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St Padarns Institute (SPI) External Communication Policy

Contents

General Information

The General Data Protection Regulation (GDPR), and the main provisions of the UK's new Data Protection Act 2018, came into effect on 25th May 2018. The GDPR requires that all businesses ensure the ways they collect, manage and use any personal data are compliant with new, higher, standards of data protection. The purpose of GDPR is to protect the privacy rights and interests of individuals and it ensures that any business that trades within the EU, processes personal data in a way that respects these rights, with strict penalties for those who breach legislation or their own data processes. The key element of the legislation that impacts on the work of SPI is Article 5 which states:

1. *Personal data shall be:*

   (b) Collected for the specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall not be considered to be incompatible with the initial purposes.

Definitions

- *St Padarn's Institute*: St Padarns is the training, equipping and resourcing department of the Church in Wales.
- *Learners*: The specific groups the Institution is responsible for training, equipping and resourcing are outlined in the following sections, but for the sake of convenience they are collectively known as 'Learners'.
- *Learner Database*: This is the central storage facility for the data St Padarn's holds on its learners'.

This policy is concerned with the data SPI gathers and processes for its *Learners*.

Storage of Data

Articles 25, 26 and 32 of the GDPR Regulations are concerned with the protection and processing of data. There are several other areas outside of the Learner Database where data may be held:

1. Data being processed, for example, registration lists for UWTSD.
2. For recording initial enquiries for various courses before the individual is properly enrolled.
3. Finance records on individual student fees.
4. Representative Body Accounts Software.
5. Student records which are held on SharePoint, this includes diocesan sponsorship forms, applications, reports to bishops on individual students, etc.

6. The Virtual Learning Environment (Moodle) where participant information is stored to enable learners to access:

   o Information relevant to any modules they are studying
   o Academic guidelines and policies relating to their programme of learning
   o Turnitin for the uploading of assignments for assessment

7. Short term databases are also created from the Learner database to produce attendance registers for residentials. But these databases are deleted once the particular course is complete and attendance recorded on the Learner Database.

Regardless of where the data is stored, the same policies for its collection, storage and use apply. This is explained fully in the Church in Wales Data Retention Policy.

Areas of Personal Data Gathering

The Church in Wales

St Padarn's Institute has been mandated by the Church in Wales Bishops to provide initial and ongoing training for all those the Church in Wales has selected for training or has ordained and/or licensed for ministry within its churches – these individuals are known as *Learners*. Their information is securely stored on the SPI *Learner Database* and used specifically for training, equipping and resourcing.

Wider Educational Remit

SPI provides both undergraduate and postgraduate training in theology and associated specialisms across the UK and beyond. As well as non accredited courses such as Beginning Chaplaincy. Data on these students is stored on the *Learner Database* and includes:

   o contact and personal information required in order to administer the application process.
   o information required to inform decision-making about the applicant's suitability for their chosen programme of study.
   o equality and diversity monitoring.

Discipleship

There is a third category of data that is stored on the *Learner Database* and is there to enable SPI to communicate to those who have *specifically asked* to be kept updated with training opportunities and resources in their specific field. The area to note here is that of *informed consent,* and is covered under Article 7 of the GDPR Regulations. For SPI to keep information under this category requires *informed consent*, this can be achieved by asking those who have contact with SPI to indicate that they would like to be updated of future training and resources. It is important to note that consent can also be withdrawn.

Contacting those on the Learner Database

With the aforementioned provisions in place, the *Learner Database* is an effective tool for contacting and communicating to individuals. But there are two essential elements to this:

- Article 5 - The data can only be used for the purpose it was collected, ie, training (including education), equipping and resourcing.
- Articles 32 - The processing of personal data must be protected. Hence the number of people with permission to access, process and retrieve data must be appropriately limited.

While not specifically mentioned in the legislation, it is important that those on the *Learner Database* are not inundated with information and that the information that we send out is appropriate, for example, we wouldn't send out sales information for third parties. Therefore, the following patterns of communication are in place:

Programme Specific

Information goes out from FLM, NLM, MD, Undergraduate and Postgraduate departments to those who are part of their programmes as and when necessary.

Ministry Area Specific

There are times when specific subject areas are targeted, ie, Youth Workers Training, Resources for all Licensed Ministers, Pioneer Community events. However, it for the Senior Leadership Team to agree the sending out to specific audiences, and requests should be brought/sent to the weekly SLT meeting.

Breach of Policy

Breach of this policy may be considered a disciplinary offence and could be dealt with under the appropriate disciplinary policy and its related procedures. Where an offence has occurred under UK law, it may also be reported to the police or other appropriate authority. Therefore, if in any doubt, please contact the Director of Operations before e-mailing or posting to external recipients.

Further Information

St Padarn's Institute is part of the Representative Body of the Church in Wales, and as such comes under its policies. The Church in Wales operates under one Data Protection Policy which can be found at: https://www.churchinwales.org.uk/privacy-notice/. Further details of how St Padarn's handles data can be found via the same link under the section Privacy Notices: St Padarn's Students, along with other related documents.