

## CATHOLIC SAFEGUARDING ADVISORY SERVICE (CSAS)

### GENERAL PRIVACY NOTICE

#### 1. ABOUT THIS DOCUMENT

- 1.1 During the course of our activities we process personal data (which may be held on paper, electronically, or otherwise), and we recognise the need to process such data lawfully, fairly and in a transparent manner. The purpose of this notice is to make you aware of how we will do so.
- 1.2 A separate notice applies to the personal data that we are provided with or obtain when carrying out Disclosure and Barring Service checks. That notice is available here [DBS privacy notice](#)

#### 2. DETAILS ABOUT US

- 2.1 The Catholic Safeguarding Advisory Service ("CSAS") forms part of the Department of Christian Responsibility and Citizenship, which is one of the Departments of the Catholic Bishops' Conference of England and Wales, which is the permanent assembly of Catholic Bishops and Personal Ordinaries in the two-member countries. The legal entity for the Catholic Bishops' conference of England and Wales is the Catholic Trust for England and Wales ("CaTEW"), incorporated on 15 April 2003 under company no. 04734592 and registered as a charity on 12 May 2003 under charity no. 1097482. CaTEW supports the legal, financial and charitable activities of the Bishops' Conference and its departments, agencies and offices.
- 2.2 CSAS is also a **Registered Body** for the Disclosure and Barring Service ("DBS") and undertakes checks for charities and organisations that are Catholic Church based.
- 2.3 We have to comply with the Data Protection Act 2018 ("DPA") and the EU General Data Protection Regulation 2016 ("GDPR") which together and with other guidance issued by the Information Commissioner's Office is the "Data Protection Legislation".
- 2.4 CaTEW is the data controller and responsible for ensuring compliance with the Data Protection Legislation. Any questions about the operation of this notice or any concerns that the notice has not been followed should be referred in the first instance to CaTEW's data protection officer (details available at the end of this notice).
- 2.5 Our general contact details are: 39 Eccleston Square, London, SW1V 1BX. Telephone 0207 901 1920. Email [admin@csas.uk.net](mailto:admin@csas.uk.net)

#### 3. PERSONAL DATA WE MAY COLLECT AND PROCESS

- 3.1 In connection with providing safeguarding advisory services to dioceses, religious congregations, catholic organisations and other individuals who may contact CSAS as well as driving and supporting improvements in safeguarding practice with the Catholic Church in England and Wales, we will collect and process the categories of personal data set out in the Schedule to this notice. This may include data we receive direct from you or from any person working in the name of the Catholic Church in England and Wales and other jurisdictions, including outside of the EEA (this includes employees, volunteers and office holders), members of the public or from other sources as well as governmental and regulatory or other authorities.
- 3.2 "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you, or indications as to our intentions about you and special category data which includes information about race, ethnic origin, political opinions, religion, philosophical beliefs, trade union membership, genetics, biometrics (where used for ID purposes), health, sexual behaviour or sexual orientation. It may also include information relating to criminal convictions and offences. "Processing" means doing anything with the data such as accessing, disclosing, destroying or using the data in any way.
- 3.3 By using our website, we may collect personal data about individuals including their IP address and other information collected using cookies and similar technology. For details of our cookies policy please see here [Cookies Policy](#)

#### 4. LAWFUL BASES FOR PROCESSING

- 4.1 We must have a lawful basis to process your personal data. The legal basis on which we do so will vary according to purposes for which we process personal data. The basis on which we will usually process personal data relating to people contacting CSAS is set out in the Schedule to this notice, in each case by reference to the processing purpose.
- 4.2 We will only process special categories of data about ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientations where a further basis is also met. Processing of information relating to criminal convictions and offences must also only take place where a further basis is met. The

purposes for which we process special category personal data and Information about criminal convictions, and the legal basis on which we do so, will vary according to the category of personal data concerned. The basis on which we will usually process personal data relating to people contacting CSAS is set out in the Schedule to this notice, in each case by reference to the processing purpose.

