

**PRIVACY POLICY**

**1. Policy Statement**

Leicestershire Leicester and Rutland Headway is a local voluntary sector organisation providing support and services to brain injury survivors and their families and carers living (or receiving treatment) in Leicestershire Leicester and Rutland.

As an essential part of our service provision, we collect and manage service user and non-service user data. In doing so we observe the UK data protection legislation and are committed to protecting the service user and non-service user privacy and data we hold.

**2. What Information do we collect about you?**

In general terms, we seek to collect information about you so that we can:

- Administer our relationship with you, provide services and respond to enquiries.
- Enable business development including sending publications and details of events.
- Process applications for employment.
- Deliver requested information to you about our services.
- Ensure the billing of any procured services and obtain payment.
- Process and respond to any complaints.
- Enable us to meet our legal, contractual and regulatory obligations imposed on us.

The information that we require for these purposes is known as “personal data”. This includes your name, date of birth, home address, email address and telephone numbers. We may collect this in a number of ways, for example, by correspondence via email or letter or over the telephone.

In some instances we also process sensitive classes for information that includes physical or mental health and racial or ethnic origin.

We will seek your permission if we need to record any of your sensitive personal data on our systems. If you contact us on behalf of a third party, (for example, when making a referral for Headway services), you must have their explicit consent to share their personal data.

**3. How will we use the information?**

We use the data collected from you for the specific purposes listed in the table below. The table also explains:

- The legal basis for processing your data, linked to each processing purpose; and
- In what circumstances your data will be shared with a third party organisation.



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| <b>Purpose for processing data</b>  | <b>Legal basis for processing data</b>  | <b>Third party organisations with whom the data is shared</b>   |
|---|---|---|
| To administer our relationship with you, provide services and respond to enquiries.   | To meet our charitable aims and objectives and the requirements of our contracts and grants.  | Other service providers, social services and medical professionals but only with the individuals advance, explicit consent  |
| To enable us to deliver the appropriate support and services which meet the needs of individuals with an acquired brain injury.                               | To fulfil contractual obligations and enable us to complete risk assessments to meet our legal obligations to health and safety.  | Other service providers, social services and medical professionals but only with the individuals advance, explicit consent. |
| To ensure the billing of any procured services by you and obtain payment.   | To meet the requirements of a contract.   | Government VAT and tax inspectors, Charity Commission and external auditors.  |
| To communicate with you about event invitations, newsletters etc which are relevant to you and in line with your preferences.                                 | To seek explicit consent prior to sending individuals the information and in line with their preferences.   | None  |
| Telephone helpline to provide information, regarding our services to enquirers, and accept details of referrals for brain injured survivors.                  | To fulfil charitable aims and objectives and fulfil contractual obligations. This includes information gathering to determine the suitability of a referral to Headway. | None  |
| To process and respond to complaints.   | To meet legal and contractual obligations.  | Our contract providers including Adult Social Care and Clinical Commissioning Group.  |
| To capture photographs and videos to be used for marketing and promotional material for the organisation, including our website, brochures, bids and tenders. | To seek explicit consent prior to collecting and using this information.  | None  |
| To conduct human resources administration to include assessing suitability, eligibility and/or fitness for work.  | To fulfil contractual and safeguarding obligations, this includes taking action before entering into a contract.  | Disclosure and Barring Service and Adult Social Care.   |

## 4. Your Rights

Under the terms of Data Protection legislation, you have the following rights:

### 4.1 Right to be informed

The Privacy notice fulfils our obligation to tell you about the ways in which we use your information.



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## 4.2 Right to Access

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a “Subject Access Request”. Except in exceptional circumstances, you can obtain this information at no cost. We will send you a copy of the information within 30 days of your request.

To make a “Subject Access Request”, please write to:

**Services’ Director  
Headway House  
4 Hospital Close  
Leicester  
LE5 4WP**

## 4.3 Right to Rectification

If any of the information that we hold about you is inaccurate, you can either:

**Contact us on 0116 2739763**

**Headway House  
4 Hospital Close  
Leicester  
LE5 4WP**

**[headway@headwayleicester.org.uk](mailto:headway@headwayleicester.org.uk)**

## 4.4 Right to be Forgotten

From 25<sup>th</sup> May 2018, you can ask that we erase all personal data that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days.

## 4.5 Right to Object

You have the right to object to:

- The continued use of your data for any purpose listed in Section 3 above for which consent is identified as the lawful basis for processing, i.e. you have the right to withdraw your consent at any time.
- The continued use of your data for any purpose listed in Section 3 above for which the lawful basis of processing is that it has been deemed legitimate.

## 5. Is the Processing of Information Likely to cause Individuals to Object or Complain?

Leicestershire Leicester and Rutland Headway is not aware of any justifiable reasons that would constitute a legitimate reason for objecting or complaining about the way we process or control information.



## 6. How long will we retain information for?

Leicestershire Leicester and Rutland Headway will typically retain information for a period of seven years. This is due regulatory reasons and to ensure our records are adequate to maintain the requisite levels of insurance to protect our service users and non-service users.

## 7. Data Privacy and Security

At Leicestershire Leicester and Rutland Headway, we maintain a comprehensive data management work programme, which includes processes for ensuring that data protection is a key consideration of all new and existing IT systems that hold personal data. Where any concerns, risks or issues are identified, we conduct relevant risk assessments in order to determine any actions that are necessary to ensure optimum privacy.

As an organisation we have signed up to Cyber Essentials Certification which provides an annual check on the integrity and security of our IT systems. The combination of Cyber Essentials, our policies and procedures and staff training helps us to:

- Protect against potential breaches of confidentiality.
- Ensure all IT facilities are protected against damage, loss or misuse.
- Increase awareness and understanding of the requirements of information security, and the responsibility of the team at Headway to protect the confidentiality and integrity of the information that they handle.



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