



The Barnes Fund  
SUPPORTING THE COMMUNITY OF BARNES



Walsingham Lodge  
SUPPORTING THE COMMUNITY OF BARNES

## The Barnes Fund and Walsingham Lodge Trust<sup>1</sup> Privacy Policy

The Barnes Fund ("TBF") and Walsingham Lodge Trust takes your privacy seriously. Our policies and processes are compliant with the GDPR 2018.

Please read this Privacy policy. It explains our data protection policy and describes how we'll use the personal data that you provide to us.

This policy applies to grant giving and applications for employment as well as for residents and leaseholders at Walsingham Lodge<sup>2</sup>.

Walsingham Lodge is managed on behalf of The Barnes Fund and Walsingham Lodge Trust by RLHA (part of the ELM Group). For Walsingham Lodge please also see the ELM group Privacy Policy which is available here - <https://thebarnesfund.org.uk/policies/>

The Barnes Fund is registered with the Information Commissioner's Office.

### Our principles

- When you complete an application form for a grant, or an application form for the Walsingham Lodge housing register or apply to work for TBF, we will process your personal data using 'Legitimate Interest' as the lawful basis.
- For Walsingham Lodge residents and leaseholders we will process your information using 'Contract' as the legal basis
- We will always ask for your 'Consent' to process Special Category personal data (as described below) for processing, storing and transferring purposes.
- We'll only ever use your information where we have lawful grounds (ie your consent referred to above, legitimate interests or contract) to do so.
- Some examples of where we have a legitimate interest to process your personal information are where we contact you about our work; or where we contact a third party in order to process your grant, eg ordering white goods and arranging for delivery

<sup>1</sup> The Barnes Fund Trustee Ltd (Company Number 10873803), corporate trustee of The Barnes Fund (Charity Number 200103) and Walsingham Lodge Trust (Charity Number 200103-1)

<sup>2</sup> Walsingham Lodge Trust, part of The Barnes Fund charity, provides sheltered housing (almshouses) at Walsingham Lodge. The Trust provides 33 almshouses, comprising 18 flats and 15 bungalows. The Barnes Fund is landlord for five leasehold bungalows, located adjacent to the Walsingham Lodge Trust almshouses.

SUPPORTING THE COMMUNITY OF BARNES

PO Box 347, Hampton, TW12 9ED

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[executivedirector@thebarnesfund.org.uk](mailto:executivedirector@thebarnesfund.org.uk)

The Barnes Fund  
[www.thebarnesfund.org.uk](http://www.thebarnesfund.org.uk)  
Registered Charity No. 200103

Walsingham Lodge Trust  
[www.walsinghamlodge.org.uk](http://www.walsinghamlodge.org.uk)  
Registered Charity No. 200103-1

The Barnes Fund Trustee Ltd  
Corporate Trustee to the above charities Company Number 10873803

Registered address:  
Tudor John Nightingale House, 46-48 East Street, Epsom, Surrey, United Kingdom, KT17 1HQ.

Limited company registered in England and Wales.

- Whenever we process your information under any lawful basis we make sure that we take into account your rights and interests
- We'll be transparent in our dealings with you and tell you how we'll collect and use your information.
- If we collect your information for a particular purpose we'll only use it for that purpose, unless you've been otherwise informed and given your permission where relevant. We won't ask for more information than we need for the purposes for which we're collecting it.
- We'll update our records when you tell us that your details have changed.
- We'll periodically review our records to ensure we don't keep your personal information for longer than is necessary.
- We'll ensure that your information is securely deleted at the end of the retention period of six years, or 12 years in the case of residents and leaseholders at Walsingham Lodge, after the last time that we process it.
- We'll observe your rights under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are dealt with promptly and transparently in accordance with the law.
- We'll ensure our staff and Board members are aware of their privacy obligations, and train them as required to stay up to date.
- We'll ensure our property management company, have a privacy policy in place, which is consistent with our policy.
- We'll ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held.

## **1. Information we hold about you, how we collect it and how we'll use it**

### **(a) Information you give us**

You may give us information about yourself

- by filling in the grant application forms on our website,
- by filling in the application forms for the Walsingham Lodge housing register
- by providing information as part of the recruitment process to become a member of staff or member of the Trustee Board
- or corresponding with us by phone, email or otherwise.

Alternatively for grant applicants, your Referral Agency (eg Citizens Advice, Richmond or Age UK) will give us information about you when you ask them to submit an application for a grant on your behalf.

The information you give us may include:

Personal Data such as:

- name, contact details, date of birth,
- employment, education details and retirement information
- gender personal circumstances
- financial information and bank details
- next of Kin
- date of birth

We will only process such data if there are lawful grounds, such as a legitimate

Interest or contract, to do so.

Special Category Personal data such as:

- racial or ethnic origin
- health details of yourself or a family member, who may be a child
- sexual orientation

We will only process such Special Category data if we have your express consent to do so.

