



Triple C
(Liverpool)

Christ Church Community Centre
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DATA PRIVACY NOTICE

Policy Adopted	June 2018
Last Reviewed	June 2024
Interim Review	September 2025
Next Review Due	June 2027

Date	Reviewed by	Approved by	Date Accepted by Trustees
June 2021	OM/HE	Policy Review Team	June 2021
June 2024	HE/SC	Policy Review Team	July 2024
July 2025	HE	Policy Review Team	Interim review, signed off by Policy Review Team September 2025
November 2025	KW	Policy Review Team	Interim amendment, signed off by Policy Review Team Nov 2025

DATA PRIVACY NOTICE

Please see page 5 onwards for a supplementary Privacy Notice relating to data which is collected if you make a Confidential Declaration alongside a DBS as part of an application for an employed or volunteer role.

Last amended 25th August 2025 (v1.2).

1. What is personal data?

Personal data allows a living individual to be identified from that data. Identification can be by the information alone or alongside any other information that the data controller possesses or likely to possess in future. The processing of personal data is governed by the General Data Protection Regulation (GDPR).

2. What is the role of the Trustees of Triple C?

The board of Trustees of Triple C (Liverpool), hereafter referred to as the charity, is the data controller. This means we are legally responsible for deciding how your personal data is processed and for what purposes.

3. How do we process your personal data?

We comply with our obligations under GDPR by keeping personal data up to date, by storing and destroying it securely, by not collecting or retaining excessive amounts of data, by protecting personal data from loss, misuse, unauthorised access and disclosure, and by ensuring that appropriate technical measures are in place to protect it.

4. Why do we process your personal data?

We use your personal data for the following purposes:

- To enable us to provide a service for the benefit of the public in our local area.
- To administer membership records.
- To manage our employees and volunteers.
- To maintain accounts and records in compliance with our obligations as a charity.
- To raise funds and promote the interests of the charity.
- To inform you about news, events, activities and services running in the local area.
- To share your contact details with the charity so they can comply with their legal obligations and to keep you informed about charity news and events, and in which you may be interested.
- Some events may be recorded or livestreamed, to enable other people to participate remotely. You will be informed at the time if this is the case, so you will be aware if you may be being filmed or recorded.
- Some premises may have CCTV or surveillance systems to help maintain safety for staff, visitors and other people, and to protect against vandalism or other crimes. Any CCTV or surveillance systems will be clearly signposted in each location, with contact details in case of questions.

5. What is the lawful basis for processing your personal data?

The GDPR legislation provides different legal bases for processing personal data. We use the following:

- Legitimate interest, where we need the data to fulfil your request for a service or to make it easier to fulfil future requests.
- Legal obligation and public task, where processing is necessary for carrying out legal obligations in relation to Gift Aid or under employment, social security or social protection law, or other record keeping regulations.
- Your consent where we wish to keep you informed about news, events, activities and services or where you want us to share your contact details with other people.

6. Special Category data

The data we collect may also reveal health status or disabilities, for instance through notifying group leaders of accessibility requirements or children's allergies.

7. Who do we collect data from

We primarily collect data from you (or from a family member on your behalf).

8. Sharing your personal data

Your personal data will be treated in strict confidence and will only be shared with other members of the charity so we can carry out the purposes above.

Some data may occasionally be visible to third parties in strictly controlled circumstances:

- Software support teams when they are requested to fix technical issues in applications that store personal data.
- for oversight of financial, regulatory, legal and safeguarding processes, to assist with setting up processes and systems, and for wider communications and correspondence.

All of these parties have their own privacy and security policies. Data will not be shared outside of the UK/EAA without safeguards in place.

Data may be shared with other parties for safeguarding purposes if you apply for a role that requires a Confidential Declaration – please see Section 13 onwards for more details.

If we wish to share your data with third parties other than these, we will request your consent.

9. How long do we keep your personal data?

In line with current UK legislations, we will only keep personal data for as long as necessary for the purposes for which it was collected. Personal data shall not be retained for longer than:

- a) In the case of data held by subject consent: the period for which the subject consented to the Charity holding their data;
- b) in the case of data held by legitimate interest of the charity: the period for which that legitimate interest applies. For example: in the case of data subjects who held a role, such as a volunteer, with the Charity the retention period is that for which the Charity reasonably has a legitimate interest in being able to identify that individual's role in the event of any retrospective query about it;
- c) in the case of data held by legal obligation: the period for which the Charity is legally obliged to retain those data. The Charity shall regularly – not less than every 6 months – review the personal data which it holds and remove any data where retention is no longer justified. Such removal shall be made as soon as is reasonably practical, and in any case no longer than 20 working days (of the relevant Data Processor) after retention of the data was identified as no longer justified.

10. Your legal rights and complaints

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- You can request a copy of all the personal data which we hold about you.
- You can request that we correct any personal data if it is inaccurate or out of date.
- You can request that we erase your personal data where it is no longer necessary for us to retain such data.
- Where there is a dispute in relation to the accuracy or processing of your personal data, you can request a restriction is placed on further processing.
- You can withdraw your consent at any time (this only affects data processed under the basis of consent).
- You can lodge a complaint with us or with the Information Commissioner's Office.

11. Further processing

If we wish to use your personal data for a new purpose that is not covered by this Data Privacy Policy, we will publish a new policy explaining this new use before starting the processing to explain the relevant purposes and processing conditions. Wherever necessary, we will seek your prior consent to the new processing.

