

DIOCESE OF LANCASTER GENERAL DATA PROTECTION REGULATIONS COMPLAINTS POLICY

1 INTRODUCTION

- 1.1 The Diocese of Lancaster (the "**Diocese**") is a charity registered with the Charity Commission in England and Wales. Our charity number is 234331 and our registered address is The Pastoral Centre, Balmoral Road, Lancaster, LA1 3BT. In this Notice, references to 'we' and 'us' mean the Diocese.
- 1.2 When you provide us with personal data in order to engage with us and/or benefit from our activities, we will keep the data you give in an orderly and retrievable system that will enable us to comply with our statutory obligations and to achieve our charitable objects of advancing and maintaining the Roman Catholic religion through the operation of our parishes and our other activities.
- 1.3 For the purpose of the General Data Protection Regulation (GDPR), the Diocese, through its Trustees, will be a Data Controller in respect of your personal data. In some cases, the Diocese may be a joint Data Controller of your personal data (e.g. where your data is shared between the Diocese and another organisation for a particular purpose)]. Please be aware that our parishes form part of the Diocese and are not separate legal entities. Parishes are not Data Controllers nor do they process personal data on behalf of the Diocese as a Data Processor.
- 1.4 Under GDPR everyone has rights about how their Personal Data is handled by organisations. The Diocese is committed to ensuring that personal data is properly and securely managed in accordance with the relevant data protection laws and believes this is an important part of achieving trust and confidence between the Diocese and those with whom it interacts. This policy reiterates what those rights are and advertises the fact that if an individual considers that the Diocese has not carried out its duty correctly or failed to respond to a request the individual has a right to make a complaint.

2 THE RIGHTS OF AN INDIVIDUAL (DATA SUBJECT).

- 2.1 GDPR provides the data subject with the following rights.
 - 2.1.1 The Right to be Informed. Individuals have the right to be informed what their personal data is used for, how long it will be retained and who it will be shared with. This information should be provided at the time of collection of the personal data.
 - 2.1.2 The Right of Access. Individuals have the right of access to their personal data. This is often referred to as a *Subject Access Request*. These requests can be made verbally or in writing. There is a time limit of one month in which the Diocese must respond. This can be extended if there is a vast amount of data to be collated. There is no specific person to whom these requests are made. Subject access request can be rejected provided the reason is recorded and the requestor is notified. The Data Protection Officer should be involved in subject access requests.
 - 2.1.3 The Right of Rectification: Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. Requests can be made verbally or in writing and there must be a response within one month.

- 2.1.4 The Right to Erasure: Individuals have the right to have personal data removed. As an example this applies when the personal data is no longer necessary for the purpose it was originally collected for. The individual has withdrawn consent. Personal data is used for direct marketing purposes. Requests can be made in writing or verbally and there must be a response within one month.
 - 2.1.5 The Right to Restrict Processing: Individuals have the right to suppress or restrict processing of their data. As an example, this may apply when an individual contests the accuracy of their personal data and we are verifying the accuracy. Processing must stop. Requests can be made in writing or verbally and must be responded to within one month. The data controller is permitted to store the data but must not use it in the response period.
 - 2.1.6 The Right to Portability: Individuals have the right to obtain and reuse their personal data for their own purposes across different services. This allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way. This right applies only to the information the individual has provided to a controller. Portability does not apply to paper files.
 - 2.1.7 The Right to Object: Individuals have the right to object to their personal data being processed for Direct Marketing, Public Task, Legitimate Interest or Research Purposes. The individual must give a reason for their objection.
- 3 Every time we ask an individual for personal data, we are obliged to provide them with a privacy notice. This can be an abbreviated form that gives brief details but also refers to the Privacy Notice on the Diocesan website.
 - 4 All officials of the Diocese i.e. clergy, paid employees and lay people who have been appointed to specific roles on an honorary basis must be alert to an individual exercising their rights as laid out above.
 - 4.1 When an individual exercises any of his/her rights, as above, he/she must be given a progress report. The individual must also be informed of his/her right to complain at any time if he/she is dissatisfied with the Diocese.
 - 4.1.1 In line with the Data Protection Policy of the Diocese parishes and Diocesan Commissions are not data controllers or data processors. Therefore, if an individual is not satisfied with the actions or results taken at parish or commission level a complaint should be raised the Data Controller i.e. the Trustees. (Data Protection Officer), The Pastoral Centre, Balmoral Road, Lancaster, LA1 3BT. (e-mail Chris.Barwise@lancasterrcdioocese.org.uk)
 - 4.1.2 If an individual has exercised their right at Data Controller level and is not satisfied with the progress or result then the individual has a right to complain to the Information Commissioners Office on 03031231113 or the online at the ICO website