



Biblical Counselling UK

## Intern Scheme Privacy Policy

**Policy last updated:** May 2021

**Date of next review:** April 2022

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## **Aim of Privacy Notice**

Biblical Counselling UK values the individuals who share their details with us – for example in order to keep informed of our work, to support us financially, to attend our conferences, or apply for training courses or resources we offer. We respect your privacy and we are committed to ensuring that your personal data is kept safe and used in a way that you would reasonably expect.

This privacy policy sets out how Biblical Counselling UK processes and protects the personal information that is given to us when you enquire and/or apply to the Intern Scheme, and when you become an Intern and graduate from the Scheme. We aim to be clear about how we collect, store and use your data and to let you know your rights, including how to stop receiving communications from us.

If there are any significant changes to this policy we will let you know by email.

If you have any questions about this policy, please email the Data Controller – [info@biblicalcounselling.org.uk](mailto:info@biblicalcounselling.org.uk), or write to: The Data Controller, Biblical Counselling UK, c/o Christ Church, Christchurch Street, Cambridge, CB1 1HT.

Biblical Counselling UK is Charitable Incorporated Organisation. Our Registered charity number is 1164965. Our registered address is Christ Church, Christchurch Street, Cambridge, CB1 1HT.

## **Your rights**

You can ask for a copy of the information we hold about you at any time. Please write to the Data Controller, Biblical Counselling UK, c/o Christ Church, Christchurch Street, Cambridge, CB1 1HT, with details of the information you would like to see and proof of your identity.

If you have any concerns about the data we hold or how we process it, please contact us at the above address. If your issue is not resolved you can contact the Fundraising Regulator or the Information Commissioner.

## **Enquirers to the Intern Scheme**

### **How we collect and use your personal data**

We will collect personal information from you when you enquire about the Intern Scheme. This includes your name, surname, email address, the church you attend, how many Certificate Course modules you have taken and whether you are considering an application to the Intern Scheme for the next intake. We will also process any additional information you choose to share with us that is relevant to an application to the Intern Scheme, such as how many hours per week you might have to participate in the Intern Scheme and any follow-up communication we have with you.

We collect this information from the email or phone communication with you when you enquire.

We process the information you share with us on the basis of legitimate interests, as doing so allows us to keep track of application trends, assess the resources needed to facilitate the next intake of Interns and enable follow-up communication with enquirers.

### **How long will we keep your personal data?**

We will keep a record of enquirers indefinitely. This record retains your name, surname, church and brief notes on communication. Not all enquirers decide to apply for the next academic year but express a desire to do so in the future, so we retain this record to facilitate progress in future years and for tracking trends in the application process.

Any other information you share with us will only be kept as long as is reasonable and necessary, and we will only use it for the designated purposes.

### **How we keep your data secure and who has access to it.**

We are committed to holding your information securely. In order to prevent unauthorised access or disclosure, we have put in place a number of administrative and technological safeguards. These include use of passwords, restricted access, technical and physical security. The only people who access your data are those who have been nominated and trained.

Your name and contact information will not be added to our mailing lists when you enquire. We will never sell or trade your personal information to third parties.

## Applicants to the Intern Scheme

### How we collect and use your personal data

#### Application Form

We will collect personal information from you when you apply to the Intern Scheme. This includes a photograph to enable the Director of the Intern Scheme to recognise applicants and learn their names. We collect this information using the forms you fill in and send us to register your application.

The information we collect includes your name, age, contact information including phone numbers and personal email address, home address, family information including spouse and children, church information, work and educational background and personal statements.

We process the information you provide on the legal basis of contract. We process Special Category (“personal data revealing religious or philosophical beliefs”) data that you provide under the Article 9 “not-for-profit-bodies” condition of the UK GDPR.

The information you provide is used to assess your suitability to the Intern Scheme to which you are applying. It is shared securely with the Director of the Intern Scheme, the Executive Director, the Senior Administrator and members of the application assessment team.

