This privacy notice covers any individual engaged with one or more of the three Project ADDER strands: Treatment and Recovery, Diversion and Enforcement.

Change Grow Live takes data protection seriously. Please be assured that your information will be used appropriately in line with data protection legislation, will be stored securely, and will not be processed unless the requirements for fair and lawful processing can be met.

**What information is being used?**

In order to provide the service, we may collect:

* Name
* Address
* Date of birth
* Gender
* Marital status
* Telephone number
* Email address
* Location based data
* Financial information
* Racial or ethnic origin
* Health data
* Sexuality
* Criminal Offences
* Genetic data

**How will your information be used?**

* Improve outcomes for Hastings residents who misuse substances
* Improve future service provision and inform other decision making
* Reduce pressure on the criminal justice system
* Project monitoring of aims and outcomes

We aim to maintain high standards, adopt best practice for our record keeping, and regularly check and report on how we are doing. Your information is never sold for direct marketing purposes.

Our staff are trained to handle your information correctly and protect your confidentiality and privacy.

Your information is not processed outside of the European Economic Area

**What is the legal basis for processing your information?**

We have an Information Sharing Agreement (ISA) which governs the sharing of information between partners for the purpose of Project ADDER. This ISA states that the sharing is lawful to protect the vital interests of data subjects (Article 6(1)(d) UK GDPR). The sharing is also necessary for the performance of a task carried out in the public interest (Article 6(1)(e) UK GDPR).

Where we process your special category data (like health data), we are relying on Article 9(2)(g) UK GDPR, which states that the sharing is lawful if it is necessary for reasons of substantial public interest.

**How long will your information be kept for?**

We will not keep your personal information for any longer than it is needed.

**Sharing your information**

Project ADDER is a whole system approach to tackling substance misuse and, by its nature, demands joined-up working between services and partners.

Your personal information may be shared with, or processed by, Project ADDER partners as necessary to facilitate delivery of the project. This is to enable partners to deliver services under the treatment and recovery, diversionary, and enforcement strands of the project.

Current partners are:

Sussex Police

Seaview

East Sussex County Council

East Sussex Veterans Hub

Hastings Borough Council

Oasis Women’s Recovery Service

CounsellingWORK

Luna Light Transformation

Any organisation commissioned by East Sussex County Council (as we are) will be under contractual obligation to comply with data protection legislation.

Any sharing of personal data is always made:

* on a case by basis
* using the minimum personal data necessary
* with the appropriate security controls in place
* in line with legislation

Information is only shared with those agencies and bodies who have a “need to know” *or* where you have consented to the sharing of your personal data to such persons.

We may use the information we hold about you to assist in the detection and prevention of crime or fraud.

**Your rights**

Under data protection legislation, you may have the right:

* to be informed why, where, and how we use your information
* to ask for access to your information
* to ask for your information to be corrected if it is inaccurate or incomplete
* to ask for your information to be deleted or removed where there is no need for us to continue processing it
* to ask us to restrict the use of your information
* to ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information
* to object to how your information is used
* to challenge any decisions made without human intervention (automated decision making)

**How to find out more or complain**

Should you have any further queries on the uses of your information, please speak directly to our service

To complain about the use of your information, please contact [complaints@cgl.org.uk](mailto:complaints@cgl.org.uk), or you can contact our Data Protection Officer at [dpo@cgl.org.uk](mailto:dpo@cgl.org.uk)

**Information Commissioner’s Office (ICO)**

The ICO is an independent authority that has been set up to uphold information rights in the public interest.

You can also contact the ICO for further information or to make a complaint.

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

Phone: 0303 123 1113 (local rate) or 01625 545745 if you prefer to use a national rate number.

You can also report a concern on the ICO’s website - https://ico.org.uk/make-a-complaint/