12. Contact Details

If you wish to exercise your legal rights, or raise a query or complaint, please contact the Operations Manager at Christ Church, Sedgemoor Road, Liverpool L11 3BR. Telephone number: 0151 270 1688 or email: info@triplecliverpool.org

You can also contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

CONFIDENTIAL DECLARATION PRIVACY NOTICE FOR TRIPLE C (LIVERPOOL)

This Privacy Notice supplements the main Privacy Notice above. It explains how the information you supply in your Safer Recruitment DBS and Confidential Declaration is used and your rights with respect to that data as required by the UK GDPR and the Data Protection Act 2018, (the “DPA 2018”).

Last amended 8th April 2024.

1. Why we collect and use your personal data

The overall purpose of the Confidential Declaration Form is to ensure that we take all reasonable steps to prevent those who might harm children, young people and/or vulnerable adults from taking up positions where they have substantial contact with children, young people and/or vulnerable adults in accordance with the Safer Recruitment and People Management Guidance (2021).

We use your data for the following purposes:

- Appointing individuals to positions that have substantial contact with children, young people and/or vulnerable adults.
- For the Diocesan Safeguarding Adviser to conduct a risk assessment where an applicant discloses information on the form.
- To collect information about members of your household aged 16 and over (cf. Qs.6 & 7) if your role is deemed “home-based” as defined by the DBS¹.
- To undertake criminal records checks both in the United Kingdom and in non-UK countries where applicable.

2. The categories of personal data we collect

The information we process for these purposes is:

Category	Applicant
Name	✓
Age	✓
Gender	✓
Contact Details	✓
Role	✓
Role Location	✓
Job Title	✓
Current and previous employment or volunteering (where applicable)	✓
Country of Residence	✓
Current or previous conduct allegations and/or investigations (where applicable)	✓
<i>For a very small number of roles, for example, when a role involves regulated activity in a person’s home, additional data may be requested and stored. This may include data about the applicant and those who they share a household with. In these unusual circumstances, the applicant would be advised about the implications for the privacy notice.</i>	

3. The lawful basis for using your information

We collect and use personal data under the following lawful bases:

¹ <https://www.gov.uk/government/publications/dbs-home-based-positions-guide/home-based-position-definition-and-guidance>

Personal data

- **Consent (Article 6(1)(a)).** You have consented to the transfer of your data to a non-UK country when applicable in order for us to undertake an overseas criminal records check.
- **Legal obligation (Article 6(1)(c)).** We are required by law to undertake the confidential declaration process in accordance with:
 - Section 5A(3) and (4) of the Safeguarding and Clergy Discipline Measure 2016 as inserted by:
 - Safeguarding (Code of Practice) Measure 2021 (also see Safer Recruitment and People Management Guidance – Section 5 – Confidential Declarations - Requirements).

Special categories and criminal information

- **Explicit Consent (Article 9(2)(a)).** You have consented to the transfer of your data to a non-UK country when applicable in order for us to undertake an overseas criminal records check.
- **Substantial public interest (Article 9(2)(g) and Schedule 1, Part 2, paragraphs 10, 11 and 18 of the DPA 2018).** It is necessary for reasons of substantial public interest in order to prevent or detect unlawful acts and protect members of the public from harm, including dishonesty, malpractice and other seriously improper conduct or for the purposes of safeguarding children, young people and vulnerable adults.

4. Who we collect from or share your information with:

We collect your information from (where applicable or relevant):

- You
- Police
- Social Services in Local Authorities
- Current and previous employer/voluntary organisation
- Disclosure and Barring Service (UK)
- Criminal records organisations (non-UK)

Your personal data will be treated as strictly confidential and will only be shared with those involved in the recruitment/appointment process and, where appropriate, the Diocesan Safeguarding Adviser.

It may be shared outside the Charity for the prevention or detection of an unlawful act; to protect members of the public from harm or safeguarding purposes with:

- Police
- Social Services in Local Authorities
- Statutory or regulatory agencies in the UK and in other countries (e.g. the Disclosure and Barring Service)

5. Your personal data may be sent to countries outside the UK

Your data may be transferred out of the UK in order for us to undertake overseas criminal records checks where the recipient organisation is located in a third country or territory where applicable. This transfer is protected by UK adequacy arrangements, or, where necessary, your consent.

6. How long do we keep your information?

We keep your personal data, if your application is successful, for no longer than reasonably necessary for the periods and purposes set out in our retention schedule. If your application is not successful, your data will be held for 6 months after the recruitment process ends, and then destroyed. If however, your role includes regulated activity, working with children, young people or vulnerable adults, your records will be kept longer. If any safeguarding concerns are raised, these too will be retained. For details regarding the retention of Safeguarding Records, please refer to the Church of England retention

table: [“Records Management Toolkit: Safeguarding Records Retention”](#), which is available from the [Church of England website](#).

7. Your legal rights and complaints

Unless subject to an exemption under the GDPR or DPA 2018, you have the following rights with respect to 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

8. Contact Details

If you wish to exercise your legal rights, or raise a query or complaint, please contact the Operations Manager at Christ Church, Sedgemoor Road, Liverpool L11 3BR. Telephone number: 0151 270 1688 or email: info@triplecliverpool.org

You can also contact the Diocesan Safeguarding Team, whose contact details can be found at <https://www.liverpool.anglican.org/making-it-easier-parishes/safeguarding-matters/>.

You can also contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.