



**Southwell Cathedral**

# **GDPR AND DATA PROTECTION POLICY**

---

**Date approved:** May 2023, updated with non-substantive amendments December 2025

**Approving body:** Chapter

**Next review by:** May 2026

**Policy owner:** Chief Operating Officer (Data Protection Lead)

## Contents

<b>1. Introduction</b>	<b>1</b>
<b>2. Legal framework</b>	<b>1</b>
<b>3. Data protection principles</b>	<b>1</b>
<b>4. Roles and responsibilities</b>	<b>1</b>
Data Protection Lead (DPL)	1
Staff and volunteers	2
<b>5. Lawful bases for processing</b>	<b>2</b>
<b>6. Types of personal data held</b>	<b>2</b>
<b>7. Data subject rights</b>	<b>2</b>
<b>8. Privacy notices</b>	<b>3</b>
<b>9. Data security and storage</b>	<b>3</b>
<b>10. Data sharing</b>	<b>3</b>
<b>11. Data retention and disposal</b>	<b>3</b>
<b>12. Volunteers: personal data and retention</b>	<b>4</b>
Retention of volunteer data	4
Choice to remain in contact	4
<b>13. Data breach management</b>	<b>4</b>
<b>14. Training and awareness</b>	<b>5</b>
<b>15. Children and vulnerable adults</b>	<b>5</b>
<b>16. Monitoring, review and enforcement</b>	<b>5</b>
<b>17. Contact information</b>	<b>5</b>
<b>Appendix A: Data retention schedule</b>	<b>6</b>
Retention table	6
Secure disposal	7
Review	7

---

## 1. Introduction

---

Southwell Cathedral is committed to protecting the privacy and security of personal data and ensuring compliance with the **UK GDPR** and the **Data Protection Act 2018**. Personal data is information relating to a living individual who can be identified from that data, including names, contact details, email addresses, financial standing, or other identifiers.

This policy applies to all personal data processed by the Cathedral, whether held electronically, on paper or in other formats, and to all employees, clergy, volunteers, contractors and third parties acting on its behalf.

---

## 2. Legal framework

---

This policy is based on current UK data protection law, including:

- UK GDPR.
- The Data Protection Act 2018.
- Guidance from the Information Commissioner's Office (ICO).

---

## 3. Data protection principles

---

We adhere to the following principles:

- **Lawfulness, fairness and transparency:** personal data will be processed lawfully, fairly, and in a transparent manner.
- **Purpose limitation:** collected for specified, explicit and legitimate purposes.
- **Data minimisation:** adequate, relevant and limited to what is necessary.
- **Accuracy:** accurate and kept up to date.
- **Storage limitation:** kept no longer than necessary.
- **Integrity and confidentiality:** processed securely to protect against unauthorised or unlawful processing and against loss, damage or destruction.
- **Accountability:** we take responsibility for and can demonstrate compliance with these principles.

---

## 4. Roles and responsibilities

---

### Data Protection Lead (DPL)

The Cathedral has a Data Protection Lead responsible for overseeing data protection compliance, providing advice and training, responding to data subject requests, and coordinating data breach responses.

The DPL's contact details can be found in Section 17 below.

## Staff and volunteers

All staff and volunteers processing personal data must:

- Follow this policy and associated procedures.
- Only process data when authorised and necessary.
- Keep personal data secure.
- Report potential breaches to the DPL immediately.

---

## 5. Lawful bases for processing

---

We process personal data only when there is a lawful basis under UK GDPR, such as:

- **Consent** (e.g. mailing list opt-in).
- **Contractual necessity** (e.g. employment records).
- **Legal obligation** (e.g. statutory returns).
- **Legitimate interests** of the Cathedral, provided these do not override an individual's rights.

Where consent is relied on, it will be freely given, specific, informed, and brought to an easily withdrawn status.

---

## 6. Types of personal data held

---

We may hold:

- Contact information (name, address, phone number, email).
- Financial data (giving history, payment records).
- Safeguarding data (where necessary and lawful).
- Employment and volunteer records.
- Attendance or service engagement information.
- Photographs or video where consent has been provided.

---

## 7. Data subject rights

---

Individuals have the right to:

- **Access** their personal data.
- **Rectify** incorrect information.
- **Erase** data in certain circumstances.
- **Restrict or object** to processing.
- **Data portability**.
- **Withdraw** consent at any time.

Requests should be made in writing to the DPL and will be responded to within statutory timeframes, usually **one month**. Delays may apply in complex cases or extended by a further month when justified under law.

---

## 8. Privacy notices

---

We will provide privacy notices explaining:

- What data we collect.
- Why we collect it.
- How it will be used.
- Legal bases for processing.
- How long it will be stored.
- Individual rights and how to exercise them.

Privacy notices will be made available where personal data is collected.

---

## 9. Data security and storage

---

We will ensure appropriate technical and organisational measures to protect personal data, including:

- Secure storage (locked cabinets, password-protected systems).
- Encryption where appropriate.
- Controlled access based on role.
- Regular review of security measures.

Personal data stored electronically will be protected against unauthorised access, and physical records are stored securely.

---

## 10. Data sharing

---

Personal data will not be shared with third parties without lawful grounds unless required by law or with explicit consent. When sharing data:

- Contracts or agreements will be in place.
- Minimum necessary data will be shared.
- Data sharing will be documented.

