

PRIVACY NOTICE

How we use your information

This Privacy Notice tells you how St Cuthbert's Care collects and uses personal information about you. We will only use your personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and any other applicable laws that set out how we can use your personal data. It applies to information we collect about:

- visitors to our websites;
- people who use or visit our services;
- job applicants and our current and former employees/volunteers

Definitions

In this Privacy Notice, the use of the following words/phrases mean:

we, us, our or the Charity (or similar words) refer to St Cuthbert's Care;
you means the person whose personal information we collect;
service means the part of the Charity you are associated with;
third parties means anyone who we may share your personal information with;
website means any of the Charity's websites

Data Controller

We decide why and how personal data is collected and used by us. This makes St Cuthbert's Care the Data Controller for the purposes of UK GDPR and the Data Protection Act 2018. Our contact details, including how to contact our Data Protection Officer, can be found in the "How to contact us" section of this Privacy Notice.

Purpose and legal basis for processing your personal data

At the point we collect your personal data we will tell you, where appropriate, why we need it, what we will use it for, the lawful basis we rely on, whether you are required to provide it, who we may share it with, and how long we keep it. Where we process special category data, such as health, care, safeguarding, ethnicity, religious belief, disability, biometric or employment-related medical information, we will identify both a lawful basis under Article 6 UK GDPR and a separate condition under Article 9 UK GDPR. Where required by the Data Protection Act 2018, we will also rely on an applicable Schedule 1 condition and maintain an appropriate policy document.

Service or activity	Purpose and types of information	Lawful basis and special category condition
Care and support services	To assess needs, provide care and support, maintain care records, communicate with you and your representatives, safeguard people, manage incidents, and meet CQC, Ofsted, local authority, NHS or	Article 6: contract, legal obligation, vital interests, public task where applicable, and legitimate interests. Article 9: health or social care, substantial public interest, vital interests, employment/social protection where applicable, and

	other legal and regulatory requirements. This may include contact details, care plans, health and social care information, medication information, risk assessments, safeguarding information, incident records and family or representative details.	explicit consent where consent is the appropriate basis. DPA 2018 Schedule 1 conditions may apply for safeguarding, social care and employment-related processing.
Fundraising and supporter engagement	To manage donations, supporter relationships, fundraising events, communications, Gift Aid records and fundraising preferences.	Article 6: legitimate interests, legal obligation for financial and tax records, and consent where required for electronic marketing or specific fundraising communications. Where special category information is provided voluntarily, we will only use it where necessary and where a valid Article 9 condition applies.
Employment, volunteering and recruitment	To recruit staff and volunteers, administer employment or volunteering arrangements, manage payroll, pensions, training, absence, performance, conduct, occupational health, DBS checks, equality monitoring, IT access and workplace safety.	Article 6: contract, legal obligation, legitimate interests and, where appropriate, consent. Article 9: employment, social security and social protection law; health or social care; substantial public interest; occupational medicine; and explicit consent where appropriate. Criminal offence data is processed only where permitted by law and with appropriate safeguards.
Charity-wide safety, governance and security	To protect people, premises, systems and services; manage CCTV, access control, information security, complaints, insurance claims, audits, service improvement, statutory reporting and risk management.	Article 6: legal obligation, legitimate interests, vital interests and public task where applicable. Article 9: substantial public interest, health or social care, vital interests and legal claims where applicable.

How we collect data

We collect data in the following ways:

- a) data given to us
- b) data is collected automatically

Data that is given to us by you

We will collect your data in a number of ways, for example: when you contact us through the website, by telephone, post, email, or through other means. Each in accordance with this Privacy Policy.

Data that is collected automatically leading to an automated decision

During recruitment we may use automated tools to help manage applications, for example to check whether an applicant meets essential eligibility criteria. We do not use automated processing as a substitute for meaningful human involvement where a decision would have a legal or similarly significant effect on you, unless this is permitted by law and appropriate safeguards are in place. If automated processing is used in a way that significantly affects you, we will provide meaningful information about the logic involved, the significance and likely consequences of the processing, and your right to request human intervention, express your point of view and challenge the decision.

