

Data Protection Policy **Chapel and Choir**

How we use your personal information

This statement explains how King's College ("we" and "our") handles and uses information we collect about those who use or participate in the Chapel and Choir. We use data to ensure we maintain contact with those who wish to be informed about events in the Chapel or involving the Choir and to maintain legal records where required, including licenses necessary to travel with children, and for children to perform. We also store certain data relating to members of the Choir and their families as this is needed to make sure their needs are met both when the Choir is in residence and when it is touring. Such personal data is used by the College to communicate with those concerned and to fulfil our statutory duties. Data for those involved with the Chapel and Choir may also be used by the College in ways described under other parts of the Data Protection policies, particularly those that deal with visitors, alumni, staff, and online sales. You may wish to see those policies too.

The controller for your personal data is King's College, King's Parade, Cambridge, CB2 1ST.

The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd, 12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk. OIS Ltd should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Freedom of Information Officer, foi@kings.cam.ac.uk

How your data is used by the College

In most cases the legal basis for processing is the legitimate interest of the College (GDPR¹ 6(1)(f)), including maintaining relationships with Chapel visitors, maintaining our historically and culturally significant Chapel with its Choir services and other events, and maintaining our relationships with parishes with whom we have historic links. Some data is held by consent (GDPR 6(1)(a)). The health (including allergens) data is processed to protect your vital interests (GDPR 6(1)(d)), and as special category data it also requires a purpose under article 9, which in this case is consent (GDPR 9(2)(a)) or, in the case of children who cannot legally provide consent, their vital interests (GDPR 9(2)(c)). Some information is required as a legal obligation of the College (GDPR 6(1)(c)): we are required to apply for licences under The Children and Young Person Acts 1933 and 1963 and The Children (Performances and Activities) (England) Regulations 2014, and Magistrates' Court permission is required to take children abroad on Choir tours. We may request DBS checks on adults associated with the Choir, on the basis of article 6(1)(c) of the GDPR legal obligation and condition 18: (Safeguarding of children and individuals at risk), and condition 12 (Regulatory requirements relating to unlawful acts and dishonesty etc.) of Schedule 1, Data Protection Act 2018, before allowing contact with children who are part of the Choir. Information about weddings,

¹ Broadly speaking the UK data protection legislation uses the same legal bases as the EU General Data Protection Regulation (GDPR).

confirmations and baptisms is processed under the College's legitimate interest (GDPR 6(1)(f)) as a place of religion, and being special category data, the relevant article 9 section is that processing is carried out in the course of the Chapel's legitimate activities (GDPR 9(2)(d)). The information about marriages is, in addition, required by law (GDPR 6(1)(c)).

GDPR 5(1)(b) allows the College to process personal data which was collected for other purposes, for the purposes of the historical record.

The chief ways in which personal data is held and used by the Chapel are:

1. Names and contact details of Chapel and Choir supporters (which includes, but is not limited to, subscribers to the College's Choir and Concerts mailing list, and those who receive the term's services booklet by post).
2. Names and contact details of those who seek to use the Chapel for an event, or who approach us for information.
3. Correspondence and contact details for people, including clergy in College Livings, in parishes where the College is Lay Rector and co-patrons of multi-parish benefices or team ministries. This may include personal data about others in the parish.
4. Details of those getting married in Chapel, as required by law.
5. Baptismal and confirmation records.
6. Information regarding members of the Choir that is necessary when the Choir is in residence and when it tours. This includes name and contact details for Choral Scholars, probationers and choristers and their parents, results of voice trials, Choir members' semi-annual measurements (for cassock fitting), and passport numbers (or photocopies) as well as correspondence with Choir members or probationer/chorister parents. It also includes medical and dietary requirements as provided by the Choir members and those travelling or dining with them. This information is shared when necessary with the agents who manage Choir tour arrangements.
7. Names and contact details for Choir alumni.
8. Information regarding artists and other performers engaged to work with the Choir or in the Chapel for concerts and /or recordings.
9. Contact details and attendance records and audition notes for non-College members of King's Voices.

The following table gives details about how this data is held and managed.

| No | Short Description | Data | How long retained? | GDPR legal bases for processing |
|----|-----------------------------|--------------------------|------------------------|---------------------------------|
| 1 | Chapel and Choir supporters | Name and contact details | While consent is given | 6(1)(a) |

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| 2 | Event organizers, in Chapel or on tour, including our tour operator agents | Name and contact details, Personal Data contained within correspondence about an event | Calendar year + 2 years; names of events organizers may be archived | 6(1)(f); 5(1)(b) (names and event details) |
| 3 | Clergy and parishioners in 'College Livings' | Names and contact details; correspondence with the Dean and/or Patronage Committee from and about the incumbent | For the duration of incumbency + 1 year, and Patronage Committee minutes are archived, as are other records of historical interest | 6(1)(f), 9(2)(d), 5(1)(b) |
| 4 | Wedding couples | Names, contact details and proof of identity Record of the wedding, order of service | Until 1st wedding anniversary Archived | 6(1)(f), 9(2)(d), 6(1)(c) 6(1)(f), 6(1)(c), 9(2)(d), 5(1)(b) |
| 5 | Correspondence | Name and contact details; content of correspondence/request and our response | Calendar year + 2 years | 6(1)(f) |
| 6 | Application forms for permission to make photograph/video/audio recordings | Name and contact details; nature of request and our response | Calendar year + 2 years, then archived | 6(1)(f), 5(1)(b) |
| 7 | Those baptized or confirmed | Name and contact details | Archived as part of the Register | 6(1)(f), 9(2)(d), 5(1)(b) |
| 8 | Prospective Choir members | Name and contact details; records from auditions | 2 years after year of anticipated entry into Choir | 6(1)(f) |

