

Privacy Policy

The Appropriate Adult Service Limited

Last Updated: November 2025



1. Introduction

The Appropriate Adult Service Limited ("TAAS", "we", "us", or "our") is committed to protecting the privacy and confidentiality of all individuals who use our services or visit our website. This Privacy Policy explains how we collect, use, store, and protect your personal information in accordance with UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Given the sensitive nature of our work supporting vulnerable individuals during police custody procedures, we place the highest importance on maintaining confidentiality and data security.

2. Who We Are

Company Name: The Appropriate Adult Service Limited

Registration: 06262053

Registered Office: Heritage House, Vicar Lane, Daventry, Northants NN11 4GD

ICO Registration Number: Z1023622

Privacy Manager Contact: Leon Aldridge

Email: gdpr@theappropriateadultservice.org.uk

Address: Heritage House, Vicar Lane, Daventry, Northants NN11 4GD

3. Information We Collect

3.1 Website Visitors

When you visit our website, we may collect:

- Technical information including IP address, browser type, and device information
- Information about your visit, including pages viewed and time spent on the site
- Cookies and similar tracking technologies (see our Cookie Policy)

3.2 Service Users (Individuals Receiving Appropriate Adult

Support) When providing appropriate adult services, we may collect:

- Personal identification details (name, date of birth, address)
- Contact information
- Information about the circumstances requiring appropriate adult support
- Details of police interactions and custody procedures
- Health information relevant to providing support (e.g., mental health conditions, learning disabilities, communication needs)

- Safeguarding information where relevant
- Records of support provided and outcomes

3.3 Referrers and Professional Partners

- Contact details of police officers, custody staff, and other professionals making referrals
- Professional correspondence and communications
- Contractual and partnership information

3.4 Job Applicants and Employees

- Application materials including CVs and cover letters
- Employment history and references
- DBS check information
- Training records and qualifications
- Performance and conduct records
- Payroll and HR information

4. Legal Basis for Processing

We process personal data under the following legal bases:

4.1 Contractual Necessity

Processing necessary to fulfil our contracts with police forces, local authorities, and other commissioning bodies to provide appropriate adult services.

4.2 Legal Obligation

Compliance with legal requirements under:

- Police and Criminal Evidence Act 1984 (PACE)
- PACE Code C
- Mental Health Act 1983
- Children Act 1989/2004
- Safeguarding legislation
- Employment law
- Health and safety regulations

4.3 Vital Interests

Where processing is necessary to protect the vital interests of the data subject or another person, particularly in emergency or safeguarding situations.

4.4 Public Task

Processing necessary for the performance of tasks carried out in the public interest, specifically supporting the criminal justice system and protecting vulnerable individuals.

4.5 Legitimate Interests

Where we have a legitimate business interest that does not override your rights and freedoms, such as:

- Quality assurance and service improvement
- Business administration and development
- Fraud prevention and security

4.6 Consent

In specific circumstances where we have obtained your explicit consent, particularly for special category data where no other legal basis applies.

5. Special Category Data

Due to the nature of our services, we regularly process special category (sensitive) data including:

- Health information (physical and mental health)
- Information about disabilities or conditions affecting vulnerability
- Alleged criminal offences and proceedings
- In some cases: racial or ethnic origin, religious beliefs (where relevant to support needs)

We process this data under the following UK GDPR Article 9 conditions:

- Substantial public interest (safeguarding and criminal justice support)
- Vital interests (where necessary to protect life)
- Legal claims (where necessary for legal proceedings)
- Explicit consent (where appropriate and obtained)

6. How We Use Your Information

6.1 Service Delivery

- Providing appropriate adult support during police custody procedures
- Ensuring appropriate support based on individual needs and vulnerabilities
- Communicating with police, legal representatives, and other relevant parties
- Maintaining accurate records as required by PACE

6.2 Safeguarding

- Identifying and responding to safeguarding concerns
- Sharing information with relevant authorities where there is a risk of harm

- Complying with safeguarding duties under relevant legislation

6.3 Quality Assurance and Improvement

- Monitoring service quality and outcomes
- Training and supervision of staff
- Service development and improvement initiatives
- Compliance monitoring and auditing

6.4 Business Operations

- Contract management and billing
- Responding to enquiries and correspondence
- Recruitment and HR management
- Legal and regulatory compliance
- Risk management and business continuity

6.5 Research and Statistics

- Anonymised statistical analysis to improve services
- Reporting to commissioners and regulatory bodies (using aggregated, non-identifiable data)

7. Information Sharing

We may share personal information with:

7.1 Police Forces and Custody Suites

Information necessary for the provision of appropriate adult services and as required under PACE.

7.2 Legal Representatives

Information relevant to the detained person's legal representation and defence.

7.3 Healthcare Providers

Where necessary for the health and wellbeing of service users, including mental health services and emergency medical services.

7.4 Local Authorities and Social Services

Particularly regarding safeguarding matters, child protection, and adult social care.

7.5 Commissioning Bodies

Necessary information for contract management, service reporting, and quality assurance (typically anonymised or aggregated).

7.6 Regulatory Bodies

Where required by law or regulation, including the Information Commissioner's Office, Care Quality Commission (where applicable), and courts or tribunals.

7.7 Professional Advisers

Including legal advisers, auditors, and insurers where necessary for business operations.

7.8 Service Providers

Trusted third-party service providers who process data on our behalf, including:

- IT systems and software providers
- Secure cloud storage providers
- Payroll and HR systems
- Professional training providers

All third-party processors are bound by data processing agreements ensuring appropriate security and confidentiality.