Visitors to our websites

When someone visits one of our websites, we use a third party service provided by our website hosting company SiteGround Hosting Ltd, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

We do not make and do not allow SiteGround Hosting Ltd to make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Our websites may use cookies and similar technologies. Some cookies are necessary for the website to work. We may also use analytics cookies to understand how visitors use our websites and to improve their performance. Where cookies are not strictly necessary, we will only use them where we have obtained appropriate consent and we will provide a way for you to manage your cookie preferences. Cookies are not used to identify you personally unless we make this clear at the point of collection.

Search engine

Our website search facility does not log searches made.

What if you fail to provide personal information?

If you fail to provide certain personal information when requested or required, we may not be able to perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory or contractual rights.

With whom do we share your personal information?

We will not sell or rent your information to third party organisations and we will not share your personal information for others to use in their marketing or fundraising.

We may share your personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where

it is necessary for our legitimate interests (or those of a third party).

Depending on the service or activity, these third parties may include health and social care professionals, local authorities, NHS bodies, regulators, safeguarding agencies, professional advisers, insurers, IT and system providers, payroll and pension providers, auditors, funders, emergency services and other organisations where sharing is necessary, lawful and proportionate.

How does the Charity protect your personal information?

The Charity has put in place, and regularly reviews, measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try to prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a legitimate need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our Data Protection Officer.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The transmission of information via the internet is not completely secure; this risk is not specific to our website and is common across the internet. Unfortunately, we cannot guarantee the security of the transmission of the data which is outside our control; any data you send is at your own risk. However, to reduce this risk, our internal procedures require that staff needing to send sensitive personal data outside our network, do so with strict controls on encryption and password protection.

The Charity also has procedures to identify, assess and respond to actual or suspected personal data breaches. Where a breach is likely to result in a risk to individuals' rights and freedoms, we will notify the Information Commissioner's Office without undue delay and, where required, within 72 hours of becoming aware of it. Where a breach is likely to result in a high risk to individuals, we will also inform affected individuals without undue delay, unless an exemption applies.

For how long does the Charity keep your personal information?

The Charity will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

Our data retention periods differ depending on the type of information, the service involved, our legal and regulatory duties, limitation periods, safeguarding requirements, care record requirements and operational needs. We maintain retention guidance and will provide details of the relevant retention period or the criteria used to determine it on request. We do not keep personal information for longer than is necessary for the purpose for which it is processed.

Your rights in connection with your personal information

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes so that our records can be updated. The Charity cannot be held responsible for any errors in your personal information in this regard unless you have notified the Charity of the relevant change.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes
- Rights in relation to automated decision making and profiling.

We do not currently make decisions based solely on automated processing, including profiling, that have legal or similarly significant effects on you, except where explicitly described in this Privacy Notice and permitted by law. Where such processing is used, you have the right to obtain human intervention, express your point of view and contest the decision.

If you wish to exercise any of these rights, please contact our Data Protection Officer. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that

specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that the Charity has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues and can be contacted through its website at www.ico.org.uk.

Transferring personal information outside the UK

We do not routinely transfer your personal information outside the UK. If we need to make a restricted international transfer, we will only do so where permitted under UK data protection law, for example where the destination is covered by UK adequacy regulations or where appropriate safeguards are in place, such as the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism. We will also carry out any required transfer risk assessment and ensure that individuals' rights and protections are not undermined.

Changes to this privacy notice

The Charity reserves the right to update or amend this privacy notice at any time. We will post the updated version on our website so that you are always aware of what personal information we collect, how we use it and under what circumstances we disclose it.

The updated Privacy Notice will take effect as soon as it is posted on our website. This Privacy Notice was last updated on 19 August 2026.

How to contact us

If you have any questions about this Privacy Notice or how we handle your personal information, please contact our Data Protection Officer by writing to them at St Cuthbert's Care, St Cuthbert's House, West Road, Newcastle upon Tyne, NE15 7PY, or by emailing them at DPO@stcuthbertscare.org.uk.

Please mark any correspondence with the title, Data Protection Query.

How to complain

If you wish to complain about the way we have handled your personal information, please contact our Data Protection Officer using the details above. You also have the right to complain to the Information Commissioner's Office at any time and you do not have to wait for our internal complaints process to finish before contacting the ICO.

The ICO's contact details are:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF