

1. Summary

This Privacy Notice explains how Calico Gateway Services Limited collects, uses, stores and shares personal information about customers, learners, service users and other people who engage with our services. It is intended to meet the transparency requirements of the UK GDPR, the Data Protection Act 2018 and relevant updates introduced by the Data (Use and Access) Act 2025.

Calico Gateway Services Limited provides employability, skills, training, apprenticeship and related support services. We only collect and use personal information where we have a clear purpose and a lawful basis for doing so.

Calico Gateway Services has two charitable objects which govern its activities and business development:

1. To relieve the charitable needs of people with disabilities, ill health or in necessitous circumstances by the provision of support services to enable them to live in the community.
2. The advancement of education, training and the relief of unemployment of people who are unemployed, low paid, low skills or have no skills.

Calico Gateway Services Limited is the Data Controller for the personal information described in this notice, unless we tell you otherwise. Our registered office is **Centenary Court, Croft Street, Burnley, Lancashire, BB11 2ED**. General enquiries can be made by telephone on 01282 686300.

Our Data Protection Officer can be contacted by email at dataprotection@calico.org.uk. For general enquiries, please contact contact@calico.org.uk.

2. Who we are

Calico Gateway Services

Calico Gateway Services Limited is part of The Calico Group. We provide training, employability, apprenticeships, recruitment support and related services to help people access opportunities, develop skills and move towards or remain in work.

The Calico Group

The Calico Group is made up of businesses and charities working together to make a positive difference to people's lives. Current group companies include Calico Homes Limited, Syncora Limited, Calico Gateway Services Limited, SafeNet Domestic Abuse and Support Services Ltd, Ring Stones Maintenance and Construction Limited, Acorn Recovery Projects and Delphi Medical Limited.

Calico Homes

Calico Homes Limited provides housing and related support services for customers and communities in and around Burnley and the wider local area.

Ring Stones Maintenance and Construction Limited

Ring Stones is a values-led construction company based in the North West, providing contractor, construction, regeneration and related services.

Syncora Limited

Syncora Limited is part of The Calico Group and provides group-wide and customer-facing services across a range of functions.

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.

SafeNet Domestic Abuse Services

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.

3. How we collect your information

We collect personal information in different ways, including when you apply for or enrol on one of our programmes, complete a form, use our services, contact us by telephone, email, letter, website, social media or in person, attend an appointment or event, take part in a survey, or otherwise communicate with us.

We may also receive information about you from third parties where this is relevant to the service being provided, including:

- education, training and funding partners;
- employers, referral agencies, contractors and key stakeholders;
- health, social care, housing, emergency services and safeguarding partners where relevant;
- local authorities, government bodies, regulators and auditors;
- people authorised to act on your behalf.

4. What information we collect about you

The information we require from you, may include:

- Full name (and proof of your identity / photo ID)
- Date of birth
- National Insurance number (your unique identifier)
- Contact details (phone, e-mail or correspondence address)
- Details of anyone authorised to act on your behalf, if applicable
- Banking details
- Educational history and qualifications
- Previous work history
- Disabilities or vulnerabilities. We use this information to tailor our service to better meet your particular circumstances
- Next of Kin or Emergency Contact Information you provide to be used in case of emergency. You should only provide this information where you know the specified person(s) is/are happy to act as your emergency contact and could expect us to contact them about you
- Gender
- Ethnicity
- Religion
- Sexual orientation
- Appropriate evidence of right to work in UK
- GP Practice, and registered GP
- Relevant medical conditions so that we are able to fulfil our contractual obligation
- Previous tenancy information
- Access details in an emergency

5. Consent

We will only rely on consent where consent is the appropriate lawful basis for the specific activity. Where we ask for your consent, we will explain what you are consenting to, keep a record of your decision, and tell you how you can withdraw consent. You can withdraw consent at any time, although this will not affect any processing carried out before consent was withdrawn.

Where information is needed to provide a service, meet a legal requirement, protect vital interests, perform a task in the public interest, fulfil a contract or pursue a legitimate interest, we may rely on a lawful basis other than consent. We will make this clear where it applies.

6. How we process your information

We use personal information to provide and manage our services, assess eligibility, deliver training or support, administer funding and contracts, communicate with you, keep accurate records, safeguard individuals, meet legal and regulatory duties, manage complaints and improve our services.

We may also use anonymised or aggregated information for research, reporting, performance monitoring and service improvement. Where information has been anonymised, it is no longer personal information because individuals cannot be identified from it.

The processing activities we conduct can be summarised as follows:

- Providing your support plan and safety plan
- Complying with relevant legislation and regulation

Calico Gateway Services Limited 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.

Calico Gateway Services Limited 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.

In order to fulfil our contractual obligation with outside funding providers we also if appropriate share your personal information in cases in which the support you're receiving is subject to accessing funding.

We keep personal information only for as long as it is needed for the purpose it was collected, including to meet legal, regulatory, contractual, funding, audit and safeguarding requirements. Retention periods vary depending on the type of record and the service involved. We regularly review the information we hold and securely delete, anonymise or archive it when it is no longer required.

