



## Privacy Policy

# From Dependence to Freedom

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## 1. Summary

This Privacy Policy is a public document and applies to all clients and customers of 'Delphi Medical' (Delphi Medical Ltd and Delphi Medical Consultants Ltd).

The policy explains how we collect and process your personal information to conduct our normal business activities.

Delphi Medical is a provider of addiction treatment services, regulated by the Care Quality Commission (CQC). Our normal business activities can be summarised as:

- Providing addiction treatment services
- Managing company communications (complaints etc.)

In order to conduct these business activities, we collect and process personal information.

This policy provides information regarding:

- Who we are
- How we collect personal information
- What information we collect
- How we process personal information
- Who we share your data with
- Your individual rights
- Changes to our Privacy Policy

## 2. Who we are

**Delphi Medical** provides addiction treatment services across the UK.

Our purpose is to make a difference to people's lives, by providing innovative and specialised addiction services that lead the way from Dependence to Freedom.

We are a value based organisation and have defined the culture of the organisation by implementing our values. We reference them in all decision making; from decisions about patient care through to strategic planning.

We offer people-centred services which are;

- Accessible – with open access provision and a promise to make communications easy. You should be able to ask questions of anyone within Delphi and we should always go one step further with our patients.
- Sustainable – by caring about our wellbeing as individuals and teams, and through minimal our impact on the environment, Delphi Medical ensure the business is sustainable for the future.
- Accountable – by understanding responsibilities, both personal and organisational, and how these help us improve and strengthen ourselves and our organisation.

Delphi Medical adopts a 'privacy by design' approach across all areas of the business, ensuring data protection is integrated into every aspect of our activities.

Delphi Medical is the Data Controller in its own right. Delphi's Head Office is located at 72 Harrowside, Blackpool, Lancashire, FY4 1LR. The telephone number is 01253 405072. For general enquiries email [corporateservices@delphimedical.co.uk](mailto:corporateservices@delphimedical.co.uk).

### Other Parts of 'The Calico Group'

**Delphi Medical** is part of a group structure whose parent is The Calico Group.

**The Calico Group** 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** 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** 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.

**SafeNet Domestic Abuse Services** 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** 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.

Calico's Head Office is located at Centenary Court, Croft Street, Burnley, BB11 2ED. The telephone number is 01282 686300. The company Data Protection Officer can be contacted at [dataprotection@calico.org.uk](mailto:dataprotection@calico.org.uk).

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

Delphi Medical collects personal information from you via a variety of sources, including when you make contact with one of our services, fill in one of our forms, sign into one of our buildings, meet with an employee of Delphi Medical, when you call, write, or email us, and when you use our social media sites.

If you contact us on social media e.g. Facebook or Twitter, you agree to their terms and conditions and understand that information posted in the public domain is not confidential.

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.

We may also receive information about you from third parties including:

- Referring agencies / parties
- General Practitioner (GP and/or their Surgery)
- Pharmacies
- Outreaches
- Other Healthcare Professionals involved in your care
- Other Drug and Alcohol Treatment service providers
- HMP's /Probation /Parole Board /Safer Custody Officer /Chaplaincy /Sentence Planning Officer
- Other non-Healthcare Agencies such as the Department for Work and Pensions.

We may take photographs at events to use for our legitimate business interests and publicity purposes. Where necessary, we will obtain consent from individuals before using their images in publicity and marketing campaigns.

Delphi Medical operates a CCTV system inside medication dispensary rooms for the detection and prevention of crime. Images are stored in line with retention guidance before being destroyed. In areas where CCTV is in operation, there are visible signs to identify the cameras.

As part of the commissioning of drug and alcohol services, service providers may change. As part of this process, Delphi Medical may collect personal information about you from the outgoing provider. Where this situation applies, you will be informed (by the outgoing provider) of the transfer of service and how your data will be transferred.

## Our Website

When someone visits <https://www.delphimedical.co.uk> we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. Apart from the IP address of the device you use to access our site, we do not collect any personal data about you nor do we 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 up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

This Privacy Policy only covers <https://www.delphimedical.co.uk> although we do link to other websites. If you follow these links, you will no longer be subject to Delphi Medicals privacy terms. We recommend you read the other sites' Privacy Policies.

Search queries and results from search engines are logged anonymously to help us improve our website and search functionality. No user-specific data is collected.

