

BUGB Privacy Notice (Safeguarding Team)

We are the **Baptist Union of Great Britain** (“BUGB”, “we”, “us”), a charitable incorporated organisation registered in England and Wales under charity number 1181392. Our contact details are:

Address: The Baptist Union of Great Britain, PO Box 44, Didcot, OX11 8RT

Email: www.baptist.org.uk/contactus Telephone: 01235 517700

This privacy notice describes what information (your ‘personal data’) we collect about you, the purposes for which we collect it and how we will handle and use it.

For the purposes of data protection law, we are considered as the ‘controller’ of the personal data we collect and hold about you and we are therefore responsible for it.

Our Legal Services Manager (Damien Miller) is our **Data Protection Officer**, and he is the person responsible for matters relating to the protection of personal data. He can be contacted at the address above or by email (dataprotection@baptist.org.uk) or phone 01235 517700.

We are registered with the Information Commissioner’s Office (“ICO”) with registration number Z5717589.

1. INTRODUCTION

We hold and process various categories of personal information for a number of reasons. We collect this data either from you or from third parties who provide it to us.

2. INFORMATION ABOUT YOU

We may collect information about you in the following ways:

2.1 Information which you give us

We collect information about you when you fill in one of our forms and when you communicate with us face to face or in writing, by email, phone or text. This can include (but is not limited to) your name, address, email address, phone number(s), the roles you hold within your church and your bank details.

2.2 Information we collect about you

Normally we will only process the information which you have provided us directly. We may, however, obtain additional information about you from statutory bodies, other third parties or anyone reporting a safeguarding concern. In certain circumstances, this may include special category and criminal convictions etc data, where the lawful processing conditions (described below) are met.

3. WHY WE COLLECT AND PROCESS THIS INFORMATION

In this section we list the different purposes for which we collect and use your personal information, as well as the legal grounds under the Data Protection Act 2018 (DPA) and the Retained General Data Protection Regulation (UK GDPR) on which we rely to justify such data processing.

Purpose	Legal grounds
<p>Processing DBS Checks, including making recommendations about blemished disclosures and keeping a record of our decision.</p>	<p>This will only be done if you submit a request for a DBS check. No record of the blemish will be retained but a record of our advice and decision will be retained under the following legal grounds:</p> <p>where it fulfils one of the substantial public interest conditions from Schedule 1, Part 2 of the Data Protection Act 2018, in particular, Conditions 10, 11, 12, 18 and 19 and Condition 31 from Schedule 1, Part 3 of the Data Protection Act 2018.</p> <p>See the BUGB Data Protection Policy and Appropriate Policy Document (Schedule 2 of the policy) on the BUGB website.</p>
<p>Managing and/or investigating safeguarding concerns in churches, Associations, Colleges and in our Specialist Teams, including mitigating the risk of individuals committing criminal offences and assessing individuals' suitability for ministry or other work within the Baptist family, which may involve processing special category and criminal convictions etc data, which is essential to safeguard against any risks posed to children and adults at risk.</p>	<p>Article 6(1)(f) UK GDPR where "processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."</p> <p>Where it fulfils one of the substantial public interest conditions from Schedule 1, Part 2 of the Data Protection Act 2018, in particular, Conditions 10, 11, 12, 18 and 19 and Condition 31 from Schedule 1, Part 3 of the Data Protection Act 2018.</p> <p>See the BUGB Data Protection Policy and Appropriate Policy Document (Schedule 2 of the policy) on the BUGB website.</p>
<p>Managing offenders or those awaiting charge or who have been charged and are awaiting Court for offences in churches, Associations, Colleges and in</p>	<p>Explicit consent if you enter into a safeguarding contract; or otherwise under Schedule 1 DPA 2018 Conditions 10, 11, 12, 18, 19 and 31 as set out above.</p>

our Specialist Teams and negotiating the terms of their safeguarding contracts	
Maintaining and reviewing details of approved Safeguarding trainers, and Safeguarding Contacts in Associations and Colleges	The information is necessary for our legitimate interest of supporting and resourcing BUGB member churches
Research, analysis and collection of data for the purpose of monitoring safeguarding trends within the Union, including inquiries and statutory reviews.	Article 6(1)(f) UK GDPR where “processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”

