



**DURHAM  
CATHEDRAL**  
THE SHRINE OF ST CUTHBERT

## **Durham Cathedral Privacy Notice – Recruitment**

### **Durham Cathedral**

Durham Cathedral is a Christian church of the Anglian Communion and the Seat of the Bishop of Durham. We are a place of welcome, worship and hospitality.

We are dedicated to working in ways that are motivated by wisdom, responsibility, ethics and above all, the Christian faith. We recognise the image of God in all human beings, honour their dignity and treat them with courtesy. This is reflected in the way in which we work with everyone with whom we engage as a Cathedral – our employees, volunteers, visitors, supporters and those who worship here – and in how we respect their privacy and protect their personal information.

### **Our Organisation**

Durham Cathedral is made up of several connected organisations, trading companies and charities and this enables us to deliver our work in the most efficient manner. This notice applies to all the following and for the purposes of this Privacy Notice, “Durham Cathedral”, “we”, “us” refers to all of them: -

- Durham Cathedral
- Durham Cathedral Open Treasure Limited
- Durham Cathedral Trading Limited

The Chapter of Durham Cathedral is the data controller for the purposes of GDPR and responsible for our website hosted at [www.durhamcathedral.co.uk/](http://www.durhamcathedral.co.uk/) (“this website” or “our website”). This means it decides, as data controller, how your personal information is processed and for what purposes.

## **Purpose of this Privacy Notice**

This purpose of this Privacy Notice is to set out in detail how we collect your personal information, how and why we use it, as part of our recruitment process as we deal with applicants for jobs at Durham Cathedral. It states your rights to access your data and to control how it is used. It also refers to the relevant UK data protection legislation, currently the General Data Protection Regulation ((EU) 2016/679) (GDPR), and describes the steps that we are taking to ensure that we comply with it regarding your personal data. We have used the capitalized term Personal Data throughout this Notice – see below for what we mean by this term.

This Privacy Notice applies to all applicants to work with us at Durham Cathedral and means you are a data subject for the purposes of this Notice. This Notice may be updated from time to time.

Our Privacy Notice is founded on three main principles:

Transparency: We are committed to giving you clear and detailed information on when and why we collect your personal information and how we use and store it. Information about this is set out in this Privacy Notice and in other written communications which we may make available to you such as Privacy Notices specific to the interaction between you and us or Consent Forms. Our approach to data privacy can help you to be in control of how your data is held here. Further details are available from the Chapter Clerk's Office.

Lawfulness: We are committed to collecting and using personal information in a way that complies with the law.

Fairness: We are committed to fairness in all our dealings with personal information. Your trust is very important to us and we will do our best to keep your data safe and secure.

## **What is Personal Data and what data do we collect?**

**Personal Data** is information about living, identifiable individuals relating to their private, professional or public life, that can be used directly, or when combined with other information, indirectly to identify the person. It applies to Personal Data held both electronically or in hard copy documents.

Durham Cathedral collects and processes the following types of Personal Data about the people who apply to work for us: -

Identifying Data which includes first and last name, marital status and dependants, preferred title, date of birth, gender, (and may include in some circumstances a maiden or previous name) and your photograph;

Contact Data which includes postal address, personal email address and telephone numbers. It will also include you next of kin and emergency contact details;

Financial Data which includes bank account details;

Recruitment information and Employment records which includes copies of right to work documentation, qualifications, skills, references and other information included in a CV or cover letter or as part of the application process, employment records including start date/date of previous employment, job titles, work history, copy of driving licence, training records and professional memberships, performance information, disciplinary and grievance information, leaving dates and reasons for leaving.

We may also collect and use the following types of special categories of personal data but will seek your consent to do so:

- 
- Information about your race or ethnicity;
- Information about your religious beliefs and political opinions;
- Information about your sexual orientation;
- Trade union membership;
- Information about your health or disability, including any medical condition, for which we may need to make reasonable adjustment during the recruitment process;
- Information about criminal convictions and offences.

