GENERAL PRIVACY NOTICE

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal data for the purposes of the GDPR. Our use of your personal data is subject to the instructions of the Bishop of Lichfield or the Diocesan Board of Finance for whom we act, as well as by the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

<table>
<thead>
<tr>
<th>We, us, our</th>
<th>FBC Manby Bowdler LLP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Our representative for Data Protection</td>
<td>Kim Carr</td>
</tr>
<tr>
<td>Personal data</td>
<td>Any information relating to an identified or identifiable individual</td>
</tr>
<tr>
<td>Special category personal data</td>
<td>Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership</td>
</tr>
<tr>
<td>Genetic and biometric data</td>
<td></td>
</tr>
<tr>
<td>Data concerning health, sex life or sexual orientation</td>
<td></td>
</tr>
</tbody>
</table>

Who are we?

This Privacy Notice is provided to you by FBC Manby Bowdler who is the data controller for your data. We act as legal advisors to the Bishop of Lichfield, the Lichfield Diocesan Board of Finance, the Lichfield Diocesan Trust, the Lichfield Diocesan Board of Education and the Lichfield Diocesan Synod; Niall Blackie, who is a partner in the firm, is retained by the Bishop as his Legal Secretary and he is the Lichfield Diocesan Registrar. Even if we are advising you about an ecclesiastical matter we are doing so on behalf of the Bishop or one of the other bodies mentioned: we are not acting for you. We explain this below.

- The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church’s mission in each community.
- England is divided into two Provinces, Canterbury and York, each having an Archbishop. Each Province is divided into Dioceses.
- Dioceses are geographical areas, of which Lichfield is one; the Bishop of Lichfield is the chief pastor of the Diocese of Lichfield which lies within the Province of Canterbury.
- The Diocese is divided into 3 Episcopal Areas, (Wolverhampton, Shrewsbury and Stafford) in which the Bishop of Lichfield delegates many of his functions to Area Bishops.
The Diocese is also divided into 4 Archdeaconries (Walsall and Lichfield for the Wolverhampton Episcopal Area, Salop for the Shrewsbury Episcopal Area and Stoke upon Trent for the Stafford Episcopal Area; there is an Archdeacon for each Archdeaconry.

Each Archdeaconry is divided into Deaneries each having a Rural Dean.

Finally the Diocese is divided into Parishes, each having an Incumbent (a Rector or Vicar), or, if the benefice comprising that Parish is Vacant, there will usually be a Priest or Minister or Curate in Charge, but sometimes a Curate who is simply licensed to serve the Parish.

Each Parish has Churchwardens and a Parochial Church Council.

The Deaneries and Diocese each have Synods on which laity and clergy are represented.

The Board of Finance, the Board of Education and the Diocesan Trust are each registered as Companies to handle respectively financial/administrative, custodian trusteeship and educational functions for the Diocese as a whole and in some situations for particular parts of it.

As the established Church in England there are many functions which are considered centrally, through the Church Commissioners and Archbishops’ Council.

Whilst this summary tends to suggest a hierarchy, for most practical purposes, the Church of England is not a hierarchical body at all. It is perhaps best described as a federation. Each part of the federation functions partly independently of the others and partly in concert.

As lawyers, we are retained to provide advice to the Diocese and in particular to the Bishop of Lichfield, and the Lichfield Board of Finance. We also serve as the Registrars to the Bishop’s Diocesan Consistory Court (of which the Diocesan Chancellor is Judge) and to the Diocesan Chancellor in his capacity as Vicar General to the Bishop. As the Bishop’s lawyer we provide advice on his behalf to many people within the Diocesan umbrella: in so doing we are not acting as their legal advisors, but are acting for the Bishop or one of the Boards. Through this retainer, we provide advice on the Bishop’s behalf to many people without acting for those people as such, but on behalf of the Bishop.

Because the Church of England is made up of all of these persons and organisations (and others) working together, we may need to share personal data we hold with other parts of the Church so that they can carry out their responsibilities to the Church and our community.

This Privacy Notice explains how this firm will process your data.

