

Website Privacy Policy

Date: July 2026

Version: 2.0

Approved by: Board of Trustees

Policy Owner: Chief Executive

Review Frequency: Every two years or sooner if required by changes in legislation or organisational practice.

Last Reviewed: July 2026

Version	Date Approved	Approved By	Review Date	Author/Lead
V1.0	July 2026	CEO	July 2027	CEO

Purpose

St John's Winchester ("the Charity", "we", "our" or "us") is committed to protecting the privacy and security of the personal information we collect.

We recognise that the people we work with place their trust in us and we take our responsibilities under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable legislation seriously.

This Privacy Notice explains how we collect, use, store and protect personal information when you engage with the Charity.

Who We Are

St John's Winchester is a registered charity providing:

- Almshouse accommodation
- Resident wellbeing and community support
- Dementia Support Services
- Volunteer services
- Community activities
- Property and estate management

We act as the **Data Controller** for the personal information described in this notice.

Contact Details

If you have any questions regarding this Privacy Notice or wish to exercise your rights, please contact:

Data Protection Lead

St John's Winchester
32 St John's South
The Broadway

Winchester
SO23 9LN

Email: privacy@stjohnswinchester.co.uk

Telephone: **01962 854226**

Information We Collect

The information we collect depends on how you interact with us.

This may include:

Identity Information

- Name
- Date of birth
- Address
- Telephone numbers
- Email address
- Emergency contacts

Financial Information

- Bank account details
- Payment records
- Gift Aid information

Resident Information

- Housing applications
- Occupancy information
- Support requirements
- Welfare contacts
- Maintenance records

Dementia Support Information

Where appropriate, we may collect:

- Health information
- Dementia diagnosis
- Care needs
- Assessments
- Support plans
- Information provided by health professionals
- Information from carers and family members

Volunteer Information

- Contact details

- References
- DBS information where required
- Training records
- Availability

Employment Information

For employees and job applicants we may collect:

- Employment history
- Qualifications
- References
- Payroll information
- Right to work documentation
- DBS checks where required

Website Information

When you visit our website we may collect:

- IP address
- Browser type
- Device information
- Cookie information
- Website usage information

How We Collect Information

We obtain information:

- Directly from you
- From application forms
- During assessments
- Through meetings and correspondence
- Through our website
- From healthcare professionals
- From local authorities
- From NHS organisations
- From Dementia UK
- From family members or representatives where appropriate
- From volunteers
- From regulatory bodies where required by law

Why We Process Your Information

We process personal information in order to:

- Assess applications for almshouse accommodation
- Manage residency and licences
- Deliver wellbeing services
- Deliver Dementia Support Services
- Safeguard residents and service users
- Respond to emergencies
- Maintain accurate records
- Recruit and manage staff
- Recruit and support volunteers
- Process donations
- Manage contracts
- Meet legal obligations
- Improve our services
- Protect our residents, staff and property

Our Lawful Basis for Processing

Under UK GDPR we process information under one or more of the following lawful bases:

- Consent
- Performance of a contract
- Compliance with a legal obligation
- Protection of vital interests
- Performance of a task carried out in the public interest
- Legitimate interests pursued by the Charity

Where we process health or other special category information, we rely upon the relevant conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

Special Category Information

Some of the services we provide require us to process information about:

- Physical health
- Mental health
- Dementia
- Disabilities
- Safeguarding concerns
- Social care needs

We only process this information where there is a lawful basis to do so and where appropriate safeguards are in place.

Who We Share Information With

We only share personal information where necessary and lawful.

This may include:

- NHS organisations
- GP Practices
- Hampshire County Council
- Winchester City Council
- Dementia UK
- Emergency services
- Professional advisers
- Auditors
- Regulators
- Our IT service providers
- Payment processors
- Contractors carrying out services on our behalf

We never sell personal information.

Systems We Use

To deliver our services securely we use a range of trusted systems, which may include:

- Microsoft 365
- Salesforce CRM
- Financial management systems
- Property management systems
- Secure cloud storage
- Website hosting providers

All suppliers are required to meet appropriate data protection standards.

International Transfers

Some of our service providers may process information outside the United Kingdom.

Where this occurs, appropriate safeguards are implemented to ensure that personal information remains protected in accordance with UK GDPR.

Data Security

We employ appropriate technical and organisational measures including:

- Secure IT systems
- Encryption where appropriate

- Access controls
- Password management
- Multi-factor authentication
- Staff training
- Confidentiality obligations
- Secure disposal of records
- Regular review of security arrangements

How Long We Keep Information

We only retain information for as long as necessary.

Retention periods are determined by:

- Legal requirements
- Regulatory guidance
- Operational needs
- Charity Commission expectations
- Limitation periods

Full details are contained within the St John's Winchester Data Retention Schedule.

When information is no longer required it is securely deleted or destroyed.

Your Rights

You have the right to:

- Access your personal information
- Correct inaccurate information
- Request erasure where appropriate
- Restrict processing
- Object to processing
- Receive a copy of your information where applicable
- Withdraw consent where consent is relied upon

Some rights may be limited where legal exemptions apply.

Cookies

Our website uses cookies to ensure the website functions correctly and to help us understand how visitors use the site.

Where required, we will ask for your consent before placing non-essential cookies on your device.

Further details are available in our Cookie Notice.

Marketing

We will only send marketing or fundraising communications where we have an appropriate lawful basis.

You may unsubscribe or update your preferences at any time.

Children's Information

Although our services are primarily aimed at older people, we may occasionally process information relating to children or young people where they are family members, volunteers or participants in community activities.

Such information is processed with appropriate safeguards.

CCTV

Where CCTV operates at our premises, it is used to:

- Protect residents
- Protect staff
- Prevent crime
- Investigate incidents
- Protect Charity property

Separate signage is displayed where CCTV is in operation.

Automated Decision Making

St John's Winchester does not make decisions about individuals solely by automated means.

Complaints

If you are unhappy with how we use your information, please contact us first so that we can try to resolve your concerns.

You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this Privacy Notice

We may update this Privacy Notice from time to time.

The latest version will always be available on our website and significant changes will be communicated where appropriate.