

Winchester Cathedrals – Information Rights Privacy Policy - 2024

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1. Winchester Cathedral Information Rights and Data Protection Contact Details

If you have any questions, concerns or complaints relating to the Cathedral's information rights and data protection policy please contact the Cathedral's Data Protection Officer in the first instance. Our office opening hours are 9am to 16:00 (Monday to Friday excluding bank holidays and the Christmas / New Year Period). Should you need to speak with a member of the team more immediately please call our reception desk where your call will be guided accordingly.

Please note: Should you need to meet a member of the Cathedrals staff in person or virtually online to discuss a data protect question, please organise an appointment / meeting using the contacts below.

1.1 Key Contacts

Please note that the Cathedral's back-office administration reception is not located within the main Cathedral building. Our back-office opening times are (Monday to Friday 9am to 16:00) - excluding bank holidays. Full details can be found on our web site. If you need to speak to or meet a member of our team, please email or call to make an appointment.

Role	Email
Data Protection Officer	dataprotection@winchester-cathedral.org.uk
Safeguarding Officer	safeguarding@winchester-cathedral.org.uk
Pastoral Care and Bereavement	pastoralcare@winchester-cathedral.org.uk
Chapter Office (central admin team and personal assistants)	chapter.office@winchester-cathedral.org.uk
Marketing Team	marketing@winchester-cathedral.org.uk
Volunteers	volunteers@winchester-cathedral.org.uk
Music and Liturgy	Please call reception to guide your request
Learning Centre	learning.centre@winchester-cathedral.org.uk
Development / Partners and Fundraising	fundraising@winchester-cathedral.org.uk
Regular Giving and Legacy	legacy@winchester-cathedral.org.uk
Cathedral Archive	curator.enquiries@winchester-cathedral.org.uk

2. Information Rights Summary

2.1 Introduction

The Cathedral's vision and calling inspires our clergy, volunteers and staff to provide a "trustworthy place of faith, hope and love" for our congregation, visitors, local and international communities.

Our aim is to provide a "safe space" where people can find renewal and inspiration; a space where people can connect with God and each other. As part of this vision when you connect with the Cathedral and elect to share personal information (consent), we aim to maintain the personal data you share with us (processing) in accordance with your wishes (preferences). It is also our duty to comply with the UK's General Data Protection Regulation 2018 (known as GDPR), which underpins our information rights and privacy policy.

GDPR Exception Clause: It is very rare that the Cathedral (Dean or delegate) would invoke the GDPR exception clause, but this aspect of the legislation provides a safety net should the welfare and security of an individual or group be considered at risk.

2.2 Information Rights and Data Privacy – The Cathedral's Values and Commitment

Our clergy, volunteers and staff are trained in the GDPR legislation, and we place you, the individual, at the heart of our information rights and data protection training and policies. We endeavour to comply with your wishes and will do everything in our power to address any data protection or information rights concerns you may have.

If you consent to share personal information with us (e.g. name, email, address) and wish to receive religious service updates, newsletters and events information, we will contact you in accordance with the preferences and interests you have agreed with us. Some of our supporters prefer postal correspondence, but to protect the environment and support our net zero carbon targets, our preference is to connect with you electronically via email, social media, and other electronic platforms.

2.3 What Does GDPR Mean to You

- The right to be informed (we always endeavour to be transparent, stating how and why we use your data at the Cathedral).
- The right of access (you have the rights to request a copy of the information we hold about you) - you will be asked to provide proof of your identity.
- The right of rectification (we are legally obliged to update or amend your data at your request, or if we / you note a discrepancy).
- The right of erasure (we are legally obliged to delete your data at your request or via a trustee / responsible adult (referred to as 'the right to be forgotten').
- The right to restrict processing (to request that we cease processing your data (in part or in full)).
- The right to data portability (to transfer the data we hold for our own purposes {known as legitimate interest} to include automatically sharing information with approved 3rd parties such as the Friends of Winchester Cathedral / Schools / Scout Groups / Local Government / a small number of trusted commercial partners that have a legitimate interest).
- The right to object (to object to us processing your data for certain purposes).

2.4 Freedom of Information Requests (Exception)

The Church of England and the Cathedral are excepted from the Freedom of Information Request.

