

A catalyst for change in people's lives

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

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1. Summary

This Privacy Notice is a public document and applies to customers of Calico Enterprise to explain how the organisation collects and processes personal information to conduct normal business activities.

Calico Enterprise was established in 2007 initially as a subsidiary of Calico Homes, and later becoming a subsidiary of the Calico Group. The company has operated successfully for a number of years delivering skills, and employability contracts alongside care and support contracts.

Calico Enterprise has two charitable objects which govern its activities and business development:

1. To relieve the charitable needs of people with disabilities, ill health or in necessitous circumstances by the provision of support services to enable them to live in the community.
2. The advancement of education, training and the relief of unemployment of people who are unemployed, low paid, low skills or have no skills.

Calico Enterprise is the Data Controller in its own right whose **Head Office is located at Centenary Court, Croft Street, Burnley, BB11 2ED, 0800 169 2407.**

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

2. Who we are

Calico Enterprise

We are part of the Calico Group and comprises of provisions that deliver skills, employability, social enterprises and commercial services. 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.

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 and 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 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.

Acorn Recovery Projects

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. By providing

innovative recovery services, Acorn Recovery Projects enables individuals and their families to break free from drug, alcohol and other addictions. They do this by helping their clients find substance, emotional, social and lifelong recovery.

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.

3. How we collect your information

Calico Enterprise collects information from you via a variety of sources, including when you enrol on one of our training programmes, apprenticeships or complete one of our forms or respond to a survey, also when you call, write, e-mail or meet with us.

Additionally, we may collect information when you use our social media sites or websites.

We may receive information about you from third parties including:

- Our partner FE Colleges
- Funding partners
- Contractors and key stakeholders
- Face to face, email, telephone) – from yourselves to ensure we can deliver effective tenancy related support for you to remain independent in your own home
- other services (social services, housing)
- Social services
- GP's & surgeries
- Mental health team
- MASH/MARAC team
- Housing references – Be with us
- Salvation army
- Local Councils
- Food banks
- Emergency services
- Tunstall monitoring cent

4. What information we collect about you

The information we require from you, may include:

- Full name (and proof of your identity / photo ID)
- Date of birth
- National Insurance number (your unique identifier)
- Contact details (phone, e-mail or correspondence address)
- Details of anyone authorised to act on your behalf, if applicable
- Banking details
- Educational history and qualifications
- Previous work history
- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances
- Next of Kin or Emergency Contact Information you provide to be used in case of emergency. You should only provide this information where you know the specified person(s) is/are happy to act as your emergency contact and could expect us to contact them about you
- Gender
- Ethnicity
- Religion
- Sexual orientation
- Appropriate evidence of right to work in UK
- GP Practice, and registered GP
- Relevant medical conditions so that we are able to fulfil our contractual obligation
- Previous tenancy information
- Access details in an emergency

5. Consent

We may sometimes want to process your data for other purposes than we have your consent for, i.e. evidencing our work, and in these instances, we will always ask for your written consent you have the right to withdraw your consent at any time where relevant. However, this may affect the services that we can make available to you. Further explanation on this subject can be found within our consent form, please contact us directly if this is the case.

This is discussed at the initial needs assessment and at every support plan renewal or at any change of circumstance where we need consent to share with partner agencies.

6. How we process your information

The information collected about you is used to manage your licence agreement or other contract between you and Calico Enterprise Limited.

We also use it to provide and manage our services to you, personalising our services to you, responding to communications from you, supplying you with information that is of interest to you which you have requested.

The processing activities we conduct can be summarised as follows:

- Providing your support plan and safety plan
- Complying with relevant legislation and regulation

Calico Enterprise Limited conducts research and statistical analysis to help improve the services offered to our customers, as well as to evaluate our performance against other benchmarks. Statistical information is anonymised.

Calico Enterprise Limited operates a range of information, communication 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 on IT systems which may be copied for testing, backup archiving and disaster recovery purposes. All data is held within the UK.

In order to fulfil our contractual obligation with outside funding providers we also if appropriate share your personal information in cases in which the support you're receiving is subject to accessing funding.

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 services	Performance of a contract
Financial information such as bank account details, payment information	To take payment for the service we provide	Performance of a contract
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 marketing materials such as our newsletter 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

7. Additional voluntary services

Occasionally, we provide voluntary services and 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.

We may use volunteers within service and they will be issued with minimum information about you.

8. Children's information

Calico Enterprise Limited will collect and process information from any children accessing the services.

This might include:

- Personal information such as date of birth, full name and address
- Health conditions, cultural needs
- Other special category information used for statistical reporting and analysis
- Details of the reason for referral to the services
- Conduct document review meetings

For children, we will need to gain consent from the person holding parental responsibility for the child in order to process this information.

9. Property information

- Managing any tenancy related support
- Managing the repairs, maintenance and adaptations of the properties.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud

10. How we will communicate with you

Communication with our customers will usually be in writing, e-mail, social media or by telephone. We are moving many of our services on-line as this is usually more convenient for you and more efficient for us. Depending on the circumstances we may also communicate face to face, in coffee mornings and consultations. We may also send our marketing information via email regarding our services. Email marketing will only be sent with prior consent. Customers can opt out of marketing at any time by emailing dataprotection@calico.org.uk

11. Who we share data with and how long we keep information

Calico Enterprise Limited shares information with other agencies involved with your tenancy and support, which may include police, social services, solicitors, health professionals, local Councils and with other organisations and agencies where we are legally allowed to do so.

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, social services	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
Funding Partners	Legally required to share	Legal obligation

12. 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.

13. 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 Customer Services Team on 0800 169 2407 or 01282 686300 or email contact@calico.org.uk. If you are still not happy with our service, you may complain to the Housing Ombudsman Service at <http://housing-ombudsman.org.uk/>. If you wish to complain about our use of your personal information you may complain to the UK Information Commissioner's Office (ICO) at <http://ico.org.uk/> Our ICO registration number is Z1745675.

14. Further information

For further information about Calico Enterprise, please see our website at <https://calicohomes.org.uk/> (including website terms & conditions and information about website cookies) or contact our Customer Services team.

15. Changes to our Privacy Notice

This privacy notice was last updated in December 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://calico.org.uk/privacy/>