



LINDISFARNE COLLEGE OF THEOLOGY

GDPR & Data Protection policy

Data protection legislation controls how your personal information is used by organisations, including businesses and government departments.

In the UK, data protection is governed by the [UK General Data Protection Regulation \(UK GDPR\)](#) and the [Data Protection Act 2018](#).

See here for detailed information: <https://www.gov.uk/data-protection>

The GDPR (General Data Protection Regulation) requires organizations to handle personal data lawfully, fairly, and transparently, with specific requirements for purpose limitation, data minimization, storage limitation, data accuracy, integrity, and confidentiality, as well as data subject rights, data breach notification, and data protection impact assessments.

Core Principles:

- **Lawfulness, Fairness, and Transparency:**

Processing personal data must be lawful, fair, and transparent to the data subject.

- **Purpose Limitation:**

Data should only be processed for specified, explicit, and legitimate purposes, and not for purposes that are incompatible with those purposes.

- **Data Minimization:**

Organizations should collect and process only the data necessary for the specified purposes and retain it only for as long as necessary.

- **Accuracy:**

Data must be accurate and kept up to date, with measures in place to ensure accuracy.

- **Storage Limitation:**

Data should be kept for no longer than necessary, and measures should be in place to ensure that data is deleted when no longer needed.

- **Integrity and Confidentiality:**

Organizations must ensure the security and confidentiality of personal data, taking appropriate technical and organizational measures to protect it against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

This policy sets out the information held by LCT about individuals, the sources of this information, the reasons for holding this data, and the people who have access to these records.

You are entitled under the Act to have a copy of all the personal data we hold about you, and you may request this information at any time by completing and returning a Data Subject Access Form. However, preparation of this material will involve the staff in a considerable amount of work, and so we hope you will help us to develop 'good practice' by giving us plenty of notice, and – wherever possible – specifying the kind of information you would like to see. Please note that there are certain circumstances defined under the Act where we are not allowed to divulge information, especially where it involves the privacy of third parties.

What kind of information is held about you?

- Your name, address, date of birth, telephone number(s), email address
- Copies of any correspondence there has been between yourself and the Scheme/Course, together with any replies (this may include emails as well as letters)
- Copies of any correspondence received about you from educational or church authorities, including, in some cases, references or reports about your progress
- Records of your academic progress, including any notes from tutors
- LCT contracts and agreements signed by you

LCT also holds:

- Papers relating to the selection process
- The further personal details you supplied on your initial application form about your family, educational background, and other church/training related data
- Copies of any correspondence received from diocesan authorities (e.g. DDOs, bishops etc.) about you, relating either to initial training and subsequent ministry (and which may sometimes include financial details)
- Records of grants and/or other payments made to you by the diocesan and national church authorities (for example, Ministry Division)
- Copies of any reports received about you from your Local Clergy, Placement Supervisors etc.
- Copies of your reports signed by you

Who has supplied this information?

Lindisfarne receives information from:

- You
- Church authorities (DDO, Bishop, Selection Panel, Ministry Division etc.) or other church officers in the Church of England and/or the Methodist Church
- Your incumbent/priest-in-charge/local minister
- Placement supervisors
- University authorities
- Your tutors

For what purposes is this information held?

LCT needs to hold some information about students in order to function effectively as a teaching organisation. We need to keep records about student progress, how to contact you, and so on, and we need to keep university authorities informed about your progress through the course.

We are also asked occasionally to supply references (normally at your request), and we need to have some information to hand in order to do this efficiently and accurately.

In the case of candidates for public ministry, the Principal is asked to produce full reports for their sponsoring church, and it is essential therefore that full and accurate records are kept. We recognise, however, that much of this information falls under the heading of 'sensitive personal data' under the terms of the Act, and LCT, therefore, takes every reasonable care to maintain a secure and accurate system.

Who has access to this information?

The only people who see all this information are the Lindisfarne core staff. However, other people who may see some of this information include:

- You (e.g. your annual report)
- Your church authorities
- Durham University (academic matters only)

LCT operates a clear 'need to know' approach. Information about you would only be supplied to people outside LCT (other than in the circumstances listed above) with your written consent.

Data Protection Policy

The General Data Protection Regulation (GDPR 2018) is designed to protect the rights of individuals concerning information or personal data held about them. It covers factual information as well as expressions of opinion or judgement, and it extends the principles of data protection to paper-based files as well as computer systems.