2.5 How and Where We Ask For Your Consent

- Religious services or ceremonies (where personal / special category data is required).
- Musicians / Musical Directors / Drama and Community Welfare Groups.
- Education Partner (schools, colleges, universities, local authorities etc).
- You consent to share your details via our website.
- Reserve and pay for an event.
- Complete a survey (online or paper).
- When making a gift or donation when you agree to accept or reject gift aid tax relief.
 - Give, donate one time or reoccurring (online).
 - Give, donate one time or re-occurring (in person).
 - Give, donate onetime or re-occurring (over the phone).
 - Give or donate via a legacy or will.
- Complete an information request form (electronic / paper).
- Attend a workshop / talk / educational or cultural event.
- Hire the Cathedral for a ceremony or private event.
- Request further information.
- Purchase of certain goods and services that are not event related.
- Attending VIP or business events.
- Cathedral reception, café, shop, information desk.
- Making an application for a role at the Cathedral (clergy, volunteer, or staff).
- Commercial Partner (as stated in contracts).
- Supplier (contracts).
- Property rental (longer term contracts).
- Partners that sponsor or donate, run events in support of the Cathedral.
- QR codes are sometimes used by the Cathedral to help our supporters, volunteers and partners quickly navigate to our web site, electronic forms, and surveys. You will be asked to provide consent when you use these online services.
- The Cathedral does not sell your personal or special category data to 3rd parties, we do share data where there is a legitimate reason or cause. We will only share information with your consent, unless an exemption applies (e.g. national archive)
- We support vulnerable people as part of our pastoral responsibilities; we will always endeavour to gain the individual's consent, but this is sometimes not possible. Our Clergy, Pastoral Care and Safeguarding team are trained to support people in need, we will always endeavour to protect an individual's rights. In addition to respecting the UK's GDPR legislation we also comply with the Church of England's Safeguarding policy.

3. Cathedral Information Rights Categories

To comply with your information wishes (preferences) when you consent to share your personal details with us, we will categorise your information into groups. These groups allow the Cathedral to process personal information securely and efficiently so that when we communicate / connect with you, in line with your wishes, you can change your preferences and permission to consent at any time by using the contact list located in section 1 of this policy. If you are still unsure who to speak with please contact our Data Protection Officer in the first instance.

3.1 Special Category Data (Health, Belief, Accessibility Needs etc)

As part of the Cathedral Vision and Calling, our clergy, volunteers and staff work with young people under the age of 16 as well as vulnerable people in our society. Our default position is not to ask you to consent or share special category information about yourself, but if there is a need for our clergy, volunteers, and staff to be aware of an individual's health, wellbeing, or religious belief, we will consult with the individual or a nominated guardian / responsible adult (e.g. carer - teacher) to arrange consent.

You can learn more about the classification of special category information by accessing the Information Commissioners website (ICO) - handy links can be found in the appendix section of this policy.

3.2 Liturgy (worship), Visitors, Donations, Ceremonies

As a living church, most of the personal information / data we collect, and process comes under this main group. We welcome our congregation and thousands of visitors each year to worship, talks, exhibitions, musical and theatrical performances, educational and cultural workshops, as well as our café, shop, and special events such as the Christmas market.

Any questions, complaints, amendments to personal details or consent should be directed to our marketing team in the first instance.

Some ceremonies (e.g. christening, wedding etc) require the Cathedral to process personal and special category data in order that the ceremony can proceed; provision of personal information is mandatory in the cases. Full details are provided when you apply (online). Should you have any questions our Liturgy team will be happy to answer any questions you may have.

3.3 Informing the Cathedral of a Bereavement

We recognise that the loss of a loved one or someone that is close to you is a sad and challenging occasion. We have a specialist team who will act as a single point of contact to ensure the personal details of the deceased are updated across the Cathedral. As part of this process the team will ask you if you would like us to share the details of the deceased with our recognised partners to help take the administrative burden off the trustees / executors of the deceased. If the Cathedral is informed by a family member, friend, or volunteer that a supporter of the Cathedral has sadly passed away, we will endeavour to contact a trustee / executor so that we can take instruction on the deletion of the individual's personal data from our systems.

