

Privacy notice

The Bishop's Palace (managed by The Palace Trust) is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as a volunteer of The Bishop's Palace. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to current and former members of staff and free-lance contractors.

Data controller details

The Bishop's Palace is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows:

The Bishop's Palace
Wells
Somerset BA5 2PD
01749 988111

Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way,
- collect your data only for reasons that we find proper for the course of your volunteering in ways that have been explained to you,
- only use it in the way that we have told you about,
- ensure it is correct and up to date,
- keep your data for only as long as we need it,
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

Types of data we process

We hold many types of data about you, which depending on your role may include

- your personal details including your name, address, date of birth, email address, phone numbers,
- photograph,
- gender,
- marital status,
- dependants, next of kin and their contact numbers,
- medical or health information including whether or not you have a disability,
- information used for equal opportunities monitoring,
- information included on your application form/CV including references, education history and employment history,
- documentation relating to your right to reside in the UK or appropriate visa or entry conditions to the UK which allow volunteering,

- bank details for the payment of expenses,
- current and previous role titles, role descriptions, hours of volunteering and other terms relating to your volunteering,
- records of conversations relating to your volunteering role which may include letters of concern or formal warnings,
- details of your criminal record,
- training details,
- CCTV footage (when in use e.g. temporary exhibition).

How we collect your data

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in an application form, CV and notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your volunteering, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your passport or other right to reside evidence. In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

Personal data is kept in personnel files or within the Palace's HR, Payroll and IT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the volunteering agreement that we are party to,
- in order to carry out legally required duties,
- in order for us to carry out our legitimate interests,
- to protect your interests, and
- where something is done in the public interest.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data in order to carry out the volunteering agreement that we have entered into with you.

We also need to collect your data to ensure we are complying with legal requirements such as carrying out checks in relation to your right to reside in the UK.

We also collect data so that we can carry out activities which are in the legitimate interests of the Palace. We have set these out below:

- making decisions about who to offer volunteer roles to,
- maintaining comprehensive up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained,

- effectively monitoring both your conduct and your performance and to undertake processes with regard to both of these if the need arises,
- offering a method of recourse for you against decisions made about you,
- assessing training needs,
- dealing with legal claims made against us,
- preventing fraud,
- ensuring our administrative and IT systems are secure and robust against unauthorised access.

Special categories of data

‘Special categories of data’ is data relating to your health, sexual orientation, race, ethnic origin, political opinion, religion, trade union membership and genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines.

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing,
- we must process the data in order to carry out our legal obligations,
- we must process data for reasons of substantial public interest,
- you have already made the data public.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage however, it may also be collected during your time of volunteering. We use criminal conviction data in the following ways:

- to determine individual suitability for the role, including any necessary adjustments,
- to comply with the Church of England’s safeguarding and safer recruitment policies.

We rely on the following lawful basis to process this data:

- in order to perform the volunteering agreement that we are party to,
- in order to carry out legally required duties,
- in order for us to carry out our legitimate interests,
- to protect your interests, and
- in the public interest.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your volunteer agreement. If you do not provide us with the data needed to do this, we will be unable to perform those duties. We may also be prevented from confirming, or continuing with, your volunteering with us in relation to our legal obligations if you do not provide us with this information e.g. confirming your right to reside in the UK or, where appropriate, confirming your legal status for carrying out your volunteer role via a criminal records check.

Sharing your data

Your data will be shared with colleagues within the Palace where it is necessary for them to undertake their duties. This includes, for example, the Volunteer Coordinator and immediate supervisor.

We may share your data with third parties in order to obtain references as part of the recruitment process. We may also share your data with third parties for other reasons to comply with a legal obligation upon us. We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Where we share your data with third parties, we ensure that appropriate systems are in place to ensure that your data is held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, which will be at least for the duration of your volunteering for the Palace though in some cases we will keep your data for a period after you cease volunteering. Retention periods can vary depending on why we need your data, as set out below:

- for six years after the ending of your volunteering,
- we reserve the right to retain minimal information following these dates in order to be able to continue to process requests such as references.

Automated decision-making

No decision will be made about you solely on the basis of automated decision-making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice,

- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from Human Resources,
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it,
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it,
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct,
- the right to portability. You may transfer the data that we hold on you for your own purposes,
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests,
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision-making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Human Resources or the Palace's Data Protection Officer.

Making a complaint

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

If you have any concerns about our use of your personal information, you can make a complaint to us at info@bishoppalace.org.uk