#### **(b) Information we receive from other sources**

If your grant application is submitted to us for your own benefit by a Referral Agency like Citizens' Advice, Richmond, we will correspond with them throughout the application process. They might give us additional information about you where this will help our consideration of your application. We may use this information on its own or combined with any of the information we receive or collect from you for any of the below purposes.

It is unlikely that we will source information in relation to a grant application from anywhere other than a Referral Agency as referred to above, but if we do obtain your personal information from a third party at our request, we will obtain your consent to do this first.

If you are a resident/ leaseholder at Walsingham Lodge we will receive information from our property management company, RLHA. We may also receive information from relevant bodies such as adult social services, care line service, medical professionals, solicitors, or contractors.

#### **(c) We may use this information:**

- to carry out our obligations to Residents/ leaseholders in terms provision of sheltered accommodation at Walsingham Lodge and as landlord of the leasehold bungalows adjacent to Walsingham Lodge.
- to help us consider whether we can award you a grant
- to monitor and improve our service offering to you (including via research activities), as well as to notify you of changes to our processes.
- to carry out any obligations we have to you, and provide you with services and information that you request from us, such as informing you of whether any other funders or service providers might help you
- to provide you with information about grants we offer that may be relevant to your circumstances
- to provide you with information that you have consented to receive
- to comply with the requirements of our regulators and of our charitable objects
- as part of a recruitment process, when applicable

Where we use information for survey, or research activities, or to comply with the requirements of our own regulators (including Charity Commission and Companies House), this will only ever be published anonymously as a combination of responses, rather than individually, unless otherwise agreed with you.

## **2. Passing on information about you to third parties**

To operate effectively, we may need to pass some of your information on to selected and trusted third parties. In terms of grant making the third parties we may share information with are:

- Third party Referral Agents who may be considering making a new grant application on your behalf, where it is appropriate for them to know about any previous grants you have been awarded
- Where we contact a third party in order to process your grant, eg ordering white goods and arranging for delivery
- Referees nominated by Education grant applicants
- Any third party to whom you've given your consent to receive your personal data, and where we have your explicit consent to do so.

In terms of Walsingham Lodge the third parties we may share information with are:

- our property management company, RLHA
- others such as adult social services, care line service, medical professionals, solicitors, or contractors.

Please be assured that when we outsource any processes, we ensure that any supplier or contractor has adequate security measures in place. We'll also require them to comply with privacy principles as part of our contract with them.

## **3. Security, safe storage and retention of your personal information**

Information supplied by you to us, or that we collect about you, may be transferred, and stored by us, our agents or contractors for the purpose of providing services to you.

Once we've received your information, we'll use appropriate procedures and security features to try to prevent unauthorised access.

We will do our best to keep your information secure by using password protected software.

If we receive any of your information in paper form, where we don't already have that information in electronic format, we will keep it in locked storage.

Unfortunately, while wherever possible we do not email personal data, the transmission of information via cloud-based services or the internet is not completely secure. Although we endeavour to protect your personal data, we do not encrypt it, so we cannot guarantee the complete security of data transmitted over the internet.

In line with our obligations as a Charity to keep records for accountancy purposes, if you have applied for a grant or to work for us we will retain your personal data for six years following the last time that we process it. If you are a resident/leaseholder we will hold your data for 12 years in accordance with accounting purposes relating to residents and leaseholders. After this period your personal data will be deleted from our records.

## **4. How can you access, correct or delete your information and/or withdraw consent?**

You may make a request to access your personally identifiable information that is held by us and maintained in our database. To do this you need to email your request to our Executive Director, Katy Makepeace-Gray whose email is [ExecutiveDirector@thebarnesfund.org.uk](mailto:ExecutiveDirector@thebarnesfund.org.uk)

If we have incorrect or out of date information or your circumstances change, you are able to correct the information we hold about you by emailing our Executive Director at [ExecutiveDirector@thebarnesfund.org.uk](mailto:ExecutiveDirector@thebarnesfund.org.uk)

Since 25 May 2018, depending on the circumstances, you also have the right to:

- request erasure of personal information we hold about you
- request restriction of processing of such information
- object to the processing of such information

You can email us or write to us about the above rights, or if you have any concerns about the way we handle your personal data, (see “comments and questions” below), or you can contact the Information Commissioner's office (“ICO”), or raise a complaint with us, or with the ICO.

Please be aware that should you request deletion, restriction or erasure of Personal data, or object to us using it, we may not be able to assist you in the way that you would like us to. We will make this clear to you at the time of your request.

## **5. Changes to the policy**

We may change our Privacy policy from time to time. If or when changes are made, we'll include them here. We will notify you of any substantial changes.

## **6. Comments and questions**

You can send any queries and comments about this Privacy policy by email to [ExecutiveDirector@thebarnesfund.org.uk](mailto:ExecutiveDirector@thebarnesfund.org.uk) or by mail to The Barnes Fund, PO Box 347, Hampton TW12 9ED.

**This policy has been approved for issue by the directors of The Barnes Fund Trustee Ltd.**

Last updated: 23 November 2020