**Our privacy notice**

**About this notice**

Recovery Focus is a group of charities highly experienced in providing specialist support services to individuals and families living with the effects of mental ill health, drugs and alcohol use, gambling and domestic abuse.

As part of our work, we collect and process personal data about the people who interact with us in accordance with the data protection act 2018 (DPA) The Data Protection, Privacy and Electronics Communications Regulation 2019 (UK GDPR) and any other relevant data protection laws applicable. The kind of data we collect depends on how people use our services, whether that’s getting support, supporting our work via donations, applying for jobs or volunteering.

We only collect the bare minimum we need to offer our services and do our work. We are completely committed to protecting your data and privacy, and pride ourselves on taking great care to ensure it stays completely safe.

We promise we’ll never share or sell your personal data to a third-party organisation for marketing, fundraising or campaigning purposes.

This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

References to 'we' or 'us' are to:

* Recovery Focus: a group of charities inspiring recovery together
* Richmond Fellowship: a company registered England (No. 0662712) a registered charity (No. 200453), a registered provider of social housing provider (H2025) and a registered care provider (No. 1-151675564)
* Aquarius: a company registered England (No. 2427100) a registered charity (No. 1014305)

We regularly check this notice to make sure we’re giving you the most up-to-date information available about how we’re processing our data. We recommend you re-read this page from time to time to make sure you’re happy with any changes that might be made.

We provide some services under sub-contract to another agency and as part of that arrangement we may be required to use their systems and follow their instructions in relation to data and its protection – we only enter into these arrangements with agencies who meet our standards around data protection. Nonetheless whilst your data is in use or being handled by us and being processed or amended by us, we will scrupulously follow our own protocols as set out here.

While we’ve tried to make our privacy policy as comprehensive as possible, it doesn’t include an exhaustive list of every aspect of how we collect and use of personal information. If you need any further information or explanation though, we’re happy to help.

If you have any questions about this policy, please contact us using the details in the ‘Contact us' section below.

This privacy policy was last updated in October 2020.

**Why we collect your data**

We collect and process personal data about the people who interact with us. The kind of data we collect depends on someone’s needs, and how they’re using our services. For instance, we might collect data to communicate with someone and send requested information to them, to help us administer donations, or to improve our services.

We collect the minimum of data required to provide our services and do our work. We’re completely committed to protecting your data and privacy, and we pride ourselves on taking great care to ensure it stays completely safe.

Some of the reasons we might collect your data include:

* to provide you with the support, care, employment services, domestic abuse or housing service you have requested or been referred to
* to record personal details shared during conversations with our recovery workers, therapists and facilitators to ensure we continue to provide you with the best possible support
* to let you know about ways in which you can utilise your skills and experience to influence, shape and support the organisation
* to let you know about our Working Together and Anchor events and opportunities for co-production
* to record and contact you regarding payments you might make to Richmond Fellowship (including DVIP/MyTime) or Aquarius
* to administer the services Richmond Fellowship or Aquarius is providing to you
* to communicate with you regarding Recovery Focus’s work, fundraising, and campaigning activities
* to process donations and administer Gift Aid information for any donation you make to Richmond Fellowship
* to process a purchase via one of our shops or cafes
* to provide you with information about and to administer events, including training sessions
* to manage your communication preferences
* to process job applications or volunteer placements
* to conduct surveys, research and gather feedback
* to obtain information to improve our services and user experiences
* to address and resolve complaints about Richmond Fellowship or Aquarius and our services
* to comply with applicable laws and regulations, and requests from statutory agencies
* to comply with our contractual obligations to our funders

**Information we collect**

Depending on how you use our services, the types of information we collect from you might include:

* your full name and date of birth
* contact details – including your postal address, telephone number(s), and email address
* National Insurance number
* details of your case when providing you services
* your bank details
* records of your correspondence and engagement with us
* donation history and Gift Aid details
* information you may enter on the Recovery Focus, Aquarius or Richmond Fellowship website
* photographs, video or audio recordings
* occupation
* biographical information
* other information you share with us

This information may be collected via:

* any paper forms you complete
* telephone, webchat or email conversations, or face-to-face interactions
* digital forms completed via our website, or online surveys
* third-party companies and websites such as Just Giving
* publicly available sources
* communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law.

Where we are providing you with support services, we may record your sensitive personal data if this is necessary for the delivery of health, therapeutic and care interventions, or if it is in the substantial public interest because we would not be able to provide our services without doing so.

