

**Providing quality services that make a
real difference to people's lives**

Issued: November 2018
Author: Gemma Dailey

1. Summary

This Privacy Policy is a public document and applies to customers of Acorn Recovery Projects to explain how the organisation collects and processes personal information to conduct normal business activities. We are a registered charity regulated by The Charities Commission and the Care Quality Commission and normal activities can be summarised here:

1. Providing psychosocial therapeutic treatment in community and residential settings.
2. Providing supported housing services.
3. Delivering training and education via Acorn Academy.
4. Offering support with life skills such as; debts, benefits, health, housing and employment.
5. Providing volunteering opportunities.
6. Media and production via Badkamra.
7. Delivering motivational programmes.
8. Providing support for affected families and loved ones.

Our purpose is:

'Providing quality services that make a real difference to people's lives'

We want to help individuals of all ages and backgrounds, and their families, live peacefully and prosperously in warm, secure homes and safe, friendly neighbourhoods. We have a passion for making our customers' lives better.

2. Who we are

Acorn Recovery Projects is a registered charity set up to help individuals struggling with addiction and de-motivational issues to find and live a **Life worth Living**.

Acorn Recovery Projects is the Data Controller whose Head Office is located at **Fulstone House, 130 Mile End Lane, Stockport, SK2 6BY**.

The company Data Protection Officer can be contacted at dataprotection@calico.org.uk or for general enquiries email: contact@acornrecovery.org.uk

Other Parts of 'The Calico Group'

The Calico Group

We are part of The Calico Group, which is made up of innovative businesses and charities, working together to make social profit, rather than financial profit, the driving force behind a wide range of high quality services. We do this by understanding the community's needs and harnessing the widest possible range of expertise; combining our growing range of complementary services to create innovative, new opportunities for the benefit of the community. The Group is made up of the following companies:

Calico Homes

They own and manage approximately 4,600 homes in Lancashire by providing accommodation for families and older people, plus supported housing and services for homeless people. They aim to make a difference to the quality of life of individuals and the wider communities in which they work.

Ring Stones Maintenance and Construction LLP

They develop and maintain approximately 4,800 homes in Lancashire. They aim to make a difference to the quality of life of individuals and the wider communities in which they work. They assist and contribute to providing accommodation for families and older people, as well as supported housing and services for homeless people and community developments. Ring Stones undertake contract work for a variety of clients across the North, providing an all-round management delivery model and the full range of contractor services. They have a wide range of experience in sourcing funding for and delivering retrofit schemes, helping their clients to achieve significant ECO or Green Deal funding to support social and private households.

Delphi Medical Ltd

Delphi Medical is a leading independent provider of drug and alcohol treatment in the UK. They focus on ensuring excellent clinical and psychosocial provision as part of an integrated recovery pathway, which supports and facilitates patients to engage in genuine recovery. Their areas of expertise include Community Drug and Alcohol Treatment, Offender Health, Inpatient Detoxification Services, Clinical Systems and Training.

SafeNet Domestic Abuse Services

SafeNet protects victims and survivors of domestic abuse through the provision of safe refuge and support services, and promotes the prevention of further harm, through various initiatives including, working to build safe and healthy relations and promote equality.

Calico Enterprise

Calico Enterprise works with a host of organisations to deliver a range of services across the North West that: provide housing-related support; tackle worklessness; and give information and advice. Such services include: Calico Interiors; Constructing the Future; Calico Careers; and Floating Support contracts.

3. How we collect your information

Acorn Recovery Projects collects information from you via a variety of sources, including when you access our treatment services, complete one of our forms, make an enquiry and also when you call, write, email or meet us. Additionally, we may collect information when you use our social media and/or website.

We operate a CCTV system at our office and primary residential premises for the detection and prevention of crime. It operates continuously, and recordings are held for up to one month, after which the data is automatically destroyed.

From time to time, we may operate CCTV/sound recording and/or use photography to capture evidence of breach of contracts, alleged anti-social behaviour or crime.

We take photographs at our properties, events and in our communities to use for record keeping, marketing and publicity. Photographs of individuals will only be used for marketing and publicity with the individual's consent.

We may receive information about you from third parties including:

- Police, welfare or other support organisations involved with you
- Your council, local authority and benefits agencies
- GP's, nurses, hospitals and other health professionals involved in your care
- Social services (where applicable)
- Other companies within our Group

4. What information we collect about you

The information we require from you, the service user includes:

- Your name
- Date of birth
- National insurance number
- Contact details (phone number, home address, e-mail or correspondence address)
- Bank Card details if you pay by card (however card details are not stored)
- Banking details (if you pay by BACS, standing order)
- Details of anyone authorised to act on your behalf
- Next of kin details
- Proof of housing eligibility, any interest or equity in other property
- Financial information. We may use this to help resolve payments and optionally to provide welfare, benefits and debt advice as a free service to help you budget and pay your bills or apply for funding on your behalf
- Other personal information that will vary on a case by case basis to help us resolve breach of tenancy, breach of contract, alleged anti-social behaviour or fraud.

