



**Bedford Morison and Cordery Almshouse
Charity**

Dame Mary Morison Apprenticeship Trust

**BEDFORD, MORISON & CORDERY ALMSHOUSE CHARITY
DAME MARY MORISON APPRENTICESHIP TRUST**

DATA PROTECTION

Bedford Morison and Cordery Almshouse Charity, Watford, was established in 1580
England and Wales Charity Registration number: 207042

Dame Mary Morison Apprenticeship Trust

*Established 6 April 1629 to aid and assist young persons (poor children of the Town and
Parish of Watford) during their educational years*

England and Wales Charity Registration number: 312129

Registered Office: 19 St Mary's Close, Watford, WD18 0EQ

Approved by Trustees September 2025

Introduction:

- 1.1 The purpose of this policy is to enable the Bedford, Morison & Cordery Almshouse Charity (the Charity) to comply with the Data Protection Act 1998 in respect of the data it holds about individuals.
- 1.2 The Bedford, Morison & Cordery Almshouse Charity is registered under the Data Protection Act 1998 Reg. No. A8295002
- 1.3 The Charity Will :
 - follow good practice
 - protect residents, trustees, staff, volunteers and other individuals by respecting their rights
 - demonstrate an open and honest approach to personal data and
 - protect the charity from the consequences of a breach of its responsibilities.
- 1.4 This policy applies to all the information that the Charity controls and processes relating to identifiable, living individuals including contact details, test and exam results, bank details, photographs, audio and digital recording.

Data Storage and processing:

- 2.1 Bedford, Morison & Cordery Almshouse Charity recognises that data is held about:
 - residents
 - trustees
 - staff
 - volunteers
 - members.
- 2.2 This information is always stored securely and access is restricted to those who have a legitimate need to know. The Charity is committed to ensuring that those about whom we store data understand how and why we keep that data and who may have access to it . The Charity does not transfer data to third parties without the express consent of the individual concerned.

Rights of individuals

- 3.1 All individuals who come into contact with Bedford, Morison & Cordery Almshouse Charity have the following rights under the Data Protection Act:
 - a right of access to a copy of their personal data
 - a right to object to processing that is likely to cause or is causing damage or distress
 - a right to prevent processing for direct marketing
 - a right to object to decisions being taken by automated means
 - a right, in certain circumstances, to have inaccurate personal data rectified, blocked, erased or destroyed and
 - a right to claim compensation for damages caused by a breach of the DPA.
- 3.2 Archived records are stored securely and the charity has clear guidelines for the retention of information.

- 3.3 The Trustees recognise their overall responsibility for ensuring that the charity complies with its legal obligations. A trustee is responsible as follows:
- briefing trustees on Data Protection responsibilities
 - reviewing Data Protection and related policies
 - advising other staff on Data Protection issues
 - ensuring that Data Protection induction and training takes place
 - notification
 - handling subject access requests.
- 3.4 All trustees, staff and volunteers are required to read, understand and accept any policies and procedures that relate to the personal data they may handle in the course of their roles. Significant breaches of these policies will be handled under disciplinary procedures.

Key risks to the safety of data control and process:

- 4.1 The trustees have identified the following potential key risks:
- breach of confidentiality (information being given out inappropriately)
 - individuals being insufficiently informed about the use of their data
 - misuse of personal information by staff or volunteers
 - failure to up-date records promptly
 - poor IT security and
 - direct or indirect, inadvertent or deliberate unauthorised access.
- 4.2 The trustees will review the charity's procedures regularly, ensuring that the charity's records remain accurate and consistent and in particular:
- IT systems will be designed, where possible, to encourage and facilitate the entry of accurate data
 - data on any individual will be held in as few places as necessary and trustees and staff will be discouraged from establishing unnecessary additional data sets
 - effective procedures will be in place so that relevant systems are updated when information about an individual changes.
- 4.3 If a breach of data security is suspected or occurs the trustees should be notified immediately.

Subject Access Requests

- 5.1 Any individual who wants to exercise their right to receive a copy of their personal data can do so by making a Subject Access Request, ('SAR') to the Trustees. The request must be made in writing and the individual must satisfy the Trustees of their identity before receiving access to any information.
- 5.2 A SAR must be answered within 40 calendar days of receipt by the charity.

Collecting and using personal data

- 6.1 Bedford, Morison & Cordery Almshouse Charity typically collects and uses personal data in connection with the provision of residency of the Almshouses. The charity collects personal data mainly in the following ways: (below are examples)
- by asking applicants for accommodation to complete paper forms
 - by asking residents to give staff information verbally.
- 6.2 The Bedford, Morison & Cordery Almshouse Charity will:
- not use any of the personal data it collects in ways that have unjustified adverse effects on the individuals concerned
 - be transparent about how it intends to use the data and give individuals appropriate privacy notices when collecting their personal data
 - handle people's personal data only in ways they would reasonably expect
 - not do anything unlawful with the data.

Keeping Data Secure

- 7.1 The Charity will take all appropriate measures to prevent unauthorised or unlawful processing of personal data and to protect personal data against loss, damage or destruction. This means that: (below are examples)
- personal files for residents, trustees, and employees and applications for accommodation will be
 - kept in a locked filing cabinet at all times
 - electronic files containing personal data will be password protected
 - backed up electronic data will be held securely on an alternative site or when off-site it will be encrypted, password protected and only accessed by named staff
 - if any data is taken from the office (e.g. to work at home) the data must be held securely at all times whilst in transit and at the location the data is held.

Retention of personal data

- 8.1 The Charity will not keep personal data for longer than is necessary. This means that:
- a resident's file will be completely destroyed after twelve months from the resident leaving or passing away
 - records of complaint/investigations concerning residents will be destroyed twelve months after the resident leaves or passes away
 - application forms for unsuccessful applicants will be destroyed one year after the date of application.
 - trustees will destroy and delete all charity documents held within their own records twelve months after ceasing to be a Trustee, including all computer data and paper copies trustees personal files will be destroyed one year after ceasing to be a trustee
 - staff personal files will be destroyed 6 years after employment ceases.

GDPR statement

The Bedford Morison and Cordery Almshouse Trust are compliant with the General Data Protection Regulation (GDPR) and are committed to ensuring the security and protection of the personal information that we hold, and to provide an effective and compliant approach to data protection. Both paper and computerised records may be kept.

We may hold sensitive personal information including information relating to ethnicity, physical or mental health or condition, and or criminal records as well as personal financial information relating to the payment of the Maintenance fee.

We retain information regarding Residents and their next of kin so as to support them in their residence and all such data is destroyed 12 months after leaving the Almshouse residence. The information will not be disclosed to a third party without the Residents knowledge and consent. It will not be used for marketing purposes.

This policy has been approved for issue by the board of trustees:

Name: Felicity Evans MBE, Chair of Trustees

Date: 16 September 2025