**Using your personal data**

**Recovery Focus Services**

If you are receiving support from us, or if someone else has referred you to us for such a service, we will need to process your data because of your specific relationship with us.

We will keep all your relevant personal information – including notes, letters, emails and information given to us about you – in a confidential record that is specific to you. We use an electronic case management system as well as paper records to support our advice, guidance and support provision. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your case(s). This ensures that we provide appropriate and accurate advice or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or for one of the other purposes discussed in this notice.

We may need to disclose and discuss your personal information to third party individuals or organisations if this is necessary to help resolve your issue. Examples include:

* your GP or medical professionals
* lenders and creditors
* legal representatives or advisers
* Local Authority safeguarding teams
* the court
* your landlord
* council housing, social services and Housing Benefits teams
* the DWP/Job Centre or HMRC

We will discuss this with you as we go along, and will only act with your express consent unless one of the other legal bases in data protection legislation applies.

To ensure that our services meet a high standard of quality, client files are sometimes checked by our quality assurance staff. Files may also be checked by external auditors if the work we do is funded by another organisation, such as a local authority or NHS trust. All auditors are bound by confidentiality policies.

Where our funders require it as a condition of our contract with them, we may use your data in reports to them. Typically this is so that they can monitor the outcomes of the help we have provided to you, to ensure we are meeting the terms of our contract with them.

We may use your data for general statistical reports. These statistics will not include any information that could be used to identify any individual.

The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it.

**How we collect your information:** We collect most of our information directly from you, including when you use one of our services, complete one of our forms, when you write, phone, email or meet with us. We also collect information from other third parties where is it relevant to the service we are providing to you. This includes:

* Local authorities, health and social care professionals, previous care providers
* Other housing, care and support service providers, and referral agencies where we are working in partnership with them
* Your family, next of kin and support network when it is directly related to your care and support
* Any other statutory agencies involved in your care and support where relevant

**How we use your personal information**:

* To assess your care and support needs, determine your eligibility for a service, enter into a support agreement with you and to provide you with personalised care and support: As a provider of housing, care and support services, we need information about your health, housing, support and/or social care needs to deliver our services and to meet your assessed needs. We need this information to assess your eligibility for a service and offer you housing or other support service. We use this information to develop a support plan and review your progress at regular intervals.
* To keep individuals safe and make sure no one is at risk of harm: We have a legal duty to do what we can to keep people safe – this includes you, our staff, as well as others that may be involved in supporting you. We use this information to agree a safety and protection plan or other emergency responses with you if this is necessary.
* To contact and communicate with you: We use your contact details (including telephone numbers and email addresses) to get in touch with you about issues relating to the service we have agreed to provide you. We will not share your contact details except with your consent or where it is necessary to provide a service to you. We do not sell, share or provide contact details for marketing or other purposes. We may pass your details on to our contractors that provide services on our behalf, so that they can contact you. For example, some services have emergency out of hours support from another provider or where a repairs contractor may need information to carry out a repair to one of our properties. Where this is the case they will have to demonstrate that they can keep your information safe and secure.
* To monitor equality, diversity and inclusion: We ask you to provide us with your diversity data (ethnicity, religion, sexual orientation). This information is not used to inform any decisions we make about you individually, but is gathered for statistical purposes to help us understand who is using our services. It helps us ensure fairness and equality in the services we provide. You do not have to provide this information but it helps us if you choose to do so.

If you believe that you are adversely affected by us processing your data for our ‘legitimate interests’ you may ask us to stop processing it. This may not always be possible though we will explain why, if this is the case.

**Sharing your personal information**

If we are working with other organisations or services to support you, we may have to share information with them. We only do this if we have a good reason to and it is necessary for delivering the agreed support. Where we are providing care and support services as part of a local authority contract, we may share your information with the commissioning local authority or NHS health trust. Sometimes we might have to share information with authorities if we think that you or someone else is at serious risk of abuse or harm. We don’t need your consent to do this. We may also share some information with other organisations that carry out a service on our behalf. We only share information which is necessary for them to carry out the service they have been contracted to provide. All our contractors operate under the terms and conditions of a legally enforceable contract and will not use your information for anything other than carrying out a service on behalf of Richmond Fellowship or Aquarius. Other organisations we may share your information with include:

• Government departments such as the Benefits Agency

• Police and other law enforcement agencies

• Representatives acting on your behalf

• Care Quality Commission

**Fundraising/campaigning/direct marketing**

We would love to keep you up to date with our fundraising, marketing and campaigning activity.

