



PRIVACY NOTICE FOR APPLICANTS FOR ALMSHOUSE ACCOMMODATION

The Charity is committed to safeguarding the privacy of applicants for almshouse accommodation. The Charity will use the information that we collect about you lawfully and in accordance with General Data Protection Regulations (GDPR).

Personal Data and Processing

Personal data means any information about an individual provided that the Charity is able to identify that the information is specifically about that person as opposed to anyone else. For example, your personal data includes your name and email address. Processing personal data means storing or using it in a way for example having it in a data base, viewing it on screen or as paper copies.

Data Subjects and Data Controller

The data subjects in relation to whom the Charity processes personal data are applicants for the charity accommodation (you) and their next of kin as stated in the application form (your next of kin). The Cambridge Royal Albert Homes is the Data Controller

Why the Charity processes Personal Data

The Charity processes your personal data to carry out its charitable purposes as set out in its governing documents. When carrying out these charitable purposes the Trustees are required by law to act in its best interests of the Charity at all times. This obligation itself may also require the Charity to process yours and your next of kin's data.

The Trustees have a duty to ensure that the Charity offers almshouse accommodation only to an applicant:

- who best fits the beneficiary criteria out of all the applicants at the time (for example as to age and financial need)
- who is capable of independent living
- who has a close connection with Cambridge
- where there are no reasonable grounds to suspect they might prejudice the flourishing of the almshouse community or the Charity itself
- whose appointment would not in any other way cause the Trustees to breach their duty to act in the best interest of the Charity

Categories of Personal Data Processed

The main categories of personal data which the Charity processes in relation to your application are the items covered in the application form or otherwise obtained by the Charity in the course of deciding your application. Broadly these are as follows:

- Full name and address, phone number and email address
- Date of Birth
- Gender
- Marital status
- Name and address of GP
- Name and address of next of kin
- Name and addresses of referees
- National Insurance number
- Supporting documents such as references and copies of documents such as your passport or birth certificate which the Charity made to comply with the law when offering you accommodation and bank and buildings society statements
- Information about your health as supplied by yourself or as provided by your GP or medical advisor

- Details of any unspent criminal convictions

Minutes of meetings and records of decisions may include your name and other information about you if it was essential that Trustees or staff knew which specific resident was being discussed

Data about your next of kin is usually limited to the contact details you have supplied on your application form

Criminal convictions

The application form asks you to declare unspent criminal convictions (A criminal conviction is unspent if a court has convicted you of a criminal offence and you have not yet reached the point where you are legally entitled to keep silent about the convictions.)

With your consent the Charity will hold and otherwise process information about any unspent criminal convictions you have in order to assess whether you present an unacceptable level of risk to the other residents or the Charity itself. The application form asks you to give consent. If you do not give your consent or subsequently withdraw your consent the Charity will not be able to consider your application, because the Trustees will no longer be able to comply with their legal obligations to act in the best interest of the Charity

Your health

With your consent the charity holds the minimum information necessary about your health to be able to evaluate your application properly in light of the principle that almshouse accommodation is for people capable of independent living and who are likely to remain so for the foreseeable future. The application forms ask you to give that consent. If you do not give that consent or subsequently withdraw your consent, the Charity will not be able to consider your application because the trustees will no longer be able to comply with their legal obligations to act in the best interest of the Charity

Sale or Passing of Personal Data to Third Parties

The Charity will not sell your personal data to any commercial or other charitable organisation. The Charity may share your personal data with the following people in order to evaluate your application properly in light of the duty to act in its best interests

- your referees and medical advisors
- your current and immediately previous accommodation providers
- any statutory agencies
- any parties whom the Charity believes it necessary to consult in order to evaluate your credit worthiness

Retention of Personal Data

If your application is successful, the Charity will retain your personal data until three years after you have ceased to be a resident or until the end of your life whichever is earlier. After your death that information will cease to be personal data because it will no longer relate to a living individual. In that circumstance the Charity reserves the right to retain the data for as long as the Charity sees fit, for example to resolve any queries or issues about funeral arrangements

The Charity will retain:

- Information about your health as long as the Charity considers necessary
- personal data about any unspent criminal convictions until those convictions become spent

Unsuccessful Applicants

The Charity reserves the right to keep a record of personal data obtained through the application process for 3 years as a reasonable precaution against individuals making false declarations of fact about their circumstances in an attempt to increase their prospects of success

Data Subject' Rights

Right of Access

You are entitled to access your personal data by making a Subject Access request (SAR) so that you are aware of and can verify the lawfulness of the processing you have the right to obtain:

- Confirmation that your data is being processed
- access to a copy of your personal data
- and other supplementary information that corresponds to the information in this privacy notice

To make a SAR please make your request by email to admin@cambridgeroyalalberthomes.org.uk with the words Subject Access Request in the subject bar. This information will be provided without charge and within one month. Should there be any problems with your request you will be formally notified and your rights to apply to the UK information Commissioner's office (ICO) will be highlighted

To protect your personal data, the Charity will seek to verify your identity before releasing any information in response to a SAR about you. In most cases verifying identity is likely to be simple but will probably involve additional steps if a SAR is made by a family member or a former resident or a relative or personal representative of the deceased resident

Right of rectification

You are entitled to have personal data rectified if it is inaccurate or incomplete. The Charity will respond within one month of your request and in the unlikely event of the Charity not taking action to fulfil a request for rectification the Charity will inform you of your rights (if any) to complain

Right of Erasure

You may request the deletion or removal of personal data under the Right of Erasure. This does not provide an absolute right to be forgotten rather it is a right to have personal data erased and to prevent processing in the following circumstances

- where the personal data is no longer necessary in relation to the purpose which it was originally collected/processed
- when you withdraw consent for data where your consent was our legal basis for processing it
- when you object to the processing and there is no overriding legitimate interest for continuing the processing
- the personal data was unlawfully processed
- the personal data has to be erased to comply with legal obligation

Right to Restrict Processing

When processing is restricted the Charity is permitted to store the personal data but not to process it further. In this event the Charity will explain to you exactly what personal data is held and why. Please note that the Charity would challenge your exercise of this right by making a compelling case why it needed to continue processing data. This is because the trustees cannot comply with their legal obligation to act in the best interest of the Charity if it is unable to process data

Right to Data Portability

You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy or transfer your personal data easily from our IT environment to another in a safe and secure way without hinderance to usability. The right to Data Portability only applies:

- to personal data you have provided
- where processing is based on your consent

In these circumstances the Charity will provide a copy of your data in PDF format free of charge without due delay and within one month. If there is a delay you will be informed

Right to Object

You have the right to object on grounds relating to your particular situation to

- processing based in legitimate interest or the performance of a task in the public interest/exercise of official authority
- direct marketing
- processing for purpose of scientific/historical research and statistics

Automated Decision Making and Profiling

The Charity does not carry out any:

- automated individual decision making about Data Subjects (i.e. making decisions about you solely by automated means without any human involvement or
- profiling of Data Subjects (i.e. automated processing of personal data to evaluate certain things about you)

Changes to this Privacy Notice

The Charity keeps its privacy policies under regular review and this may result in issuing updated versions of this notice. Updates will be displayed on the website www.cambridgeroyalalberthomes.org.uk

Queries about your data

If you have a query about the processing of your personal data, please

email: admin@cambridgeroyalalberthomes.org.uk

or write to the Clerk at 28 Royal Albert Homes, 120 Hills Road Cambridge CB2 1PP

Disclaimer: The information in the Privacy Notice is for general guidance on your rights and responsibilities and is not legal advice. Please contact a lawyer if you need legal advice

