

Privacy Notice

Spark – Blackburn with Darwen Recovery Collaborative

Last updated: July 2026

1. Introduction

Spark is committed to protecting and respecting your privacy.

This Privacy Notice explains how we collect, use, store, share and protect personal information when you access our services, make a referral, receive support, visit our website, contact us, or otherwise engage with us.

We process personal information in accordance with:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025;
- health and social care legislation;
- safeguarding legislation; and
- other applicable legal and regulatory requirements.

We are committed to ensuring that personal information is processed lawfully, fairly, transparently and securely.

Spark regularly reviews its privacy practices, policies, procedures and information governance arrangements to ensure ongoing compliance with data protection legislation and guidance issued by the Information Commissioner's Office.

2. Who we are

Spark is the Blackburn with Darwen Recovery Collaborative. We provide drug and alcohol recovery services for people of all ages, families and communities across Blackburn with Darwen. Spark's services include support with alcohol, drugs, ketamine, employment and families, as well as detox and rehabilitation support, family support, harm reduction and outreach services, blood testing, needle exchange, prescribing support, counselling and ongoing recovery support. [\[sparkbwd.org.uk\]](https://sparkbwd.org.uk)

Spark is funded by Blackburn with Darwen Borough Council and led by The Calico Group. [\[sparkbwd.org.uk\]](https://sparkbwd.org.uk)

For the purposes of data protection legislation, Spark and its delivery partners may act as Data Controllers for the personal information processed as part of service delivery. This means we are responsible for deciding how and why your personal information is used.

Contact details

Spark

Telephone: 01254 495014

Email: BWD@calico.org.uk

Data Protection Officer

You can contact the Data Protection Officer by:

Email: dataprotection@calico.org.uk

Post:

Data Protection Officer
The Calico Group
Centenary Court
Croft Street
Burnley
BB11 2ED

3. Information we collect

The information we collect will depend on the services you access and your individual circumstances.

We may collect the following types of personal information:

Personal and contact information

- Name
- Date of birth
- Address
- Telephone number
- Email address
- NHS number, where applicable
- Emergency contact details
- Details of family members, carers or people involved in your support, where relevant

Referral and service information

- Referral details
- Assessment information
- Recovery plans
- Treatment plans
- Support plans
- Attendance information
- Progress notes
- Case records
- Risk assessments
- Details of services provided to you

Health and wellbeing information

- Physical health information
- Mental health information
- Medication information
- Prescribing information
- Substance use history
- Alcohol use history
- Clinical information relevant to your treatment, recovery or support
- Information about disabilities, vulnerabilities or additional needs

Safeguarding and risk information

- Safeguarding concerns
- Risk to self or others
- Domestic abuse concerns, where relevant to support or safeguarding
- Criminal justice involvement, where relevant
- Information required to protect children, adults at risk, staff or the wider public

Equality, diversity and inclusion information

- Ethnicity
- Religion or belief
- Sexual orientation
- Gender identity
- Disability information
- Language or communication needs

Housing, employment and financial information

Where relevant to your recovery or support, we may collect information about:

- Housing circumstances
- Employment status
- Education or training
- Benefits or financial circumstances
- Social support needs

Website and digital information

When you use our website, we may collect limited technical information, including through cookies and similar technologies. The Spark website includes cookie preference options for necessary, functional, analytics, performance and advertisement cookies.

4. Special category personal data

Some of the information we process is classed as special category personal data under UK GDPR. This is more sensitive information and receives additional protection.

This may include information about:

- physical or mental health;
- substance use or alcohol use;
- medication or treatment;
- ethnicity;
- religion or belief;
- sexual orientation;
- gender identity;
- disability;
- safeguarding concerns; and
- social care or clinical needs.

We will only process special category personal data where we have a lawful reason to do so and where an additional condition under UK GDPR and the Data Protection Act 2018 applies.

These conditions may include:

- providing health or social care services;
- delivering treatment, recovery and support services;
- safeguarding children or adults at risk;
- protecting someone's vital interests;
- reasons of substantial public interest;
- establishing, exercising or defending legal claims; or
- explicit consent, where this is appropriate.

5. Information we receive from others

We may receive information about you from other organisations or individuals where this is lawful and relevant to the support being provided.

This may include information from:

- GPs;
- NHS organisations;
- hospitals;
- mental health services;
- pharmacies;
- Blackburn with Darwen Borough Council;
- social care services;
- police;
- probation services;
- courts;
- schools, colleges or education providers;
- housing providers;
- family members, carers or advocates, where appropriate;
- other support organisations; and
- commissioners or partner agencies.

We will only use information received from others where it is necessary, relevant and lawful to do so.