- 4.3 If permitted to process your personal data under the Data Protection Legislation on other grounds, we may also carry out such processing e.g. for compliance with other obligations to which we are subject or in connection with any legal proceedings, legal advice, legal rights or court or tribunal activities.

## **5. DISCLOSURE AND SHARING OF PERSONAL INFORMATION**

5.1 We may disclose personal data we hold to third parties:

- (a) if we are under a duty to disclose or share a data subject's personal data in order to comply with any legal obligation; or
- (b) in order to enforce or apply any contract with the data subject or other agreements; or
- (c) to protect our rights, property, or safety of our employees, customers, or others, including exchanging information with other companies and organisations for the purposes of fraud protection, in which case the processing would be necessary for the purposes of the legitimate interests pursued by CSAS, namely in order to achieve those ends;
- (d) for the purposes of the legitimate interests pursued by CSAS, as set out in the Schedule;
- (e) who have been appointed by CaTEW as data processors to provide us with specific services such as specialist IT services or support; and/or
- (f) where we are otherwise permitted to under the Data Protection Legislation e.g. working with your elected representative such as a local MP.

5.2 We will ensure that personal data will only be transferred to data processors whose processing meets the requirements of the Data Protection Legislation and ensures the protection of the rights of the data subjects, and under a written contract with CaTEW that sets out (amongst other things) the subject-matter and duration of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects, and the obligations and rights of our organisation as data controller.

5.3 In the course of processing personal data, or sharing your data, CaTEW may transfer it to countries which are outside the European Economic Area (EEA) (e.g. to the Vatican), some of which may not have laws which provide the same level of protection to personal data as laws inside the EEA. In such cases CaTEW will take steps to ensure that the transfers comply with the Data Protection Legislation and that the personal data is appropriately protected and any processing will be to the same standard as the Data Protection Legislation sets out.

5.4 If you have questions in relation to any specific transfers that we make, please contact CaTEW's data protection officer (details available at the end of this notice).

## **6. DATA PROTECTION PRINCIPLES – OUR OBLIGATIONS**

6.1 We will ensure that your personal data is processed in accordance with the key principles set out in the GDPR.

6.2 We will check the accuracy of any personal data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

6.3 We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer required. The Schedule to this notice sets out the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period, and when it will be erased.

6.4 We will process all personal data in line with the data subjects' rights.

6.5 We will process all personal data that we hold in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measure.

## **7. YOUR RIGHTS AS A DATA SUBJECT**

7.1 As a data subject, you have certain enforceable rights under the Data Protection legislation, including:

- (a) the right to obtain from the controller confirmation as to whether or not personal data concerning them are being processed; and
- (b) if so, access to the personal data, plus a copy of the personal data undergoing processing along with an explanation of what we do with it, who we share it with and where it came from ("**right of access**").

7.3 In addition, as a data subject you have:

- (a) (“**right of rectification**”) the right to obtain from us without undue delay the correction of inaccurate personal data concerning yourself and (taking into account the purposes of the processing) the right to have incomplete personal data completed;
- (b) (“**right of erasure**”) the right to obtain from us the erasure of personal data concerning yourself without undue delay, in various circumstances which includes where:
  - (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or
  - (ii) the processing is based on your consent , and you withdraw that consent (and there is no other legal basis for processing); or
  - (iii) the processing is based on it being necessary for our legitimate interests as the data controller or those of a third party, and you as the data subject object to the processing, unless we demonstrate that the processing is based on compelling legitimate grounds which override your interests, rights and freedoms as the data subject, or that it is for the establishment, exercise or defence of legal claims; or
  - (iv) we have unlawfully processed your personal data.
- (c) (“**right of restriction**”) the right to obtain from us the restriction of processing where the data is inaccurate, unlawfully processed, no longer required except for the establishment, exercise or defence of legal claims, or pending the verification whether we have legitimate grounds as the controller which override your rights;
- (d) (“**right of portability**”) the right to receive the personal data concerning yourself, which you have provided to us, in a structured, commonly used and machine-readable format, and to transmit the data to another controller, where our processing is based on consent or contract and carried out by automated means;
- (e) (“**right to object**”) the right to object to processing based on our legitimate interests, where these are outweighed by your interests, rights and freedoms, unless the processing is required for the establishment, exercise or defence of legal claims. You also have the absolute right to object to processing for marketing or profiling purposes;
- (f) the right not to be subject to a decision based solely on automated processing, including profiling (although we do not currently carry out any automated processing or profiling in relation to the activities covered by this notice);
- (g) the right to withdraw your consent or explicit consent, where the processing is based on that lawful basis; and
- (h) the right to make a complaint to the Information Commissioner’s Office at <http://www.ico.org.uk>.