5. Special Category of personal data

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

- Mental and physical health details, disabilities or vulnerabilities including current medications to enable us to tailor our service to better meet your personal circumstances.

We may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that:

- it is necessary for us to provide you with treatment for your addiction;
- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims; or
- Based on your explicit consent.

We may also collect previous criminal records information about you to enable us to safeguard you and others. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

6. Withdrawing Consent

We may sometimes process your data for specific purposes, in these instances we will always ask for your written consent. You have the right to withdraw your consent at any time. . Further explanation on this subject can be found within our consent form, please contact us directly if this is the case.

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. When we obtained your consent, we would have provided you with information on how to withdraw same. Alternatively, you can contact us on contact@acornrecovery.org.uk if you wish to withdraw your consent.

7. How we process your information

The information about you is used to manage your support, tenancy or other contract between you and Acorn Recovery Projects. Please read your contract carefully for specific details as 'performance of a contract' is usually the legal basis for processing your information and carrying out our activities.

The processing activities we conduct can be summarised as:

- Managing your treatment and the service you access
- Managing your welfare and that of others in and around the service
- Safeguarding you, other service users, staff, volunteers, visitors and the general public
- Reporting
- Complying with relevant legislation and regulations

Warning and vulnerability information may be processed as part of any function we legitimately perform for safeguarding of our workforce, including contractors, service users, visitors and the general public.

Acorn Recovery Projects conducts research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance against other benchmarks. When possible, statistical information is anonymised or pseudonymised.

Acorn Recovery Projects conducts surveys regularly and periodically relating to our services in order to gauge satisfaction and make improvements based on feedback. Acorn Recovery Projects operates a range of information, communications systems and technologies for efficient operation of the business. Personal information is stored and managed within those systems which are maintained to achieve a high level of Confidentiality, Integrity and Availability (CIA) including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes. All data is held within the UK.
The table below lists the type of information we collect, the purpose of collecting them and the lawful basis for doing so:

What personal data we process	Our purpose for doing so	Our lawful basis
Personal contact details such as name, addresses, telephone numbers, email addresses, date of birth, photographic ID	Providing you with treatment services	Performance of a contract
Financial information such as bank account details, payment information	To take payment for the service we provide if applicable to your service needs	Performance of a contract
Records of previous treatment received	Providing our services to you	Performance of a contract; Legal Obligation
Equality and diversity information	Statistical reporting to our regulator or other government organisations;	Legitimate interest of the organisation; Equal opportunities monitoring
Information regarding your marketing preferences	To deliver promotional materials, gather feedback on the service you received or make note of preferences.	Consent
Information about any complaints made by you or about you	To investigate and resolve any complaint you have raised	Legitimate interest of the organisation; Legal Obligation

8. Additional voluntary services

Acorn Recovery Projects conducts a number of additional voluntary services including delivering family groups, providing one to one placement counselling, aftercare services, and gathering information to improve our services.

For these voluntary services, where your personal information is needed, and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

For the additional services, much of the information contained in our Privacy Notice is still relevant, such as details about Calico Homes as the Data Controller, contact information for the Data Protection Officer and the rights you have under the legislation, including the right to withdraw your consent and the right to complain.

9. Our Legitimate interests

Certain information is processed as it is deemed to be in our business or commercial interests. When we rely on any legitimate interest, we will ensure that we take a balanced approach and have appropriate safeguards in line with your expectations. If we rely on any legitimate interest, we will tell you what that is. Our legitimate interests include:

- Having appropriate security, for our offices and on our sites
- CCTV and identification photographs.
- Handling and investigating complaints.
- Keeping our records up to date.
- Recording threatening behaviour.
- Appending data from other sources.
- Official Communications.
- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.

10. Children's information

Acorn Recovery Projects does not normally process children's information as part of the service, as all service users are adults. However, we record children's basic information for the sake of safeguarding; this includes their name, age, school and living arrangements. This is required for ensuring that children are safeguarded and being looked after appropriately whilst you access our services.

We may receive children's information if we are involved in the aspects of a welfare case as part of a multi-agency working solution.

In some circumstances we are legally obliged to share information, for example under a court order or where there are safeguarding concerns. Disclosure without your consent also becomes appropriate in circumstances where it is considered necessary in the public interest. This would, for example, cover matters such as serious crime, child abuse, drug trafficking or other activities that place you or others at risk. In any scenario, we will satisfy ourselves that we have a lawful basis on which to share the information.

11. Automated decision making and profiling

Our services or activities are not based on any automated decision-making or profiling.

12. Property information

Much of the data we use relates to our properties, which includes their maintenance and repair. However, information such as the age of the kitchen, the results from an asbestos survey, planning to replace windows or a repair to a tap etc., we do not consider to be classed as personal information.