How do we process your personal data?

Under data protection law, we can only use your personal data if we have a proper reason for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our instructions;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, or where the organisations for whom we work or third parties have such reason, so long as this is not overridden by your own rights and interests.
We will comply with our legal obligations to keep personal data up to date; to store and destroy it securely; we will not collect or retain excessive amounts of data; we will keep personal data secure, and we will protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

The table below explains what we use (process) your personal data for and our reasons for doing so:

<table>
<thead>
<tr>
<th>What we use your personal data for</th>
<th>Our reasons</th>
</tr>
</thead>
<tbody>
<tr>
<td>To provide legal services to the Bishop or the Diocesan Board of Finance</td>
<td>For the performance of our contract with them or to take steps at your request before entering into a contract</td>
</tr>
<tr>
<td>Conducting checks to identify our clients and those with whom they deal and to verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business, eg under health and safety regulation or rules issued by our professional regulator</td>
<td>To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</td>
<td>To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>Ensuring business policies are adhered to, eg policies covering security and internet use</td>
<td>For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best service to our clients</td>
</tr>
<tr>
<td>Operational reasons, such as improving efficiency, training and quality control</td>
<td>For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for you at the best price</td>
</tr>
<tr>
<td>Ensuring the confidentiality of commercially sensitive information</td>
<td>For our legitimate interests or those of a third party, ie to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>Statistical analysis to help us manage our practice, eg in relation to our financial performance, client base, work type or other efficiency measures</td>
<td>For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service for our clients at the best price</td>
</tr>
<tr>
<td>Preventing unauthorised access and modifications to systems</td>
<td>For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging for us and for our clients To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>Updating and enhancing client records</td>
<td>For the performance of our contract with our clients or to take steps at their request before entering into a contract To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>What we use your personal data for</td>
<td>Our reasons</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>For our legitimate interests or those of a third party, eg making</td>
<td>making sure that we can keep in touch with our clients and those who have</td>
</tr>
<tr>
<td>sure that we can keep in touch with our clients and those who have</td>
<td>dealings with us or them about existing and new services</td>
</tr>
<tr>
<td>dealings with us or them about existing and new services</td>
<td></td>
</tr>
<tr>
<td>Statutory returns</td>
<td>To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>Ensuring safe working practices, staff administration and assessments</td>
<td>To comply with our legal and regulatory obligations</td>
</tr>
<tr>
<td>For our legitimate interests or those of a third party, eg to</td>
<td>making sure we are following our own internal procedures and working</td>
</tr>
<tr>
<td>make sure we are following our own internal procedures and working</td>
<td>efficiently so we can deliver the best service to our clients and to you</td>
</tr>
<tr>
<td>efficiently so we can deliver the best service to our clients and to</td>
<td>you</td>
</tr>
<tr>
<td>you</td>
<td></td>
</tr>
<tr>
<td>Marketing our services to:</td>
<td></td>
</tr>
<tr>
<td>—existing and former clients;</td>
<td>For our legitimate interests, ie to promote our business to existing and</td>
</tr>
<tr>
<td></td>
<td>former clients</td>
</tr>
<tr>
<td>External audits and quality checks, eg for Lexcel, ISO or CQS</td>
<td>For our legitimate interests, ie to maintain our accreditations so we can</td>
</tr>
<tr>
<td>accreditation and the audit of our accounts</td>
<td>demonstrate we operate at the highest standards</td>
</tr>
<tr>
<td></td>
<td>To comply with our legal and regulatory obligations</td>
</tr>
</tbody>
</table>

Specifically in our work for the Bishop and Diocesan Board of Finance and other Church of England bodies we may use your personal data for some or all of the following purposes:

