

Nottingham Roman Catholic
Diocesan Education Service



PRIVACY NOTICE

Version 1 – 25 May 2018

INTRODUCTION

The Nottingham Roman Catholic Diocesan Education Service is committed to collecting and using personal information responsibly, proportionately, securely and fairly.

Information that we hold in relation to individuals is known as “*personal data*”. This will include data that we obtain from you directly and data about you that we obtain from other people and Data Controllers. We might also need to continue to hold your *personal data* for a period of time. Anything that we do with an individual’s *personal data* is known as “*processing*”.

This policy sets out what *personal data* we will gather and hold about individuals, why we process that data, who we share this information with and your rights in relation to your *personal data* processed by us.

We may make changes to this Notice from time to time as our organisational practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance, and wherever possible seek consent) or otherwise than is permitted by data protection laws.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or *processing* personal information about you, so that you are aware of how and why we are using such information.

This Notice applies to information about living identifiable individuals only.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you (and or your child/children) must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

ON WHAT GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

We must have a lawful basis for *processing* your information; this will vary according to the circumstances of how and why we have your information but typical examples include:

- the activities are within our legitimate interests in advancing and maintaining the Roman Catholic religion;
- you have given consent (which can be withdrawn at any time by contacting us) for us to process your information (e.g. to send you information or by email or SMS);
- we are carrying out necessary steps in relation to a contract to which you are party or prior to you entering into a contract (e.g. where you enter into a hire agreement for one of our facilities);
- the *processing* is necessary for compliance with a legal obligation (e.g. where we pass on information to a local authority for safeguarding or other reasons);
- the *processing* is necessary for carrying out a task in the public interest; or
- to protect your vital interests (e.g. if you were unfortunate enough to fall ill or suffer an injury on our premises, then we may pass on information to the NHS for treatment purposes);
- If we process any *special categories of personal data* we must have a further lawful basis for the *processing*. This may include:
 - where you have given us your explicit consent to do so (e.g. to cater for your medical or dietary needs at an event);
 - where the *processing* is necessary to protect your vital interests or someone else's vital interests (e.g. passing on information to the Police);
 - where the *processing* is carried out in the course of our legitimate interests as the NRCDES working with and supporting our schools and the information is not shared outside the Diocese other than with your consent.
- you have made the information public;
- where the *processing* is necessary for the establishment, exercise or defence of legal claims;
- where the *processing* is necessary for carrying out the Diocese's employment and contractual obligations; or
- the *processing* being necessary for reasons of substantial public interest (e.g. where steps are taken to prevent fraud or other dishonest activity);
- provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a Roman Catholic diocese and charitable institution.

WHAT PERSONAL DATA DO WE HOLD ABOUT YOU?

We may hold the following types of *personal data*:

- name and contact details;
- gender, age, date of birth, marital status and nationality;
- information about your education/work history and professional qualifications;
- information about your family and any dependants;
- information about your current involvement in diocesan activities and events;
- financial information (e.g. bank details) and details of any donations you have made to us in the past;
- information obtained as a result of any background checks on volunteers;
- any other information which you knowingly and voluntarily provide to us, and allow us to keep;
- we may also hold *special categories of personal data* e.g. information about your religious beliefs, information about your health and wellbeing, information revealing racial or ethnic origins or in the case of background checks, information about criminal records or proceedings;
- we may also receive and process *personal data* about you from third parties, for e.g. schools, employment and character referees and Local Authorities. The third party should make you aware of this.

HOW AND WHY DO WE PROCESS YOUR PERSONAL DATA?

The *personal data* which we hold about you, whether it is collected directly from you or whether we receive it from a third party, may be Processed in a number of ways, e.g.:

- to communicate with you in relation to news about or activities and events taking place in the diocese, including seeking feedback and informing you of any changes to our activities;
- to improve our activities and the way we communicate with you.
- to carry out our activities.
- to process donations that you may make to us or other payments where, for example, you hire facilities belonging to the NRCDES;
- to administer, support, improve and develop the administration of our work and operations and to keep NRCDES accounts and records up-to-date;
- to process applications from you, including grant applications and applications for a role within the NRCDES; to ensure we comply with our legal obligations (e.g. by providing information to the Charity Commission or HMRC or carrying out safeguarding activities).

HOW LONG WILL WE HOLD YOUR PERSONAL DATA FOR?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

WHO WILL WE SHARE YOUR INFORMATION WITH?

- We will only use your *personal data* within the NRCDES for the purposes for which it was obtained.
- Sometimes the NRCDES contracts with third parties whom we ask to process *personal data* on our behalf (e.g. IT consultants, appeals clerks, appeals panel members, schools and local authorities). We require these third parties to comply strictly with our instructions and with Data Protection and GDPR Laws.
- We have in place administrative, technical and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised *processing* or disclosure of the *personal data* that we hold.

YOUR RIGHTS

You also have the right, in certain circumstances to:

- Object to the *processing* of your *personal data*.
- Have accurate or incomplete *personal data* about you rectified.
- Restrict *processing* of your *personal data*.
- Object to the making of decisions about you taken by automated means.
- Have your data transferred to another organisation.
- Claim compensation for damage caused by a breach of your data protection rights.
- If we process your *personal data* on the basis that we have your consent, the right to withdraw that consent.
- the right to ask that we delete your *personal data* where there is no compelling reason for us to continue to process it.

Please note that the above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your *personal data*. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

CONTACT DETAILS

- If you have any questions, require further information about how we protect your *personal data*, if you wish to exercise any of the above rights or if you would like to provide feedback or make a complaint about the use of your information, please contact the Diocesan Data Protection Officer at dpo@nottingham-des.org.uk
- Any complaints will be dealt with in accordance with the NRCDES Complaints Policy.
- We hope that we can satisfy any queries you may have about the way in which we process your *personal data*. However, if you have unresolved concerns you also have the right to complain to the Information Commissioner ('ICO') (www.ico.org.uk).

GLOSSARY

"Data controller" means a person, organisation or body that determines the purposes for which, and the manner in which, any *Personal data* is processed. A *data controller* is responsible for complying with the data protection laws including the GDPR and establishing practices and policies in line with them.

"Data processor" means any person, organisation or body that processes *personal data* on behalf of and on the instruction of the NRCDES. *Data processors* have a duty to protect the information they process by following data protection laws.

"Data subject" means a living individual about whom the Diocese processes *personal data* and who can be identified from the *personal data*. A *data subject* need not be a UK national or resident. All *data subjects* have legal rights in relation to their *personal data* and the information that the NRCDES holds about them.

"Personal data" means any information relating to a living individual who can be identified from that information or in conjunction with other information which is in, or is likely to come into, the NRCDES possession. *Personal data* can be factual (such as a name, address or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. A mere mention of someone's name in a document does not necessarily constitute *personal data*, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition.

"Processing" means any activity that involves use of *personal data*. It includes obtaining, recording or holding the information or carrying out any operation or set of operations on it, including organising, amending, retrieving, using, disclosing, erasing or destroying it. *Processing* also includes transferring or disclosing *personal data* to third parties.

"Special categories of personal data" (previously called sensitive *personal data*) means information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexuality. It also includes genetic and biometric data. *Special categories of personal data* can only be processed under strict conditions and such *processing* will usually, although not always, require the explicit consent of the *data subject*.