7.4 These rights may be limited in some situations – for example, where CaTEW can demonstrate that it has a legal requirement to process your personal data. Also, CaTEW may need you to provide proof of identity for verification and data security purposes before you can exercise your rights.

7.5 Rights may only be exercised by the individual whose information is being held by CaTEW or with that individual's express permission. Children from around 12 years upwards are entitled to make their own requests (where CaTEW is of the reasonable view that they have an appropriate understanding of the request they are making) and parents / guardian / family members do not have an automatic right to see information about their child or prevent their child from making a request to CaTEW.

7.6 For further information about your rights or to exercise any of them, please contact the CaTEW Data Protection Officer or review <https://ico.org.uk/your-data-matters/>

## 8. CHANGES TO THIS POLICY

8.1 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 data 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 wherever possible) or otherwise than is permitted by Data Protection Legislation.

## 9. CONTACT DETAILS

9.1 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 CaTEW Data Protection Officer:

Karen O’Connor, Data Protection Officer,



CaTEW, 39 Eccleston Square, London. SW1V 1BX  
0207 630 8220  
[Karen.Oconnor@CBCEW.org.uk](mailto:Karen.Oconnor@CBCEW.org.uk)

**Schedule – Data processing activities**

<b>Purpose of Processing</b>	<b>Required to maintain a record of religious alignment</b>
<b>Data Subject(s)</b>	Contact persons for Religious Orders that are currently aligned to dioceses and those that are no longer aligned
<b>Type or category of Personal Data</b>	Information recorded on the national religious database which includes: names, addresses, number of members, phone numbers, email
<b>Type of Processing</b>	Electronic records
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>• Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>• Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul>
<b>Specific Category / Criminal Info legal basis</b>	<ul style="list-style-type: none"> <li>• Legitimate interests of CaTEW in processing information in relation to members of the Catholic Church in England and Wales and to those with regular contact with it.</li> <li>• Necessary for archiving purposes in the public interest, historical research and statistical</li> </ul>
<b>Transfers to third parties (including outside EEA)</b>	Data is also accessible to individuals approved by CSAS to enable them to access alignment information and contact details i.e. safeguarding personnel in diocese and religious congregations.
<b>Retention Period</b>	Indefinitely (Updated yearly)

<b>Purpose of Processing</b>	<b>Required for invoicing purposes in relation to alignment of religious orders to CSAS</b>
<b>Data Subject(s)</b>	Members of religious Orders who are responsible for financial contributions
<b>Type or category of Personal Data</b>	Religious Alignment Financial Contributions Spreadsheet which includes name of contact person, number of members, address, email
<b>Type of Processing</b>	Electronic records
<b>Legal basis of processing</b>	Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.
<b>Specific Category / Criminal Info legal basis</b>	Legitimate interests of CaTEW in processing information in relation to members of the Catholic Church in England and Wales and to those with regular contact with it.
<b>Transfers to third parties (including outside EEA)</b>	No – CSAS only
<b>Retention Period</b>	Updated yearly