Delphi Medical uses a third-party service to help maintain the security and performance of the Delphi Medical website. To deliver this service it processes the IP addresses of visitors to the Delphi medical Website. The IP address (Internet Protocol address) is a numerical label that computers, tablets, smartphones, and other computing devices, use to identify them and communicate with other devices.

## 4. What Information we collect about you

The information we may collect from you includes:

- Full name
- Date of birth
- Contact details (phone number, e-mail or correspondence address)
- NHS Number
- GP name and address
- Details of anyone authorised to act on your behalf, if applicable

## 5. Special Category Personal Information

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; and
- Information about your health, including any medical conditions, health and sickness records, medical records and health professional information.

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
- you have provided consent to the processing.

The table below lists the type of information we collect, the purpose of collecting them and our 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, GP details, and NHS Number	Providing you with treatment services	Consent
Information about your health (including mental health)	Providing you with safe treatment services	Consent

Records of previous treatment received	Providing our services to you	Consent
Equality and diversity information	Statistical reporting to our Regulator, our commissioners or other government organisations;	Legitimate interest of the organisation and our Commissioners; Equal opportunities monitoring
Criminal record information	Providing you with safe services	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

Providing this information allows Delphi Medical employees to offer you a full and safe service. We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

## 6. How we process your personal information

The information we collect from you is used to ensure you receive the best possible care. When we process your personal information, we do this based on your consent to freely submit to our treatment services towards your recovery, by completing a consent form..

Consent is usually the legal basis for processing your information and providing treatment to you. Processing your information on this basis puts you in control of your information. Your consent will be reviewed with you as appropriate, and you are able to withdraw your consent at any time. Please note that should you wish to withdraw your consent, this will stop your treatment and all the medications you receive will also be stopped.

Warning and vulnerability information may be processed as part of any function we legitimately perform for safeguarding of our workforce, including contractors.

Delphi Medical does not normally process children’s information, as all our customers are adults. However, we are sometimes given information about children when working with/in a family support capacity, or if we are involved in aspects of a welfare case as part of a multi-agency working solution.

Delphi Medical conducts surveys, research and statistical analysis to help improve our business processes and the services offered to our customers, as well as to evaluate our performance. This information is anonymised or pseudonymised.

## 7. 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 such as providing a report to our Commissioners
- Keeping our records up to date, working out which of our products and services may interest you and telling you about them.
- Publicity purposes to advertise our services

## 8. Storing your information

Delphi Medical operates a range of information 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.

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.

Your personal information will be kept for as long as you are receiving treatment from Delphi Medical, and for a period not exceeding 10 years afterwards in line with national regulation and retention guidance.

## **9. Automated decision-making or profiling**

Delphi Medical does not do any automated decision-making or profiling.

## **10. Who we share data with**

We will only discuss or communicate information about you with those named on your consent form, authorised (temporarily or permanently) by you. You have the right to withdraw this consent at any time.

Delphi Medical shares limited personal information with our contractors who carry out services on our behalf. Our contractors are required to comply with the law and our own Data Processing Agreements to ensure data is appropriately managed for specified purposes.

We may share your information with a language translation service if it is necessary to translate any information into or from a foreign language for you.

Delphi Medical may need to share personal information with our Commissioners, our regulator, and/or our auditors.

We may also share your data with the Police where this is necessary for the detection and prevention of crime or to monitor anti-social behaviour.

As part of the commissioning of drug and alcohol services, service providers may change. As part of this process Delphi Medical may be required to share personal information about you to a new incoming provider. Where this situation applies, you will be informed (by Delphi Medical) of the transfer of service and how your data will be transferred.

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 permission to do so.

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 also becomes appropriate in circumstances where it is considered necessary in the public interest. This would, for example, cover matters 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.

## **11. Your Individual rights**

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. Please contact

[corporateservices@delphimedical.co.uk](mailto:corporateservices@delphimedical.co.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 [corporateservices@delphimedical.co.uk](mailto:corporateservices@delphimedical.co.uk) if you wish to request access to 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 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.

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 Corporate Services team on 01253 405072 or e-mail [corporateservices@delphimedical.co.uk](mailto:corporateservices@delphimedical.co.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 **Z2735447** (Delphi Medical Ltd), **Z9883686** (Delphi Medical Consultants Ltd), and **Z4571092** (Calico).

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

This Privacy Policy was last updated in October 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 policy from time to time. The latest full version is always available from our website at <https://www.delphimedical.co.uk>.