

Privacy Notice

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

Issued:

Author:

1. Summary

This Privacy Notice explains how Delphi Medical Ltd and Delphi Medical Consultants Ltd, trading as Delphi Medical, collect, use, store and share personal information about clients, patients, customers, website users and other people who contact or use our services.

It is intended to provide clear privacy information in line with the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, including how you can raise a data protection complaint with us.

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 Notice

Where we process confidential patient information, we consider whether the national data opt-out applies and review whether any data is used for planning or research purposes. 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.

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 values-based organisation and use our values to guide decision-making, from 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 wellbeing as individuals and teams, and by reducing our impact on the environment, Delphi Medical aims to 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 for the personal information it processes in connection with its services. 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.

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.

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, when you use our social media sites and when you contact us via our website.

If you contact us on social media, for example through Facebook, X or any other platform we use, you agree to that platform's 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 Notice only covers <https://www.delphimedical.co.uk>, although we may link to other websites. If you follow those links, you should read the privacy information provided by the other website or organisation.

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.

Where we process special category personal data, we identify both a lawful basis under Article 6 UK GDPR and a separate condition under Article 9 UK GDPR. Where required, we also rely on an appropriate condition under Schedule 1 of the Data Protection Act 2018 and maintain appropriate safeguards.

- 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 and condition
Personal contact details such as name, address, telephone number, email address, date of birth, GP details and NHS number	To identify you accurately, manage referrals and appointments, communicate with you and provide treatment services	Article 6 UK GDPR: public task, legal obligation, legitimate interests or contract, depending on the service arrangement. Where this information is connected to healthcare, Article 9 UK GDPR: provision of health or social care/treatment may also apply.
Information about your health, including mental health, addiction treatment needs, medication, risk information and care records	To provide safe and effective treatment, care planning, clinical records, safeguarding, risk management and continuity of care	Article 6 UK GDPR: public task, legal obligation, legitimate interests or vital interests, depending on the circumstances. Article 9 UK GDPR: provision of health or social care/treatment, substantial public interest, vital interests or legal claims where applicable. Data Protection Act 2018: appropriate Schedule 1 condition and safeguards where required.
Records of previous treatment received	To understand your treatment history, support continuity of care and provide safe services	Article 6 UK GDPR: public task, legal obligation or legitimate interests, depending on the service arrangement. Article 9 UK GDPR: provision of health or social care/treatment or substantial public interest where applicable.

Equality and diversity information	To monitor equality, accessibility and service outcomes, support reporting to commissioners, regulators or public bodies and improve services	Article 6 UK GDPR: legal obligation, public task or legitimate interests. Article 9 UK GDPR: substantial public interest, equality of opportunity or treatment, or explicit consent where this is appropriate. Wherever possible, reporting will use anonymised or aggregated information.
Criminal record, offending, probation, prison, safeguarding or risk-related information	To provide safe services, assess and manage risk, support safeguarding and work with relevant agencies where necessary	Article 6 UK GDPR: public task, legal obligation, vital interests or legitimate interests, depending on the circumstances. Article 10 UK GDPR: criminal offence data will only be processed where authorised by law and subject to appropriate safeguards. Data Protection Act 2018: substantial public interest, safeguarding or other relevant Schedule 1 condition where applicable.
Information about complaints made by you or about you	To investigate, respond to and resolve complaints, improve services, meet regulatory requirements and establish, exercise or defend legal claims	Article 6 UK GDPR: legal obligation, legitimate interests or public task. Article 9 UK GDPR: legal claims, provision or management of health or social care, or substantial public interest where special category data is included.

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

We use personal information to provide safe and effective treatment and support services, manage our relationship with you, meet our legal and regulatory obligations, protect people from harm, maintain accurate records, respond to complaints and improve our services.

We will only rely on consent where this is appropriate and valid under data protection law. In some circumstances, we may need to process information because it is necessary for healthcare or treatment purposes, to meet a legal obligation, to perform a task carried out

in the public interest, to protect vital interests, or because we have a legitimate interest which is not overridden by your rights and freedoms.

Warning markers, risk information and vulnerability information may be processed where necessary to safeguard you, other service users, our workforce, contractors or the wider public. We will only record and use this information where it is relevant, proportionate and supported by an appropriate lawful basis.

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 may conduct surveys, research, audits and statistical analysis to help improve services, evaluate performance and meet reporting requirements. Wherever possible, this information will be anonymised. Where information is pseudonymised or identifiable, we will ensure there is an appropriate lawful basis and safeguards in place.

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.

Where personal information is transferred outside the UK, we will ensure appropriate safeguards are in place in line with UK data protection law.

Your personal information will be kept for as long as it is needed for the purpose it was collected, including while you are receiving treatment from Delphi Medical and for a period afterwards in line with legal, regulatory, clinical and retention requirements. We will not keep personal information for longer than necessary.

9. Who we share data with

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 contractors, suppliers and service providers who carry out services on our behalf. Where they process personal information for us, they must comply with data protection law and contractual requirements, including appropriate data processing terms.

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 commissioners, regulators, auditors, professional advisers, safeguarding partners, health and care providers, emergency services or other organisations where this is necessary, lawful and proportionate.

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 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. Please contact corporate@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 corporate@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 the right to data portability in certain circumstances and the right not to be subject to a solely automated decision which has a legal or similarly significant effect on you, unless this is permitted by law and appropriate safeguards are in place. More information about your rights is available from the Information Commissioner's Office at <https://ico.org.uk/>.

We may need to confirm your identity before responding to a request about your personal information. Some rights are not absolute and may not apply in every situation. If we cannot comply with a request, we will explain why.

You have the right to raise a complaint with us about how we use your personal information or how we have handled a data protection request.

In the first instance, please contact our Corporate Services team on 01253 405072 or email corporateservices@delphimedical.co.uk. We will acknowledge data protection complaints within 30 days of receipt, take appropriate steps to investigate without undue delay, keep you informed of progress where appropriate, and tell you the outcome of your complaint. If you are not satisfied with our response to a data protection complaint, you can contact the Information Commissioner's Office at <https://ico.org.uk/>. If your complaint is about our wider service rather than data protection, you may also be able to complain to the Parliamentary and Health Service Ombudsman or the Local Government and Social Care Ombudsman, depending on the nature of the matter.

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 Notice

This Privacy Notice was last reviewed in July 2026 and will be updated to reflect changes to the way we operate, the services we provide, or changes to data protection legislation and regulatory guidance.

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>.