We are happy to assist you in any questions or queries you may have about the property you are living in and any work done to it.

As soon as your name, contact details or other personal information is used in conjunction with property information, such as to complete a property repair visit, then this is treated as personal information.

13. How we will communicate with you

Acorn Recovery Projects needs to communicate with its customers and this will usually be face to face, in writing or by telephone.

Our service users may receive promotional material about community events that relate to them or which are taking part in their local community, to opt-out please contact us via email to: contact@acornrecovery.org.uk to update your preferences.

We will only discuss or communicate your support details with those named on the agreement or those authorised (temporarily or permanently) by you. Authorisation of a temporary person can be done verbally over the phone, however to nominate someone permanently you must contact your support worker.

14. Who we share data with

Acorn Recovery Projects are required by Public Health England (PHE) to process and share anonymised data with via the use of the National Drug Treatment Monitoring System (NDTMS). The data will be processed on the following basis:

- Article 6 (1)(e) "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"
- Article 9(2)(i) "processing is necessary for reasons of public interest in the area of public health such as ... or ensuring high standards of quality and safety of health care"

However, Acorn Recovery Projects and PHE will continue to respect service users' consent and withdrawal of consent for contributing their treatment information to NDTMS.

We may also share your data with companies in the same group of companies as us for the purpose of providing a service to you. These companies are listed above, under the Calico Group.

More information about who we share data with can be seen in the table below:

Who we share your personal data with	Our purpose for sharing it	Our justification (lawful basis) for sharing
People or agencies who provide services to you or who work with us to provide services to you, such as your care/support provider.	To deliver our services	Performance of a contract
Our regulator or other bodies which look at how we provide services to you, our auditors & other people where we are legally required to provide information to them.	Legally required to share	Legal obligation
A language translation service	where necessary to translate any information into or from a foreign language for you	Legitimate interest
Public Health England (PHE) via the use of the National Drug Treatment Monitoring System (NDTMS)	Legally required to share	Legal obligation
Companies in our Group such as Calico Homes, Delphi Medical Ltd, SafeNet Domestic Abuse Services, Calico Enterprise, Ring Stones Maintenance and Construction, Whitworth Care Trust.	Providing a service to you	Performance of a contract

15. What we will not do

We will not send individuals unsolicited direct marketing material without their consent. However, we may conduct business to business marketing campaigns.

We will not sell individuals personal information on to third parties.

We will not pass on your personal information to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do so.

We will not transfer or store your personal information outside of Europe (the European Economic Area) outside of the control of the UK / European regulations.

16. How long we retain your data for

We will retain your data for as long as you are still accessing our treatment services. When you have completed your treatment and no longer our tenant, different factors will be considered in determining how long we retain your data for. These have been documented in our Data Retention Policy. If you require more information on this, please contact a member of staff or email us on contact@acornrecovery.org.uk and we will send you a copy.

17. Your rights, the right to complain and the ICO

Data protection regulations have conferred certain rights on you as the data subject regarding your personal data which we hold. These rights include:

- **Right to be informed** about the collection and use of your personal information. This is called 'privacy information'. We are required by data protection regulations to provide you with information regarding the purposes for processing your personal information, the retention period and who it will be shared with. This Privacy Policy serves that purpose.
- **Right of access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Right of rectification** – This enables you to have any incomplete or inaccurate information we hold about you to be corrected.

- **Right to erasure** – (also known as right to be forgotten) this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Right to object** to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In some cases, we may be able to continue processing if you can show that you have a compelling reason for doing so. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Please note that some of these rights are not absolute and can only apply in certain circumstances. For more information on your rights, visit the ICO website at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of these rights, please write to us at dataprotection@calico.org.uk, we will always endeavour to answer your questions as part of our normal friendly, helpful service. To advise of any changes or corrections, please contact our Customer Services team on 0800 169 2407 or 01282 686 300 or via e-mail to contact@calio.org.uk.

You have the right to complain about any matter relating to our service, including how we use your personal information. In the first instance please contact our Data and Performance team on 0161 484 0000 or e-mail contact@acornrecovery.org.uk to raise a complaint. If you are still not happy with our service you may complain to the Charities Commission Service at <https://www.gov.uk/complain-about-charity> or the Care Quality Commission at <https://www.cqc.org.uk/contact-us/how-complain/complain-about-service-or-provider>. If you wish to complain about our use of your personal information you may complain to the UK Information Commissioner's Office (ICO) at the address below. Our ICO registration number is **Z6764409**.

Information Commissioner's Office

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Phone: 0303 123 1113

Website: www.ico.org.uk

18. Further information

For further information about Acorn Recovery Projects, please see our website at <https://acornrecovery.org.uk> (including website terms & conditions and information about website cookies) or contact us on 0161 484 0000.

19. Changes to our Privacy Notice

This privacy notice was last updated in October 2018 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time. The latest full version is always available from our website at <https://acornrecovery.org.uk>