- To enable us to meet all legal rules of law and statutory obligations (which include requirements under legislation specific to the regulation of all those who have contact with the Church including Acts of Parliament, Synodical Measures, Statutory Instruments, Rules made under Measures, and the Canons of the Church of England);
- To provide advice to the Bishop and on his behalf to the Area Bishops, the Archdeacons, the Rural Deans, the Incumbents and other licensed clergy and those permitted by the Bishop to officiate in the Diocese, the Synods and their Chairs, the Boards and their officers and committees, the Parochial Church Councils and Churchwardens about any legal matter pertaining to the ecclesiastical or synodical offices or their work or the corporate work of the Boards;
- To administer the jurisdiction of the Bishop’s Vicar General in respect of the grant of Common Licences for marriage;
- To administer justice in relation to the jurisdiction of the Bishop’s Consistory Court and to act as clerk to the Diocesan Chancellor as Official Principal and Judge of that Court and to ensure the publication of the Judgments of that Court;
- To advise the Bishop on matters relating to the discipline of clergy or lay people;
- To advise the Bishop and the Diocesan Safeguarding Advisor and all persons having such responsibilities in relation to safeguarding with the aim of ensuring that all children and adults-at-risk are provided with safe environments and protected from neglect or physical mental or emotional harm;
- To assist in the prevention or detection of any unlawful act, including in this context acts which are contrary to ecclesiastical law as well as secular law;
- To assist in the protection of the public from dishonesty malpractice or other seriously improper conduct, unfitness, incompetence, mismanagement or service provision failing including the misconduct of clergy or lay people in contact with the Church of England;
- To maintain the Bishop’s records as to his Acts, and the decisions of his Consistory Court;
- To maintain the Patronage Register in respect of Patrons of individual benefices;
To draw up and retain copies of all deeds and other documentation as to Ordination, Deeds of Collation, Institution and Licence and other matters;

To advise all persons as to legal matters pertaining to the Church of England in the Diocese relating to baptism, confirmation, marriage, and the burial of the dead;

To maintain our own accounts and records.

We have included an Appendix in which we explain some of the particular purposes described above in more detail.

What is the legal basis for processing your personal data?

Processing will be carried out in accordance with Article 6 of the GDPR and under the principles of Article 5 of the GDPR if it is necessary to process it

(i) for our legitimate interests as a firm, or the legitimate interests of a third party (such as the Bishop or an organisation or person within the Church of England) (for example our work may mean that we share information with another Diocese or the Church Commissioners in relation to Disciplinary matters) (in this last criterion, we will always take into account your interests, rights and freedoms)

(ii) under a legal obligation (for example the maintenance of the Patronage Register); or

(iii) for performing a task carried out in the public interest or in the exercise of official authority (for example our work under the Clergy Discipline Measure, and safeguarding work to protect children and adults at risk, or in relation to Faculties or Marriage Licences, but given that the Church of England is the Established Church this criterion will also cover a wide variety of other work which we carry out); or

In addition to the above, we may need to process special category data held by us about you, in accordance with Article 9 of the GDPR

(iv) in the course of the legitimate activities of the bodies or persons forming part of the Church of England but the data will not be processed outside the persons and bodies which form the Church of England without your consent (we will set in place appropriate safeguards for this processing);

(v) Where necessary for the establishment exercise of legal claims;

(vi) When it is carried out on the part of a Court acting in a judicial capacity.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details. The data we collect may well include special category data as to your religious beliefs.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

Personal data we collect about you

The table below sets out the personal data we will or may collect from you and other sources in the course of advising the Bishop or Diocesan Board of Finance.