Funeral End of Life Plans: There are a small number of instances that require the Cathedral to store and process an end of life or funeral plan; these plans are typically provided by an authorised undertaker or executor of the will; in some cases, a member of our congregation will choose to plan their own end of life ceremony. Due to the sensitivity of these documents we “do not specifically ask” for consent, we accept these plans are provided in good faith as they are presented to our Clergy or Bereavement team. The plans are typically stored and processed in paper / letter format; we treat these plans as special category data to ensure the appropriate physical security is in place to protect these artifacts. In some cases, the plan will include a spouse or loved one's wishes, we destroy these plans after the last wish has been actioned. In some cases there is a historical interest in the plan and ceremony; in agreement with all interested parties the Cathedral will provide the Country's Archivist with a copy of these artifacts.

3.4 Volunteers

We are blessed to have the support from around 800 volunteers who support the Cathedral to deliver its vision and calling. To protect the interests of all parties we provide our volunteers with a tailored training programme to ensure they are equipped to safely perform their role that they have kindly agreed to do. As our volunteering community need to maintain their training in accordance with best practice, we ask them to consent to their personal data, contact details and personalised training record to be processed against a personalised record. In some cases, we will process special category and complaint data which is managed in accordance with the Cathedral's Volunteer Handbook and agreement.

In support of our volunteering community the Cathedral will occasionally store and process a limited amount of special category health data at our volunteers' request. This basic health data is used by our first aid team to assist the volunteer should a known and treatable condition occur while the volunteer is on duty representing the Cathedral. The first aid data we agree to store and process (with the volunteer's consent) will be restricted to designated members of staff and our suppliers that support the Cathedral's IT systems. We will only store and process basic information required to assist the volunteer with a known medical condition. Our first aid team are qualified to provide a first aid level of response only.

In the event of a complex medical emergency the Cathedral will call the emergency services on the volunteers' behalf. We will also contact the emergency contact details as required if consent and contact details are provided.

Any questions, complaints, amendments to personal details or consent including leaving notifications relating to a volunteer should be directed to the Cathedral's Volunteer Co-ordinator in the first instance.

3.5 Community Roll and Cathedral Governance Groups

To ensure the effective governance of the Cathedral several public and specialist consultations groups are required. These groups are made up from the local community and authorities, volunteers, clergy staff, interested parties and consultants such as our architect and contractors. Consent to process personal data is required in order that we can contact, engage, share information and organise governance meetings.

Any questions, complaints, amendments to personal details or consent and resignation notifications relating to Cathedrals governance groups should be directed to the Chapter Office in the first instance.

3.6 Music, Services and Concerts

Music and concerts are an important part of Cathedral life. Our religious services and concerts require a lot of planning and practice by our talented choristers, music directors, musicians, clergy, and support staff (local and invited performers). Included in the scope of this category is processing of personal and special category data for under 16s and vulnerable adults.

To ensure GDPR compliance we work closely with the under 16s or vulnerable adult's guardian (parents, carers, teachers, scout, and guide leader etc) to ensure consent to process the individual's personal and or special category data has been granted. Our staff who support this community undertake GDPR and Church of England safeguarding training on a regular basis.

In order to run and manage these events there is an occasional need to share personal data with 3rd party organisations such as Scouts, Armed Forces, educational establishments, local government, music / theatre companies etc.

Any questions, complaints, amendments to personal details or consent / preferences should be directed to the Music and Liturgy Office.

3.7 Learning Centre

Delivering religious education for all is an integral part of our core values and vision. We offer a broad range of learning services and events to under 16s as well as adults. In order that we can plan and arrange the events, our education team will support the individual's responsible adult / guardian (e.g. head teacher, teacher, school administrator, carer, parent) to provide consent as the team often need to be made aware of special category (health or welfare related) information. Our staff are trained and follow defined policies and procedure to manage special category data in accordance with GDPR legislation and the Church of England Safeguarding policies.

Any questions, complaints, amendments to personal details or consent should be directed to our Education Centre Team in the first instance.

3.8 Commercial Partners, Sponsors and Property Rentals

The Cathedral has a range of commercial partnerships with companies, sponsors and individuals who purchase goods and services from the Cathedral. We will consult with the nominated representative from each partnership to gain their consent to process contractual and personal information relative to the agreement. Information rights consent, preferences and data processing is agreed as part of the contract between the parties.

