

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

**Issued: November 2018**

**Author: Jo Claessen**

## 1. Summary

This Privacy Policy is a public document and applies to clients of Safenet Domestic Abuse Services to explain how the organisation collects and processes personal information to conduct normal business activities as a UK charitable domestic abuse services provider.

Normal activities can be summarised as:

- Providing refuge services to victims of domestic abuse
- Providing IDVA and Outreach services to victims of domestic abuse

## 2. Who we are

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. SafeNet Domestic Abuse Services is part of a group structure whose parent is 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 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.

#### 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.

We define "social profit" as the positive difference we make to people's lives, across all the communities in which we work. We create social profit by developing innovative services and harnessing the opportunities of our unique group structure.

Safenet Domestic Abuse Services is the Data Controller whose registered office is located at Centenary Court, Croft Street, Burnley BB11 2ED. Telephone 0800 169 2407 or 01282 686300.

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

### **3. How we collect your information**

Safenet Domestic Abuse Services collects information from you when you access our services by telephone and in person, in order to provide you with our services.

We may receive information about you from third parties including:

- DWP
- Council HB departments
- Social Services
- Police
- Other support organisations
- Schools
- Your council, local authority and benefits agencies
- GP's, nurses, hospitals and other health professionals involved in your care
- Other companies within our Group

### **4. What information we collect about you**

- The information we collect about you includes:
- Full name
- Date of birth
- Address
- Cultural Needs – such as religion, sexual orientation
- National Insurance number
- Contact details
- Personal information used in applying for Housing Benefits (such as proof of benefits, payslips, proof of ID)
- Details of the reason for referral to the services

We may also collect information such as:

- Disabilities. We use this information to tailor our service to better meet your particular circumstances
- Photo ID, bank statement, payslips or income details when we require this information to apply for Housing Benefit on your behalf.
- If you do not provide the above information as required, we may not be able to provide all our services to you.

### **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 information on this subject can be found within our Confidentiality and Information Sharing Form.

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 at Centenary Court, Croft Street, Burnley BB11 2ED. Telephone 0800 169 2407 or 01282 686300, or [dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk) if you wish to withdraw your consent.

## 7. How we process your information

The information collected about you is used to manage your licence agreement or other contract between you and SafeNet Domestic Abuse Services.

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:

- Managing your tenancy charges and payments
- Providing your support plan and safety plan
- Complying with relevant legislation and regulation

SafeNet Domestic Abuse Services 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.

SafeNet Domestic Abuse Services 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.

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 our services   | 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 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. 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 services may interest you and telling you about them.
- Seeking your consent when we need it to contact you.

## 9. Children's Information

SafeNet Domestic Abuse Services 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

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

## 10. How we will communicate with you

SafeNet Domestic Abuse Services will communicate with its clients in person, in writing or by telephone.

We will only discuss or communicate your tenancy or support details with those named on the Confidentiality and Information Form.

## 11. Who we share data with

SafeNet Domestic Abuse Services 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:

| <b>Who we share your personal data with</b>   | <b>Our purpose for sharing it</b> | <b>Our justification (lawful basis) for sharing</b> |
|---|-----------------------------------|---|
| 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 |
| The police                     | Assisting with the prevention and detection of crime                                 | Legal obligation    |

### 12. What we will not do

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. How long we retain your data for

We keep information relating to your Housing Benefit claim and service charge records for 2 years. We keep information regarding your support plans permanently. This is stored on our software system.

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 at Centenary Court, Croft Street, Burnley BB11 2ED. Telephone 0800 169 2407 or 01282 686300 or [dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk)

### 14. Automated decision making and profiling

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

### 15. 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](mailto: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](mailto: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](mailto: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 Z7309623.

#### **16. Further information**

For further information about Safenet Domestic abuse Services, please see our website at <http://safenet.org.uk/> (including website terms and conditions and information about website cookies) or contact our Customer Services team.

#### **17. Changes to our Privacy Policy**

This Privacy Policy was last updated in November 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 <http://safenet.org.uk/>