

## Privacy Notice

### **How we use your information**

This privacy notice tells you what to expect when Syncora companies & The Calico Group collect personal information. It applies to information we collect about:

- 1. Visitors to our website(s)**
- 2. Visitors to our sites**
- 3. People who make a complaint to us**
- 4. People who use our services**
- 4. Your individual rights according to UK GDPR**

### **1. Visitors to our website**

When someone visits calico.org.uk & associated company websites, we collect standard internet log information and details of visitor behaviour patterns. We do this to find out information such as the number of visitors to the various parts of the site. We collect this in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be transparent about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Use of cookies by Syncora companies & The Calico Group**

You can [read more about how we use and apply cookies here.](#)

### **Search engine**

Searches and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by either The Calico Group or any third party.

### **Security and performance**

Calico Group uses a third-party service to help maintain the security and performance of the website. To deliver this service it processes the IP addresses of visitors to the website.

The IP address (Internet Protocol address) is a numerical label that computers, tablets, smartphones, and other computing devices, use to identify themselves and communicate with other devices.

### **People who email us**

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

### **2. Visitors to our sites**

When you visit a Syncora property, you will be required to sign in upon entry. This measure is in place to ensure your safety in the event of an emergency, such as a fire. Any information captured during the sign-in & sign-out process will be recorded on a purpose-made GDPR-compliant form to ensure the redaction of any sensitive data. These logs will be retained by the company for a period of up to three years.

### **3. People who make a complaint to us**

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant, and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that.

However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for the duration of the commissioned contract.

### **4. People who use our services**

Syncora offer a wide variety of different services to local communities, young people, families, adults and general members of the public.

The personal information we hold on people who use our services will include their contact details, details on why they are receiving support from us and details of their contact with us. However, we only use this information to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested some of our service materials to find out if they would like further support from us. There may be occasions where we will share

data with other organisations involved in supporting people who use our services. We will advise if we intend to share data with a third party, however this may not always be possible and any data sharing with a 3<sup>rd</sup> party will be in line with ICO guidelines.

We will ask service users how they would like us to stay in touch with them during their treatment. Service users can update this information on their preferred contact methods at any time.

All information held by Syncora companies in this regard is subject to strict data protection principles to ensure the security, consistent management and compliance to Information Commissioner's Office (ICO) standards are maintained at all times due to the confidential nature of the data filed.

### **Service providers reporting a breach**

Public service providers are required to consider reporting serious security breaches to the Information Commissioner's Office (ICO). We provide an online form for this purpose, we use the data collected by the form to record the breach, to make decisions about the action we may take, and as relevant in order to carry out those actions.

We retain personal information only for as long as necessary to carry out these functions, and in line with our retention schedule. This means that logs and breach reports will be retained for one year from receipt and longer where this information leads to regulatory action being taken. Syncora & The Calico Group have measures in place to ensure the security of data collected and only processes personal information in line with our policies and procedures.

## **5. Your Individual rights according to UK GDPR**

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 Notice serves that purpose.
- **Right of access** to your personal information (commonly known as a "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. Please contact [syncoragovernance@calico.org.uk](mailto:syncoragovernance@calico.org.uk) if you wish to request access to any of your personal information.
- **Right of rectification** – This enables you to have any incomplete or inaccurate information we hold about you to be corrected. Please contact [syncoragovernance@calico.org.uk](mailto:syncoragovernance@calico.org.uk) if you wish to rectify any of your personal information

- **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 we can show that we 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.

You also have other rights which can be seen by visiting the Information Commissioner's Office (ICO) website and reading about Data Protection law at <https://ico.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 Governance team at [syncoragovernance@calico.org.uk](mailto:syncoragovernance@calico.org.uk) to raise a complaint.

If you are still not happy with our service, you may complain to the Parliamentary and Health Services Ombudsman or the Local Government Ombudsman (LGO).

If you wish to complain about our use of your personal information you may complain to the UK Information Commissioner's Office (ICO) at <https://ico.org.uk/>.

Our ICO registration numbers are:

Calico Enterprise Ltd	Z1745675
Delphi Medical Limited	Z2735447
Acorn Recovery Projects	Z6764409
The Calico Group	ZB210782
SafeNet Domestic Abuse Services	Z7309623

### **Legal basis for processing data**

Syncora has identified the legal basis from Article 6 the GDPR for processing of personal data. This is legitimate interests Article 6(1)(f). We need to hold data on service users in order to provide support / treatment. We need to hold data on employees in order to employ them

Syncora has identified the legal bases from Article 9 of the GDPR for processing of special category data on service users. These include:

- When this is necessary to protect the vital interests of the data subject or of another person Article 9(2)(c). Vital interests will cover situations where an individual is at risk of immediate and serious harm.
- Data has already been made public by the data subject Article 9(2)(e).
- Processing of legal claims Article 9(2)(f).
- Research purposes Article 9(2)(g)
- Reasons of substantial public interest Article 9(2)(g)(8)(17)
- Preventive or occupational medicine Article 9(2)(h)
- Public interest in the area of public health Article 9(2)(i).