We will obtain your consent to contact you by email and text message for marketing purposes.

We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point using the details in the ‘Contact us’ section below.

Any electronic communications, such as emails, will have a link to unsubscribe from future electronic communications, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record without undue delay and at the latest within one month of receipt. It may take 60 days for our systems to update and stop any postal communications from being sent to you. Email communications will, however, be stopped immediately. If you tell us you do not wish to receive marketing, fundraising or campaign communications, you may still receive transactional and service-based communications confirming and servicing other relationships you have with us (as described below).

Where possible, we cleanse and remove out of date data by checking it against publicly available records such as deceased records. This helps us to improve the delivery rate of our mailings and minimise wasted expenditure.

**Social enterprises**

When you purchase an item from one of our cafes, garden centre, or make a donation, we will collect certain information from you – including your name, address, phone number, email address, Gift Aid information, marketing preferences, and payment details – so that we can process your purchase or donation, or contact you if we have any queries regarding your purchase, or donation.

Where you have purchased an item from our shops we may contact you again about similar products or services. We will always give you the opportunity to opt out of receiving further communications of this nature.

**Social media/digital**

Our website also uses web beacons or pixels through third-party service providers that allow us to track conversions and activity on our website as – well as generating advertisements that appear on Facebook and other search engines, like Google, for you and other potential users. Please [see our Cookies Policy](http://england.shelter.org.uk/contact_us/cookies) for more information.

If you receive an email, open it, don’t open it, select a link and/or browse our website, we collect this information to ensure that the information we send to people is received and relevant.

When we’re seeing what people do online like this, we’re using cookies. We use cookies to tailor your browsing experience and ensure we show you more relevant information. If you don’t want cookies, you can set your browser to notify you when you receive one, then choose to decline it. Please [see our Cookies Policy](http://england.shelter.org.uk/contact_us/cookies) for more information.

**Applying for a Richmond Fellowship or Aquarius job**

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics collected. Where we need to share your data – such as for gathering references, obtaining a Disclosure and Barring Services/Disclosure Scotland check (depends on the role), or a prison clearance (depends on the role) – you will be informed beforehand, unless the disclosure is required by law.

These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If you tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held for 6 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it. If we feel there is another suitable vacancy available, we will contact the applicant prior to sharing your application details with the relevant manager.

Once you have taken up employment with Richmond Fellowship or Aquarius, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

**Professional contacts**

We may collect data about professional contacts and partners with whom we work, or to whom we provide professional services – such as training. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

**Our legal basis for processing personal data**

The law requires us to tell you the basis on which we process your data. These include:

* To provide health and social care services: We process your information so that we can provide the service we have been commissioned to provide.
* For the performance of a contract: Some of our processing is carried out to fulfil a contract or an agreement we have with you. Where we require information because it is necessary in the performance of a contract you will not be able to opt out of providing this information. This is because without it we would be unable to do what you have asked us to do. We consider a contract to include a tenancy or licence agreement, care and/or support contract/agreement signed by you or where you purchase care and support directly from us.
* To fulfil our legal and regulatory obligations (substantial public interest): Some of our processing is carried out to ensure we fulfil our legal and regulatory obligations in providing housing, care and support services, for example under the:

• Companies Acts

• Charities Acts

• Housing and Regeneration Act 2008

• Care Act 2014

• Health and Social Care Act 2008

• Mental Capacity Act 2005

• Mental Health Act 1983

• Health & Safety Legislation

* Consent: In some instances, we may ask for your consent to process your information where there is no other legal basis to do so. This applies to special categories of data such as your health information.
* Where it is necessary for our legitimate interests: In all other cases, we rely on a condition called “legitimate interests”. The law allows us to process your data if it is in our legitimate interests to do so. But we can only do this if:

• it does not disproportionately affect your rights

• it doesn’t cause you any harm

• it isn’t overly intrusive

The law also says we must let you know what we consider our legitimate interests to be, in holding relevant personal data in relation to your housing, care and support.

