

Privacy Notice

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

Issued:

Author:

1. Summary

This Privacy Notice explains how Acorn Recovery Projects collects, uses, stores and shares personal information about service users, residents, customers, families, visitors and other people we support or work with. It is intended to provide clear and accessible information about what personal information we process, why we need it, the lawful bases we rely on, how long we keep it, who we may share it with, and the rights individuals have under data protection legislation, including the UK GDPR, the Data Protection Act 2018 and relevant changes introduced by the Data (Use and Access) Act 2025.

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.

The CQC requires us to identify the data flows that fall under Regulation 5 of the Control of Patient Information Regulations (COPI) 2002 and to comply with the national data opt-out.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all the confidential patient information we process on an annual basis to see if this is used for research and planning purposes.

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**.

Our Data Protection Officer can be contacted at dataprotection@calico.org.uk. General enquiries can be sent to 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 process criminal offence, allegation or safeguarding information where this is necessary to protect individuals, manage risk, meet legal or regulatory obligations, establish or defend legal claims, or support safeguarding. Where we process this type of information, we will identify an Article 6 lawful basis and, where required, an appropriate condition under Schedule 1 of the Data Protection Act 2018, and we will apply additional safeguards.

6. Withdrawing Consent

Where we rely on consent, we will make this clear at the point we ask for it and explain what the consent relates to. You have the right to withdraw consent at any time. Withdrawing consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

If you wish to withdraw consent, you can contact us using the details in this Privacy Notice or speak to your support worker. We will explain any practical impact of withdrawal, for example where we need certain information to continue providing a service or to meet a legal obligation.

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 types of information we collect, the purposes for using it and the lawful basis we may rely on. Where we process special category data or criminal offence data, we will also identify the relevant Article 9 condition or Schedule 1 condition and apply appropriate safeguards.

What personal data we process	Purpose	Article 6 lawful basis	Special category / criminal offence condition
Identity and contact details, including name, address, telephone number, email address, date of birth and photographic identification.	To assess eligibility, register you for services, verify identity, communicate with you and manage your support, tenancy or service agreement.	Article 6(1)(b) – performance of a contract, or steps before entering into a contract. Article 6(1)(c) – legal obligation, where checks or records are required by law. Article 6(1)(f) – legitimate interests, where necessary to manage records and service administration.	Not usually special category data unless combined with sensitive information.
Financial information, including bank details, payment	To manage payments, charges, funding, arrears, welfare support and	Article 6(1)(b) – performance of a contract.	Not usually special category data, although related welfare information

records, arrears, benefits, debt information and funding information.	benefits or debt advice where this forms part of the service.	Article 6(1)(c) – legal obligation, including accounting, tax, audit or regulatory requirements. Article 6(1)(f) – legitimate interests, including managing debts and protecting our financial position.	may be sensitive depending on context.
Health, medical, addiction, treatment, medication, disability, vulnerability and care-related information.	To assess needs, provide treatment and support, manage risk, adapt services, support recovery planning and work with health or care professionals involved in your care.	Article 6(1)(b) – performance of a contract, where needed to provide the agreed service. Article 6(1)(c) – legal obligation, where required by health, safeguarding, regulatory or care standards. Article 6(1)(d) – vital interests, where necessary to protect life. Article 6(1)(f) – legitimate interests, where necessary for safe and effective service delivery.	Article 9(2)(h) – health or social care. Article 9(2)(g) – substantial public interest, where applicable. Article 9(2)(c) – vital interests, where the person is unable to give consent. Article 9(2)(a) – explicit consent, where we rely on consent for a specific optional activity. Where required, we will identify and document the relevant Schedule 1 condition and maintain an appropriate policy document setting out our safeguards, retention and erasure arrangements.
Records of previous treatment, referral information, assessments, recovery plans, support notes and progress records.	To understand your history, provide continuity of care and support, manage referrals, monitor progress and evidence the services provided.	Article 6(1)(b) – performance of a contract. Article 6(1)(c) – legal obligation. Article 6(1)(f) – legitimate interests, where necessary to deliver and evidence services.	Article 9(2)(h) – health or social care. Article 9(2)(g) – substantial public interest, where applicable. Where required, the relevant Schedule 1 condition and appropriate policy document will be documented, including