### **Privacy Impact Assessments**

We consider data protection issues as part of the design and implementation of our systems, services and processes. We do this in order to identify risks associated with data processing, and to take action to mitigate against these risks.

We carry out Data Impact Assessments before we:

- Use new systems to process personal data
- Use new tools to communicate with service users
- Process new types of personal data

### **Choosing to share information**

You have a right to confidentiality (privacy) when accessing our services. However, this right is not absolute and there may be instances where we share your information without your consent.

We may share relevant and necessary information with other health professionals for direct care purposes. We will only share this information to inform and improve decisions about your health and care, and only to those who are delivering care to you or supporting that care. You can object to this, but this may limit the interventions we are able to offer.

Depending on the support you are getting from us, there may be different people, services and organisations who we may be required to share information with. For example, we need to share prescribing information with other healthcare providers (GPs or pharmacies) to keep you safe.

There may also be instances where the law means we have to share information. We will explain this to you and the reasons why. If you would like more information, please contact your service.

If we're concerned about your or someone else's safety, we may need to share information to keep someone safe. Wherever possible we will talk to you about this before it happens.

You can also tell us who you're happy for your information to be shared with – this might be friends, family, or other services you are engaging with. Please know, you can change this information at any time by speaking to a member of staff.

On occasion, we're asked to share information to help improve services and research. We will take steps to reduce the level of information that is shared (such as anonymising data).

We will always strive to ensure that we treat your information with dignity, respect and privacy.

### **For services that offer drug and alcohol treatment and support**

We share anonymous information about you to show the impact our services are having. The Office for Health Improvement and Disparities collects this information on a database known as the National Drug Treatment Monitoring System (NDTMS). You can find more information about this via your service, or in this [Office for Health Improvement and Disparities document](#). (PDF)

### **For services that offer prescribed medication**

If we are providing medication as part of your support from our services, we will seek your consent to do this. This means we'll tell you about all the possible consequences. This includes potential risks, benefits and side effects. Our doctors and nurses will have conversations with you that will ensure you have the information you need to make an informed decision about your medication options.

Remember, you can change your consent preferences at any time by speaking to a member of staff.

### **Care Quality Commission (CQC)**

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.

### **Caldicott Guardian**

As Syncora is predominantly made up of services that fall under the Health & Social Care sector, A Caldicott Guardian is essential to ensure the ethical and legal handling of personal data. Here are some key reasons why they are needed:

1. **Protecting Confidentiality:** Caldicott Guardians oversee the protection of patient and service user information, ensuring it is used appropriately and confidentially<sup>1</sup>.

2. **Ethical Data Sharing:** They help staff make informed decisions about sharing data, balancing the need for information sharing with the duty to protect confidentiality<sup>2</sup>.
3. **Compliance with Laws and Regulations:** Caldicott Guardians ensure that data handling practices comply with relevant laws and regulations, such as the Data Protection Act and GDPR<sup>3</sup>.
4. **Supporting Better Care:** By ensuring data is used responsibly, they support the delivery of high-quality care and improve patient outcomes<sup>1</sup>.
5. **Guidance and Support:** They provide guidance to staff on complex data protection issues, helping to navigate ethical dilemmas and legal requirements<sup>2</sup>

### **Data Protection officer**

We have appointed a Data Protection Officer (DPO) to oversee our processing of personal information whose contact details are provided below.

Mrs A Thornley: Calico Homes Limited, Centenary Court, Croft Street, Burnley BB11 2ED

Telephone: 0800 169 2407

### **Changes to this privacy notice**

Syncora will review this privacy notice annually or as and when required by legislation.

### **How to contact us**

If you want to request more information about our privacy policy, you can email us or write to:

The Calico Group,  
Centenary Court,  
Croft Street,  
Burnley,  
Lancashire,  
BB11 2ED

Please address letters for the attention of Syncora Governance & Assurance.

Alternatively, please contact us at **[syncoragovernance@calico.org.uk](mailto:syncoragovernance@calico.org.uk)** or **[dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk)**