

# Thorngate Churcher Trust

## Privacy Notice

24 September 2026

This notice explains how Thorngate Churcher Trust uses personal information when you apply for or receive housing, care or support, visit us, contact us or use our website. It also covers family members, representatives and professional contacts whose details we receive. If you work for us, our separate employee privacy notice gives more detail about employment information. We will explain any additional use of your information when we collect it.

### Who we are and how to contact us

Thorngate Churcher Trust is the organisation responsible for deciding how it uses the information described here. We are a registered charity (1169965), company (9953572) and registered provider of social housing (4839). For a privacy question, request or complaint, email [datacontroller@thorngate.org.uk](mailto:datacontroller@thorngate.org.uk), call 023 9253 4999, or write to Thorngate Churcher Trust, Head Office, Clare House, Melrose Gardens, Gosport, Hampshire PO12 3BZ.

### The information we use

- Housing applicants and residents: contact and household details; eligibility and application information; accommodation, service and payment records; correspondence; support needs, incidents and complaints where relevant.
- Care applicants and residents: contact details, assessments, care plans, health and medicine information, safeguarding and incident records, preferences, funding arrangements, charges and payment records.
- Family members, representatives and emergency contacts: names, contact details, relationship to a resident and evidence of authority to act where relevant.
- Visitors, website users and other contacts: contact messages and application forms; visit or security records such as CCTV where in use; website technical information and cookies as explained in our separate cookie information.
- Suppliers and professional contacts: business contact details, correspondence and information needed to manage services, contracts and payments.

Some information, especially health details and information about beliefs or ethnicity, has additional legal protection. We use it only when necessary for a stated purpose and with the extra legal condition required. We may also handle criminal offence information where authorised by law, for example for safeguarding.

### Where information comes from

We usually obtain information from you, your family or authorised representative, an application or referral, our staff and the records created while we deliver services. Depending on the service, we may also receive relevant details from local authorities, health and social care professionals, safeguarding partners, funders and other organisations involved in your application or care. We check what we receive and give additional privacy information where required.

## Why we use it and our legal reasons

We use information only for purposes connected to the services or activities below. More than one legal basis can apply to a particular record. The specific basis for a process depends on what we are doing and must match our processing records.

- **Housing and support:** assess applications, allocate and manage homes, provide housing and support services, arrange repairs, manage charges and respond to concerns. Depending on the activity, our bases include taking steps towards or performing an agreement, meeting legal duties and our legitimate interests in running safe housing services. For sensitive support information we also identify an applicable special category condition before using it.
- **Residential care:** assess whether we can meet a person's needs, deliver and coordinate care, keep care records, manage fees and protect residents. Bases may include the care agreement, legal duties, vital interests in an emergency and legitimate interests. Health information used to provide or manage care requires an additional condition, such as the provision of health or social care, with appropriate confidentiality safeguards.
- **Safeguarding, safety and regulation:** prevent or respond to harm, incidents and complaints and meet duties to regulators and public bodies. We use the basis that fits the action, such as a legal obligation or vital interests; sensitive information requires an additional relevant condition.
- **Administration and contact:** answer enquiries, manage contracts, accounts, insurance and legal claims, and communicate about services. Bases include an agreement, legal obligations and legitimate interests in operating the Trust. Where we ask for consent for an optional activity, you may withdraw it.
- **Website:** receive enquiries and applications and operate and protect the website. We use the basis that fits the activity; optional cookies or electronic marketing require the choices or consent set out at the point of use where applicable.

Where we need information to consider an application, enter an agreement, meet a legal duty or provide safe care, we will explain what is required. Without it, we may be unable to assess an application, provide a service or meet the relevant obligation.

## Who we share information with

We share only what is needed with staff and authorised service providers, and where appropriate with local authorities, health and care professionals, pharmacies, safeguarding agencies, regulators such as CQC and the Regulator of Social Housing, payment and professional advisers, insurers and law enforcement agencies. We may share with a family member or representative where you have authorised them, they have legal authority, or another lawful reason applies. Being listed as next of kin does not automatically give access to all records. Our suppliers may process information for us under written arrangements.

## International access and transfers

Some technology providers may store or allow access to information outside the UK. Where this amounts to an international transfer, we check the destination and use an applicable UK adequacy regulation or approved safeguards, such as the UK International Data Transfer Agreement or UK Addendum, with any required transfer risk assessment. Contact us if you want details of the safeguard that applies to your information. The Trust will verify the actual supplier locations and safeguards before publishing this notice.

## How long we keep information

We keep information for the period needed for its purpose, taking account of care and housing record duties, financial and tax rules, limitation periods, safeguarding, insurance and any ongoing complaint or claim. Different records have different periods: an unsuccessful enquiry or application, a tenancy file, a care record, CCTV and financial records are not all kept for the same time. We securely delete, anonymise or archive records when the relevant period ends. Contact us for the period or criteria applying to a particular record. The Trust will publish specific categories and periods after reconciling its retention schedule; existing documents contain conflicting figures.

## Your choices and rights

You can ask for access to your information and, where the legal conditions apply, ask us to correct or erase it, restrict its use, object to its use or receive a portable copy. If we rely on consent, you can withdraw it at any time without affecting earlier lawful use. Some rights are limited where we must keep information for care, safeguarding, legal or other reasons. We may need to check your identity and a representative's authority. Contact us using the details above; we normally respond to an access request within one month, subject to any lawful extension or pause.

We do not describe any current housing or care decision as being made solely by an automated system with a legal or similarly significant effect. This must be verified before publication. If such processing is introduced, we will explain the relevant decision, its effect and the available safeguards before it is used.

## Questions and complaints

Please contact us if you think we have handled your information incorrectly. We will acknowledge a data protection complaint within 30 days, investigate it, keep you informed and tell you the outcome without undue delay. You can also complain to the Information Commissioner's Office at [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint). You do not have to contact us first.

## Changes to this notice

We review this notice when our services, systems or legal requirements change. If we plan to use your information for a new purpose, we will provide the relevant information before that use where required. The publication date and version will be added when this notice is approved.