			safeguards for retention, erasure and access controls.
Safeguarding, risk, incident, warning marker, vulnerability, anti-social behaviour, fraud, allegation or criminal offence-related information.	To protect service users, children, staff, volunteers, visitors and the public; manage risk; investigate incidents; prevent harm, crime or fraud; and comply with safeguarding or legal duties.	Article 6(1)(c) – legal obligation. Article 6(1)(d) – vital interests, where necessary to protect life. Article 6(1)(e) – public task, where a clear basis in law applies. Article 6(1)(f) – legitimate interests, where necessary to protect people, property and services.	Article 9(2)(g) – substantial public interest, where special category data is involved. Article 9(2)(f) – legal claims, where applicable. Criminal offence data: Article 10 UK GDPR and relevant Schedule 1 condition under the Data Protection Act 2018, with appropriate safeguards and an appropriate policy document where required.
Equality, diversity and demographic information, including race, ethnicity, religion, sexual orientation or other monitoring information.	To monitor equality of access and outcomes, meet funder or regulator reporting requirements, improve services and support equal opportunities monitoring.	Article 6(1)(c) – legal obligation, where reporting is required by law or regulation. Article 6(1)(f) – legitimate interests, where used to improve and monitor services. Article 6(1)(a) – consent, where information is optional and consent is relied on.	Article 9(2)(g) – substantial public interest, such as equality of opportunity or treatment, where applicable. Article 9(2)(j) – archiving, research or statistical purposes, where applicable and safeguarded. Article 9(2)(a) – explicit consent, where consent is the appropriate condition.
Children’s basic information, family details, next of kin, emergency contacts and authorised representative information.	To support safeguarding, manage emergency contact arrangements, communicate with authorised people and work with families or agencies where necessary.	Article 6(1)(c) – legal obligation, including safeguarding duties. Article 6(1)(d) – vital interests, where necessary to protect life. Article 6(1)(f) – legitimate interests, including protecting people and managing services.	Article 9 condition may apply if health, safeguarding or other special category data is included. Where required, we will identify the relevant Schedule 1 condition and apply additional safeguards because children’s information

			requires particular protection.
Complaints, concerns, feedback, survey responses and service quality information.	To investigate and respond to complaints, improve services, evidence decisions, learn from feedback and comply with complaint-handling requirements.	Article 6(1)(c) – legal obligation, where complaint handling or reporting is required by law. Article 6(1)(f) – legitimate interests, including managing complaints and improving services. Article 6(1)(a) – consent, where optional survey participation relies on consent.	Article 9 condition may apply if the complaint or feedback includes health or other special category information. Article 9(2)(f) – legal claims, where relevant.
Marketing preferences, photographs, video, publicity material and communications preferences.	To manage consent and preferences, send relevant communications, and use images or stories for marketing, publicity or community engagement where appropriate.	Article 6(1)(a) – consent, for direct marketing to individuals and use of identifiable images for publicity. Article 6(1)(f) – legitimate interests, for limited service communications and business-to-business communications where appropriate.	Not usually special category data, unless the image or content reveals sensitive information. Explicit consent may be required where special category data is revealed and used for publicity.
CCTV, photographs for identification, security footage, audio recordings where used, and incident evidence.	To maintain safety and security, prevent and detect crime, manage incidents, protect people and property, and support investigations where necessary.	Article 6(1)(f) – legitimate interests, including safety, security and crime prevention. Article 6(1)(c) – legal obligation, where disclosure or retention is required by law. Article 6(1)(d) – vital interests, where necessary to protect life.	Criminal offence data may be involved if footage relates to alleged offences. Article 10 UK GDPR and relevant Schedule 1 condition to be documented where required.
Information shared with regulators, commissioners, auditors, public bodies, health bodies,	To meet statutory, regulatory, commissioning, public health, audit, safeguarding and reporting	Article 6(1)(c) – legal obligation, where sharing or reporting is required by law.	Article 9(2)(h) – health or social care. Article 9(2)(i) – public health, where applicable.

safeguarding agencies or NDTMS reporting routes.	requirements, and to support service monitoring and accountability.	Article 6(1)(e) – public task, where processing is necessary for a task in the public interest with a clear basis in law. Article 6(1)(f) – legitimate interests, where necessary for audit, governance or service accountability and not overridden by individual rights.	Article 9(2)(g) – substantial public interest, where applicable. Relevant Schedule 1 conditions and appropriate safeguards, including an appropriate policy document where required, will be documented for this processing.
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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 these additional services, the information in this Privacy Notice remains relevant, including the identity of Acorn Recovery Projects as Data Controller, how to contact the Data Protection Officer, your data protection rights, how to withdraw consent where consent is relied upon, and how to raise a data protection complaint.

