

## Safeguarding Training Privacy Policy

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Please read this Privacy Notice and click on the button at the bottom to continue onto the main site.

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### Data Controller and Data Processor

[Show/hide](#)

The data controller is:

The Archbishops' Council,  
Church House  
Great Smith Street  
London  
SW1P 3AZ

For further information on The Archbishops' Council please go to:

<https://www.churchofengland.org/about/leadership-and-governance/national-church-institutions>

The Data Processor is:

[ASD Arts and Education](#) who process the site data on behalf of the Archbishops Council and provide technical support through the help desk.

## 1. Why we collect and use your personal data

[Show/hide](#)

- To enable you to access the resources on this site and to complete courses
- To allow Diocesan and Training Institution Safeguarding Officers to see records of courses taken by members of their Diocese or Training Institution
- To monitor usage and improve the provision of services
- To ensure access to particular resources is restricted to those entitled to use them

## 2. The categories of data we collect (including cookies)

[Show/hide](#)

When you use this site, information in the following categories is collected

- Required Personal Data
- Optional Personal Data
- Technical Data
- Usage Data

### Cookies

Two cookies are used by this site:

The MOODLESESSION cookie is essential. It enables your browser to provide continuity and to maintain your login from page to page. When you log out or close the browser this cookie is destroyed from your browser and on the server.

The MOODLEID cookie is optional. It remembers your username within the browser so that when you return to this site the username field on the login page will be already filled out for you.

No other cookies are used by this site.

### 3. Details of the data collected and the lawful basis for using your information

[Show/hide](#)

Category of Data	Type of Data	Lawful basis for processing
Personal Data	<ul style="list-style-type: none"> <li>• Your Name</li> <li>• Your email address</li> <li>• Your Moodle username</li> <li>• If you opt to specify a Training Institution and/or a Diocese this data will be stored</li> </ul>	Statutory obligation
Course Participation Data	Your progress and time taken to go through any of the courses on the site is recorded along with answers to quizzes and longer reflections on safeguarding practice and your role in your setting.	Statutory obligation
Optional Personal Data	<ul style="list-style-type: none"> <li>• You may opt to add your Church and/or you Church Role.</li> <li>• You may opt to add information to your profile.</li> </ul>	Data revealing your religion or any other special category data is optional and is not required for you to use the resources. By entering this optional information, you are providing consent for it to be stored. You can delete it at any time

Technical Data	<ul style="list-style-type: none"> <li>• browser type and version</li> <li>• time zone setting &amp; location</li> <li>• operating systems of the devices used to access this site</li> <li>• IP address used to access this service</li> </ul>	Necessary for our legitimate interests (provision of administration and IT services, network security and to prevent fraud.)
Usage Data	<ul style="list-style-type: none"> <li>• pages visited on this site</li> <li>• interaction with resources on this site</li> </ul>	Necessary for our legitimate interests (to ensure that access to resources is restricted to specific groups of users, troubleshooting and site optimisation).

### Aggregated Usage Data

Data about the use of the various resources is aggregated. This is not personal because it does not reveal your identity. It is used to inform the development of the site and help optimise the use of the site,

We use Google Analytics to provide an overview of usage data for reporting and monitoring purposes.

### Legitimate Interest Assessment

We have a specific purpose with a defined benefit	To properly support our Statutory obligation to provide data subjects with access to online safeguarding training resources and record their participation.
The processing is necessary to achieve the defined benefit.	Technical and Usage Data needs to be collected to provide this service. Details of access to the site are stored for security, for troubleshooting and to improve the site

The purpose is balanced against, and DOES override, the interests, rights and freedoms of data subjects.	Since the processing of data is kept to a minimum and is only for the purpose of providing the data subjects with courses that they wish to use, the purpose, and our Legitimate Interest DOES override, the interests, rights and freedoms of data subjects.
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For a copy of the full Legitimate Interest Assessment please contact the person named in section 7.

#### 4. Who we collect from or share your information with:

[Show/hide](#)

We collect basic personal information about you from the information you give us and from your participation in courses. We do not collect personal information about you from any other source.

- a) We will share your Personal Data, your Optional Personal Data and your Course Participation Data with the Diocese or Training Institution that you indicated when you created your account.
- b) If you indicated that you were not part of a Church of England Diocese your data will not be shared with any Diocese.
- c) If you indicated that you are not part of a Training Institution, then your data will not be shared with any Training Institution.
- d) Your personal data will not be sent to countries outside of the UK unless you indicated that you were part of the Diocese in Europe.
- e) If you are part of the Diocese in Europe, then your data will be sent out of the UK but will not be sent to countries outside of the EU.
- f) You have the option of sharing your training record with a local safeguarding officer or equivalent by entering their email address into your profile in the appropriate place. You can revoke this permission at any time by removing this information.

When you complete a course, you will receive an email with a certificate. This may be presented to safeguarding officials from another diocese or training institution if you wish them to be able to check your personal details and your course completion details.

This site provides access and links to different resource providers. We do not provide these sites with any information about you. Each of these will have their own privacy policy and you should read their privacy policies before providing them with your information.

## 5. How long do we keep your information?

### [Show/hide](#)

If you specify that you are part of a Diocese or Training Institution, then we will keep your data for one hundred years, as Dioceses and Training Institutions need a long term record of training by their members.

If you do not specify that you are part of a Diocese or Training Institution, then we will keep your data at least 12 months from the expiry date of the most recent course undertaken, after which we will be able to delete it on request.

Course participation data for Leadership and Senior Leadership courses is retained for a maximum period of 24 months after the date of completion.

## 6. Your rights

### [Show/hide](#)

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 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
- The right to obtain and reuse your personal data to move, copy or transfer it from one IT system to another

To exercise these rights, please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

## 7. Queries, complaints or concerns

### [Show/hide](#)

If you have any queries regarding this processing activity, please contact, in the first instance,

Andrea Watkins at [SafeguardingEO@churchofengland.org](mailto:SafeguardingEO@churchofengland.org)

If you have any concerns or queries about how the the Ministry Division of the Church of England handle your personal data, please contact the Data Protection Officer at:

[gdpr@churchofengland.org](mailto:gdpr@churchofengland.org) or Data Protection Officer, Church of England Record Centre, 15 Galleywall Road, London, SE16 3PB, Tel: 020 7898 1030.

You have the right to make a complaint at any time to the Information Commissioner at <https://ico.org.uk/concerns/> or Information Commissioner's Office, Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF, Tel: 0303 123 1113 (local rate).

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I agree to the Safeguarding Training Privacy Policy

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