<table>
<thead>
<tr>
<th>Personal data we will collect</th>
<th>Personal data we may collect depending on why we have been instructed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Your name, address, aliases and telephone</td>
<td>Your National Insurance and tax details</td>
</tr>
<tr>
<td>Personal data we will collect</td>
<td>Personal data we may collect depending on why we have been instructed</td>
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<tr>
<td>-------------------------------</td>
<td>---------------------------------------------------------------------</td>
</tr>
<tr>
<td>number</td>
<td>Details of your professional online presence, eg LinkedIn profile</td>
</tr>
<tr>
<td>Information to enable us to check and verify your identity, eg your date of birth or passport details including photographs</td>
<td>Details of your spouse/partner and dependants or other family members</td>
</tr>
<tr>
<td>Electronic contact details, eg your email address and mobile phone number</td>
<td>Your employment status or ministerial status and details including salary or stipend and benefits if a clergy person or a lay person holding office within the Church</td>
</tr>
<tr>
<td>Information relating to the matter about which we are providing advice or are handling</td>
<td>Information to enable us to undertake a credit or other financial check on you</td>
</tr>
<tr>
<td>Your financial details so far as relevant to the matter we are advising about, eg the source of your funds bank account numbers, payment card numbers, payment/transaction identifiers, policy numbers, and claim numbers</td>
<td>Details of your pension arrangements</td>
</tr>
<tr>
<td>Your signature</td>
<td>Special category data as to employment or ministerial records including records relating to</td>
</tr>
<tr>
<td></td>
<td>age, date of birth,</td>
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<tr>
<td></td>
<td>gender sexual orientation, sex life, marital status,</td>
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<tr>
<td></td>
<td>health and sickness, attendance, medical mental and physical health records, details of injuries, medication/treatment received,</td>
</tr>
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<td></td>
<td>performance, disciplinary, conduct and grievances,</td>
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<td></td>
<td>trade union membership or affiliation, and political beliefs (in so far as they relate to proscribed organisation),</td>
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<tr>
<td></td>
<td>may be collected for example where relevant to advice concerning pastoral care of clergy and parishioners or to discipline grievance and capability issues concerning clergy and licensed lay persons or those holding office within the Church</td>
</tr>
<tr>
<td></td>
<td>Special category data as to religious or similar beliefs may be collected where relevant to the mission of the Church including patronage and pastoral matters</td>
</tr>
<tr>
<td></td>
<td>Special category data as to nationality and ethnic origin may be collected where relevant to licensing of clergy or as to marriage licence work</td>
</tr>
<tr>
<td></td>
<td>Special category data may be collected as to your criminal records, fines; and judicial records where relevant to disciplinary matters</td>
</tr>
</tbody>
</table>
This personal data is required to enable us to provide our service to the Bishop or the Diocesan Board of Finance or to enable us to carry out our obligations under our retainer or to give you advice about ecclesiastical matters.

The processing of personal and special category data is governed by the Data Protection Act 2018 the General Data Protection Regulation 2016/679 and sometimes by other legislation relating to personal data and rights such as the Human Rights Act 1998.

How your personal data is collected

We collect most of this information from you direct. However, we may also collect information:

- from publicly accessible sources, eg Companies House or HM Land Registry;
- directly from a third party, eg:
  - sanctions screening providers;
  - credit reference agencies;
  - client due diligence providers;
  - estate agents and surveyors
- from the Bishops and clergy of the Diocese or the wider Church of England Institutions or bodies such as Parochial Church Councils, and their staff (see ‘who are we’ below)
- from a third party with your consent, eg:
  - your bank or building society, another financial institution or advisor;
  - consultants and other professionals we may engage in relation to the matter;
  - your employer and/or trade union, professional body or pension administrators;
  - your doctors, medical and occupational health professionals;
- via our website—via enquiry and call back forms; newsletters sign ups and event registrations you complete; we use cookies on our website (for more information on cookies, please see our Cookies Policy, www.fbcmb.co.uk/cookies-policy
- via our information technology (IT) systems, eg:
  - case management, document management and time recording systems;
  - door entry systems and reception logs;
  - other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems including LiveChat;
  - FBCMB App should you choose to use this to leave a review or send us a message

Sharing your personal data

Your personal data will be treated as strictly confidential. It will be shared with the Bishop or other body retaining us. It will only be shared with third parties where it is necessary for the performance of our tasks. It is likely that we will need to routinely share your data with some or all of the following (but only where necessary):

- The appropriate bodies of the Church of England including the other data controllers such as the Dean and Chapter of the Cathedral and the Church Commissioners;
Agents, servants and contractors of the Bishop or Boards or other parties instructing us;

Other clergy or lay persons nominated or licensed by the bishops of the Diocese of Lichfield to support the mission of the Church in your parish including the Area Bishops and Archdeacons in particular and the secular and ministry officers of the Board of Finance;