We request from you the name and contact details of your church’s safeguarding officer, senior pastor and your proposed local supervisor. We process their contact information under the legal basis of legitimate interests and request you obtain their consent to put their information on the form.

#### References

We request from you the name and contact details of two referees in order to contact them to supply a reference. We process their contact information under the legal basis of legitimate interests and request you obtain their consent to put their information on the form.

We also request you provide the name and contact information of a relevant Certificate Course Tutor or BCUK / CCEF Recitation Instructor to provide input on your engagement in the modules. We process their contact information under the legal basis of legitimate interests and request you obtain their consent to put their information on the form.

#### Due Diligence Form

We ask your senior pastor to fill out a due diligence form to indicate whether you have a DBS check in place for your proposed role. We also ask the senior pastor to indicate whether they have any concerns about your suitability for your role as intern, and where relevant, whether your immediate family have any known concerns about your suitability for the role of Intern.

We process this information on the legal basis of legitimate interests and process Special Category (“personal data revealing religious or philosophical beliefs”) data that is provided under the Article 9 “not-for-profit-bodies” condition of the UK GDPR.

#### Grant Information

If you fill out a grant application form, we will collect the contact information of your church’s treasurer. We process their contact information under the legal basis of legitimate interests and request you obtain their consent to put their information on the form.

#### Communication about your application

Occasionally applicants have questions for the Director of the Intern Scheme or vice versa once the application forms have been received. There will also be contact to arrange an interview with each applicant and their pastor. Where further information is shared that is useful in assessing your suitability to the role of Intern, this will be passed on to members of the assessment team on the legal basis of legitimate interests.

#### Interview

All applicants and their pastors will be invited to an online video interview with the Executive Director and the Director of the Intern Scheme. You will be asked questions and have an opportunity to ask any of us. After the interview, a short, written summary about your contributions will be passed on to the remaining members of the assessment team to aid decision-making. We collect and process this information on the legal basis of legitimate interests.

We use Zoom for our interviews. You can read Zoom’s privacy policy [here](#).

### **How long will we keep your personal data?**

We will keep a record of applicants indefinitely. If accepted, this record retains your name, surname, email, year you applied, church information, your acceptance status, your church leader, local supervisor contact information, safeguarding officer contact information, any safeguarding concerns that arose during time as Intern and your ongoing relationship with Biblical Counselling UK (if any). If not accepted, this record retains your name, application status, application year, church and church leader name.

We will store the forms and information of applicants who are accepted onto the Intern Scheme for the duration of their time as Interns. Please see the privacy notes for alumni on what we retain after the Scheme ends.

We will delete the forms and references of applicants who are not offered a place in September of each academic year. We will delete the forms of applicants who withdraw from the Scheme part-way upon request.

Any other information you share with us will only be kept as long as is reasonable and necessary, and we will only use it for the designated purposes.

## **How we keep your data secure and who has access to it.**

We are committed to holding your information securely. In order to prevent unauthorised access or disclosure, we have put in place a number of administrative and technological safeguards. These include use of passwords, restricted access, technical and physical security. The only people who access your data are those who have been nominated and trained.

Your name and contact information will not be added to our mailing lists when you apply. We will never sell or trade your personal information to third parties.

## Interns

### How we collect and use your personal data

Once you become an Intern, information about you increases during your time on the Scheme through your participation in meetings, communications, and reports generated by you or about you from your local supervisor and mentor.

We are committed to protecting your personal data and would not do anything with it that you would not reasonably expect. We process much of your personal information during your time as an Intern on the legal basis of legitimate interests in pursuit of our aims to:

- Enable Biblical Counselling UK to achieve its strategic goals for the Intern Scheme
- Support Interns and churches in achieving their biblical counselling goals
- Improving the Intern Scheme
- Encouraging spiritual growth
- Communication with Interns, Local Supervisors and Mentors on the Scheme
- Safeguarding and the promotion of welfare of Interns and others who come into contact with the Intern Scheme
- Ensuring all relevant legal and statutory obligations of Biblical Counselling UK are complied with (for example, Charity Commission, financial auditing).

