

Truro Cathedral Visitation

1. Introduction and data controller

This privacy notice explains why and how personal data is processed by the members of the external Visitation Team led by the Bishop of Stepney, the Rt Revd Dr Joanne Grenfell, who are acting as commissaries for the Bishop of Truro.

The Bishop of Stepney acts as the joint data controller with the Bishop of Truro for the purposes of the Visitation. The Bishop of Stepney is assisted in her work by Lucinda Herklots, Peter Spindler, Dave Pate, Patti Russell and an administrator.

The contact details are:

Visitation Team

Anne Stunt

visitation@truro.anglican.org

The Bishop of Truro

Rachael Varney

rachael.varney@truro.anglican.org

2. Why the Visitation Team processes personal data

The Bishop of Truro instituted a Visitation of Truro Cathedral which was announced on 3 July 2022. A Visitation allows a diocesan bishop, as Visitor of a cathedral, to inquire into certain matters relating to the way in which a cathedral is being governed. It also gives him the ability to make formal determinations and give directions to resolve any issues arising through the Visitation. Personal data is to be processed by the Visitation Team in order to help them fulfil the terms of reference of the Visitation in order to identify and make findings in respect of both good practice and failings in matters relating to how Truro Cathedral is governed, which will then be reported to the Bishop of Truro.

3. The information the Visitation Team may process

The types of information the Visitation Team may process include:

- Name
- Title
- Marital Status
- Gender
- Nationality
- Job title/position
- Contact information (email addresses)
- Employment, offices and appointments
- Education details
- Training attendance/certification
- Human Resources records (including disciplinary records, risk assessments, confidential declaration forms, safer recruitment information e.g. DBS checks)

The Visitation Team may also process “special categories” of information such as:

- Race, nationality, ethnic origin
- Politics
- Religion
- Health

- Sex life or sexual orientation
- Criminal convictions and offences including criminal allegations

The Visitation Team may process information about:

- Current, former and retired clergy
- Current and former employees
- Current and former Chapter members, volunteers and members of the congregation
- Individuals who have raised complaints or allegations, including allegations of abuse and/or witnesses to those complaints or allegations.
- Current and former professional advisers and consultants
- Current and former members of the Cathedral choir
- Current and former staff of Truro School in respect of the Cathedral choir
- Complaints of misconduct or incompetence

Information may be obtained by the Visitation Team from a number of sources including from:

- Interviews with contributors and witnesses (interview notes will be taken)
- Emails and letters from contributors and witnesses – if you contact the Visitation Team we will retain any personal data you provide to us in doing so, and we may use it to contact you about the work of the Visitation. We may also use it to assist us with our investigations.
- Minutes of meetings
- Records of any enquiries, advice sought or provided
- Notifications to external parties e.g. local authorities, Charity Commission etc
- HR, governance and safeguarding files

4. Lawful basis for processing personal information

The Visitation Team's "lawful basis" for processing personal data as defined by the UK GDPR, is that the information being collected is necessary to fulfil the Articles of Inquiry of the Visitation, which is a public task that is carried out in the public interest. The Visitation Team will, for example, need to process personal data to undertake investigations during the Visitation, in order that the Bishop of Truro may make any necessary formal determinations and directions to resolve any issues arising from the Team's findings, and ensure good governance of the Cathedral.

Special category data

The Visitation Team may also need to use information classed as "special category" above in the course of their investigations during the Visitation. The law provides additional protections for this information, and we are required to fulfil an additional condition before using this information. Here, the additional condition relied upon is that the information is necessary in order that the Visitation Team can carry out the function that has been conferred on them by an enactment or rule of law.

The purposes for the use of the information are also considered to be in the substantial public interest - in particular this will apply when the information is used for:

- the protection of members of the public generally against improper conduct;
- any failures in connection with the Cathedral's activities,
- for safeguarding purposes.
- to ensure equality of opportunity or treatment.

5. Sharing your information

All personal data provided will be treated as strictly confidential to the Visitation Team and the Bishop of Truro. The Visitation Team will use the personal data to draft a report containing their findings for submission to the Bishop of Truro. The Visitation Team will anonymise the identity of individuals in this report. The report will be confidential to the Bishop however he may be obliged to share this with bodies such as the Church Commissioners, the Charity Commission and the National Safeguarding Team for example. The Bishop will use the Visitation Team's report to draft a publicly available summary including his determination and any directions.

Special category personal data will only be shared with third parties where there is a legal basis for doing so, such as if it is in the substantial public interest to do so – for example if there is a risk of harm to a child or vulnerable adult. Matters requiring action concerning safeguarding will be referred to the Assistant Diocesan Safeguarding Advisor, Andy Earl.

6. How long does the data controller keep your information

Personal data will be retained securely by the Visitation Team during the period of the Visitation and then returned to the Bishop of Truro for his office to hold for a reasonable period in line with legal obligation relating to retention and disposal of records. Where there is no legal obligation or requirement to retain personal data, it will be deleted.

7. Security

The data controllers and processors 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.

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. International transfers and automated processing

If the Visitation Team need to share your information outside of the UK (usually because the systems used to store information use servers outside of the UK), we will ensure that all necessary safeguards are in place to protect your information.

The Visitation Team will not make any decisions about you based on solely automated means.

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 Rachael Varney or Anne Stunt using the contact details in section 1 above.

10. Complaints or concerns

If you have any concerns or queries about how your personal data is handled by the Visitation Team please contact Anne Stunt using the contact details in section 1 above.

You have the right to make a complaint at any time to the Information Commissioner at:

Online: <https://ico.org.uk/make-a-complaint/your-personal-information-concerns>

or

Tel: 0303 123 1113