---

## 11. Data retention and disposal

---

We will retain personal data only as long as necessary for the purposes for which it was collected or as required by law. Retention periods are documented in Appendix A. Secure disposal methods (e.g. shredding, secure deletion) will be used.

---

## 12. Volunteers: personal data and retention

---

Southwell Cathedral recognises the vital contribution made by volunteers and is committed to handling volunteer personal data lawfully, fairly and transparently.

Personal data relating to volunteers is collected and processed for purposes including recruitment, safeguarding, training, communication, pastoral support, and the effective administration of volunteer roles.

### Retention of volunteer data

Personal data relating to volunteers will normally be retained for **12 months after a volunteer retires or resigns**. This retention period is necessary in order to:

- comply with legal and safeguarding obligations;
- respond appropriately to any subsequent safeguarding, disciplinary, insurance or regulatory enquiries;
- enable the Cathedral to contact former volunteers where this is necessary or appropriate, for example in relation to Cathedral matters, historical records, or volunteer recognition.

Volunteer data during this period will be held securely and access will be restricted to authorised staff and office-holders only.

### Choice to remain in contact

When a volunteer resigns or retires, they should inform their **Group Lead** whether they wish:

- to **remain in contact** with Southwell Cathedral (for example to receive news, invitations or volunteer communications); or
- to have their personal data **deleted** from Cathedral systems, subject to any legal or safeguarding retention requirements.

Where a former volunteer requests deletion of their data, personal data will be securely erased as soon as reasonably practicable, except where retention is required by law or where there is a legitimate safeguarding or regulatory reason to retain specific information.

It is the volunteer's responsibility to ensure that their wishes are communicated to the Group Lead, and the Group Lead **must** pass this information on to the Cathedral immediately.

Preferences regarding future contact will be recorded and respected.

---

## 13. Data breach management

---

A data breach is any unauthorised access, loss or disclosure. All breaches must be reported immediately to the DPL, who will:

- Assess risk to individuals.
- Contain and recover data where possible.
- Notify the ICO where required.
- Inform affected individuals when necessary.

---

## 14. Training and awareness

---

All staff and volunteers involved with personal data processing will receive training appropriate to their roles. Regular updates will be provided to reflect changes in law or practice.

---

## 15. Children and vulnerable adults

---

Special care will be taken when processing data relating to children or vulnerable adults. This includes additional safeguards and lawful bases for processing sensitive information.

---

## 16. Monitoring, review and enforcement

---

This policy will be reviewed annually or when legal, organisational or technological changes occur. Compliance with this policy is mandatory; failure to comply may result in disciplinary action.

---

## 17. Contact information

---

For questions, concerns or data subject requests, contact the **Data Protection Lead**:

Chief Operating Officer

[coo@southwellminster.org.uk](mailto:coo@southwellminster.org.uk)

01636 812649

Minster Centre, Church Street, Southwell NG25 0HD

If you are not satisfied with how the Cathedral has processed your data, you can lodge a complaint with the **Information Commissioner's Office (ICO)**:

<https://ico.org.uk/make-a-complaint>

0303 123 1113

## Appendix A: Data retention schedule

This Data Retention Schedule sets out the periods for which Southwell Cathedral retains different categories of personal data. It supports compliance with the UK GDPR and the Data Protection Act 2018 by ensuring that personal data is:

- kept no longer than necessary;
- retained for clear and lawful purposes; and
- disposed of securely when no longer required.

Retention periods may be extended where there is a legal, safeguarding, insurance or regulatory requirement to do so.

### Retention table

Category of data	Examples	Retention period	Notes
<b>Volunteer records</b>	Applications, role profiles, contact details, training records, DBS status (not certificates)	<b>Duration of volunteering + 12 months after resignation or retirement</b>	Enables safeguarding, legal compliance, and appropriate post-service contact
<b>Volunteer safeguarding records</b>	Incident reports, concerns, risk assessments	<b>As required by safeguarding guidance (often until individual reaches age 75 or for at least 30 years)</b>	In line with Church of England safeguarding retention guidance
<b>Employee records</b>	Contracts, payroll, disciplinary records	<b>Up to 6 years after employment ends</b>	HMRC and employment law requirements
<b>Recruitment records (unsuccessful applicants)</b>	Applications, interview notes	<b>12 months</b>	Allows response to challenges or feedback requests
<b>DBS information</b>	Disclosure outcome only (not certificates)	<b>6 months for recruitment records; duration of role for current staff/volunteers</b>	DBS certificates are not retained
<b>Financial and gift aid records</b>	Donations, Gift Aid declarations	<b>6–7 years</b>	HMRC requirements
<b>Mailing lists and communications</b>	Email lists, newsletters	<b>Until consent withdrawn or data no longer required</b>	Reviewed regularly
<b>CCTV footage</b>	Recorded images	<b>Typically 30 days</b>	Unless required for investigation
<b>Safeguarding training records</b>	Training completion dates	<b>Duration of role + 12 months</b>	Demonstrates compliance
<b>Complaints by the public or volunteers</b>	Written complaints, notes of verbal complaints	<b>6 years</b>	Allows review of best practice

## **Secure disposal**

When personal data reaches the end of its retention period it will be securely deleted from electronic systems or confidentially shredded or destroyed if held in paper form.

Disposal will be carried out in a way that ensures data cannot be reconstructed or retrieved.

## **Review**

This retention schedule will be reviewed regularly and updated to reflect changes in legislation, Church of England guidance or Cathedral operations.