<b>Purpose of Processing</b>	<b>Required for the set- up of users on E-bulk and ongoing processing of DBS checks</b>
<b>Data Subject(s)</b>	ID verifiers and users of E-bulk
<b>Type or category of Personal Data</b>	Diocesan details, parishes, ID verifiers details, user details
<b>Type of Processing</b>	Electronic records held within the E-bulk system
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>Necessary for compliance with legal obligations to which CSAS is subject as a Registered Body for DBS checks.</li> <li>Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul>
<b>Specific Category / Criminal Info legal basis</b>	<ul style="list-style-type: none"> <li>Legitimate interests of CaTEW in processing information relation to members of the Catholic Church in England and Wales and to those with regular contact with it.</li> <li>Necessary and in the substantial public interest for compliance with CSAS' legal functions and obligations as a Registered Body for DBS checks and ensuring that only appropriate individuals can access the system.</li> </ul>
<b>Transfers to third parties (including outside EEA)</b>	GB group who is a third-party provider of the system used for processing electronic DBS applications
<b>Retention Period</b>	Indefinitely, updated regularly

<b>Purpose of Processing</b>	<b>Gathered for the purpose of inclusion in the NCSC annual report or other specific reports</b>
<b>Data Subject(s)</b>	Individuals who have contacted dioceses and religious congregations in relation to safeguarding matters
<b>Type or category of Personal Data</b>	Anonymised data provided annually, or otherwise as required, by each diocese and religious commission. Some individuals might be recognisable in relation to other case information held by CSAS.
<b>Type of Processing</b>	Paper and Electronic records of individual data returns and aggregated spreadsheets produced by CSAS
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul>
<b>Specific Category / Criminal Info legal basis</b>	<ul style="list-style-type: none"> <li>Necessary for archiving purposes in the public interest, historical research and statistical purposes</li> <li>Necessary for the establishment, exercise or defence of legal claims or to obtain legal advice.</li> <li>Necessary for substantial public interest condition of undertaking safeguarding activities.</li> </ul>
<b>Transfers to third parties (including outside EEA)</b>	Data may be provided to a researcher for the specific purpose of analysis on behalf of the Catholic Church in England and Wales
<b>Retention Period</b>	Indefinitely

<b>Purpose of Processing</b>	<b>Required for contacting ID verifiers regarding DBS applications</b>
<b>Data Subject(s)</b>	ID Verifiers
<b>Type or category of Personal Data</b>	ID verifier contact details- name, address, telephone and email
<b>Type of Processing</b>	Electronic
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>• Necessary for compliance with legal obligations to which CSAS is subject as a Registered Body for DBS checks.</li> <li>• Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>• Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul>
<b>Specific Category / Criminal Info legal basis</b>	<ul style="list-style-type: none"> <li>• Legitimate interests of CaTEW in processing information relation to members of the Catholic Church in England and Wales and to those with regular contact with it.</li> <li>• Necessary and in the substantial public interest for compliance with CSAS' legal functions and obligations as a Registered Body for DBS checks and ensuring that only appropriate individuals can access the system.</li> </ul>
<b>Transfers to third parties (including outside EEA)</b>	None
<b>Retention Period</b>	Indefinitely, updated regularly

<b>Purpose of Processing</b>	<b>Maintaining records of individuals registered on the e-learning programme</b>
<b>Data Subject(s)</b>	Users registered on Educare
<b>Type or category of Personal Data</b>	E-learning records
<b>Type of Processing</b>	Electronic
<b>Legal basis of processing</b>	Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.
<b>Specific Category / Criminal Info legal basis</b>	Legitimate interests of CaTEW in processing information relation to members of the Catholic Church in England and Wales and to those with regular contact with it.
<b>Transfers to third parties (including outside EEA)</b>	Educare which is the third-party provider of the e-learning programme
<b>Retention Period</b>	Indefinitely (updated regularly)

<b>Purpose of Processing</b>	<b>Registering and maintaining records of Counter-signatories for the purpose of compliance with the DBS Code of Practice</b>
<b>Data Subject(s)</b>	DBS Counter-signatories
<b>Type or category of Personal Data</b>	Name, contact details, counter-signatory number
<b>Type of Processing</b>	Electronic
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>• Necessary for compliance with legal obligations to which CSAS is subject as a Registered Body for DBS checks.</li> <li>• Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>• Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul>
<b>Specific Category / Criminal Info legal basis</b>	Necessary and in the substantial public interest for compliance with CSAS' legal functions and obligations as a Registered Body for DBS checks and ensuring that only appropriate individuals can access the system.
<b>Transfers to third parties (including outside EEA)</b>	DBS
<b>Retention Period</b>	<ul style="list-style-type: none"> <li>• <b>Applications:</b> until processed and submitted to DBS; and</li> <li>• <b>Records:</b> until no longer a counter-signatory</li> </ul>