Important: We never sell personal data to third parties. All sharing is conducted in accordance with data protection law and, where applicable, information sharing agreements.

8. International Transfers

We do not routinely transfer personal data outside the United Kingdom. Where international transfers are necessary (e.g., cloud storage providers with international infrastructure), we ensure:

- Adequate safeguards are in place (adequacy decisions, standard contractual clauses, or other approved mechanisms)
- Data is protected to UK GDPR standards
- Transfers comply with UK data protection law

9. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected:

9.1 Service User Records

- **Adult appropriate adult records:** Minimum 7 years from last interaction (to comply with PACE requirements and potential legal claims)
- **Child appropriate adult records:** Until the individual reaches age 25, or 7 years from last interaction, whichever is longer (in line with safeguarding best practice)
- Records may be retained longer where ongoing legal proceedings require or where serious safeguarding concerns necessitate extended retention

9.2 Employment Records

- **Successful applicants:** Duration of employment plus 7 years
- **Unsuccessful applicants:** 6-12 months (unless consent given for longer retention for future opportunities)
- **DBS information:** In accordance with DBS Code of Practice

9.3 Business Records

- **Contracts and financial records:** 7 years after contract end
- **General correspondence:** 2-3 years unless related to ongoing matters
- **Website analytics:** 26 months

9.4 Secure Disposal

When retention periods expire, we securely delete or destroy personal data using:

- Secure digital deletion/overwriting for electronic records
- Confidential shredding for paper records
- Certificate of destruction for sensitive materials where appropriate

10. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

10.1 Technical Measures

- Encrypted data storage and transmission (SSL/TLS)
- Secure, password-protected systems with multi-factor authentication
- Regular security updates and patches
- Firewall and anti-malware protection
- Secure backup systems with encryption
- Access controls and audit trails

10.2 Organisational Measures

- Mandatory data protection training for all staff
- Confidentiality clauses in employment contracts
- Clear data protection policies and procedures
- Regular audits and compliance checks
- Incident response and breach notification procedures
- Secure physical storage with restricted access
- Clean desk and clear screen policies
- Secure transportation of records where necessary

10.3 Staff Vetting

All staff undergo:

- Enhanced DBS checks

- Right to work verification
- Reference checks
- Comprehensive induction including data protection training

11. Your Rights

Under UK data protection law, you have the following rights:

11.1 Right of Access

You can request a copy of the personal data we hold about you (Subject Access Request). We will respond within one month, free of charge (unless requests are manifestly unfounded or excessive).

11.2 Right to Rectification

You can request correction of inaccurate or incomplete personal data.

11.3 Right to Erasure

In certain circumstances, you can request deletion of your personal data. However, this right is limited where we have legal obligations to retain information (e.g., PACE requirements, safeguarding duties, legal claims).

11.4 Right to Restriction

You can request that we restrict processing of your personal data in certain circumstances (e.g., while we verify accuracy or assess legal grounds).

11.5 Right to Data Portability

Where processing is based on consent or contract and carried out by automated means, you can request your data in a structured, commonly used format.

11.6 Right to Object

You can object to processing based on legitimate interests or for direct marketing purposes.

11.7 Rights Related to Automated Decision-Making

You have rights regarding automated decision-making and profiling. We do not use fully automated decision-making in relation to service delivery.

11.8 Right to Withdraw Consent

Where processing is based on consent, you can withdraw consent at any time. This does not affect the lawfulness of processing before withdrawal.

Important Limitations: Some rights are limited where we have overriding legal obligations, particularly regarding:

- PACE record-keeping requirements
- Safeguarding duties
- Legal proceedings
- Public interest considerations

12. Exercising Your Rights

To exercise any of your rights, please contact our Privacy Manager:

Email: leon@theappropriateadultservice.org.uk

Post: Heritage House, Vicar Lane, Daventry, Northants NN11 4GD

Phone: 0333 2424999

We will respond to requests within one month. In complex cases, we may extend this by two months and will notify you of any extension.

13. Complaints

If you are unhappy with how we have handled your personal data, please contact our Privacy Manager first. We take complaints seriously and will investigate thoroughly.

If you remain dissatisfied, you have the right to complain to the supervisory authority:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113

Website: www.ico.org.uk

14. Cookies

Our website uses cookies to improve functionality and user experience. For detailed information about the cookies we use and how to control them, please see our separate Cookie Policy [link].

15. Third-Party Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices of other websites. We encourage you to read the privacy policies of any linked websites you visit.

16. Children's Privacy

While we frequently work with children and young people as service users, our website is not directed at children under 13. We do not knowingly collect personal information from children through our website without appropriate parental consent.

Service provision to children follows specific safeguarding protocols and PACE requirements regarding appropriate adults for juveniles.

17. Changes to This Policy

We review this Privacy Policy regularly and may update it to reflect changes in our practices, technology, legal requirements, or business operations. The "Last Updated" date at the top indicates when changes were last made.

Significant changes will be highlighted on our website. Continued use of our services after changes constitutes acceptance of the updated policy.

18. Contact Us

For any questions about this Privacy Policy or our data protection practices:

The Appropriate Adult Service Limited

Email: info@theappropriateadultservice.org.uk

Phone: 0333 2424999

Address: Heritage House, Vicar Lane, Daventry, Northants NN11 4GD

Privacy Officer:

Email: gdpr@theappropriateadultservice.org.uk

Phone: 0333 2424999

For service-related enquiries, please contact your local TAAS team or our 24/7 operations centre.