### **How do we collect your Personal Data?**

We collect Personal Data in three main ways:

- Data provided by you verbally or in writing in for example a CV or from other documentation such as your passport, while applying for employment with us;
- Data Collected from Third Parties: In some cases, we may receive Personal Data about you from a third party. Please note that we do not buy data from third parties. If we do acquire Personal Data from a third party, we will only use it if we have a legal basis for doing so (see below). The ways in which we sometimes collect Personal Data from third parties may include from an employment agency or background check provider (including sometimes a credit reference agency) or from former employers of yours. Please note that we will only seek this information from third parties once an offer of employment has been made to you;
- Data Collected from publicly available sources: We may collect data from publicly available sources including data from Companies House, or social media platforms such as LinkedIn / Facebook.

## How do we use your information?

We use your Personal Data collected as above in the following ways: -

- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- [Re-imbursing you costs of travelling to Durham Cathedral as part of the recruitment process];
- Providing employment related benefits to you;
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties;
- Liaising with the trustees or managers of a pension arrangement operated by us, your pension provider and any other provider of employee benefits;
- Administering the contract we have entered into with you;
- Making decisions about salary and compensation;
- Assessing qualifications for the job;
- Making decisions about your appointment;
- To respond to and defend ourselves in any legal disputes involving applicants;
- Complying with health and safety obligations (for example noting your name and vehicle registration when you arrive for interview);
- To conduct data analytics studies to review and better understand profile of applicants;
- Equal opportunities monitoring; and

## Legal Basis of Holding Personal Data

We respect your right to Privacy and are committed to ensuring that our holding of all Personal Data has a lawful basis. We will hold your Personal Data only on the following legal bases: -

- you have given us your **consent** to do so. We will seek your consent to using Personal Data about you that is special category or sensitive data as defined above;
- the data is for the performance of a **contract** with you and for carrying out rights and obligations under employment law, including in relation to making reasonable adjustments to the recruitment process to those with a disability;
- as a legitimate interest of ours to undertake the recruitment process and to keep records on it to allow us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. In this case we have considered whether those interests are overridden by the rights of applicants and has concluded that they are not;
- to meet our **legal compliance** obligations or to establish, exercise or defend legal claims; and

- to protect your **vital interests** (for example in taking emergency contact details and providing your medical data if it is necessary) where you are not able to give your consent at that time;

We might process your sensitive personal data in the situations and purposes which are listed below: -

- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting as permitted under data protection legislation;
- We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and for meeting our regulatory requirements including safeguarding obligations.

We do not take automated decisions about you using your personal data or use profiling in relation to you.

### **Sharing your information**

Internally, your Personal Data will be shared only for the purposes of the recruitment process. This will include to the HR&OD Department, interviewers involved in the recruitment process and managers in Departments with a vacancy.

If your application is successful and we offer you a position, we may share your data with third parties where: -

- we are legally required to do so, for example, by a criminal record checking agency;
- we have a legitimate interest to contact your previous employers and other individuals provided by you to us to obtain references; and
- where we are working with our service providers in order for them to perform services on our behalf – such as providers of background check providers.

We only choose partners we can trust and are committed to ensuring that they: -

- abide by the requirements of GDPR;
- only use the data they receive for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation); and
- allow us to carry out checks to ensure they are doing all these things.

## **Storing and processing your information**

We place a great importance on the security of all Personal Data of everyone who works with us.

Your Personal Data is held by us electronically subject to appropriate security procedures. We may also store information in paper files which are also subject to security protocols.

We have appropriate technical and organisational policies and/or procedures in place to mitigate against unauthorised or unlawful processing of your Personal Data and against accidental loss, destruction or damage. Our staff must comply with our Privacy Policy and our IT procedures, that are available on our shared drive.