We process Special Category (“personal data revealing religious or philosophical beliefs”) data that you provide under the Article 9 “not-for-profit-bodies” condition of the UK GDPR.

Further points of clarification or exceptions to legitimate interests are outlined in the information below.

#### Phone Number

We will obtain your consent to add your name and number to the Director of the Intern Scheme’s mobile phone in the event of needing to get in contact with you regarding the timing of meetings, phone calls to support your time as an Intern or to aid with travel to in-person events. We may also make use of Whatsapp groups to facilitate cohort interaction but your number would only be added and shared with fellow Interns with your express consent. Whatsapp’s privacy policy is [here](#).

You may withdraw consent at any time, and we will not use your number in a way that you would not reasonably expect. Should you withdraw consent, communication will happen via email.

#### Email Address

We will share your email address with your mentor and with your fellow first and second year Interns to facilitate the Scheme. We may also need to share your name and email address to members within the Biblical Counselling UK team to enable communication and carry out the activities of the Intern Scheme (eg. Paying grant instalments, helping you sign up to the residential conference). We will only share your email address where it is reasonable and expected, and we will not share your email address with those outside of the Biblical Counselling UK team and Intern cohort without your express consent.

## Grants and Expenses

Where Interns are receiving a grant and are not employees of their church, we will make grant payments directly to the Intern's personal bank account. When you provide us with your bank account details, we will store your bank account details as a "saved payee" in our online bank account under the legal basis of contract for the duration of your time as Intern.

Where funds allow, Biblical Counselling UK seeks to cover travel expenses of Interns to in-person training days. In order to reimburse these expenses, we will ask for your personal bank details. We will store your bank account details as a "saved payee" in our online bank account under the legal basis of contract for the duration of your time as Intern.

## Recorded meetings

Intern meetings are mainly held online via Zoom. Zoom's privacy policy is available at <https://zoom.us/privacy>.

The purpose of meetings is live interaction. However, at times we will record training meetings (but never peer supervisions) to share with Interns who are absent from a seminar. Where meetings on Zoom are recorded, Biblical Counselling UK is the data controller and Zoom is the data processor. Interns' personal data is processed under the legal basis of contract.

Where a meeting is being recorded, the Director of the Intern Scheme will inform Interns and this is indicated in the on-screen display in Zoom. Only the main sessions can be recorded. The breakout rooms cannot be recorded. Recordings are stored in the Zoom cloud, and in Biblical Counselling UK's file storage.

## Safeguarding & Duty of Care

Safeguarding responsibilities for those you meet with in your church or local area remain with you and your church. However, where Biblical Counselling UK has concern for the Intern's personal welfare or how safeguarding matters are being handled by the Intern's church, we may make and keep an internal record for our own documentation to ensure we protect and promote the welfare of Interns. We may also be required to share information externally with local authorities, police or externally appointed safeguarding advisors. We process this information on the legal basis of legitimate interests, but where appropriate, we may process data on an alternative legal basis, such as legal obligation.

## Audio Recordings

To enable continued growth in conversation skill and wisdom, you may record the audio of conversations you have with one or more individuals at your church if possible. You must do so only after you have obtained signed consent of the individual and you are confident they understand why and how the audio is recorded and shared. You will be given a separate document on this. You must provide evidence to Biblical Counselling UK that you have obtained the individuals' consent to have their audio recording uploaded to a Biblical Counselling UK Dropbox folder.

You are the data controller for this information, and Biblical Counselling UK is the data processor. We process this information on the legal basis of consent, which may be



withdrawn at any time by the person who has been recorded. The audio recording will be uploaded by you to the Dropbox folder that is shared between you, your Mentor and the Director of the Intern Scheme. You must delete the audio recording immediately after the mentor and Intern have discussed the recording.