Please refer to the commercial contract / agreement to establish who within the Cathedral you should contact to discuss any questions, complaints, amendments to your personal details or consent. If you are still unsure who to contact, please speak with the Cathedral's Data Protection Officer who will assist with your request.

3.9 Staff

When a member of staff joins the Cathedral both (employee and employer) sign a contract. The contract and Fair Processing Notice define how we will process and retain staff personal and special category data.

Should a member of staff have any questions, complaints, amendments to their personal details or consent they should speak with their line manager in the first instance.

If the member of staff feels unable to speak with their line manager, they should speak with the HR Team who will assist you.

3.10 Vulnerable People

A key part of our mission is to support vulnerable people in our society. It is not always possible to gain consent from an individual who is struggling with addiction or a severe mental health issue. In this scenario our Safeguarding Officer will keep a record of the situation (written and verbal) and any concerns reported to the Cathedral. Any concerns in this regard will be treated in accordance with Church of England Safeguarding policy. Our Safeguarding Officer will decide if further action is required. If there is an immediate or short-term security or welfare concern, we will engage emergency services as required.

3.11 Retention of Records for Archival Purposes

The Cathedral has a responsibility to retain and preserve its institutional records for legitimate archival purposes, such as potential research benefit; long-term public accountability; or establishing an audit trail for decision-making activities. The records which together make up the Cathedral Archive (held at the Hampshire Records Office on behalf of the Cathedral) reflect the past and present life of the organisation. The retention of such records is justified under the terms of archival exemption from standard GDPR legislation. (please refer to the appendix section of this policy, which will guide you to the National Archives and Hampshire County Council policies and procedure for the processing and recording of archival records that are in the public interest)

The retention and sharing of archive documents which contain personal information, including under-16 information, and images on subjects such as choirs, congregation, learning and other events, is determined by their archival significance, the Cathedral will process these artifacts in accordance with archival standards. Sensitive records deposited in the Cathedral Archive will remain 'closed' to the public for a minimum of 75 years.

4. Data Retention and Security Policy Summary

The Cathedral is a special place of worship and celebration. Many of our congregation, clergy, visitors, volunteers, supporters, and staff have a lifelong association and relationship with the Cathedral. We rely on the generosity of all our supporters and partners to help fund the maintenance of the Cathedral to protect its use as a place of worship for generations to come. Our philosophy regarding information rights and data protection is to always respect your privacy wishes. We like to stay in touch and will continue to process your information in accordance with your consent and preferences, you can change your mind at any time.

Where we have a commercial or partnership contract / agreement in place, we will respect the data retention policy (end date) agreed within each contract. If a data retention period is not explicitly agreed, we reserve the right to archive records associated with the contracted / agreement for "7 years" from the time both parties have agreed the termination date.

Special Notes:

In the case of legacies, wills, and complaints we reserve the right to retain personal data beyond 7 years if the process has not been concluded.

We are also custodians of historically important artefacts that contain personal information. This data is exempt from the 7-year data retention policy.

In accordance with best practice, we adopt the philosophy that you choose to "opt out" unless you tell us otherwise.

Please direct any questions about our data retention and security policy to the Data Protection Officer

5. Winchester Cathedral Registered Companies and Charities

This privacy policy relates to Winchester Cathedral and its wholly owned subsidiary, Winchester Cathedral Enterprise Limited

6. Gift Aid, 3rd Parties – Data Sharing Agreement

We will occasionally share your personal information with a small number of trusted partners (e.g. The Friends of Winchester Cathedral, HMRC, Winchester Cathedral Trust (in respect of Gift Aid) and online payment providers, sponsors of events). All our 3rd party providers are independent of the Cathedral, they have their own legal, contractual, information rights and GDPR policies and procedures. Our commitment to you is that we will only share your personal information if there is a legitimate reason or cause, combined with your consent and preferences. In user cases where the Cathedral is classed as the “data owner” we will agree a 3rd party data sharing agreement with our suppliers. The purpose of this agreement is to ensure that the supplier complies with the Cathedral’s security and privacy policy.

Website Analytics: The Cathedral uses Google Analytics to help design and enrich the customer experience on our official website. Please refer to Google’s privacy policy and the Cathedral’s website cookies for more information. (Please refer to the cookies section explored later in this policy).

