



DIOCESE OF SODOR AND MAN

PRIVACY NOTICE – STAFF, VOLUNTEERS AND CLERGY

This Privacy Notice explains who we are, how to contact us, when we collect personal data, how we use that data, how long we may keep that data and your rights.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the applicable legislation, including:

- The IOM General Data Protection Regulations and Law Enforcement Directive Implementing Regulations 2018
- The UK General Data Protection Regulation 2016
- The UK Data Protection Act 2018
- and other regulatory requirements and applicable guidance.

Who we are

The Diocese of Sodor and Man is the controller for all personal data processed by the diocese, staff or other appointed Officers in relation to Diocesan matters.

Each Parish within the Diocese has its own controllers of all personal data processed by that Parish, staff or other appointed Officers. These are the Parochial Church Council, Vicar and Churchwardens. Please see separate Privacy Notices for each Parish/Church.

Contact details

The Bishops Office
Thie yn Aspick
4 The Falls
Douglas
IM4 4PZ
Telephone: + 44 1624 622108

What is our approach to personal data?

We respect an individual's fundamental right to privacy. In general, the Diocese endeavours to be open and transparent with individuals when processing their personal data. However, in some limited exceptions, for example when investigating an allegation, it is not possible to do so.

How will we collect and use your personal data?

The Diocese complies with their obligations under the legislation by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure; and by ensuring that appropriate technical measures are in place to protect personal data. Whilst the

majority of the information you provide to us is mandatory, some of it is provided to us on a voluntary basis.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual.

Examples include:

- personal information (such as name, national insurance number)
- special categories of data such as gender, age, ethnic group
- recruitment information (including copies of right to work documentation, references and other information included in an application or cover letter as part of the application process)
- contract/Statement of particulars information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- relevant medical information,
- disciplinary, grievance and performance information
- information about your use of our information and communications systems
- photographs and CCTV images
- addresses, emails and phone numbers (including emergency contact details),
- other payroll information

The Diocese processes personal data for the following purposes:-

- to perform/administer the contract that we have entered into with you
- to comply with our legal obligations
- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;
- To administer membership records;
- To fundraise and promote the interests of the church and charity;
- To manage our employees and volunteers;
- To maintain our own accounts and records;
- To inform you of news, events, activities and services running at our churches;
- To share your contact details with the diocesan office so they can keep you informed about news in the diocese and events, activities and services that will be occurring in the diocese and in which you may be interested.
- When leaving or joining the diocese data will be shared between the appropriate parties (relevant Dioceses/Parishes) as part of the recruitment, transfer and onboarding processes. This includes such things as the 'Blue file', the Clergy Current Status Letter (CCSL),
- For the purpose of correspondence, for example the issuing of newsletters
- when making enquires or undertaking investigations in accordance with statutory functions and duties
- Detailed information about our statutory functions can be found on the website.

What is the legal basis for processing your personal data?

- Your personal data is collected and processed based on legal obligations and the legitimate interest of both parties. We may collect and process special categories of personal data based on legal obligations and the legitimate interests of both parties where it is necessary, such as absence management or welfare support for example.
- Explicit consent of the data subject for example so that we can keep you informed about news, events, activities and services and keep you informed about diocesan events.

- Processing is necessary for carrying out legal obligations for example in relation to Gift Aid or under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent.

Will we share your personal data?

Your personal data will be treated as strictly confidential and will only be shared with other members of the church in order to carry out a service to other church members or for purposes connected with the church for example a transfer between diocese/parish. We will only share your data with third parties outside of the Diocese/parish with your consent.

How long do we keep your personal data?

We keep data in accordance with the guidance set out in the guide “Keep or Bin: Care of Your Parish Records” which is available from the Church of England [website](#) ¹subject to the Manx legislative variations where applicable.

Specifically, we retain electoral roll data while it is still current; donations and associated paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals and burials) permanently.

Information about criminal convictions

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided that we do so in line with our data protection policy. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or where we are notified of such information directly by you in the course of you working for us.

What are your rights in relation to your personal data?

Unless subject to an exemption under the legislation, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the Diocese holds about you;
- The right to request that the Diocese 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 Diocese to retain such data;
- The right to withdraw your consent to the processing at any time
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable)
- 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, (where applicable)
- The right to lodge a complaint with the Isle of Man Information Commissioners Office.

Will we further process your data?

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

What about our website; do we collect your data and cookies?

If you need to make a complaint here is what to do.

In the first instance we would ask you to raise any concerns/complaints to

Bishop's Chaplain

Telephone: + 44 1624 622108

Email: chaplain@sodorandman.im

If you are not satisfied with how we dealt with your concern/complaint you are entitled to contact the Isle of Man Information Commissioner, P.O. Box 69, Douglas, Isle of Man, IM99 1EQ Telephone: +44 1624 693260 Email: ask@inforights.im directly. Details can be found [here](#)

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last reviewed May 2024.

¹. <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

I confirm receipt of the attached document.

Signed:

Date: