

PRIVACY NOTICE

Supported Accommodation, Service Users, Workforce and Business Contacts

Version	1	Approved	September 2026
Document owner	Data Protection Officer	Review	September 2027 or sooner if required
Organisation	Callum Security Solutions Ltd	ICO reference	ZB432699
Data Protection Officer	Michael Callum	Contact	info@calsecsolutions.com

1. Who we are

Callum Security Solutions Ltd provides security, safeguarding and supported accommodation services, including Ofsted-registered supported accommodation for young people aged 16 and 17. We are responsible for protecting personal information that we collect and use in accordance with applicable UK data protection law, including the UK GDPR and Data Protection Act 2018.

Our ICO registration reference is ZB432699. Our Data Protection Officer is Michael Callum. Questions about this notice or the use of personal information can be sent to info@calsecsolutions.com.

2. Who this notice applies to

This notice applies, as relevant, to young people using our supported accommodation services; parents, carers and family members; advocates and representatives; employees, workers, applicants and contractors; social workers, personal advisers and other professionals; local authorities and commissioners; clients, suppliers and other business contacts; and people who contact us or use our website.

Where information is provided specifically to a young person, we aim to explain it in clear and accessible language and provide appropriate support to help them understand how their information is used.

3. Information we may collect

Depending on our relationship with you and the service being provided, we may process:

- identity and contact information, including names, dates of birth, addresses, telephone numbers and email addresses;
- placement and support information, including referrals, care or pathway plans, support plans, risk assessments and records of support;
- health and wellbeing information, including relevant physical or mental-health information, medication, disabilities and allergies;
- safeguarding information, including concerns, incidents, missing episodes, exploitation risks and allegations;
- equality and identity information where relevant, which may include racial or ethnic origin, religion or belief, health, disability, sex life or sexual orientation;
- criminal-offence information where processing is necessary and lawful for safeguarding, risk management, recruitment or service delivery;
- education, training and employment information; and

- complaints, incidents, communications, visitor, recruitment, staff training, financial, contractual and operational records.

Some of this information is special-category personal data or criminal-offence data and receives additional protection under data protection law.

4. Where we get information from

We may receive personal information directly from you. For supported accommodation, information may also come from organisations or people involved in supporting or protecting a young person, including local authorities, social workers, personal advisers, health or education professionals, police and safeguarding agencies, advocates and other authorised professionals or services.

We may also create information while providing services, for example through support records, safeguarding records, incident reports and risk assessments.

5. Why we use personal information

- to provide safe and appropriate supported accommodation and support;
- to safeguard young people and others from harm;
- to assess referrals, placement suitability and risk;
- to develop and review support and safety plans;
- to support health, education, independence and preparation for adulthood;
- to communicate with young people and professionals responsible for their support;
- to respond to safeguarding concerns, incidents, missing episodes and emergencies;
- to investigate and respond to complaints;
- to meet Ofsted and other regulatory requirements;
- to fulfil contractual and commissioning obligations;
- to recruit, manage and train our workforce;
- to maintain appropriate business, financial and operational records;
- to protect our premises, systems, staff and service users; and
- to comply with legal obligations and monitor and improve the quality and safety of our services.

6. Our lawful bases

The lawful basis depends on why particular information is being processed. Depending on the circumstances, processing may be necessary for a contract, compliance with a legal obligation, protection of vital interests, performance of a public task where applicable, legitimate interests where those interests are not overridden by individual rights, or consent where consent is the appropriate basis.

Where special-category or criminal-offence information is processed, we also identify an appropriate additional condition under data protection law. We do not rely on consent where another lawful basis more appropriately reflects the circumstances.

7. Sharing personal information

Callum Security Solutions Ltd does not currently routinely disclose personal information to third-party recipients. Information may nevertheless be shared where it is necessary and lawful, including for safeguarding, regulatory, emergency, legal or commissioning purposes. This may include relevant local authorities, social workers,

safeguarding services, police or emergency services, Ofsted, health or education professionals, advocates, commissioners, professional or regulatory bodies, and authorised service providers where required.

We share only information that is necessary and proportionate for the relevant purpose and apply appropriate safeguards.

8. International transfers

Callum Security Solutions Ltd does not currently transfer personal information outside the UK. If this changes, appropriate safeguards required by UK data protection law will be put in place and this Privacy Notice will be updated.

9. Storage, security and access

Personal information is currently stored electronically in access-controlled, password-protected cloud storage. Access is restricted to authorised personnel and is currently limited to the Data Protection Officer. Appropriate technical and organisational measures are used to protect information from unauthorised access, loss, alteration or disclosure.

Staff and authorised personnel must follow applicable data-protection and information-governance procedures. Higher-risk processing is assessed and Data Protection Impact Assessments are used where appropriate.

10. How long we keep information

Unless information remains necessary for an active service, safeguarding, legal, regulatory or contractual purpose, personal information is generally retained for a minimum of six months and a maximum of two years according to its purpose and record type. Information may be retained for longer where there is a legal, safeguarding, regulatory or contractual requirement to do so.

Information that is no longer required is securely deleted or destroyed.

11. Your rights

Depending on the circumstances, data-protection law may give you the right to be informed; request access to your personal information; ask us to correct inaccurate or incomplete information; request erasure in certain circumstances; request restriction of processing; object to certain processing; receive certain information in a portable format; and raise concerns about automated decision-making where applicable. Not every right applies in every circumstance.

Young people have data-protection rights too. We will support young people to understand how their information is used and how to exercise their rights. To make a request, contact the Data Protection Officer at info@calsecsolutions.com. We may need to confirm identity before releasing personal information.

12. Safeguarding and young people's information

Information concerning young people in supported accommodation can be particularly sensitive. We will explain, as clearly as possible, what information we need and why. A young person's information will not be shared simply because another person asks for it. Information may, however, need to be shared without consent where this is necessary to protect the young person or another person, comply with safeguarding duties, meet a regulatory requirement or satisfy another lawful obligation.

Young people can ask staff, their social worker, advocate or another trusted professional for help understanding how their information is used or exercising their data-protection rights.

13. Complaints about our use of personal information

If you have concerns about how Callum Security Solutions Ltd uses your personal information, please contact our Data Protection Officer first so that we can investigate.

Data Protection Officer: Michael Callum

Email: info@calsecsolutions.com

You also have the right to raise a concern with the Information Commissioner's Office (ICO), the UK's independent data-protection regulator. Information about making a complaint is available at ico.org.uk.

14. Changes to this notice

We will review this Privacy Notice at least annually and sooner where our services, information use, legal requirements or regulatory requirements materially change. Where an important change affects how personal information is used, we will take reasonable steps to bring that change to the attention of affected people.