



## Clergy Personal Files: Privacy Notice

The Bishop of Southwark holds a certain amount of personal data relating to Clergy who have his Licence or Permission to Officiate, in the form of a Clergy Personal Files (“Blue Files”). This notice explains how this data is used and managed, and your rights with respect to that personal data.

### 1 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 my possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the “GDPR and the Data Protection Act 2018, (the “DPA 2018”)

### 2 Who is the data controller?

The personal data covered by this privacy notice is that which is held by the Bishop of Southwark as Corporation Sole. The registered data controller is the Bishop’s Chaplain, The Revd Dr Alun Ford, who decides on behalf of the bishop how your personal data is processed and for what purposes.

### 3 How is your personal data processed?

In order to comply with obligations under the GDPR and DPA 2018, your data is kept up to date; it is stored or destroyed securely; excessive amounts of data are not collected; personal data is protected from loss, misuse, unauthorised access and disclosure; appropriate technical measures are put in place to protect personal data.

### 4 For what purposes is your personal data used?

To enable the Bishop to exercise his legal and pastoral responsibilities as your diocesan bishop. In addition to his general oversight of your ministry, he is responsible for assessing your qualifications and suitability for any particular office or ministry within the diocese, and for making appropriate arrangements for your ministerial development (including ministerial development review). In exercising these responsibilities it may be necessary to share some data, confidentially, with relevant colleagues.

### 5 What is the legal basis for processing your personal data?

There has to be a lawful basis for any data to be processed. The Bishop processes your ordinary personal data for the purposes of his legitimate interests under the Canons. These include his general responsibilities as chief pastor of the diocese, and his role in developing, supporting, administering, and regulating clergy through their ministry. Any data that comes within “special categories of personal data” is processed in accordance with the rather tighter restrictions that relate to such categories of data under the Data Protection act 2018.

Episcopal References and Clergy Current Status Letters (CCSL) are processed on the basis that there is a legitimate interest as established by the House of Bishops Policy Statement



“Promoting a Safer Church” (2017). However, in so far as the personal data contained within the Episcopal Reference and CCSL relates to “special categories of personal data” and criminal conviction and offence data, this will be processed on the basis that it is necessary for reasons of substantial public interest on the basis of UK law.

The Episcopal Reference and CCSL will be disclosed both for posts within the Church of England and externally, where you have applied for a ministerial post in another diocese or a church outside the Church of England. This is done so as to protect members of the public from harm, including dishonesty, malpractice and other seriously improper conduct or safeguarding purposes as established by the Safer Recruitment: Practice Guidance (2016).

### 6 Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only when necessary with institutional bodies that comprise the Church of England for the purposes of administrative functions in connection with your role, including the provision of Episcopal Reference and CCSL. If you are appointed to a role outside the diocese of Southwark your Blue File will be transferred to the Bishop of your new diocese: this transfer will not take place until after the new appointment or PtO has been confirmed.

If the Bishop wishes to share your personal data outside the Church of England, your consent will be sought unless there is a lawful reason (such as a court order) for sharing it without consent.

### 7 How long is your personal data retained?

Your personal data is retained for no longer than reasonably necessary. The periods and purposes for which it is retained are set out in the Church of England national policy: please see the retention table in the document at the following link:

[http://www.lambethpalacelibrary.org/files/personal\\_files\\_relating\\_to\\_clergy\\_2018\\_edition\\_0.pdf](http://www.lambethpalacelibrary.org/files/personal_files_relating_to_clergy_2018_edition_0.pdf)

### 8 Your rights and your personal data

Unless subject to an exemption under the GDPR or DPA 2018, you have the following rights with respect to your personal data:

- to be informed about why, and for what purposes your personal data is collected and for how long it is held (set out in this notice)
- to request a copy of your personal data which the Bishop holds about you
- to request that the Bishop corrects any personal data if it is found to be inaccurate or out of date
- to request your personal data is erased where it is no longer necessary for the Bishop to retain such data
- 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
- where your personal data is held electronically, for it to be readily transferable at your request in a “portable” form (this right is of limited application in the case of this notice, as your Blue File is entirely physical)



- to object to the processing of personal data, (where applicable) The right to lodge a complaint with the Information Commissioners Office
- rights related to automatic decision making (which again will not be triggered in relation to data held by the Bishop, as there is no automatic decision making)

### 9 Transfer of Data Abroad

If your personal data is to be transferred to countries or territories outside the EU, for example in the case of your receiving preferment elsewhere in the Anglican Communion, further consent for the transfer of your data will be sought.

### 10 Further processing

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

### 11 Contact Details

To exercise all relevant rights, queries or complaints please contact the registered Data Controller for the Bishop of Southwark, who is  
The Revd Dr Alun Ford  
Bishop's Chaplain  
Trinity House  
4 Chapel Court  
London SE1 1HW  
020 7939 9422  
[alun.ford@southwark.anglican.org](mailto:alun.ford@southwark.anglican.org)

You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.