#### United for Mission Partnership

Biblical Counselling UK has formed a partnership with United for Mission (UFM) whereby interested Interns can opt in to become volunteers to UFM to provide pastoral support to their mission partners. Once an Intern has expressed interest in volunteering to UFM in this way, the Intern's name, contact information and information regarding their availability and issues they are or are not interested in will be shared via a secure Google Drive account with the UFM pastoral worker on the legal basis of legitimate interests. Once Interns enter a signed volunteer contract with UFM, UFM's data policies apply and will be provided to the Intern.

#### Conferences

Interns are expected to attend the Biblical Counselling UK residential conference where possible. Please see the [main privacy policy](#) for further details of how we collect and use your information in relation to the conference. Your name and contact details will be passed on to our in-house event organiser to assist in planning the conference.

#### Photography & Publications

We will obtain your consent to take photographs (ie. At the conference or Intern training days) which may be used in publicity or news to supporters. You may withdraw your consent at any time.

We will obtain your consent to use Garnering Story submissions in mailings to supporters. You may withdraw your consent at any time.

### **How long will we keep your personal data?**

We will keep a record of Interns indefinitely. This record retains your name, surname, email, year you applied, church information, your acceptance status, your church leader, local supervisor contact information, safeguarding officer contact information, any safeguarding concerns that arose during time as Intern and your ongoing relationship with Biblical Counselling UK (if any).

We will store the forms and information of applicants who are accepted onto the Intern Scheme for the duration of their time as Interns. Please see the privacy notes for alumni on what we retain after the Scheme ends.

Any other information you share with us will only be kept as long as is reasonable and necessary, and we will only use it for the designated purposes.

## **How we keep your data secure and who has access to it.**

We are committed to holding your information securely. In order to prevent unauthorised access or disclosure, we have put in place a number of administrative and technological safeguards. These include use of passwords, restricted access, technical and physical security. The only people who access your data are those who have been nominated and trained.

Where handwritten notes are taken during meetings for the purpose of follow-up, notes are kept anonymous and physically secured in locked rooms and cabinets.

Your name and contact information will not be added to our mailing lists when you apply. We will never trade or sell your personal information to third parties.

## **Mentors**

Where the Director of the Intern Scheme does not already have your name and contact information through other connections you have had or currently do have with Biblical Counselling UK, the Director of the Intern Scheme may obtain this information from another party within the Biblical Counselling UK team (eg. The Senior Administrator) on the legal basis of legitimate interests.

Once you become a mentor, we process your name and contact information and share it with your Intern and their Local Supervisor as well as those within the Biblical Counselling UK team to fulfill the goals and aims of the Intern Scheme on the basis of legitimate interests.

We will indefinitely retain a record of all applicants to the Intern Scheme that includes the mentor's name if the applicant was accepted. We process this information on the legal basis of legitimate interests and it is used to help us track interest in the Scheme and for historical records.

The following sections from the Intern part of this policy also apply to Mentors: Expenses, Recorded Meetings, Safeguarding and Photography.

## **Local Supervisors**

We collect and process your name, email address and phone number you are nominated by an applicant on their application form. We do so on the legal basis of legitimate interests.

We will retain a record of all applicants that includes the local supervisor's name if the applicant was appointed as an Intern to keep track of who has applied for the Scheme over the years. We process this information on the legal basis of legitimate interests and it is used to help us track interest in the Scheme and for historical records.

Local Supervisors will be connected via email to their Intern's mentor for the purpose of facilitating the Scheme.

Throughout the Scheme, the Director of the Intern Scheme may email local supervisors about the Scheme or upcoming invitations to Biblical Counselling UK events, on the legal basis of legitimate interests. We will blind carbon copy your email address in these mailings. Local supervisors may request to stop receiving these emails at any time by emailing [interns@biblicalcounselling.org.uk](mailto:interns@biblicalcounselling.org.uk), and they will no longer receive these emails once their engagement with the Intern Scheme ends.

