



Privacy Notice

Lambeth Palace SCIE Safeguarding Audit

1. Introduction and data controller

This privacy notice explains why and how your personal data is processed by the Social Care Institute for Excellence (SCIE) Safeguarding Audit in compliance with the UK GDPR and the Data Protection Act 2018.

The Audit has been commissioned by the National Safeguarding Team (NST) into the handling and management of abuse allegations and safeguarding practice in the institutional Church of England.

Further information about the SCIE audits are available here:

<https://www.churchofengland.org/safeguarding/reviews-and-reports/social-care-institute-excellence-independent-audits>

The data controller is

The Archbishop of Canterbury (in his corporate capacity)
Lambeth Palace
Lambeth Palace Road
London SE1 7JU

2. Why the auditors process your personal data

The purpose of the processing is to support safeguarding improvements. The goal is to understand the safeguarding progress at Lambeth Palace to understand both how things work in Lambeth Palace and to evaluating how well they are working. This includes exploring the reasons behind identified strengths and weaknesses. The conclusions of the audits pose questions for the Lambeth Palace leadership to consider supporting them in tackling the underlying causes of any gaps and weaknesses identified.

The information the auditors will process include

- Name
- Title
- Marital status
- Gender
- Nationality
- Job title/position
- Dates (birth, joined, ordination etc)
- Contact information – work and personal (address; email address, phone numbers)
- Family names and details, including wider family
- Lifestyle and social circumstances
- Socio-economic details
- Employment offices held and appointments



- Training attendance/certification

The auditors may also process “special categories” of information, such as:

- Race
- Ethnic origin
- Religious belief
- Health
- Sex life, or
- Sexual orientation

The auditors may also process data concerning:

- criminal convictions and offences, including criminal allegations.

The auditors may process information about:

- Current, former and retired clergy
- Current and former church officers (A church officer is anyone appointed/elected by or on behalf of the Church to a post or role, whether they are ordained or lay, paid or unpaid).
- Current and former employees
- Current and former volunteers
- Individuals who made allegations of abuse and/or raised concerns about unsafe people, practice or arrangements
- Current and former professional advisers and consultants
- Individuals whose safety has been/was put at risk
- Children and parents/carers
- Individuals who witnessed any misconduct or any unlawful acts or were alleged to witness such acts and/or raised concerns about unsafe people, practice or arrangements

The auditors may process the following types of documents, records or correspondence:

- SCIE audit survey and interviews
- Records of alerts, notifications, concerns or allegations
- Safeguarding and personal (HR/Blue) files
- Risk Assessments
- Confidential declaration forms
- Recruitment documentation e.g. DBS checks
- Training records
- Referrals
- Self-referrals
- Minutes of meetings

- Correspondence, including letters, emails etc.
- Telephone call notes
- Records of any enquiries, advice sought or provided
- Records provided by the police or statutory agencies
- Records or reports from independent investigations or statutory enquiries e.g., IICSA
- Any notifications provided to external parties e.g., police, local authorities, Charity Commission, insurers, etc.

3. The lawful bases for processing your personal information

The auditors will process your personal data on the following lawful bases:

Personal data

- **Legitimate interest** – the auditors will need to process personal data to undertake the audit, in order that Lambeth Palace can take steps to enhance and improve its response to allegations of abuse and working practices, thereby ensuring a safe environment for all.

Legitimate Interest Assessment

We have undertaken a Legitimate Interest Assessment the summary of which sets out why we have a legitimate interest.

We have a specific purpose with a defined benefit	The purpose of the audit is to advise and recommend to Lambeth Palace improvements to its response to allegations of abuse and its safeguarding working practice, thereby ensuring a safe environment for all.
The processing is necessary to achieve the defined benefit.	Lambeth Palace would be unable to address any failings as these would not be known or understood, and would be less able to improve practice, or to address the concerns and needs of survivors.
The purpose is balanced against, and does not override, the interests, rights and freedoms of data subjects.	Data subjects have a joint interest in learning from the audit and understanding what happened and what needs to be done to improve practice and survivor support. Data subject involvement is a key component of the audit, and measures are in place to protect their rights and freedoms.

