

Benefice Privacy Notice

Benefice of Westcote Barton with Steeple Barton, Duns Tew and Sandford St Martin, and Over with Nether Worton

1. Your personal data – what is it?

Personal data is any information that relates to a living individual who can be identified from that information. Identification can be by the information alone or by that information in conjunction with any other information in the possession of, or likely to come into the possession of, the data controller. 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 are we?

This Privacy Notice is provided to you by the Parochial Church Councils (PCCs) of St Edward the Confessor, Westcote Barton, St Mary the Virgin, Steeple Barton, St Mary Magdalene, Duns Tew, Sandford St Martin, and Holy Trinity, Over Worton, with St James, Nether Worton. The PCCs work together with the incumbent of the parishes (that is, our Rector).

As the Church is made up of PCCs, clergy, ministers, associated lay volunteers and administrators all working together, we may need to share personal data we hold with them, so that they can carry out their responsibilities to the Church and our communities. The PCCs and our Rector are joint data controllers. This means they decide how your personal data is processed and for what purposes, and they are all responsible for how your data is processed.

In this Privacy Notice, the word 'we' refers to any or all of the above data controllers, as appropriate.

3. What personal data do we collect and where do we get it from?

In most cases, we collect your personal data from you. However, we may obtain contact details from other sources (e.g. relatives or friends) in connection with pastoral activities associated with ministry, such as visiting, as follows:

4. How do we process your personal data?

The PCCs and Rector comply with their obligations under the GDPR and DPA 2018 by: keeping personal data up to date; storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure; and ensuring that appropriate technical and organisational measures are in place to protect personal data.

We use your personal data for the following purposes:

- To enable us to meet legal and statutory obligations (which include maintaining and publishing our electoral rolls in accordance with the Church Representation Rules).
- To minister to you and provide you with pastoral and spiritual care (such as visiting you when you are ill or bereaved) and to organise and perform services for you, such as baptisms, confirmations, weddings and funerals.
- To deliver the Church's mission to our community and to carry out any other voluntary or charitable activities for the benefit of the public in the benefice or a parish.
- To enable us to provide a voluntary service for the benefit of the public in our benefice.
- To administer records of our employees, ministers, office-holders and volunteers.
- To fundraise and promote the interests of our churches and communities.
- To maintain our own accounts and records.

- To process any donations that you have made to us (including the processing of Gift Aid information).
- To seek your views or comments.
- To notify you of our services, events and office-holders.
- To send you communications that you have requested and may be of interest to you. These may include information about campaigns, appeals, or other fundraising activities.
- To process a grant or application for a role within the benefice or a parish.
- To carry out safeguarding procedures in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments.
- To share your contact details, when necessary, with the Oxford Diocesan Board of Finance which is responsible for the financial and administrative arrangements for the Diocese of Oxford, including the granting of faculty permission for building repairs and maintenance.

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

The legal basis for processing varies depending on the purpose:

- Most data is processed because it is **necessary for our legitimate interests**, or the legitimate interests of a third party (such as the Oxford Diocesan Board of Finance). For example, we hold office-holders' personal data to support the day-to-day communications needed to run our churches (this applies to roles such as churchwarden and PCC secretary). In processing your data on this basis, we will always take into account your interests, rights and freedoms.
- Some of our processing is **necessary for compliance with a legal obligation**. For example, we are required by the Church Representation Rules to administer and publish the electoral roll, and under Canon Law to announce forthcoming weddings by means of the publication of banns.
- Some of our processing is **necessary for the performance of a task carried out in the public interest**. For example, [**].
- We may process your data if it is **necessary for the performance of a contract** with you, or to take steps to enter into a contract. For example, we might process your data in connection with a contract for maintenance of our buildings or equipment.
- In some circumstances, we may process your data **in order to protect your vital interests or those of another person**. For example, this might apply in relation to safeguarding.
- In circumstances where no other lawful basis for processing applies, we will only process your data with your explicit **consent**. An example of this would be regular email newsletters providing information about our services and activities in the parish/benefice.

6. Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. We may need to share your data with some or all of the following:

- Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Oxford to support the mission of the Church in our parishes. For example, our clergy are supported by our area dean and archdeacon, who may provide confidential mentoring and pastoral support. Assistant or temporary ministers, including curates, deacons, licensed lay ministers, commissioned lay ministers or persons with Bishop's Permissions may participate in our mission in support of our regular clergy.
- Other persons or organisations operating within the Diocese of Oxford including, where relevant, the Oxford Diocesan Board of Finance or the Oxford Diocesan Board of Education.
- Our agents and contractors (such as maintenance contractors, printers and architects).

- On occasion, other churches or community organisations with whom we are carrying out joint events or activities.

7. 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 (see <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>).

We will keep some records (e.g. parish registers of baptisms, marriages and funerals) permanently if we are legally required to do so. However, in general, we will endeavour to keep data only for as long as we need it. This means that we may delete or destroy it when it is no longer needed. By way of example, we retain electoral roll data while it is still current and gift aid declarations and associated paperwork for up to 6 years after the tax year to which they relate.

8. Your rights and your personal data

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

- The right to request a copy of your personal data which we hold about you;
- 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 at any time to withdraw your consent to the processing;
- The right to request that the data controllers provide you with your personal data and, where applicable and possible, transmit that data directly to another data controller (this is known as the right to data portability).
- 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 Information Commissioner’s Office.

When you exercise any of these rights, before complying with your request, we may need to verify your identity for your security. In such cases we will need you to provide proof of your identity before you can exercise these rights.

9. Further processing

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

10. Contact Details

To exercise your rights, raise queries or make complaints, please in the first instance contact the Benefice Administrator (GDPR), c/o The Rectory, 29 Enstone Road, Westcote Barton, Chipping Norton, OX7 7AA, or email enquiries.bartonbenefice@outlook.com, with ‘GDPR’ in the subject line. 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.