PRIVACY NOTICE – SOUL SURVIVOR

1. This privacy notice tells you what you can expect the Reviewer to do with the personal information you share when you make contact or meet with her.
2. Fiona Scolding KC, the Reviewer, is the data controller for the purposes of the personal information process. The scope and terms of reference are attached to this document. Fiona can be contacted on [soulsurvivor@landmarkchambers.co.uk](mailto:soulsurvivor@landmarkchambers.co.uk) , and her postal address is FAO Soul Survivor Review, Landmark Chambers, 180 Fleet St, London EC4A 2HG.
3. If you have any questions or would like to exercise your data protection rights or think that your personal data has been misused or mishandled, please contact Fiona Scolding.

WHY WE HOLD YOUR PERSONAL INFORMATION

1. We are seeking consent from individuals to process their personal information for the purposes of this review. That consent will cover the processing of data about an induvial which is not provided directly by them but from other sources: for example from other contributors to the review or where relevant information has been posted online.
2. Where it is not possible to obtain consent we will only process your personal where we have a lawful basis to do so. In this case, we anticipate that this will be where there is a legitimate interest in processing your data, where that processing is necessary and where the necessity outweighs your rights in respect of the data. These decisions will be made on a case-by-case basis. However, we consider that legitimate interests may include the prevention and detection of crime and the safeguarding of individuals.
3. Any assessment of the proportionality of processing your data in these circumstance is likely to consider the following:

1. The purpose of this review is to promote societal benefits by analysing and considering how alleged abuses of powers within church settings can be prevented, minimised or recognised at an early stage.
2. The purpose of this review is to promote the interests of those who have attended Soul Survivor or continue to do so to provide analysis and consideration of how safeguarding and abuses of power have been dealt with or should be dealt with.
3. The purpose of this review is to protect the public and to safeguard both young people and adults by examining alleged abuses of power. Please see attached legitimate interests’ assessment.
4. The extent of the interference with your privacy and any safeguards in place and
5. Whether there is a less intrusive way to achieve the same result.
6. We have considered safeguards and have put them in place.
7. Where it is not possible to obtain consent for the processing of sensitive categories of data (for example, relating to health, ethnicity or sexual life) or criminal allegations, we will only do so where we are satisfied that the processing is necessary for reasons of substantial public interest which is proportionate to the aim pursued. In this case we anticipate that such reasons will exist where:
8. The processing is necessary to prevent or detect an unlawful act and is necessary for reasons of substantial public interest;
9. The processing is necessary for the purposes of protecting an individual from neglect or physical, mental or emotional harm and for reasons of substantial public interest – where the person concerned is either under 18 or over 18 and at risk and cannot give consent, cannot reasonably give consent or where obtaining consent would prejudice the protection of the person.

WHERE WE KEEP YOUR PERSONAL INFORMATION

1. We shall keep information secure and only share it with those who have a need to see it. All personal information received shall be handled fairly and lawfully in line with data protection legislation. For this review, personal information is included as part of the information received.
2. Information shall be kept on a secure server and/or in a physically secure space whilst being processed and stored.

HOW LONG WE KEEP YOUR INFORMATION

1. All personal details and accounts provided to the Reviewer will be retained by the Reviewer during the course of the review. At the end of the review, any information that remains necessary to be kept by the reviewer shall remain with her to maintain her requirements to retain information for the purposes of her own professional duties. She shall destroy such copies when it is no longer required to keep such documentation for regulatory and compliance purposes.
2. A duplicate of all information necessary to be kept shall be transferred to [INSERT], to keep securely for the purpose of regulatory issues and/or future claims and to be destroyed when no longer necessary.
3. A court of competent jurisdiction may ask for such information. Soul Survivor and Soul Survivor Watford shall not be able to call on this information save where necessary to deal with regulatory, disciplinary or compliance obligations or future claims.

YOUR DATA PROTECTION RIGHTS

1. Under data protection law, you have rights over your personal data. The rights available to you depend on our reason for processing your information.
2. You have the right to ask us for copies of your personal information, which applies to all processing. There are some exemptions, which means we may not always be able to provide all the information we process.
3. You have a right to ask us to correct information you think is inaccurate or complete information you think it incomplete.
4. Your right to erasure. You have the right to ask us to erase your personal information in certain circumstances. The review may need to retain some information but will remove as much information as possible following an erasure request.
5. Your right to restrict processing. If you have concerns about the accuracy of your information, or about how it is being used, you have the right to restrict the processing until your concerns have been resolved.
6. Your right to object to the processing. You have the right to object to processing when we are processing your personal information to perform our tasks. If you wish to object to processing, the review shall assess whether the requirements of the task outweigh the grounds of the objection and the Reviewer will inform you of the outcome of the assessment.
7. In most circumstances, we have a month to respond to you and you do not need to pay any charge for exercising your rights.

SHARING INFORMATION

1. In accordance with the terms of reference, the Reviewer has a duty to pass on to the police and LADO any allegations about child abuse or activities of a criminal nature or which are an immediate safeguarding risk. We will include your name and contact details where you agree to this, but we can also do so without your agreement if the reviewer considers that there is a child protection concern, or someone is at risk of serious harm.
2. The Reviewer may receive a request to disclose the information that she holds. Unless she has your consent to do so, she will only share this information if she is ordered by a court to do so or if such is necessary for child protection or other matters of child or adolescent welfare, or to take appropriate disciplinary or other action by statutory bodies to protect the wellbeing and health of children.
3. Any written report shall anonymise the names of complainants. Organisations shall be named. Underlying documentation shall not be disclosed as part of the review, but extracts from relevant documents and interviews shall, with suitable anonymisation, may be used as part of the report.

YOUR RIGHT TO COMPLAIN

1. If you have any queries or concerns, please contact the Reviewer. If you remain concerned about how the personal information is being processed, you can make a complaint to the ICO ([www.ico.org.uk](http://www.ico.org.uk)) as the UK supervisory authority.