We do not sell your personal details to other marketing organisations. Traders at the Christmas Market are independent organisations responsible for their own GDPR and PCI (card payment / security and policies) compliance. Please notify any concerns or complaints directly with these organisations.

7. Surveys and Data Accuracy

7.1 Surveys

Electronic and paper-based surveys are conducted to ensure we are meeting the needs of our congregation, local community, visitors, and commercial partners. In most cases our volunteer community and staff will plan and manage these surveys, but occasionally a specialist partner will be used. Our surveys are designed to anonymise personal data wherever possible and occasionally we may ask you to share your contact details so we can discuss your feedback. You always have the right to withhold consent. We take care when asking for special category data in surveys.

7.2 Data Accuracy

To ensure we are complying with your consent and preferences our data management champion will contact you from time to time to validate your personal details. We will only contact you from an official Winchester Cathedral Email account / marketing communication system / or telephone number. If you have any concerns that someone is maliciously impersonating the Cathedral, via email / social media etc - note down the personal email address and contact our reception desk, who will guide your request to our Data Protection Officer or Cyber Security Manager.

If you are concerned that you are being scammed - via the telephone, please ask for the caller’s name and telephone number - put the phone down and call our reception desk and request to speak with our Data Protection Officer or Cyber Security Manager.

8. Legitimate Interest – Publicly Accessible Information

We may occasionally add publicly available information to your record where this relates to your relationship and engagement with the Cathedral. This could include information about your interests, groups, family information and connections, that is acquired from local or national media, social media

accounts (including Google, Facebook, X formally known as Twitter, and LinkedIn etc), databases of directorships and the land registry. This GDPR regulation is known as “legitimate interest”, whereby you agree to the terms (consent) of other large organisations you share data with e.g. social media or 3rd parties processing personal data (with your consent), can share and augment personal records when the Cathedral’s and your interests align.

9. Engagement Analysis

A vital part of our work is to secure, protect and maintain the Cathedral and its buildings as a place of worship and meeting space for today and future generations.

With help from our supporters, partners, clergy, volunteers, and staff, the Cathedral needs to raise significant sums to meet our running costs. We recognise that there are many pressures on our supporters’ and partners’ time and finances, and we pride ourselves on positive engagement, matching fundraising events and appeals with your interests in the Cathedral.

We understand you want assurance that any investment of time and money you make at the Cathedral is being spent wisely and put to good use.

As part of our engagement and planning process we would like to stay in touch so we can share with you what has been achieved and what projects and events we are planning.

Part of this process is to sensitively consider your existing and future relationship with the Cathedral, your previous donations, and your wider interests. With your consent we analyse this information you provide to predict if there is adequate support to complete future projects, and to design events that are inclusive for all.

Occasionally we may engage a 3rd party to help ensure we are organising fundraising as efficiently as possible. These partners screen our data against publicly available databases. These include Companies House listings, the Land Registry and geo-demographic analyses from our website and the data you agree to share with us.

This information, together with our existing data, helps us to identify those most likely to support our work and which events can be used to run fund raising campaigns. We also use this data to help us target our resources, including our volunteer community, to effectively run and manage these campaigns and events.

We will always try and record age ranges rather than your date of birth to minimise identity theft, but there are occasions when we need to record your date of birth.

We welcome all visitors to the Cathedral regardless of faith, ethnicity, and background. We will only ask you for details of your faith, if required by the Church of England’s and Cathedral’s overarching leadership and governance policies. Where provided we use this data to help us design and run campaigns and events to be inclusive.

10. Website Cookies, CCTV, Broadcasters, Media Outlets, Streaming and Publishers

10.1 Cookies

Our website, <https://www.winchester-cathedral.org.uk/>, uses cookies to help us understand areas of interest as well as areas of development on our website and the way we offer services.

When you access the website, you will be asked to select and then accept or reject our cookies in line with your personal preferences.

