

St Edmundsbury Cathedral



Safeguarding Privacy Notice

St Edmundsbury Cathedral is committed to protecting your personal data. Personal data is any information relating to an identified or identifiable person.

This privacy notice explains what to expect when the Cathedral collects your personal information **in relation to safeguarding**.

1. When we would collect and use personal data

We would collect and use your personal information to carry out our safeguarding responsibilities for the following activities:

- Ensuring the safety of those that work for or are employed by St Edmundsbury Cathedral, including contractors and office holders, members of the Cathedral Community and the public
- Investigating safeguarding allegations
- Maintaining records and case files regarding safeguarding incidents and/or investigations
- Providing training
- Providing support to individuals involved in safeguarding cases
- Liaising with public, statutory and regulatory enquiries (including legal and independent reviews and inquiries), local authorities and courts and tribunals
- Being involved in litigation, dispute resolution and judicial process (including liaison with external advisers)

2. The categories of personal data for safeguarding purposes:

The types of information we may process include:

- personal details
- contact information
- family details
- lifestyle and social circumstances
- employment and education details
- housing needs

We may also process “special categories” of information that may include:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- health;
- sex life; or
- sexual orientation
- criminal allegations, proceedings or convictions.

We process personal information about:

- current, retired and prospective clergy
- employees
- volunteers
- complaints of misconduct and unlawful acts
- individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution
- professional advisers and consultants
- children and parents
- individuals whose safety has been put at risk

3. The lawful basis for using your information

We collect and use personal data as explained below.

- **Legitimate interest** – we may need to process your information to undertake safeguarding tasks, including doing all that we reasonably can to ensure that no-one is at risk of harm during Cathedral-activities.

Legitimate Interest Assessment

Legitimate Interest

We have a duty of care to our Cathedral Community to provide a safe environment in which to worship, work or volunteer. On that basis, we hold HR records for staff members in line with safer recruitment. Volunteers in certain roles are also required to complete a DBS check, the result of which is recorded on a Spreadsheet. The Cathedral also securely holds Safeguarding Agreements that are specific to the Cathedral. We hold this information in the context of Safeguarding so that in

considering matters which are brought to our attention we can identify any potential wrongdoing, inappropriate behaviour, or unlawful conduct, and put in place a safer way of working across the Cathedral Community.

Necessity

In order to safeguard our staff, volunteers, children and visitors it is necessary to hold this information. Unless we properly appreciate the detail of those matters referred to, we cannot take steps to ensure that we have provided the most appropriate safeguarding response.

Balancing

There is the risk of significant and/or serious harm to others if unsuitable individuals are appointed. This risk is greatest where allegations are not properly addressed. This is balanced against, and does not override, an individual's interests, rights and freedoms.

- **Legal obligation** – we may need to process your information in order to comply with a legal obligation, such as under the Inquiries Act 2005 which may compel us to provide personal data for the purposes of a statutory inquiry, or a referral to the Disclosure and Barring Service under the Safeguarding Vulnerable Groups Act 2006, or an order of a court or tribunal.

Special categories & criminal information

- **Substantial public interest** (protecting the public against dishonesty etc.) – we may need to process your information where necessary for the protection of members of the public generally against seriously improper conduct, and from any failures in connection with, the Cathedral’s activities, or for safeguarding purposes.

This lawful basis is applied in the UK only, with reference to the GDPR Article 9(2)(g), and the Data Protection Act 2018 Schedule 2, paragraph 11. For those based outside the UK in other jurisdictions, they will have to ensure that their Member State law provides similar or equivalent use of 9(2)(g).

- **Legal claims** – we may need to process your information where there is a legal claim, or in connection with a judicial process.

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

Where necessary (or required), we collect from or share information with:

- Parishes e.g. Parochial Church Councils (PCCs) and relevant PCC members, diocesan bodies, bishops’ offices and cathedrals.
- candidates, prospective employees, employees or other staff members (including contractors, workers, consultants and volunteers, including members of any “Core Group”)
- legal representatives
- parties and individuals involved in or connected with legal claims, inquiries, reviews and dispute resolution (including mediation and arbitration)
- healthcare, social and welfare organisations or providers of health, social care or welfare services
- educational institutions
- governance bodies and committees
- local and central government
- regulatory and statutory bodies
- law enforcement and prosecuting authorities

- courts and tribunals and providers of legal services
- members of the judiciary
- charitable, religious and voluntary organisations
- statutory, public, regulatory or other legal or independent reviews or inquiries, including any “lessons learned” reviews

Once your information has been collected by the Cathedral it may be used by Staff Members, where necessary, to provide a complete service to you, and we do this on the lawful bases listed above.

5. Your personal data will not be sent to countries outside the EEA without your consent, and with necessary safeguards.

The Cathedral does not share your information with countries outside of the UK or EEA without your consent and necessary safeguards.

6. How long do we keep your information?

There’s often a legal and/or business reason for keeping your information for a set period, as stated in our document *Chapter and Verse (The Care of Cathedral Records)*, available upon request from The Administrator – People and Policies.

7. Security

We are committed to ensuring that your personal data is secure. We limit access to data on a need to know basis and test our security practices and technologies.

Employees and temporary workers are required to follow policies and procedures and complete mandatory annual training to understand data protection and information security.

If a data breach does occur, we will do everything in our power to limit the damage. In the case of a high-risk data breach, and depending on the circumstances, we will inform you about the breach and any remedial actions to prevent any further damage. We will also inform the Information Commissioner’s Office of any qualifying data breaches.

8. Your personal data will not be used for any automated decision making without access to human intervention.

9. Your rights

You have the following rights regarding your personal data, subject to exemptions:

1. The right to request a copy of your personal data

2. The right to rectify your data if you think it is inaccurate or incomplete
3. The right to request that your data being erased, in certain circumstances
4. The right to restrict processing of your data, in certain circumstances
5. The right to request that we transfer your data to you or another organisation, in certain circumstances
6. The right to object to our processing of your data if the process forms part of our public tasks, or is in our legitimate interests

To exercise these rights please contact the Data Protection Lead using the contact information provided below.

10. Complaints or concerns

If you have any concerns or queries about how the Cathedral handles your personal data, please contact the Data Protection Lead at dataprotectionlead@stedscathedral.org

or

Data Protection Lead, Cathedral Office, Abbey House, Angel Hill, Bury St Edmunds, Suffolk, IP33 1LS

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.

11. Reference documents

For further information on St Edmundsbury Cathedral please go to:

<https://stedscathedral.org/>

For further information on our safeguarding statement and Safeguarding Complaints Policy please see:

<https://stedscathedral.org/safeguarding/>

For further information on safeguarding in the Diocese of Ipswich and St Edmundsbury, please see:

<https://www.cofesuffolk.org/safeguarding>