We will share your information if we are required by law (for example to law enforcement agencies for the prevention or detection of crime, subject to such bodies providing us with a relevant request in writing);

Professional advisers who we instruct on behalf of the Bishop or the Diocesan Board of Finance, eg barristers, medical professionals, accountants, tax advisors or other experts;

Other third parties where necessary to carry out our instructions;

Credit reference agencies;

Our insurers and brokers;

External auditors, eg in relation to ISO, Lexcel or CQS accreditation and the audit of our accounts;

Our bank(s);

External service suppliers, representatives and agents that we use to make our business more efficient, eg typing services, marketing agencies or document collation.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in processing your personal data for promotional purposes (see above ‘How and why we use your personal data’). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell OR share it with other organisations outside the firm for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

• contacting us by email at marketing@fbcmb.co.uk
• using the ‘unsubscribe’ link in emails
We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

**Where your personal data is held**

Information may be held at our offices (or in files or on electronic equipment and devices held by our staff), third party agencies, service providers, representatives and agents as described above (see ‘Who we share your personal data with’).

**How long do we keep your personal data?**

We will keep your personal data after we have finished advising.

We will do so for one of these reasons:

- to respond to any questions, complaints or claims;
- to show that we treated you fairly;
- to keep records required by law or kept in the interests of historical archiving purposes or for the operation of the mission of the church.

We will not retain your data for longer than necessary for the purposes set out in this policy. The minimum storage time limit for paper files is 7 years, however some work types have different retention periods.

We will keep some records permanently if we are legally required to do so or if it necessary for the operation of the mission of the church. We may keep some other records for an extended period of time for historical archiving purposes. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Some data is recorded in registers maintained by us in paper and/or electronic form (which may be open to public inspection) and which are retained permanently.

Some data kept on a permanent basis is deposited with the Bishop or in the County Joint Records Offices on the Bishop’s behalf.

**Your rights and your personal data**

You have the following rights, which you can exercise free of charge:

<table>
<thead>
<tr>
<th>Access</th>
<th>The right to be provided with a copy of your personal data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rectification</td>
<td>The right to require us to correct any mistakes in your personal data</td>
</tr>
<tr>
<td>To be forgotten</td>
<td>The right to require us to delete your personal data—in certain situations</td>
</tr>
<tr>
<td>Restriction of processing</td>
<td>The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data</td>
</tr>
<tr>
<td>Data portability</td>
<td>The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations</td>
</tr>
<tr>
<td>To object</td>
<td>The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your</td>
</tr>
</tbody>
</table>
personal data, eg processing carried out for the purpose of our legitimate interests

| Not to be subject to automated individual decision-making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you |

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email, call or write to our representative for Data Protection —see below: 'How to contact us'; and
- let us have enough information to identify you (eg your full name, address and client or matter reference number);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

Transfer of Data Abroad

To deliver services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), eg:

- with your service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the matter in which we are advising

These transfers are subject to special rules under European and UK data protection law.

Further processing

If we wish to use your personal data for a new purpose, not covered by this 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.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach.

We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at https://ico.org.uk/concerns or telephone: 0303 123 1113.

How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

<table>
<thead>
<tr>
<th>Our contact details</th>
<th>Our representative for Data Protection contact details</th>
</tr>
</thead>
</table>
| FBC Manby Bowdler LLP  
info@fbcmb.co.uk  
01902 578000 | Kim Carr  
k.carr@fbcmb.co.uk  
01902 392427 |

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see ‘How to contact us’ above).

Changes to this privacy policy

This privacy policy was published on 25 May 2018.

We may change this privacy policy from time to time, when we do we will inform you.

Niall Blackie
Partner FBC Manby Bowdler LLP
Lichfield Diocesan Registrar
APPENDIX

SPECIFIC PROCESSING AREAS

Clergy Ordination and Licensing: We prepare papers for all Ordinations and Licensing, Institutions and Collations of clergy. We keep the Bishop’s Episcopal Register including names of all those ordained or licensed. Personal data and special category data is held for this purpose and some is retained permanently because of the public character of the Holy Orders and ministry of the Clergy of the Church of England.

