

Ely Diocesan Board of Finance

Safeguarding Privacy Notice

Date: 26 June 2025

This privacy notice is provided to explain what to expect when we process your personal information in accordance with the UK GDPR and the Data Protection Act 2018.

There are several policies which support this privacy notice, these are listed in Section 10 below.

1. Data controller

We are The Ely Diocesan Board of Finance, a company limited by guarantee (with registration number 142183) and being a registered charity (with charity registration number 245456), Etheldreda House, Wellington Road, 206 Lancaster Way Business Park, Ely. CB6 3NX

References to “EDBF”, “we”, “us” and / or “our” throughout this privacy notice are references to us.

For further information about EDBF please go to: <http://www.elydiocese.org/>

2. Why we collect and use your personal data:

Personal data (sometimes also referred to as personal information) is processed 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 maintaining and improving good practice in safeguarding; understanding failings in particular cases or safeguarding practice;
- 2.4 improving processes and case management and revealing patterns of abuse that were previously undetected and that could identify others at risk of abuse;
- 2.5 preventing death or serious harm;
- 2.6 to put in place Church Safety Plans (CSPs) and other safeguarding risk management processes including risk assessments or support

arrangements to enable early interventions to prevent the escalation of risk;

- 2.1 working to mitigate any identified risks in collaboration with the relevant statutory agencies in accordance with relevant law;
- 2.2 responding to every safeguarding concern or allegation appropriately including investigation safeguarding allegations;
- 2.3 coordinating effective and efficient responses and preventing abuse and harm that may increase the need for care and support;
- 2.4 reporting all suspicions, concerns, knowledge or allegations, which reach the relevant threshold, to the appropriate statutory authorities irrespective of the status of the person;
- 2.5 undertaking investigations and reviews (including lessons learnt reviews)
- 2.6 engaging in peer support and providing advice to Church of England bodies regarding safeguarding incidents and cases;
- 2.7 recording all safeguarding work and maintaining records and case files regarding safeguarding incidents and/or investigations;
- 2.8 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;
- 2.9 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;
- 2.10 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;
- 2.11 the safer recruitment of all those with any responsibility relating to children, young people and vulnerable adults within the Church;
- 2.12 providing professional supervision by the National Safeguarding Team to persons with operational responsibility for safeguarding in Partner organisations;
- 2.13 providing reports and information to local, national, public, regulatory or statutory bodies (including legal and independent reviews and inquiries), local authorities and courts and tribunals;
- 2.14 publishing resources, reports and reviews;
- 2.15 liaison with internal and external advisers for the purpose of litigation, dispute resolution, judicial process or to process information related to an insurance claim;
- 2.16 anonymising data for reporting, research or publication;
- 2.17 maintaining accurate and up to date information on: Disclosure and Barring Service (DBS) checks; training and post/positions held by anyone with any responsibility relating to children, young people and vulnerable adults;
- 2.18 undertaking research and statistical analysis to quality assure safeguarding practice and inform strategic planning, policy or practice improvement.

2.19 archiving records for historical and research reasons.

3. The categories of personal data we collect:

The information we collect, process and share for 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)):</p> <ul style="list-style-type: none"> • 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: • Safeguarding in Religious Communities – effective from 17 May 2021 • Declaration of Conflict of Interest Policy – effective from 8 November 2021
	<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 • Episcopal Endowments and Stipends Measure 1943 • Chapter IX of the Constitution of the Church in Wales and the Clergy Terms of Service Canon 2010 <p>Public task (Article 6(1)(e)): Church of England:</p> <ul style="list-style-type: none"> • 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; Canon C4 “Of the quality of such as are to be ordained deacons or priests” paragraph 2 (safer recruitment); • Canon C7 “Of examination of holy orders” – BAP process which requires sharing of information between DDO and Bishop and BAP • 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. • Canon C10 “Of admission and institution” paragraph 2 (safer recruitment); paragraph 3(a) (safeguarding risk assessment/investigation); • 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); • Canon C18 “Of diocesan bishops” paragraphs 2 (jurisdiction); 3