4. DISCLOSURE OF YOUR INFORMATION

At times we may share your information with others. The following is a list of who we will or might share your information with:

- Our employees, contractors and volunteers on a need-to-know basis;
- Employees and volunteers working for one of our partner organisations with whom we have a Data-Sharing Agreement. Please see the current list of partner organisations at www.baptist.org.uk/privacy
- Relevant church(es), church ministers and other employing bodies as appropriate
- Other Denominational Safeguarding Officers
- Police, Social Services, Local Authority Designated Officers and other statutory agencies
- Our insurers and professional advisors, including our solicitors.

5. WHERE WE KEEP YOUR PERSONAL DATA

All your personal information covered by this notice will be stored in the UK. To deliver services or manage our relationship with you, it is sometimes necessary for us to share your Personal Data outside of the UK (e.g. when our service providers are located outside of the UK). Many countries do not have the same data protection laws as the UK. We will, however, take reasonable steps to ensure that any such service provider has in place appropriate measures to protect your information and any contract includes appropriate clauses about the use of data. For instance, we will take steps to confirm that a third party outside of the UK is either covered by an existing adequacy agreement or has put in place regulator approved standard contractual clauses to provide an adequate level of protection for personal data.

6. RETENTION OF DATA

We will keep the personal information covered by this notice for the periods of time specified in our Data Retention Schedule and at the end of the applicable retention periods we will safely and securely delete it.

7. YOUR RIGHTS IN RELATION TO YOUR DATA

You have a number of rights under data protection law. These include:

- The right to access your personal data and to obtain certain information about it;
- The right to rectify the data if it is inaccurate;
- In some circumstances, such as when the data is no longer required or if the use of the data has no legal justification, the right to have that data erased;
- In limited circumstances, the right to object to our handling of the data;
- In limited circumstances, the right to restrict the handling of your data;

More details about how these rights apply can be found in our Data Protection Policy which can be accessed from www.baptist.org.uk/GDPR. You can exercise your rights or obtain more information about them by contacting our Data Protection Officer by email: dataprotection@baptist.org.uk or ring 01235 517700.

8. COMPLAINTS

We acknowledge that we may not always get things right, so if something has gone wrong, we need you to tell us. This will help us to improve our standards of service and data protection controls.

The table below shows the different ways you can contact us to make a complaint.

How to complain	More information
By completing our data protection complaint form	The data protection complaints form can be found at here or we can post a copy to you. You can complete the form electronically and email it to us at dataprotection@baptist.org.uk . Using the data protection form is entirely optional and you may prefer to complain to us using one of the other methods set out in this table.
By telephoning us	You can telephone us on 01235 517700.
By emailing us	You can email us with details of your complaint at dataprotection@baptist.org.uk .
By using our dedicated complaints procedure	A description of our complaints procedure is provided on our website here , together with a link to our general complaints form.

We will acknowledge your complaint within 30 days of receiving it.

We will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on

behalf of someone else, we will also need to check that the person making the complaint is properly authorised to do so.

If, having requested additional information, we are not in a position to identify the person making the complaint or we are not satisfied that they have proper authority to make the complaint, we may be unable to deal with it.

We will investigate your complaint. This will usually involve reviewing your complaint; locating and reviewing the records we hold about you; establishing the relevant facts; and liaising with individuals who you may have dealt with.

We may also need to ask you for further information or documents. If so, we will ask you to provide the information within a specific period of time.

We will update you on the progress of your complaint at appropriate times and inform you of the outcome of the complaint without undue delay.

We will explain clearly what we've done to resolve your complaint and, where appropriate, any action we have taken as a result.

If you are unhappy with the outcome of your complaint, you have a right to complain to the Information Commissioner's Officer (ICO) about the way in which we collect and handle your personal data. Complaints to the ICO can be made on the ICO's website <https://ico.org.uk/>. You should usually submit your complaint to the ICO within three months of your last contact with us.