The following sections from the Intern part of this policy also apply to Local Supervisors: Recorded Meetings, Safeguarding and Photography.

## **Safeguarding Officers**

We collect and process your name, email address and/or phone number when an individual from your church jointly applies to the Intern Scheme alongside your church leadership. We do so on the legal basis of legitimate interests and may contact you if a safeguarding matter is mentioned in peer, training or mentor meetings to ensure that safeguarding policies have been followed if we are

unsure. We will store your name and contact information on our record of applicants if the individual is accepted onto the Scheme, on the legal basis of legitimate interests in case a need to contact you in the future arises, however unlikely.

## **Church Treasurers**

We collect and process your name, email address and/or phone number when an individual from your church jointly applies to the Intern Scheme alongside your church leadership and applies for a grant.

We will contact you to retrieve the church's bank details in order to make grant payments. We will also email you when we make each of the three installments of the grant to confirm receipt. We collect and process this information on the legal basis of contract. Our communication with you will cease when the Intern Scheme ends.

## **Intern Alumni**

### **How we collect and use your personal data**

On completion of your time as an Intern, we will use some of the information obtained during your time as an Intern to continue our relationship with you as alumni.

We will retain a record of all Interns that includes your name, email address, church name, church address, participating years, church leader's name, mentor and your local supervisor's name. We will update this list with your ongoing relationship with us (eg. If you become a Mentor in future years). We also include a note on whether there were any safeguarding concerns that arose to our knowledge while you were an Intern. If there were any safeguarding concerns that arose, we will retain a record according to our safeguarding policy. This record is used to help us track trends and maintain historical records.

We will retain your mentor and local supervisor reports for two years following your graduation, after which they will be deleted. Your application forms, references and remaining items in your Dropbox folder will be deleted upon completion of the Scheme, but we will notify you to retrieve any items you would like to save before we do so.

We may share the name and general geographical location of Alumni with Certificate Course tutors for the purpose of connecting regional venues with local people who have received training in biblical counselling, either to help promote the Intern Scheme at the venue or to help with the course itself. We process this information on the legal basis of legitimate interests. Contact information will not be shared unless the Alumnus gives their express consent for it to be shared with the requesting individual and we will remove individual information off the list upon request.

We will obtain your consent to retain your phone number after you leave the Scheme, and your consent can be withdrawn at any time. We would like to retain your number for the ongoing purposes of networking and maintaining communication as appropriate to our ongoing relationship with you.

We may contact Intern Alumni from time to time to inform them of upcoming events or contact them about opportunities to be involved with Biblical Counselling UK. We do so on the basis of legitimate interests and Alumni are free to request they stop receiving any such emails by emailing the Data Controller for the Intern Scheme at [interns@biblicalcounselling.org.uk](mailto:interns@biblicalcounselling.org.uk) or writing to the Data Controller c/o The Director of the Intern Scheme Biblical Counselling UK, c/o Christ Church, Christchurch Street, Cambridge, CB1 1HT.

## **How long will we keep your personal data?**

We will keep the record of Interns indefinitely. We will retain your mentor and local supervisor reports for two years following your graduation, after which they will be deleted. Your application forms, references and remaining items in your Dropbox folder will be deleted upon completion of the Scheme, but we will notify you to retrieve any items you would like to save before we do so.

Any other information you share with us will only be kept as long as is reasonable and necessary, and we will only use it for the designated purposes.

## **How we keep your data secure and who has access to it.**

We are committed to holding your information securely. In order to prevent unauthorised access or disclosure, we have put in place a number of administrative and technological safeguards. These

include use of passwords, restricted access, technical and physical security. The only people who access your data are those who have been nominated and trained.

Your name and contact information will not be added to our mailing lists unless you personally choose to do so. We will never trade or sell your personal information to third parties.