6. How we use your information

We use personal information to:

- provide drug and alcohol treatment, recovery and support services;
- assess your needs and eligibility for services;
- create and manage recovery plans, treatment plans and support plans;
- provide clinical, prescribing or harm reduction support where applicable;
- provide counselling, family support and outreach services;
- help you access other services, where appropriate;
- safeguard children and adults at risk;
- protect life and prevent serious harm;
- manage risk to individuals, staff and the wider public;
- communicate with you about your support;
- monitor attendance, progress and outcomes;
- respond to complaints, concerns or information rights requests;
- meet legal, contractual and regulatory obligations;
- support service planning, reporting and improvement; and
- demonstrate compliance with funding, commissioning, quality and regulatory requirements.

Where possible, information used for reporting, monitoring or service improvement will be anonymised or aggregated so that individuals cannot be identified.

7. Lawful bases for processing

We rely on one or more lawful bases under UK GDPR depending on the reason we are using your information.

Purpose	Lawful basis under UK GDPR
Providing treatment, recovery and support services	Article 6(1)(e) – task carried out in the public interest

Managing referrals, assessments and care planning	Article 6(1)(e) – task carried out in the public interest
Clinical treatment, prescribing and health-related support	Article 6(1)(e) – task carried out in the public interest
Protecting someone from serious harm	Article 6(1)(d) – vital interests
Meeting safeguarding duties	Article 6(1)(c) – legal obligation and/or Article 6(1)(e) – public task
Meeting legal, regulatory or contractual obligations	Article 6(1)(c) – legal obligation
Managing services, records, quality and governance	Article 6(1)(f) – legitimate interests
Responding to complaints and information rights requests	Article 6(1)(c) – legal obligation

Where we process special category personal data, we also rely on relevant conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

8. Consent

We do not usually rely on consent as our main lawful basis for providing treatment, recovery or support services.

This is because we may need to process information to provide services, meet legal obligations, safeguard individuals or protect people from harm.

Where we do rely on consent for a specific purpose, we will explain this clearly at the time. You may withdraw consent at any time, but this will not affect the lawfulness of anything we have already done before consent was withdrawn.

9. Who we share information with

We may share information where it is necessary, proportionate and lawful.

This may include sharing information with:

- GPs;
- NHS organisations;
- hospitals;
- pharmacies;
- mental health services;
- Blackburn with Darwen Borough Council;
- social care services;
- police;
- probation services;
- courts;
- safeguarding partners;
- schools, colleges or education providers;
- housing providers;
- commissioners;
- regulators;
- auditors;
- legal advisers; and

- other organisations involved in your treatment, recovery, safeguarding or support.

We will not sell your personal information to third parties.

We will only share information where there is a lawful reason to do so, and we will apply appropriate safeguards to protect your confidentiality.

10. Safeguarding and public protection

Protecting people from harm is a core part of our role.

We may share information without consent where this is necessary and lawful, including where:

- a child may be at risk of harm;
- an adult may be at risk of abuse or neglect;
- there is a serious risk to life;
- there is a risk of serious harm to you or another person;
- a crime has been committed or may be committed;
- we are required to share information by law; or
- disclosure is necessary for public protection or safeguarding purposes.

Any safeguarding or public protection disclosure will be considered carefully and will be limited to what is necessary and proportionate in the circumstances.

Where appropriate, individuals who are dissatisfied with an information-sharing or safeguarding decision may raise concerns through the data protection complaints process described in Section 18.

11. Confidentiality

We understand that people accessing drug and alcohol recovery services may share sensitive and personal information with us.

We will treat your information confidentially and will only share it where this is necessary, lawful and appropriate. Staff, volunteers and delivery partners are expected to handle personal information responsibly and in accordance with confidentiality and data protection requirements.

There may be circumstances where confidentiality cannot be maintained, for example where there is a safeguarding concern, a serious risk of harm, or a legal requirement to disclose information.

12. Automated decision-making

Spark does not currently make decisions about individuals solely through automated processing that produce legal or similarly significant effects.

If this changes in the future, we will ensure appropriate safeguards are in place. This will include providing information about the decision, enabling individuals to obtain human review, express their views and challenge decisions where required by law.

The Data (Use and Access) Act 2025 introduced changes to the legal framework for automated decision-making and requires safeguards where decisions have legal or similarly significant effects.

13. International transfers

Personal information is primarily stored within the United Kingdom.

Where information is transferred outside the UK, we will ensure appropriate safeguards are in place in accordance with UK GDPR requirements. This may include reliance on adequacy regulations, approved contractual safeguards or other lawful transfer mechanisms.

14. How long we keep your information

We keep personal information only for as long as necessary.

Retention periods may depend on:

- the type of service provided;
- legal, clinical, safeguarding or regulatory requirements;
- commissioning or contractual obligations;
- NHS or health record requirements, where applicable;
- the need to defend or establish legal claims; and
- our records retention schedule.