Please note that the main network providers and search engines you use on your smart device use cookies to analyse your behaviour and information, these cookies are **outside our control** your network provider / search engine of choice will ask you to accept “their own terms”. These cookies are “not the legal responsibility of the Cathedral” we recommend you read and seek advice if needed before accepting the terms of these providers (for example if you are accessing our web site from a coffee shop, Wi-Fi hot spot on a train /hotel). It is possible that your browser or firewall has the capability to block these cookies (including essential ones), but before enabling this facility please seek technical advice as it could potentially block access to several of your favourite web sites.

The Cathedrals cookies fall into two main categories:

1. **Analytical/performance cookies** (designed to help us improve our web site performance and experience)
2. **Strictly necessary cookies** (default option to allow you to access our religious service information, donate, book an event at the Cathedral, watch the peregrine nesting etc)

10.2 CCTV

In order to ensure the safety and security of people visiting and working at the Cathedral and its estate we operate CCTV cameras which collect recognisable images of people. Cameras are in multiple locations around the Cathedral and its estate. Signage has been erected across the Cathedral advising all visitors and staff that CCTV is in operation. We retain CCTV footage for a minimum of 30 days. If CCTV footage is being used as part of an internal or police investigation, we reserve the right to retain footage until the investigation has been concluded.

Any person whose image is recorded on our CCTV system has a right to request a copy of their own personal image. If you wish to request footage, please contact the Cathedral’s Data Protection Officer, providing the date and time you entered the Cathedral estate plus a description of the route you took.

To request footage, you need to complete a CCTV request form, which the Data Protection Officer will provide. You will need to provide suitable proof of identity (with picture) such as a passport or driving licence).

You will also be expected to provide a secure and suitable electronic device or solution that we can use at your cost. The footage files are large so please consider this requirement before completing your request.

For the avoidance doubt we are only obliged to provide images of the individual requesting the footage (unless this is in response to an internal or Police investigation).

If, for any reason, you are unable to comply with the conditions above, or we deem the request inappropriate or it is not possible to protect the identity of others in shot, we reserve the right to decline the request to provide a copy of your CCTV image and the footage. You will be advised why the request has been declined. Your right to appeal is not affected.

Our policy is to share CCTV footage with the Police provided a legitimate cause has been declared and the requesting officer has provided adequate confirmation of their identity and intent of use. The Police Officer will be asked to sign a receipt confirming their police officer number, date, time, and a summary of the footage provided.

We may choose to use a reputable external security company to monitor and conduct investigation using our CCTV footage in the future. In this event, suitable contracts and 3rd party data sharing agreements will be put in place as needed.

10.3 Religious Services, Ceremonies and Events – Broadcasters, Media Outlets, Streaming and Publishers

As one of the UK's leading churches, our clergy, volunteers, and staff officiate over a range of services, ceremonies and events that are newsworthy / historically important. Broadcasters, media outlets and publishers record and, in some cases, provide a live stream of events taking place at the Cathedral (the full range of media options are in scope: TV, radio, digital, streaming, and printed copy). If you are attending an event that is being recorded by a broadcaster, media outlet or publisher and you have any privacy related questions, please contact our Data Protection Officer who will be happy to help.

10.4 Other Online Streaming Services of Ceremonies, Religious Services and Events

The Cathedral provides a streaming service to allow our congregation and supporters to watch religious services, ceremonies, and events online. Should you have any privacy related questions on the use of this service please contact our Data Protection Officer who will be happy to help.

11. Updating the Policy

The Cathedral typically conducts a review of its GDPR policies every two years unless there is a significant change in operations or legislative background.

12. Your Privacy Matters

Please let us know if we can do better by contacting our Data Protection Officer.

End of Policy

13. Appendix Information – Relevant Websites

Please cut and paste the relevant link into your browser to access the material.

https://admin.winchester-cathedral.org.uk/wp-content/uploads/2021/10/WIC0045_ValuesBooklet02b.pdf

<https://www.winchester-cathedral.org.uk/get-to-know-us/safeguarding/>

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/special-category-data/what-is-special-category->

[data/#:~:text=These%20include%20race%2C%20religion%20or,information%20about%20a%20person's%20health.](#)

<https://www.legislation.gov.uk/ukpga/2000/36/contents>

<https://www.hants.gov.uk/librariesandarchives/archives/about-us/access-restrictions>

<https://cdn.nationalarchives.gov.uk/documents/information-management/guide-to-archiving-personal-data.pdf>

End of Appendix