For a copy of the full Legitimate Interest Assessment, please contact Debbie McCormack whose contact details are set out at section 10 below.

Special categories and information relating to criminal convictions and offences

- **Substantial public interest** (protecting the public against dishonesty etc.) – the auditors may need to process your information where necessary for the protection of members of the public generally against seriously improper conduct, and from any failures in connection with, the institutional Church of England's activities, or for safeguarding purposes.

Consent from data subjects is not necessary. The protective function of safeguarding would be prejudiced or prevented if a data subject withheld or withdrew consent in relation to:



- investigations into allegations or circumstances surrounding allegations.
- understanding what failures or mistakes had been made that led to a particular situation or event or series of events.
- reviews or audits which could result in recommendations for improved practice and the protection of individuals in the Church and engaged in Church activities.

4. Who the auditors collect your information from:

The auditors will process personal data that comes from various sources including:

- Members of Lambeth Palace clergy (serving and retired).
- Diocesan bishops.
- Former and current safeguarding advisors.
- Former and current members of staff
- Volunteers
- The National Safeguarding Team (NST)
- Victims/survivors and those who have made allegations of abuse and/or raised concerns about unsafe people, practice or arrangements
- Advocates, parents or guardians of those who have made allegations of abuse and/or raised concerns about unsafe people, practice or arrangements
- Witnesses to any unlawful behaviour or other misconduct.
- Statutory agencies (LADO; local safeguarding boards; police); independent or statutory enquiries.

Some information will come directly from the individuals concerned (surveys, interviews) and some will come from other sources, (e.g., case files), (see section 3 above for further information).

5. Sharing your information

All personal data provided will be treated as strictly confidential.

Data may also be shared with the National Safeguarding Team (NST) should issues arise during the audit and to provide assistance if an issue that has been escalated to the NST by SCIE or Lambeth Palace.

Data may also be shared by the Lambeth Palace safeguarding officer with police or other statutory or regulatory agencies both during and after the audit, if necessary, in order to make referrals. In the event that the safeguarding officer does not make a referral as advised by SCIE, SCIE will communicate with the relevant statutory authorities directly.

When the audit is completed, the data will be anonymised for the purpose of a report and recommendations for improving Lambeth Palace's safeguarding procedures, including the response to allegations and safer working practices.

Feedback on case files will be provided to the safeguarding officer and line manager (where applicable) with recommendations for action or improvement.

The anonymised audit report and action plan will be shared with the Lambeth Palace Safeguarding Lead David Porter and the NST.

6. How long will your information be kept?



SCIE will retain your information until the completion of the audit report only and will then delete all data.

7. Security

We are committed to ensuring that your personal data is secure. We limit access to data on a need-to-know basis and all electronic transfer and storage is encrypted.

8. Your rights

You have the following rights regarding your personal data:

- The right to be informed about any data we hold about you.
- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of your personal data

To exercise these rights, please contact the Data Protection Team using the contact information provided below. The NCIs Individual Rights Policy is available on request.

9. Complaints or concerns

If you have any queries regarding this processing activity, please contact, in the first instance, the Lambeth Palace Safeguarding Officer Debbie McCormack via debbie.mccormack@lambethpalace.org.uk

If you have any concerns or queries about how Lambeth Palace or the SCIE auditors handle your personal data, please contact the Data Protection Officer at:

gdpr@churchofengland.org

or online at: [National Church Institutions data protection | The Church of England](#) or Tel: 020 7898 1019.

You have the right to make a complaint at any time to the Information Commissioners' Office online at: [Your personal information concerns | ICO](#), or by phone on 0303 123 1113 (local rate).