When information is no longer required, it will be securely deleted, destroyed or anonymised.

15. Data security

We use appropriate technical and organisational measures to protect personal information.

These may include:

- access controls;
- secure systems;
- password protection;
- encryption where appropriate;
- staff training;
- confidentiality requirements;
- secure storage;
- audit and monitoring arrangements;
- information governance policies; and
- incident reporting processes.

We take reasonable steps to protect personal information from unauthorised access, loss, misuse, alteration, disclosure or destruction.

16. Children and young people

Spark provides support to people of all ages, including children, young people and families.

Children's personal information receives additional protection. We will process children's information in accordance with data protection law, safeguarding requirements and the best interests of the child.

Where appropriate, children and young people may be able to exercise their own information rights, depending on their age, understanding and circumstances.

Parents, carers or people with parental responsibility may also be able to exercise rights on behalf of a child where this is appropriate and lawful. However, there may be

circumstances where information cannot be shared with a parent or carer, particularly where doing so could place a child, young person or another individual at risk of harm.

17. Your information rights

Under data protection law, you have rights in relation to your personal information.

These include the right to:

- be informed about how your personal information is used;
- request access to your personal information;
- ask for inaccurate information to be corrected;
- ask for information to be deleted in certain circumstances;
- ask us to restrict the use of your information in certain circumstances;
- object to certain types of processing;
- request data portability, where applicable;
- withdraw consent where we rely on consent;
- challenge decisions made solely by automated means where they have legal or similarly significant effects; and
- raise a data protection complaint directly with us.

Some rights are subject to legal exemptions or limitations. This means we may not always be able to comply with a request in full, but we will explain our decision where this applies.

18. Data protection complaints and concerns

Under the Data (Use and Access) Act 2025, you have the right to raise a data protection complaint directly with us if you are concerned about how we have collected, used, shared, retained or otherwise handled your personal information. The ICO guidance says organisations must provide people with a way to make data protection complaints, acknowledge receipt within 30 days, take appropriate steps to respond, keep people informed, and tell people the outcome without undue delay. [\[ico.org.uk\]](https://ico.org.uk)

A data protection complaint may include concerns about:

- how we have used your personal information;
- information we hold about you;
- who we have shared your information with;
- the security of your information;
- how we responded to a Subject Access Request or other information rights request;
- the accuracy of information we hold;
- how long we have kept your information;
- whether information has been shared appropriately; or
- any other concern about our compliance with data protection legislation.

You do not need to quote data protection law or use specific legal wording for us to treat something as a data protection complaint. If you tell us that you are unhappy about how we have handled your personal information, we will consider whether this should be handled as a data protection complaint.

You can make a data protection complaint by:

- emailing dataprotection@calico.org.uk;
- contacting Spark on 01254 495014;
- speaking to a member of Spark staff;

- writing to the Data Protection Officer using the contact details in this notice; or
- using any other reasonable method of contacting us.

When we receive a data protection complaint, we will:

- acknowledge receipt of your complaint within 30 calendar days;
- consider the issues you have raised;
- make appropriate enquiries;
- involve relevant staff or services where necessary;
- keep you informed of progress where appropriate;
- take reasonable steps to resolve the matter without undue delay;
- tell you the outcome of our investigation without undue delay;
- explain any action we have taken or intend to take; and
- tell you about your right to complain to the Information Commissioner's Office if you remain dissatisfied.

We will keep appropriate records of data protection complaints, findings and actions taken so that we can demonstrate compliance, identify learning and improve our services.

Where a complaint identifies a risk to confidentiality, service quality, safeguarding, patient safety or legal compliance, we may take additional corrective action to reduce the risk of the issue happening again.

Raising a data protection complaint will not affect your right to access support from Spark and will not affect your other rights under data protection law.

19. Complaints to the Information Commissioner's Office

If you remain dissatisfied with our response, or if you believe we have not handled your personal information in accordance with data protection law, you have the right to complain to the Information Commissioner's Office.

The Information Commissioner's Office is the UK's independent regulator for data protection.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: [Information Commissioner's Office](#)

20. Website cookies

Our website uses cookies and similar technologies to support website functionality, improve user experience and understand how the website is used.

Some cookies are necessary for the website to work properly. Other cookies, such as analytics, performance, functional or advertising cookies, will only be used where appropriate controls are in place.

You can manage your cookie preferences through the cookie settings available on the Spark website. The Spark website states that cookie preferences can be customised, including necessary, functional, analytics, performance and advertisement cookies.

21. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in law, guidance, technology, service delivery or organisational arrangements.

The latest version will be made available on the Spark website.

Where significant changes are made, we will take reasonable steps to bring those changes to the attention of individuals where appropriate.