LCT is committed to good practice in relation to the eight general principles set out in the Act.

Lindisfarne is committed to:

- Ensuring that no personal data is normally given to people outside LCT without the consent of the person concerned, except in the case of:
 - Reports on public ministry candidates, which will be circulated only to the authorised personnel in the sponsoring church and those who have a right of access to reports within the current terms of reporting guidelines.
 - Reports on academic progress which may be required by Durham University or other responsible educational authorities.
- Obtaining signed consent from a data subject before any personal information is released to organisations or individuals outside Lindisfarne, Durham University or sponsoring church authorities.
- Holding, withdrawing and securely disposing of personal files in accordance with LCT's Data and Record Retention Policy.
- Using data only for purposes related to the training or study programme in the case of students, or for employment purposes in the case of staff.
- Informing all data subjects in general terms of the kind of personal data held on them by Lindisfarne through the development of a Data Protection Notice scheme.
- Ensuring that all data subjects are aware of their right of access to information within the limitations of the Data Protection legislation.
- Complying with requests for data subject access as quickly as possible within the period allowed under the legislation, for which LCT may charge a small fee for printing costs.
- Taking all such reasonable steps to ensure that all those who supply LCT with reports, references or other written information or opinion are aware that data subjects will have the right of access to that data.
- Taking care to secure the privacy of all individuals associated with LCT, including staff, tutors, governors and students.
- Taking all reasonable steps to ensure that data transmitted to tutors, Durham University authorities or sponsoring church authorities through email, the Internet, or any other electronic media is handled securely.
- Ensuring that annual reports, staff appraisals and other sensitive personal data produced in electronic form (but excluding bank details where the individual has given LCT permission to hold these, and tax details) should not normally be held on a computer, and that electronic forms of data should be securely erased within three months of a reporting process being completed.

- Co-operating fully with the legal authorities in the investigation of any allegation relating to criminal activity and withholding from data subjects any such information where disclosure may impede a criminal investigation.
- Withholding personal data relating to third parties from data subjects requesting access to information held on file.
- Ensuring that all involved with LCT are aware of the Data Protection Policy, and that they:
 - agree to work within the terms of this policy as a condition of appointment.
 - are aware that the data protection policy applies to all personal information held on a data subject.
- Promoting a policy of good practice and informing the Executive Director or Chair of the Lindisfarne Board of any serious breach of this policy.

Data Subject Access Request Form

In order to obtain a copy of the personal data about you held by LCT you will need to ask the Academic Administrator to send you the relevant form. Please note that Lindisfarne may charge a small fee for the cost of supplying this information.

Lindisfarne seeks to respond quickly to Data Subject Access requests. However, under the terms of the Act, Lindisfarne is required to carry out a search for information, and to act in such a way as to protect the privacy of any third parties mentioned in the personal data. There are other circumstances laid down by the Act which would prevent LCT from making a disclosure. LCT will always keep properly informed those applying for information and will give reasons for its decisions.

Lindisfarne has up to 40 days to respond to requests; in most cases it will not take this long. In order that we might respond quickly, please indicate the type of information you require (if you want access to everything we hold about you, please write 'everything' on the form). However, please also note that LCT reserves the right not to provide you with copies of the information requested if to do so would take 'disproportionate effort'.

If you have any queries about this process, please contact the Academic Administrator. If, when you have received the information, you consider that:

- the information is inaccurate or out of date;
- Lindisfarne should no longer be holding that information;
- the information is being used for a purpose of which you were unaware;
- Lindisfarne may have passed on inaccurate information about you to someone else,

You should contact the Academic Administrator at once. LCT will then review the information and may amend your records accordingly. Alternatively, the Director of Business and Finance may notify you, giving reasons as to why he/she believes the information held about you is, in fact, accurate and relevant, and is being held for fair and lawful purposes.

Confidentiality

All those involved with LCT should be careful to respect appropriate boundaries of confidentiality. It is important that these boundaries are properly set and fully explained, in order that people are protected from accidental disclosure of personal information.

Written case studies should not include personal details of other people in a way that makes such people identifiable.

Limits of confidentiality between staff and students include the core staff team as a whole. Confidentiality is held within the staff team, not with individual staff members.

Each student has access to all assessments and gradings that relate to them and their study.

Responsibility for implementation

The Lindisfarne Director of Business and Finance is the Compliance Officer responsible for maintaining and implementing the Lindisfarne Data Protection Policy.

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