

Privacy Notice for Disclosures

About this privacy notice

We encourage anyone with information about abuse within the Church to come forward and share it with us. We understand that it can be difficult to tell us about abuse and that you may need to tell us sensitive information about yourself and others.

This privacy notice explains how we collect and use information about you if you report any abuse to us. We also have a general privacy notice which can be found on our website.

About us

The Religious Life Safeguarding Service (RLSS) is responsible for handling your personal information.

Everyone has rights with regard to how their personal information is handled by organisations. We are committed to ensuring that personal information is properly and securely managed in accordance with relevant data protection legislation. This is an important part of achieving trust and confidence between our organisation and those with whom we interact.

The Religious Life Safeguarding Service is a company registered with Companies House in England and Wales. Our company number is 13462386 and our registered address is 84 Church Street, Liverpool, United Kingdom, L1 3AY. Details of how to contact us are set out below.

What information will we collect about you?

While you may contact us anonymously regarding safeguarding issues, we typically request personal information to effectively address your report. This will typically include your name, contact details (such as a telephone number or email address) and any other information you wish to tell us that may be relevant to your report.

Depending on the circumstances, we may need to contact you again to ask you for more information. We will always do so sensitively.

As part of our investigations about your report, we may collect information from other sources, for example, from potential witnesses or from other organisations. This may include personal information about you.

How we will use information about you?

We use the personal information you provide to address safeguarding concerns, comply with statutory obligations, and fulfil our responsibilities within the Catholic Church.

This may include:

- maintaining our own records of reports received;
- responding to your report, including taking action against specific individuals where necessary; and
- sharing information about your report with other organisations (see more below).

We may also use your personal information to contact you. This may be to give you updates about your report, to seek additional information from you or to respond to any questions you may have asked us. If you specifically agree to it, we may also signpost you to other service providers who may be able to help you, such as counselling services.

We will also use the information you tell us, in an anonymous format, for audit and statistical purposes. We share anonymous information about safeguarding reports with the Catholic Safeguarding Standards Agency so that they can produce an annual report and analyse trends.

Who will we share your information with?

We recognise the sensitivity of abuse information and handle it with care. We will only share your information with your consent or when legally obligated.

We are not able to keep all reports completely confidential because in certain circumstances we have duties to notify other authorities of such reports.

It is our policy to report all allegations of abuse to the statutory authorities, regardless of whether the abuse is reported to have occurred recently or in the past, and whether the accused person is living or deceased. Where the accused person has or has had a role working with children, the allegation will be referred to the relevant Local Authority Designated Officer (LADO) for safeguarding children. Where a criminal offence may have taken place, the allegation will also be referred to the Police. This ensures that

potential crimes are reported, and independent investigations can be undertaken in line with current safeguarding best practice.

There are lots of different Catholic bodies in Great Britain, including dioceses, religious life groups and charities. Sometimes reports of abuse are made to us which involve individuals for whom we are not responsible (for example, a religious sister). In such cases, we may need to share your information with the Catholic Safeguarding Standards Agency and/or the Catholic organisation which is responsible for that individual, which may be based outside Great Britain.

Other than as set out in this privacy notice, we will not share your personal information with anyone else unless there is a significant risk of harm or disclosure is required or permitted by law.

The Religious Life Groups

The Religious Life Safeguarding Service works with Religious Life Groups (RLG) should a safeguarding concern be raised about a RLG then the Religious Life Safeguarding service may share information with them in order to gain relevant information.

The RLG may need to share information concerning your report with the Charity Commission, which is the body responsible for regulating charities. If there is information which is relevant to insurance, they may also need to share information with insurers and/or brokers. If you decide to make a claim for compensation, information may also be shared with legal advisors.

As part of our procedures, they may appoint the Religious Life Safeguarding Service or an external person from outside this organisation to investigate a report of abuse or to undertake an assessment, and to advise us on appropriate action to take. Where this is an external person, they will need to share some personal information with that individual so they can carry out their investigation. Either the RLG or the Religious Life Safeguarding Service will inform you where this is the case.

The Catholic Safeguarding Standards Agency

The Church is regulated by the Catholic Safeguarding Standards Agency (the CSSA), which is the professional standards body to which all Catholic Dioceses and Religious Life Groups in England and Wales are accountable. We may share information about your report, including your personal information, with CSSA for the following purposes:

1. For the purpose of consultation on your case, to receive professional safeguarding advice and guidance;
2. To allow the CSSA to audit our safeguarding functions against professional standards; and

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Registered in England no. 13462386

3. If you choose to complain about how your report has been handled by us, to allow the CSSA to investigate your complaint.