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| 9 | Current members of the Choir and those travelling with them on tour | <p>Name and contact details; passport information; bank details</p> <p>Measurements for cassock fitting</p> <p>Personal data contained in probationers' and choristers' birth certificates</p> <p>Adults in the Choir on tours abroad: National Insurance number</p> <p>Health related data</p> | <p>Tenure of individual concerned</p> <p>Tenure of individual concerned</p> <p>Tenure of probationer/ chorister</p> <p>Tenure of individual concerned</p> <p>Tenure of individual concerned</p> | <p>6(1)(c), 6(1)(f)</p> <p>6(1)(f)</p> <p>6(1)(c), 6(1)(f)</p> <p>6(1)(c)</p> <p>6(1)(d); 9(2)(a) (9(2)(c) for children) for health data</p> |
| 10 | King's College staff and members of the Choir who might have unsupervised contact with the probationers/ choristers | DBS certificate number | Tenure of individual concerned | 6(1)(f) GDPR; Schedule 1 (12) and (18) of Data Protection Act 2018 |
| 11 | Family members and guests of the probationers/ choristers who are dining with them | Health related information | Tenure of the probationer/ chorister (updated annually) | 6(1)(d); 9(2)(a) (9(2)(c) for children) for health data |
| 12 | Anyone performing with the Choir (probationers/ choristers, Choral and Organ Scholars, Director of Music, guest performers) | <p>Name and contact details</p> <p>Name, role in the performance, photographic image, (in case of adults) biographical sketch</p> | <p>Tenure of performer</p> <p>Archived</p> | <p>6(1)(f)</p> <p>6(1)(f), 5(1)(b)</p> |
| 13 | Choir alumni | Name and contact details | While consent is given | 6(1)(a) |

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|----|--|---|--|------------------------------------|
| 14 | Professional collaborators including e-Marketing lists | Name and contact details; nature of request/responses and general correspondence Contracts | Ten years Duration of contract; contracts of historic interest will be archived | 6(1)(a) 6(1)(b), 5(1)(b) |
| 15 | Non-College members of King's Voices | Name and contact details | Tenure of member; names may be archived | 6(1)(f); 5(1)(b) |

Who we share your data with

Most data mentioned above is not shared, except at your request. The exceptions are that we may share your data as follows:

- With business partners, group companies, suppliers and sub-contractors for the performance of the contract we enter into with them or you.
- With King's College School, Cambridge, under our legitimate interest to facilitate the learning for the choristers and probationers, the development and practice of the Choir and their participation in events, and to ensure the continuance of our day to day running. The School's Privacy Policies are available [here](#).
- With our professional advisors such as our lawyers, banks, auditors or insurers.
- With law enforcement, government or regulatory bodies in accordance with applicable laws or regulations.
- Names, addresses, dates of birth, copies of birth certificates and passports, photos, and medical fitness forms for probationers and choristers are shared with the Cambridgeshire County Council as required for Performance Licensing.
- Passport scans and DBS certificate numbers, and for the Choir members National Insurance numbers, and health and dietary requirements for the Choir and all those travelling with them is shared with Choir tour organisers, Government bodies, and airlines, those travelling, and/or employees of the King's College School as necessary for international Choir tours and/or for concerts in the UK.
- Names of Choir members are shared with recording companies, the names of adults are printed on the packaging of published recordings, seats of soloists (by first name) are shared with television recording teams, and biographies of adults in the Choir are shared with concert venues for publication in concert programmes.

- Chapel and Choir supporters' names and contact details may be shared with the College and University alumni offices and Cambridge in America. This is by your consent and you can withdraw your consent for this sharing at any time.
- Data about chorister candidates, and probationers' and choristers' singing lessons, is shared with the King's College School.

Your rights

You have various rights under applicable data protection law, including some rights to:

- access your personal data;
- correct incomplete or inaccurate personal data we hold about you;
- erase the personal data we hold about you;
- restrict our handling of your personal data;
- transfer your personal data to a third party;
- object to how we are using your personal data; and
- withdraw your consent to us handling your personal data.

Please keep in mind that data protection law is complicated, and these rights won't always be available to you all of the time.

If you choose to exercise any of your rights, including your right to erasure, this will not prejudice our relation with you. In certain circumstances, we may not be able to comply with your request. For example, where you request us to erase your data, we may not be able to do this if there is a legal requirement to maintain records that we have to comply with.

You also have the right to lodge a complaint with us or the [ICO](#), the supervisory authority for data protection issues in the UK. If you are based outside of the UK, you can find your relevant supervisory authority [here](#).

If you want to exercise any of these rights or have any questions, please contact us at foi@kings.cam.ac.uk; alternative contact details are given at the top of this Policy.

| Document Details | | |
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| Responsible Officer | First Bursar (via College Data Protection Lead) | |
| Original Date | 15 May 2018 | |
| Next Review Date | April 2028 | |
| Version Control | | |
| Version No. | Approval Date | Change Description |
| V1 | 15.5.2018 | First issue. |
| V2 | 18.1.2019 | Deleted unlabelled column listing responsible keepers; punctuation and capitalisation standardized; changes to when permission is required. |
| V3 | 29.10.2019 | ‘Choir supporter data’ added to ‘who we share with’; medical and dietary information added for the Choir on tour and those travelling with them. |
| V4 | 24.10.2023 | DBS checks added; updates and clarifications following KC School separation; transfer of existing policy to pro-forma. |
| V4.1 | 10.09.2024 | Table formatting errors were corrected. |
| V5 | 21.01.2025 | Subscribers to Choir and Concerts mailing list added. |