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
Identity and contact details, including name, address, telephone number, email address, date of birth and proof of identity	To identify you, communicate with you and provide services	UK GDPR Article 6(1)(b) contract, where needed to provide or administer services; Article 6(1)(c) legal obligation, where identity checks or records are required by law; and Article 6(1)(f) legitimate interests, where needed for service administration and communication.
Education, employment, qualification, eligibility and programme information	To assess eligibility, deliver training, manage programmes and meet funding requirements	UK GDPR Article 6(1)(b) contract, where processing is needed to deliver training, apprenticeship or support services; Article 6(1)(c) legal obligation, where required by law, funding rules or audit requirements; Article 6(1)(e) public task, where applicable to publicly funded provision; and Article 6(1)(f) legitimate interests, where needed for programme administration and service improvement.
Financial information such as bank details, payment information or funding records	To administer payments, funding and financial records	UK GDPR Article 6(1)(b) contract, where payments or funding administration are necessary to provide services; Article 6(1)(c) legal obligation, where financial records must be kept or reported; and Article

		6(1)(f) legitimate interests, where needed for financial administration, fraud prevention and audit.
Special category information, such as health, disability, ethnicity, religion or other equality information, where relevant	To make reasonable adjustments, provide appropriate support, monitor equality and meet safeguarding or legal duties	UK GDPR Article 6(1)(b), 6(1)(c), 6(1)(d), 6(1)(e) or 6(1)(f), depending on the purpose. UK GDPR Article 9 condition: Article 9(2)(a) explicit consent, Article 9(2)(b) employment/social protection law, Article 9(2)(c) vital interests, Article 9(2)(g) substantial public interest, Article 9(2)(h) health or social care, or Article 9(2)(j) research/statistics, as applicable. Where required, we also rely on the relevant condition in Schedule 1 of the Data Protection Act 2018 and maintain an appropriate policy document.
Complaints, enquiries, feedback and correspondence	To respond to enquiries, investigate complaints, improve services and maintain records	UK GDPR Article 6(1)(c) legal obligation, where we must handle complaints, rights requests or regulatory enquiries; and Article 6(1)(f) legitimate interests, where needed to respond to enquiries, investigate concerns, improve services and defend or establish legal claims.
Marketing preferences	To send information about services, events or opportunities where permitted	UK GDPR Article 6(1)(a) consent, where consent is required for direct marketing; or Article 6(1)(f) legitimate interests, where permitted for relevant service updates or business-to-business communications. We also consider the Privacy and Electronic Communications Regulations where they apply.

7. Additional voluntary services

Occasionally, we provide voluntary services and where your personal information is needed and your consent is required, we will always explain the service and obtain your consent to proceed, usually by way of a sign up / consent form for that service.

We may use volunteers within service and they will be issued with minimum information about you.

8. Children's information

Calico Gateway Services Limited 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
- Conduct document review meetings

Where we process children's information, we will take additional care to ensure the information is necessary, proportionate and handled in a way that recognises that

children merit specific protection. Where consent is required, we will seek consent from the person with parental responsibility, unless another lawful basis is more appropriate.

9. Property information

- Managing any tenancy related support
- Managing the repairs, maintenance and adaptations of the properties.
- Ensuring tenancy (or contract) conditions are complied with, such as dealing with anti-social behaviour or fraud

10. How we will communicate with you

Communication with our customers will usually be in writing, e-mail, social media or by telephone. We are moving many of our services on-line as this is usually more convenient for you and more efficient for us. Depending on the circumstances we may also communicate face to face, in coffee mornings and consultations. We may also send our marketing information via email regarding our services. Email marketing will only be sent with prior consent. Customers can opt out of marketing at any time by emailing dataprotection@calico.org.uk

11. Who we share data with and how long we keep information

Calico Gateway Services Limited 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:

Who we share your personal data with	Our purpose for sharing it	Our justification (lawful basis) for sharing
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
Funding Partners	Legally required to share	Legal obligation

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.

12. What we will not do

We will not send individuals unsolicited direct marketing material without their consent. However, we may conduct business to business marketing campaigns. 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 your personal information outside the UK unless appropriate safeguards are in place, such as adequacy regulations, an approved transfer mechanism or another lawful safeguard recognised under UK data protection law.

13. 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 Notice 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.
- **Right to data portability** where this applies, allowing you to receive personal information you provided to us in a structured, commonly used and machine-readable format.
- **Rights relating to automated decision-making** where we make decisions based solely on automated processing that have legal or similarly significant effects. Where this applies, we will provide meaningful information and appropriate safeguards, including the ability to make representations, challenge the decision and obtain human involvement.

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/>

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 handled your personal information. We must give you a clear way to make a data protection complaint, acknowledge receipt of your complaint within 30 days of receiving it, take appropriate steps to respond without undue delay, including making relevant enquiries and keeping you informed about progress, and tell you the outcome of your complaint without undue delay. You can raise a data protection complaint by emailing dataprotection@calico.org.uk or by contacting us using the details in this notice.

If you wish to exercise any of your data protection rights, please contact us at dataprotection@calico.org.uk. We may need to confirm your identity before responding. To advise us of changes or corrections to your contact details, please contact Customer Services on 01282 686300 or email contact@calico.org.uk.

If you are unhappy with how we have handled your personal information, we ask that you contact us first so we can try to resolve the issue. You also have the right to complain to the UK Information Commissioner's Office (ICO) at <http://ico.org.uk/>. Our ICO registration number is Z1745675.

14. Data Protection Officer

Our Data Protection Officer is responsible for advising us on data protection matters and monitoring compliance with data protection law. You can contact our Data Protection Officer by emailing dataprotection@calico.org.uk.

15. Further information

For further information about Calico Gateway Services Limited, please see our website or contact our Customer Services team. Further information about The Calico Group is available at <https://calico.org.uk/>.

16. Changes to our Privacy Notice

This privacy notice was last reviewed in July 2026. We will update it when there are changes to the way we use personal information, changes to our services or changes to data protection law. We will bring significant changes to your attention where appropriate. The latest version is available from our website at <https://calico.org.uk/privacy/>.