Data Privacy Notice

1. Policy Statement

The Diocese of Bristol Academies Company (DoBAC) is committed to respecting the privacy of all those for whom we hold personal information/data at any time. If you have any queries please do get in touch. You will find our contact details in section 14 at the end of this Privacy Notice.

This Privacy Notice sets out the data protection and data privacy policies that fall within the oversight of the DoBAC as a `Data Controller' and it explains how your personal data is processed by the DoBAC and for what purposes.

2. Introduction

DoBAC is committed to processing personal information we hold in accordance with current and developing national data legislation. This includes the General Data Protection Regulation (the "GDPR") which governs the processing of personal data; the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003.

DoBAC will comply with its obligations under the "GDPR" by processing information in line with the legal bases set out in law (see section 4 below).

DoBAC will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure; and ensure that appropriate technical measures are in place to protect personal data.

3. The Diocese of Bristol Academies Company (DoBAC)

DoBAC is the Umbrella Trust for multi-academy and single-academy trusts in the Diocese of Bristol and is closely linked to the Diocesan Board of Education (DBE). DoBAC has the responsibility from DBE to have oversight of the academies that have Church School Status in the Diocese. It is made up of Members and Directors, who ensure the reputational risk of the Diocese is minimised should there be any problems in the fields of academic standards, church school distinctiveness or financial viability. The work of DoBAC is supported by staff from the Diocesan Education Team.

4. The legal basis for processing your personal data

The specific legal bases against which DoBAC will process information are:

- Legitimate Interest
- Compliance with a legal obligation
- To fulfil contractual obligations
- Consent

Most of our data is processed because it is necessary for DoBAC's legitimate interests.

Some of the data processing is necessary for compliance with a legal obligation.



DoBAC will process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

DoBAC will process your data in order to respond to requests from you to receive particular information.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

5. Personal Information - what it is, and why DoBAC collects it.

Personal information 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 DoBAC's possession or likely to come into such possession.

Personal information is collected where DoBAC believes it has lawful reason to do so.

DoBAC will use your personal data for the following purposes:

- To administer meetings, elections and other such arrangements which ensure ability to meet all legal and statutory obligations;
- To keep you informed of the news/information which you have requested and that may be
 of interest to you;
- To keep you informed of information that is believed to be important to the role you hold;
- To seek your views and comments;
- To maintain DoBAC records;
- To process an application and appointment to a role, including Members/Directors of Academy Trusts and Foundation Governors;
- To notify you of changes to our services and offices;

6. Which data DoBAC collects

Some or all of the following:

- Names, titles, and aliases, photographs;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant, or where you provide them to us, we may process demographic
 information such as gender, age, date of birth, marital status, nationality, education/work
 histories, academic/professional qualifications.



The data we process is likely to constitute sensitive personal data, because the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin and, where this is relevant, mental and physical health, details of injuries, medication/treatment received, criminal records, fines and other similar judicial records.

A very broad list of examples of those with whom DoBAC is in regular contact, or with whom information may need to be shared, is in section 15 below.

7. Sharing personal data

Personal data will be treated as strictly confidential and will only be shared for lawful purposes and (see section 15 below) connected to:

- Diocesan business we will only share your data with your consent eg the Diocesan Directory;
- The Bishop of Bristol;
- Employment, social security, social protection, or other statutory reasons.

8. Keeping personal data

DoBAC keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national church eg concerning safeguarding

Details about retention periods can currently be found in the Record Management Guides located on the Church of England website at: - https://www.churchofengland.org/more/libraries-and-archives/records-management-guides.

9. Individual rights and personal data

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

- The right to request a copy of your personal data which DoBAC holds about you;
- The right to request correction of 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 DoBAC 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 at any time to withdraw your consent to processing of your personal data by DoBAC;
- The right to lodge a complaint with the Information Commissioner's Office.



10. Further processing

If DoBAC wishes to use your personal data for a new purpose, not covered by this Privacy/Data Protection Notice, then you will be provided with a new notice, explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Wherever and whenever necessary, your prior consent to the new processing will be sought.

11. Gathering information from external sources

DoBAC may from time to time undertake research to enable it to develop its work. Any information, whether personal or of a quite general nature, will be from publicly available sources, such as:

Companies House; information published in articles/papers etc; social media which is viewed publicly through the privacy notices of social media; messaging services eg Linkedin; or through national and regional bodies or authorities information such as the census data.

12. Data processors

A number of bodies process data for DoBAC, including GCI – formerly BlueChip Data Systems - for IT help and support to Education Team employees and particularly nominated officers.

13. Changes to this Privacy Notice

DoBAC will review this privacy notice regularly and may update it at any time - for example in the event of legal changes, to improve how we manage data, or where an issue or concern has come to light that needs an appropriate response. If there are any significant changes in the way DoBAC processes your personal information we will provide a prominent notice on our website or send you a notification.

14. Contact details and reporting concerns

To exercise all relevant rights, queries or complaints, please in the first instance contact DoBAC's Data Protection Officer:

Mrs Clare Stansfield

DoBAC Company Secretary
Diocesan Office Hillside House
1500 Parkway North
Stoke Gifford
Bristol
BS34 8YU

D33+010

Tel: 0117 906 0100

email: clare.stansfield@bristoldiocese.org

Diocese of Bristol Academies Company - Reg. in England: Company 07688544



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

15.

Examples of those with whom the BDBF is generally in regular contact:

Data Controllers: Bristol Diocesan Board of Finance (BDBF), The Bishop of Bristol, The Dean and Chapter of Bristol Cathedral, PCCs and Incumbents; Diocesan Board of Education, Diocese of Bristol Academies Trust (DBAT), Cathedral Schools Trust (CST), National Church Institutions.

Church officers and other church members: Churchwardens, PCC Secretaries, PCC Treasurers, safeguarding parish representatives/nominated people, church administrators, PCC/DCC members.

Committees/Boards: Diocesan Board of Education (DBE)

Examples of third parties with whom the BDBF will share data where this is appropriate:

Diocesan Directory - hard copy or password protected on-line versions, to be published with consents where appropriate

Specifically named individuals

Legal and statutory guidance and others - in compliance with the range of legal responsibilities, including: Charity Commission; Companies House; Insurers; Legal advisers.