9. Our Legitimate interests

Certain information is processed because it is necessary for our legitimate interests, or those of a third party, where this is appropriate and not overridden by your rights, freedoms or interests. Before relying on legitimate interests, we will consider the purpose, whether the processing is necessary, and whether individuals would reasonably expect the information to be used in this way. 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.
- Using information within The Calico Group for internal administration, governance, service accountability and IT security, where appropriate.
- Official Communications.
- Sending relevant service communications and information about community events, support options or services that may be relevant to you, where this is appropriate and you would reasonably expect it.
- Seeking consent where required, including for direct marketing, publicity images or optional activities.

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 may also be appropriate where it is necessary in the public interest, 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. Children's information will only be used where necessary, kept to the minimum needed and handled with additional care because children require particular protection.

11. Automated decision making and profiling

Our services or activities are not currently based on solely automated decision-making, including profiling, which produces legal or similarly significant effects. If this changes, we will update this Privacy Notice and provide meaningful information about the logic involved, the significance and likely consequences of the processing, and the safeguards available to you, including the right to obtain human intervention, express your point of view and challenge the decision where applicable.

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 may be required to process and share data through the National Drug and Alcohol Treatment Monitoring System (NDTMS), which is associated with current national health and public health reporting arrangements, including the Office for Health Improvement and Disparities and NHS England. 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"

Where applicable, Acorn Recovery Projects will explain what information is shared through NDTMS, the lawful basis for doing so, and any choices available to service users. We will respect consent choices and withdrawals where consent applies,

unless we are required or permitted by law to continue processing or sharing specific information.

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
National Drug and Alcohol Treatment Monitoring System (NDTMS), including current national health and public health reporting bodies such as the Office for Health Improvement and Disparities and NHS England.	To meet national health, public health, commissioning and statutory reporting requirements.	Legal obligation, public task or other lawful basis where applicable, depending on the specific reporting requirement.
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 your personal information outside the UK unless appropriate safeguards are in place, or another lawful mechanism applies, so that your information continues to receive an appropriate level of protection.

16. How long we retain your data for

We will retain your personal information only for as long as necessary for the purposes set out in this Privacy Notice, including providing services, meeting legal, regulatory, safeguarding, audit and reporting requirements, handling complaints, resolving disputes and establishing or defending legal claims. Retention periods vary depending on the type of information and the reason it is held, for example treatment and support records, safeguarding records, financial records, CCTV, complaints and marketing consent records

may each be kept for different periods. These periods and the criteria used to decide them are documented in our Data Retention Policy. If you require more information, please contact a member of staff or email contact@acornrecovery.org.uk.

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

Data protection legislation gives you a number of rights in relation to the personal information we hold about you. These rights are not absolute and may only apply in certain circumstances. We will explain this when responding to any request. Your 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 Notice 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.
- **Right to data portability** – This allows you, in certain circumstances, to receive personal information you have provided to us in a structured, commonly used and machine-readable format, and to ask us to transmit it to another organisation where technically feasible.
- **Rights relating to automated decision-making** – Where applicable, you have rights in relation to solely automated decisions that have legal or similarly significant effects, including safeguards such as human intervention, the ability to express your point of view and the ability to challenge a decision.

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 contact dataprotection@calico.org.uk. We may need to confirm your identity or authority to act on behalf of someone else before responding. We will respond within the timescales required by data protection legislation and will explain if an extension or exemption applies.

You have the right to raise a complaint if you are unhappy about how we use, share, store or otherwise handle your personal information, or how we have responded to a data protection rights request. In the first instance, please contact our Data Protection Officer at dataprotection@calico.org.uk or contact us on 0161 484 0000. You can also raise a complaint through any usual contact route and we will ensure it is directed appropriately.

We will acknowledge data protection complaints within 30 days of receipt, make appropriate enquiries without undue delay, keep you informed where necessary, and tell you the outcome of your complaint without undue delay. If you remain unhappy, you can complain to the UK Information Commissioner's Office. 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 reviewed in July 2026 and will be updated to reflect changes to the way we operate, the services we provide or changes to data protection legislation, including developments under the Data (Use and Access) Act 2025. We will bring significant changes to your attention where appropriate. The latest version is available from our website at <https://acornrecovery.org.uk>.