Our legitimate interests are to ensure that:

• we are meeting our objectives as a charity of ‘making recovery a reality’

• our services can meet peoples’ needs now and in the future

• our services are accessible

• we make the most efficient use of our resources

• we understand how we are performing;

• we provide a safe service

• we understand people’s experiences and views so we can make our services better

**Disclosure of your personal data**

We will not share any of your personal data with any third party – except where:

1. the transfer is to a secure data processor, which carries out data processing operations on our behalf (please see section 13 for more information)
2. we are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
3. we are required to do so because it is a condition of our funding or service provision that we share certain information with the funder or with partnership organisations. We will tell you if this is the case.
4. it is necessary to protect the vital interests of an individual
5. we have obtained your consent

We will **never** share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

**Security of your personal data**

We use appropriate technical and organisational measures and precautions to protect your personal data and to prevent the loss, misuse or alteration of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We encourage you to review the privacy statements of websites you choose to link to from our websites, so that you can understand how those sites collect, use and share your information. We are not responsible for the privacy statements, security, or other content on sites outside of the website.

**Use of data processors**

We may use a third-party supplier to manage mailings, conduct research surveys or storage of your personal information on our behalf, and to provide some of our advice and support services to you. You can find out more about the suppliers that we use by getting in touch with us using the details in the ‘Contact us’ section below.

We actively screen and monitor these companies to maximise the protection of your privacy and security. They are only permitted to use the data in accordance with relevant data protection legislation, under strict instructions from us, and in accordance with a data processing agreement entered into between Aquarius/Richmond Fellowship and the supplier.

**Transfers of data outside of the European Economic Area**

We use Microsoft Office 365 and Azure products, which are multi-tenant cloud services, for our internal office use. This means that internal documents and information generated by us are stored in cloud services hosted within the European Economic Area (EEA).

However, in some limited cases, we may use data processors that process and/or store data outside of the EEA – for example, payment processors such as Stripe. In these cases, we will take reasonable steps to ensure that we implement appropriate measures to protect your information, for example, by entering into a contract that includes prescribed clauses about the use of data.

**Retention of your data**

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

How long we keep your personal data for can depend on the type of data it is. We will never keep your information for any longer than is necessary for the purposes we need to use it for. In most cases we keep records for 6 years after the date of the last contact you have had with one of our services.

Personal data about unsuccessful applicants are held for 6 months after the recruitment exercise is complete for that vacancy.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted, or anonymised.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

**Your rights**

You have several rights which allow you to choose and control how we use your data. These rights are explained below. If you would like to use these rights, please ask your service or main point of contact and they will explain how you can do this.

These include:

**Right of Access**

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to one calendar month. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by emailing:

* dataprotectionofficer@richmondfellowship.org.uk
* dataprotectionofficer@aquarius.org.uk

Or by writing to the Data Protection Manager, c/o Company Secretary, Richmond Fellowship, 80 Holloway Road London N7 8JG

**Right to be informed**

You have the right to be informed about how we are using your data. If you think we are doing something with your information that we have not told you about in this Privacy Notice, you can object to this.

**Right to Access**

You have the right to ask us what personal information we hold about you, and to request a copy, free of charge.

**Right to withdraw consent**

If we are processing your data based on your consent, you can withdraw this consent at any time. Where this is the case we may no longer be able to provide the relevant service to you.

**Right to object**

You can object to the processing of your personal data. You should note that this right does not apply in all circumstances, for example, where we are processing information because it is necessary in the performance of contract we will not be able to stop processing this information

**Right to restrict processing**

You can ask us to restrict the personal data we use about you where you have asked for it to be erased or where you have objected to our use of it.

**Right of erasure**

You can ask us to delete your personal data where it is no longer necessary for us to use it, where you have withdrawn consent (if we process based on consent), or where we have no lawful basis for keeping it.

**Right of rectification**

If you think that the personal data we hold about you is inaccurate or incomplete, you have a right to request that it be rectified.

**Right to data portability**

You can ask us to provide you, or a third party (if possible), with some of the personal data we hold about you in a structured, commonly used, electronic form, so that it can be easily transferred.

**Complaints**

If you are not satisfied with the way that we have managed your personal data, please let us know and we will try and resolve your concerns. Please contact your service in the first instance, or the person who is dealing with the issue. If you are not satisfied with the outcome, you can make a formal complaint by using out Feedback Policy. If you are still not happy with our response, you have the right to appeal directly to the regulator: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Visit: https://ico.org.uk or telephone: 0303 123 1113

**Contact us**

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out in the 'Your rights' section above, you can get in touch with us in the following ways…