



SAFEGUARDING PRIVACY NOTICE BLACKBURN CATHEDRAL

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

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

1. Data controller(s)

Blackburn Cathedral is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes. A description of what data is processed and for what purposes is set out in this Safeguarding Privacy Notice.

The Church of England is made up of a number of different organisations and office-holders who work together to deliver the Church's mission in each community. The Cathedral works together with:

- the Bishops of the Diocese of Blackburn; and
- the Diocese of Blackburn, which is responsible for the financial and administrative arrangements for the Diocese of Blackburn including safeguarding.

As the Church is made up of all of these persons and organisations working together, we may need to share personal data we hold with them so that they can carry out their responsibilities to the Church and our community. The organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

2. Why we collect and use your personal data

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

- Ensuring the safety of those who work for or are employed by Blackburn Cathedral, including contractors and office holders, volunteers and the public;
- Investigating safeguarding allegations;
- Undertaking risk assessments;
- 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); and
- Managing archived records for historical and research reasons, including the management and administration of access to our collections.

3. The categories of personal data we collect:

The types of information we process include:

- personal details
- contact information
- family details
- lifestyle and social circumstances
- employment and education details
- housing needs
- details of misconduct and unlawful acts e.g. the nature of any allegations

We 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 (see wording below)
- volunteers
- 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

4. The lawful basis for using your information

We collect and use personal data as explained below.

- **Public task** – we may need to process your information to undertake a duty or task in the public interest. This includes making sure that the Cathedral activities are safe for everybody.
- **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

We have undertaken a Legitimate Interest Assessment which sets out why we have a legitimate interest.

We have a specific purpose with a defined benefit	The consideration of matters which are brought to our attention in order that, amongst other things, we can identify any potential wrongdoing, inappropriate behaviour, or unlawful conduct, and put in place a safer way of working across the Church of England.
The processing is necessary to achieve the defined benefit.	Unless we properly appreciate the detail of the matters to which you refer we cannot take steps to ensure that we have provided the most appropriate safeguarding response.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	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, your 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 activities, or for safeguarding purposes.
- **Legal claims** – we may need to process your information where there is a legal claim, or in connection with a judicial process.
- **Archiving** - we may keep your information for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

5. 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);
- 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;
- 3rd party data processors;
- local and central government;
- both houses of parliament and members of parliament;
- 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;
- survey and research organisations; and
- 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 other National Church Institutions (NCIs), where necessary, to provide a complete service to you, and we do this on the lawful bases listed above. It is for this reason that we link your information together, for example, to save you providing your information more than once.

6. 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.

7. How long do we keep your information?

There is often a legal and/or business reason for keeping your information for a set period and we keep data in accordance with the guidance set out in the guide “Chapter and Verse – The Care of Cathedral Records” produced by the Church of England Record Centre.

8. 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.

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

10. 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 Cathedral's Executive Director using the contact information provided below.

11. Complaints or concerns

If you have any concerns or queries about how the Cathedral handles your personal data, please email: info@blackburncathedral.com

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.

12. Reference documents

For further information on the Cathedral Safeguarding Policy:

<https://www.blackburncathedral.com/wp-content/uploads/2019/03/Cathedral-Safeguarding-Policy-updated-March-2019.pdf>

For further information on retention please see the guide "Chapter and Verse – The Care of Cathedral Records" produced by the Church of England Record Centre which is available from the Church of England website at: <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

Practice Guidance: Responding to, assessing and managing safeguarding concerns or allegations against church officers (2017):

<https://www.churchofengland.org/sites/default/files/2017-12/Responding%20PG%20V2.pdf>

Responding to Safeguarding Concerns or Allegations that relate to Children, Young People and Vulnerable Adults Practice Guidance (2018):

<https://www.churchofengland.org/sites/default/files/2018-11/Responding%20to%20Safeguarding%20Concerns%20or%20Allegations%20that%20relate%20to%20Children%2C%20Young%20People%20and%20Vulnerable%20Adults.pdf>