	<p>(delegation of authority); 7(correction and punishment);</p> <ul style="list-style-type: none"> • Canon C26 "Of the manner of life of clerks in holy orders" paragraph 2 (applying safeguarding requirements); • Canon E5 "Of the licensing of readers"; • Canon E8 "Of the admission and licensing of lay workers"; • The Churchwardens Measure 2001; • The Church Representation Rules made under the Synodical Government Measure 1969. • The Church of England Pension Measure 2018 Schedule 1, Part 2, (5)(1); • The Church of England Pensions Board Safeguarding Policy and Guidance issued from time to time. • Multi-Agency Public Protection Arrangements (MAPPA Guidance Updated November 2021); Criminal Justice Act 2003. <p>Vital interest (Art 6(1)(d)) – to protect someone from immediate risk where capacity to consent is lacking, or 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>
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4.2 Special category data (see Section 2 above)

UKGDPR Data Protection Act 2018	<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))

	<ul style="list-style-type: none"> 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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4.3 Criminal Offence data

UKGDPR Data Protection Act 2018	<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))
	<ul style="list-style-type: none"> 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))

5. Who we collect from or share your information with (this is not an exhaustive list):

Where necessary (or required), we collect from or share information with:

- [you, the] data subject;
- parishes e.g. Parochial Church Councils (PCCs) and relevant PCC members;
- diocesan bodies, bishops' offices and cathedrals;
- National Church Institutions (Archbishops' Council, Church Commissioners; Pensions Board; Church of England Central Services; National Society for Promoting Religious Education; Archbishop of Canterbury (in his corporate capacity); Archbishop of York (in his corporate capacity);
- the Church in Wales;
- candidates, prospective employees, employees or other staff members (including contractors, agency workers, consultants and volunteers, including members of safeguarding risk management meetings);
- prospective, current or retired clergy;
- legal representatives;
- parties and individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution (including mediation and arbitration);
- healthcare, social and welfare or advocacy and support organisations or providers;
- educational institutions;
- governance bodies and committees;

Commented [KC1]: Is this correct for the activity in Ely as between EDBF and the Cathedral?

Commented [KC2]: Ideally, this should be set out in separate sections as it is unclear from this list which parties supply data TO EDBF and which might be in receipt of data FROM EDBF (ie, which are parties that you share information with, rather than collect it from). It would not be appropriate to share data with all parties listed here. Some stated parties are also surprising - for example, if this notice is for the benefit of persons receiving safeguarding services, it is not clear why data would be gathered from or shared with "prospective employees".

- 3rd party data processors (independent reviewers; transcription services; technology suppliers);
- local and central government;
- regulatory and statutory bodies;
- law enforcement and prosecuting authorities;
- courts and tribunals and providers of legal services;
- charitable, religious and voluntary organisations;
- survey and research organisations;
- statutory, public, regulatory or other legal or independent reviews or inquiries, including any “lessons learned” reviews;
- independent safeguarding organisations
- the Church of England Interim Support Scheme (ISS).

A National Safeguarding Information Sharing Agreement (ISA) has been signed by Church of England bodies and the Church in Wales under the Church of England Information Sharing Framework.

6. Your data will be transferred outside the UK

Your personal data once received may be transferred between the UK, 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?

Your data will be kept in accordance with the Church of England Safeguarding Retention Schedule: <https://www.churchofengland.org/about/libraries-and-archives/records-and-information-management>.

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 use the contact information provided below.



The Church of England
Diocese of Ely

9. Complaints or concerns:

If you have any queries regarding how your data is processed, please contact:

- privacy@elydiocese.org

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).

10. Reference documents:

- [Church of England](#)
 - Safeguarding Policies and practice guidance.
 - All of the existing House of Bishops' Safeguarding Guidance is currently available from the Church of England Safeguarding Policy and Guidance page. [Policy and practice guidance | The Church of England \(Click Here\)](#)
 - The e-manual contains the Code of Practice and any Guidance in force: [Safeguarding e-manual | The Church of England \(click here\)](#)
 - Personal Files Relating to Clergy. The current policy is available here: [Personal Files Relating to Clergy \(click here\)](#)
- [Church in Wales \(CiW\)](#)
 - Disciplinary Offences as follows in Chapter IX of the Constitution:
 - Wilful disobedience to or breach of any of the provisions of the Constitution or of the Statement of Terms of Service published pursuant to the Clergy Terms of Service Canon 2010.
 - Failure to comply with advice from the Provincial Safeguarding Panel without reasonable excuse.
 - [Church in Wales Clergy Personal Files Policy \(click here\)](#)
 - Church in Wales Privacy Notice: <https://www.churchinwales.org.uk/en/privacy-notice/>