6(1)(f)** |

* 1. **Legitimate Interest Assessment (LIA)**

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.

**National Register of Clergy (Isle of Man and Channel Islands)**

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| We have a specific purpose with a defined benefit. | To provide a single, reliable, up to date public register to enable anyone to check the credentials of all active licensed clergy, including those on the Channel Islands and the Isle of Man, who are authorised to minister, (including with a permission to officiate (PTO)). |
| The processing is necessary to achieve the defined benefit. | The purpose and benefits of the Register cannot be achieved without inclusion of all authorised clergy.  The Register will help to maintain accurate information about clergy, produce comprehensive and more accurate data, and will provide the public with a single source of information about authorised clergy and it will also assist the Church as regards the administration and management of all clergy. |
| The processing legitimately overrides the interests of the data subject and any risks to their rights or freedoms. | All clergy with a license to minister have authorisation to engage in public ministry, so should expect that the details provided are made public. The publication of their credentials on the Register does not adversely affect their rights and freedoms. It is in the interests of the Church of England, authorised clergy and the general public to have a single public list of all clergy authorised to minister. |

For a copy of the full Legitimate Interest Assessment, please contact us using the details provided in Section 8 below.

**3.2 Special category data (see Section 2 above)**

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| UKGDPR | **Explicit Consent (Art 9(2)(a)) -** for the processing of medical data and race and ethnicity data for the purposes of making senior appointments in the Isle of Man  **Employment law (Art 9(2)(b))** – obligations of controller in field of employment law  **Legitimate activity (Art 9(2)(d))** – processing is carried out in the course of legitimate activities of the Church with appropriate safeguards  **Legal claims (Art 9(2)(f))** - where processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity  **Substantial Public Interest (Art 9(2)(g)):**  **Data Protection Act 2018 s. 10(3) and Schedule 1:**   * 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)) * Protecting the public against dishonesty etc. (Schedule 1, Part 2 (11)) * Insurance (Schedule 1, Part 2 (20)) * Statutory purposes for the purposes of achieving the aims, laid down by law, of officially recognised religious associations (Schedule 1, Part 2 (6); UKGDPR Recital 55) * Equality of opportunity or treatment - processing of diversity data for monitoring purposes (Schedule 1, Part 2 (8) and (9)) * Equality of opportunity or treatment – processing of racial or ethnicity data for making senior appointments (Schedule 1, Part 2 (9)) * For the purpose of complying with regulatory requirements relating to unlawful acts or dishonesty (Schedule 1 Part 2 (11 and 12)) * Preventing fraud (Schedule 1, Part 2 (14)) * Insurance (Schedule 1, Part 2 (20)) * Occupational pensions (Schedule 1, Part 2 (21))   **Archiving, research and statistics (Art 9(2)(j)** |
| Isle of Man - Data Protection (Application of GDPR) Order 2018  Isle of Man - GDPR and LED Implementing Regulations 2018 | Text of GDPR as applied to the Island in Annex to 2018 Order  **Explicit Consent (Art 9(2)(a))** - for the processing of medical data and race and ethnicity data for the purposes of making senior appointments in the Island  **Employment law (Art 9(2)(b))** – obligations of controller in field of employment, social security and social protection law.  **Legitimate Activity (Art 9(2)(d))**  **Legal claims (Art 9(2)(f))**  **Substantial Public Interest (Art 9(2)(g)):-**   * GDPR and LED Implementing Regulations 2018 reg. 12(3):- * Necessary for reasons of substantial public interest (Schedule 2, Part 2 (5) and subject to the safeguards set out in 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) 2018 Regulations);Protecting the public against dishonesty etc. (Schedule 2, Part 2 (9)) * Statutory purposes for the purposes of achieving the aims, laid down by law, of officially recognised religious associations (Para 55, DP (Application of GDPR) Order 2018)Equality of opportunity treatment – (Schedule 2, Part 7) – the processing is of a specified category of personal data and the existence or absence of equality or opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained * Preventing fraud (Schedule 2, Part 11) * Occupational pensions (Schedule 2, Part 16) |

**3.3 Criminal Offence data**

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| UKGDPR | **Data Protection Act 2018 s 10(5) and Schedule 1:**   * Processing by not-for-profit bodies (Schedule 1, Part 3 (11)) Vital interest (Schedule 1, Part 3 (3)) * Legal claims (Schedule 1, Part 3 (33)) * Judicial acts (Schedule 1, Part 3 (34)   **Data Protection Act 2018, Schedule 1, Part 3 (36):**   * 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)) * Protecting the public against dishonesty etc (Schedule 1, Part 2 (11)) * For the purpose of complying with regulatory requirements relating to unlawful acts or dishonesty (Schedule 1 Part 2 (11 and 12))   Preventing fraud (Schedule 1, Part 2 (14)) |
| Isle of Man - Data Protection (Application of GDPR) Order 2018  Isle of Man- GDPR and LED Implementing Regulations 2018 | **Article 10**   * 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)) |

1. **Who we collect from:**

We collect your information from:

* You the data subject
* Your Bishop or Archbishop
* Your Church of England records
* Partner Organisations

1. **Your data will be transferred outside the UK**

Your personal data may be transferred between the UK, the Isle of Man, the Channel Islands and the European Union, and is protected by adequacy arrangements with those jurisdictions.

1. **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.

1. **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.

1. **Complaints or concerns:**

If you have any queries regarding this processing activity, in the first instance please contact the relevant data controller using the contact information below.

**Bishop's Chaplain**

Telephone: + 44 1624 622108  
Email: [chaplain@sodorandman.im](mailto:chaplain@sodorandman.im)

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

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