

## Bristol Drug and Alcohol Services Privacy Notice

Bristol City Council have commissioned Turning Point to lead provision of the new city-wide drug and alcohol services from 1st April 2025. Turning Point will work with some local providers of drug and alcohol services and this partnership will be called 'Horizons'. For the purposes of the Data Protection Act 2018 and other regulations including the UK General Data Protection Regulation (UK GDPR) Bristol City Council and Turning Point are joint data controllers, which means we jointly determine why your personal data is collected and what purposes it is used for.

The purpose of this privacy notice is to tell you about how we collect and use personal data in connection with our drug and alcohol services. We may update this privacy notice from time to time. When we do this, we will communicate any changes to you and publish the revised privacy notice on our website. This privacy notice should be read alongside our [Corporate Privacy Notice](#).

Our address is City Hall, College Green, Bristol, BS1 5TR and our contact details can be found on [our website](#)

### **The data we need to collect and use**

To provide safe, effective, integrated care to you (directly or through commissioned services) we (and our contractors) have legal obligations to collect and process personal information. Your information will only be accessed by people involved in your care. It includes, but is not limited to:

- Your personal details: name, age, gender, date of birth, address details, sexuality, disability status and ethnicity, next of kin and/or emergency contacts.
- Information relevant to your care:
- Your physical and mental health, including current and past substance use.
- Your housing, employment and financial status
- Your safeguarding information, both to yourself and to others
- Your social situation, including relationships with friends and family
- Whether you are a parent, pregnant, details of any children you have or live with and any involvement with Social Services
- A record of your sessions with treatment and support providers
- Any past and present offending information
- Services provided to you in the delivery of your care including prescribing, talking therapies, access to harm reduction supplies (e.g. needles and syringes).

Any information obtained will be held safely and securely, as per this privacy notice.

## How we use your personal information

We use this information for one or more of the following reasons:

- To enable the delivery of multi-agency referral, assessment, care planning and review in the interests of a high quality and safe service.
- To allow performance monitoring, undertake audits and see outcomes achieved for individuals whose care is provided by us and our commissioned providers.
- To provide information about people referred to, assessed by, receiving and completing services, their characteristics and needs to ensure equality of access and service.
- To ensure compliance with our statutory duties.
- To enable research and development activities using fully anonymised data, by prior agreement with the Council and subject to Ethics Committee approval where applicable.
- To deal with any complaints where we need to investigate and ensure we address the complaint properly as well as make any changes to services, processes or procedures that are identified.

Your information will not be used for any personal or commercial gain.

## The legal basis for our use of your personal information

The lawful bases we rely on for processing this information is UK GDPR and the Data Protection Act 2018:

- Art.6(1)(c) Processing is necessary for compliance with a legal obligation to which the controller is subject
- Art.6(1)(d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person
- Art.6(1)(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
  - Art.9(2)(c) Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
- Art.9(2)(h) Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of

Union or Member State domestic law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3; Art.9(3)

- Art.9(2)(i) Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State domestic law which provides for suitable and specific measures to safeguard the freedoms of the data subject, in particular professional secrecy.

## **Who else might we share your personal information with**

Sometimes we may need to share your information outside of drug and alcohol services but will only do so where we have a valid legal basis to share data. We will only share the minimum information for each circumstance. We may share some of your personal information with one or more of the following:

- Your information will be available to other partners where they participate in your care. We may share your information with other organisations such as the NHS and other providers of physical and mental health care, Councils/Local Authorities, Department of Work and Pensions, the Ministry of Justice, housing, social care, employment and training services where relevant to the provision of treatment or management of systems and services.
- If there are concerns about risk to yourself and/or risk to others, we have a duty of care to share relevant information with an appropriate body/bodies responsible for safeguarding you and/or others.
- We also process enquiries from the Anti- Social Behaviour Team, but we will only confirm whether or not an individual has a current or past treatment history. For current service users we may also share the name of your recovery worker.

## **How long we keep your personal information**

We will hold this information for as long as it is needed, or if we are required to do so by law. In practice this means that your personal information will be retained for the relevant period listed below:

- 8 years after your treatment or support ends. We will measure this as eight years from last event recorded, or last discharge, whichever is most recent.
- After this, your personal information will be deleted unless there is a lawful basis that means we need to retain it longer. Our 'Records Retention Schedule' gives more information about our retention periods for information we hold.

## Your rights as a data subject

The law gives you a number of rights to control what and how personal information is used by us, including the right to access a copy of your personal information.

To access a copy of your personal information, more details and how to make a request can be found on the [data protection subject access requests page on the council website](#).

You have the right to rectification; you can make a request verbally or in writing to rectify any inaccuracies in the records we hold about you. To update or correct your information if it is inaccurate please [contact Citizens Services](#).

You have the right to withdraw your consent when we rely on your permission to use your personal data.

We request and store information about you and your needs based on the statutory duty to provide safe, high-quality care to you. If the data, we hold about you is incomplete or inaccurate this may affect the quality of the service you receive and, in some circumstances, service may need to be withdrawn on safety grounds.

Full details about how we use and share your data and your rights can be found on our [Corporate Privacy Notice](#). If you are unable to access our digital Privacy Notice, please [contact Citizens Services](#) whom will be able to send a hard copy.

You can exercise any of these rights, ask questions about how we use your personal data or complain by contacting us at [data.protection@bristol.gov.uk](mailto:data.protection@bristol.gov.uk) or by writing to our data protection officer at:

Data Protection Officer,  
Information Governance,  
Bristol City Council,  
PO Box 3399,  
Bristol.  
BS1 9NE.

If you think we have dealt with your information inappropriately or unlawfully, you have the right to complain to the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Website: <https://ico.org.uk/>

**Next annual review date:** A new document will be required by April 2030 or before if there are significant changes to the commissioned service arrangements due to come into effect on 1 April 2025.

# Bristol City Council



**Version number for this privacy notice: BCC & TP PN 31-03-2025 FINAL.**