We may transfer the information to reputable third-party organisations within the European Economic Area (EEA) as mentioned in Sharing Your Data above. Some third parties with whom we deal are based outside the EEA, so their processing of your Personal Data will involve a transfer of that data outside the EEA. These transfers will be subject to GDPR compliant 'appropriate safe-guards'. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA. You can also see European Commission: Adequacy of the protection of Personal Data in non-EU countries.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally obliged to do so.

## **Retaining your Personal Data**

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which we have collected it and meet our legal, financial or governance obligations or other professional best practice requirements. Currently, if your application is unsuccessful, Durham Cathedral will keep your personal data on file for a period of six months in case a similar employment opportunity may arise for which you are suitable. We will not keep more information than we need. We keep this retention policy under review.

We will take all reasonable steps to destroy or erase from our systems all your Personal Data that we no longer require in accordance with this Privacy Notice and will require third parties to delete such Personal Data where applicable.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes or for archiving material that we believe to be of historical significance or which we require to comply with the Church of England's "Chapter and Verse" document and our internal Archiving procedures and will store this information indefinitely without further notice to you.

If your application for employment is successful, your Personal Data collected in accordance with this Privacy Notice will be transferred to your personnel file and retained under the terms of Durham Cathedral's Privacy Notice for Employees.

## Your rights under GDPR

GDPR gives you several rights in respect of your Personal Data. These rights include: -

- the right to transparency i.e. the right to be informed as to how we use your data;
- the right of access i.e. the right to request and be provided with a copy of the information we hold about you;
- the right to rectification i.e. to require us to update or amend the data we hold about you if you feel it is incomplete or incorrect;
- the right to erasure i.e. the right to request that we delete or remove the data we hold about you (sometimes referred to as 'the right to be forgotten');
- the right to restrict processing i.e. the right to request information on the length of time for which we are holding your data or to request that we cease processing your data;
- the right to data portability i.e. the right to transfer the data we hold for your own purposes; and
- the right to object; i.e. the right to object to us processing your data for certain purposes. Where you have provided consent for us to process your data, you have the right to withdraw this consent at any time.

If you wish to exercise any of your rights set out above, please contact us at The Chapter Clerk's Office in writing at: -

Durham Cathedral  
The Cathedral Office  
The College  
Durham  
DH1 3EH  
[gdpr@durhamcathedral.co.uk](mailto:gdpr@durhamcathedral.co.uk)

Or via telephone: 0191 386 4266.

There is no fee payable for you to access your Personal Data or to exercise any of your rights (although we do reserve the right to charge a reasonable fee if your request is clearly unfounded or if you make several requests which become repetitive or excessive or if you require multiple copies of the data). We can also refuse to comply with your request in those limited circumstances.

We may need to request specific information from you for security purposes to help us confirm your identity and ensure your right to access your Personal Data or to exercise any of your other rights. We will act on your request without undue delay and at the latest within one month of receipt of request although we may extend this period if it is a particularly complex request. We will keep you updated about the progress of any request or exercise of your rights.

You can find out more about your rights by visiting the Information Commissioner's Office website - [www.ico.org.uk](http://www.ico.org.uk).

We have decided not to appoint a dedicated data protection officer but if you would like any further details about our organisations or if you have any questions regarding your personal information or its use, including any requests to exercise your legal rights, please contact the Chapter Clerk at the address above.

If you wish to complain about the way we are processing or controlling your data, please contact the Chapter Clerk's Office in the first instance and we will investigate and do our best to address your concerns. However, if you are not satisfied with our response you can make a complaint to the **Information Commissioner's Office** - <https://ico.org.uk/concerns/>

### **Other Important Information**

#### **Freedom of Information Act**

Please note that Durham Cathedral is not a 'public authority' as defined under the Freedom of Information Act 2000 (as amended) and we will not therefore respond to requests for information made under it.

#### **Changes to the Notice**

We may make changes to this notice from time to time. If we do so, we will inform you of the changes that have been made. Changes will apply from the time we communicate them to you.