Clergy Discipline, Clergy Capability, Grievances, and Health: We are required to advise the Bishops and Archdeacons in relation to the conduct and performance of clergy including their state of health. We may receive personal data or special category data in that context from a variety of sources. We will always share that data with the Bishops and may share it with Archdeacons, since they each have legal responsibilities for dealing with matters of this type. They are data controllers in their own right. When formal disciplinary proceedings or capability proceedings are issued the data may be shared with the parties to those proceedings, and with others who have to be notified of steps being taken. We keep the Bishop’s Register of Disciplinary matters; it is not open to public inspection but some data within it may be revealed to persons demonstrating a legitimate interest in the outcome of proceedings. (Capability Grievance and Health matters are not registered within it).

Lay Persons: We prepare papers for licensing and commissioning of lay people into ministry roles. The data we receive includes information about their suitability for such roles.

Consecration of places: We prepare Petitions for and Sentences of Consecration which include personal data of the petitioners. This is processed for the purpose of consecration which is a public act and in which the data is read out; the material is retained indefinitely and may be processed to anyone seeing to confirm whether land had a consecrated status or not. We keep the Bishop's Register of consecrations.

Faculty Procedures – parochial cases: These are cases relating to church buildings and land. We advise the Archdeacons and Diocesan Advisory Committee (DAC) as well as petitioners and objectors to proceedings. Once a petition is presented we work as Registrars to the Court and under the Faculty Jurisdiction Rules 2015. Data held by us would be processed to other parties to the proceedings including objectors, clergy, churchwardens, PCCs, and to the Archdeacon and DAC and the Diocesan Chancellor. For the most part no special category data is received: if it is, then we may be obliged to pass it on to these persons or bodies. The Judgment of the Court is made public on the internet and elsewhere and may contain personal and special category data.

Faculty Procedures – private cases: These are cases where private individuals petition for permission within churchyards: to reserve grave spaces, to bury ashes or bodies, to erect memorials, or to exhume bodies or ashes. We receive information about the parties involved but often also about their family members. We advise petitioners as to the nature of these proceedings in advance of proceedings being commenced but once a petition is presented to us we work as Registrars to the Court and under the Faculty Jurisdiction Rules 2015. Data held by us would be processed to other parties to the proceedings including objectors, clergy, churchwardens, PCCs, and to the Archdeacon and DAC and the Diocesan Chancellor. In these cases it is very common for sensitive special category data to be provided but the rules as to transparency remain the same. The Judgment of the Court is made public on the internet and elsewhere and may contain personal and special category data.
We keep the Consistory Court Register of Faculties granted which includes the names of petitioners and the details of what the petition was for. It is open for public inspection.

Court papers relating to all Faculty matters are deposited with the Joint Records Office on a rolling basis, where they are open to public inspection. The Registry has agreed with the Joint Records Office that material in relation to private faculty cases will not be open to public inspection without approval from the Diocesan Registrar.

Marriage Licences: We receive information about the parties to be married and often about their family members. We receive affidavits verifying some information and application forms for the Licences including for example passport copies to demonstrate nationality qualifications. The data is processed to the incumbent or minister, the Surrogate and the Diocesan Chancellor. We keep the Bishop’s Register of Licences granted including the names of the parties to the Licence.

Patronage Register: We maintain the statutory register of the names addresses and contact details of Patrons for every benefice in the Diocese. This is a public register and we will show it to anyone who seeks to see it. The information is also processed to the Diocese which retains it on a data base open to access by many persons. We receive data from Patrons in order to keep this register up to date, and to use it for its purpose in relation to vacancies in the benefices, pastoral reorganisation and matters under the Patronage Benefices Measure 1986 and the Mission and Pastoral Measure 2011 and other legal rules and legislative procedures. This material will include Deeds and other documents containing information as to the transfer of patronage rights to other persons: where such documents represent the title to the current registered patron they will be retained.