The CSSA will keep your information safe and secure, and only use it to fulfil its regulatory functions. More information about how the CSSA handles personal information can be found on the CSSA website catholicsafeguarding.org.uk

Our legal basis for collecting, holding and using your information

Data protection laws provide various lawful bases (or 'conditions') for collecting, holding, and using your personal information.

Whenever we receive a report of abuse or information about any other safeguarding matter, we are under a legal obligation to make a record of the report, to take action in response to the report and, where appropriate, to share information about that report with statutory bodies such as the police. For the purposes of data protection law, our legal basis for collecting, using and sharing your information is therefore to comply with these legal obligations.

We will sometimes use your personal information based upon your consent. We will always tell you where this is the case and ask you to agree before we process your information. For example, we may ask you if you would like us to share your personal information with another organisation for the purpose of facilitating counselling or other support for you.

Sometimes it is necessary for us to process your personal information for the purposes of our own legitimate interests. We will only do so where these interests are not overridden by the interests and fundamental rights or the freedoms of the individuals concerned. Although we are legally obliged to take action in response to most safeguarding reports made to us, that is not always the case. For instance, the nature of the issues you raise with us may mean that we are not required to investigate or keep records of our actions. Nevertheless, we believe that it is in our legitimate interests to do so. In this case, our legitimate interests are to ensure that all people to whom we come into contact with are kept safe and to look into any concerns raised.

We may share your personal information with the CSSA for the purposes set out above on the basis of our legitimate interests. We believe it is in the legitimate interests of everyone within the Catholic church for organisations to be subject to effective regulation by an independent professional standards body. Please tell us if you wish to object your information being shared with the CSSA.

Data protection law recognises certain "special categories" of personal information, which are information revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic information; biometric

information for uniquely identifying a person; information concerning health, and information concerning a person's sex life or sexual orientation. Information relating to criminal convictions and offences (including allegations) is given similar protection under data protection law. It may be necessary to collect some information of this nature as part of your safeguarding report.

These special categories of personal information are considered to be particularly sensitive and so we will only collect and use this type of information in limited circumstances. This includes where we consider the collection and use of your information (including sharing your information with the RLSS and CSSA) is necessary in the substantial public interest to prevent or detect unlawful acts or improper conduct and to comply with our legal obligations in relation to safeguarding, and where it is necessary for us to establish, exercise or defend legal claims. In some circumstances, we may ask you to give us your explicit consent to our further use of your information. We will tell you where that is the case.

Security and storage of your information

We securely store your information, accessible only to those who need it, such as safeguarding personnel.

We will keep your information for no longer than is necessary to meet our legal obligations. The exact length of time we will keep your information depends on the nature of the issues you raise with us. We follow the national safeguarding procedures produced by the Catholic Safeguarding Standards Agency.

The procedures provide that safeguarding case files relating to allegations against individual members of the clergy will be held for 85 years from their date of birth or until their date of death, if later. At the end of that period, a summary record will be retained indefinitely. Files relating to individuals in other church roles will be held for 25 years from the date their role ceases or at least 6 years after their death, if sooner. At the end of these periods, a summary record will be retained until the 85th birthday of the accused person. Where you raise with us issues which are not about clergy or individuals in formal church roles, the retention period will be shorter.

Your rights

1. You have specific rights regarding the personal information you provide, including:
2. The right to request a copy of some or all of the personal information that we hold about you.
3. Where we have asked for your consent, the right to withdraw that consent to our processing of your personal information.

4. The right to ask that any inaccuracies in your personal information are corrected.
5. The right to ask that we delete your personal information where there is no compelling reason for us to continue to process it.
6. The right to object to our processing of your personal information, where we do so on the grounds of our legitimate interests (see above).

Many of the rights listed above are limited and only apply in certain defined circumstances and we may not be able to comply with your request. We will tell you if this is the case.

If you choose to make a request to us, we will aim to respond to you within one month. We will not charge a fee for dealing with your request.

If you are dissatisfied with how we are using your personal information or if you wish to complain about how we have handled a request, then please contact our Data Protection Officer (details below) and we will try to resolve any issues you may have.

You also have the right to complain to the Information Commissioner's Office, which is the statutory regulator for data protection law. Details of how to complain to the ICO can be found at <https://ico.org.uk/concerns/>.

Contact Details

For questions about this privacy notice, information on how we protect your data, or to exercise your rights, please contact our Data Protection Officer:

Melissa Andrews

CEO@religioussafeguarding.org

0151 5562311

If you wish to report abuse to us, please contact our Safeguarding Team

RLSS Safeguarding team

Safeguarding@religioussafeguarding.org

0151 5562311 (option 1)