<b>Purpose of Processing</b>	<b>Contacting persons in relation to work, invitations to relevant conferences &amp; events, and sharing relevant information and updates</b>
<b>Data Subject(s)</b>	Diocesan Staff, Religious umbrella body organisations
<b>Type or category of Personal Data</b>	Various Contact lists which include names, telephone numbers, email addresses, business addresses
<b>Type of Processing</b>	Electronic
<b>Legal basis of processing</b>	Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.
<b>Specific Category / Criminal Info legal basis</b>	Legitimate interests of CaTEW in processing information relation to members of the Catholic Church in England and Wales and to those with regular contact with it.
<b>Transfers to third parties (including outside EEA)</b>	None
<b>Retention Period</b>	Indefinitely (updated regularly)

<b>Purpose of Processing</b>	<b>Keeping a record of case related advice and actions taken on a case</b>
<b>Data Subject(s)</b>	Victims/survivors of abuse; complainants; persons accused of abuse or about whom concerns have been raised
<b>Type or category of Personal Data</b>	Case related records e.g. case log, letters, emails, reports, referral information.
<b>Type of Processing</b>	Electronic
<b>Legal basis of processing</b>	<ul style="list-style-type: none"> <li>• Consent (if appropriate in the circumstances)</li> <li>• Legal obligations to which CaTEW is subject in relation to safeguarding.</li> <li>• Legitimate interests of CSAS performing its role in providing safeguarding advisory services and driving improvements.</li> <li>• Necessary to retain as part of CSAS' public interest tasks within the Catholic Church in England and Wales.</li> </ul> <p>For further information, please see our Information Sharing Protocol</p>
<b>Specific Category / Criminal Info legal basis</b>	<ul style="list-style-type: none"> <li>• Explicit consent (if appropriate in the circumstances)</li> <li>• Necessary for the establishment, exercise or defence of legal claims or to obtain legal advice.</li> <li>• Necessary for substantial public interest condition of undertaking safeguarding activities.</li> <li>• Necessary for the prevention or detection of unlawful acts.</li> <li>• Necessary to protect the public against dishonesty.</li> </ul> <p>For further information, please see our Information Sharing Protocol</p>
<b>Transfers to third parties (including outside EEA)</b>	<p><b>Internal:</b></p> <p>Shared with HR within CaTEW with individuals who require the information to allow them to fulfil their professional responsibilities e.g. General Secretary as line manager of the Director of CSAS; members of the CSAS team; the National Catholic Safeguarding Commission.</p> <p><b>External:</b></p> <ul style="list-style-type: none"> <li>• Specific dioceses, religious congregations or Catholic organisations who require the information to allow them to fulfil their professional responsibilities.</li> <li>• Organisations such as police, social care, probation for the purpose of public protection.</li> <li>• Organisations commissioned to undertake investigations or assessments where the information is required to enable them to fulfil the terms of the Agreement.</li> </ul>
<b>Retention Period</b>	<p>For <b>clergy and religious roles</b>, 85 years from date of birth, or date of death if later.</p> <ul style="list-style-type: none"> <li>• At the end of these retention periods, a summary record of the case file will be retained indefinitely.</li> </ul> <p>For <b>all other church roles</b> e.g., volunteers, office holders, 25 years from the date their role ceases.</p> <ul style="list-style-type: none"> <li>• At the end of these retention periods, a summary record of the case file will be retained until the 85th birthday of the accused person.</li> </ul> <p><b>Sensitive information</b> such as victim witness statements, psychological or psychiatric reports on witnesses should only be retained for as long as they have a purpose e.g. duration of criminal, civil or internal church investigation. Records should be destroyed 3 years after the end of the last such process to conclude. Summary details of the allegations, including status of victim and context, should be retained beyond this period but should be included in general case file information in any event</p>