

Headway Cambridgeshire

Privacy Notice for clients and their families

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Easy

Read

There is an easy read version at the end of this document, on page 15.

1. Introduction

At Headway Cambridgeshire we value people above all else, from our clients to our supporters, from our staff to our volunteers. It is only together that we can transform the lives of people with brain injuries and it is, therefore, of vital importance to us that all individuals connected with the charity are treated with consideration, fairness and respect.

We are committed to protecting your personal data and being open and honest about how and why we use it. We strive to comply with the regulatory framework that governs the way we collect and process personal data:

- the Data Protection Act 1998, which will be replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018 ('GDPR')
- the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This Privacy Notice explains how we collect, store and use your data however you interact with us. It also describes our 'legitimate interests' in the data, as defined by GDPR.

Processing of your information is carried out by Headway Cambridgeshire, registered as a charity in England and Wales (1062886) and registered as a company in England (3364699).

If you have any queries at all then please do not hesitate to contact us:

Email: **info@headway-cambs.org.uk**

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

2. How we use your data

If you are a client we will need to request and process personal data about you in order to provide you with safe, effective services which meet your needs. Sometimes this may include information about your family and carers.

If you are a family member or carer we may provide support and services directly to you, in which case we will need to collect and process your data in order to do this.

We have a legitimate interest in this data as it enables us to fulfil our charitable purpose and to provide services for the benefit of clients and families who are the subjects of this data.

We aim to keep the data collected and processed relevant and proportional to the service that we are providing and the support that is required. Data could include but is not limited to personal contact details, information about an individual's brain injury, other health conditions, medication; information about next of kin and the impact on family members, living circumstances, work status.

This data may be collected when you contact us by phone or email or during an in person meeting. We may also receive this information from third parties when they refer you to us or pass on information. This information may be collected by asking you direct questions, may be in a record of a meeting or telephone call, or may be recorded observations of Headway Cambridgeshire staff.

Due to the nature of the service we provide it is often necessary for us to process data which is regarded as 'special category data' under GDPR; this could include, where relevant, data about:

- race
- ethnic origin
- politics
- religion
- trade union membership
- health
- sex life or sexual orientation

GDPR Article 9, Condition (h) permits us to process this data where:

“processing is necessary for the purposes of preventive 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 law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3”.

We take our responsibility for this data very seriously and will apply special safeguards to processing as outlined in section 7 below. The Data Protection Bill which is currently going through Parliament will include further guidance on this and we will update this notice when this is published. If you would like to know more about why and when we might need to process special category data please contact us.

We will use your data primarily to provide you with support, information and services.

In order to do this effectively we may need to pass on relevant parts of your data to other trusted organisations or professionals. Where possible we will seek your consent to do this.

If the services you receive are individually funded by another organisation such as Adult Social Care or the NHS we will be required to pass on data regarding your attendance, progress and welfare.

We will use your contact details to send you information about services and support that is appropriate for you unless you specifically ask us not to. We will seek your consent to send you all other marketing information such as fundraising or events as outlined in section 4.

3. Social media

We have social media accounts on platforms including Facebook, Twitter, YouTube and Instagram. When you interact with us on these sites you may indirectly provide us with personal data. The data that we receive will depend on your own personal privacy settings and the individual privacy policies of these platforms. If this is something that you are concerned about then we would recommend that you check your privacy settings and the privacy notices on these platforms. Any data that we do receive in this way will be treated with the same respect and ethos as other data laid out in this notice. In the unlikely event that we use this data we will only do so where we have assessed that we have a legal basis to process.

4. Marketing communications and your preferences

We feel that it is important to keep you up to date with what we are doing at Headway Cambridgeshire. This helps us to raise awareness about brain injury, share details about our services and raise funds to sustain the charity financially. We, therefore, have a number of marketing communications which we send throughout the year. These include our bi-annual newsletter and yearly round-up. As we rely on donations to maintain and improve our services, some of these communications will include fundraising information and appeals.

We will send you communications relating to our services unless you have asked us not to. For all other communications we will only send these to you if you have consented for us to do so. We will endeavour to send these via your preferred method of contact, post or email. However, please note that our newsletter is now only available digitally, although it can be printed out from its online version.

You can either opt-in or opt-out of Headway Cambridgeshire marketing communications. You can choose your preferred method of contact, post and / or email. You can also choose what types of communications you would like to receive:

- Information about the services we offer for people with a brain injury and their families
- Newsletter (twice a year) - email only
- Events
- Fundraising

Each email you receive from Headway Cambridgeshire will include the option to unsubscribe from our communications or update your preferences. You can also contact us directly to do this should you prefer:

Email: **info@headway-cambs.org.uk**

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

If you are not yet subscribed you can do so using our online sign up form by visiting this URL:

http://eepurl.com/c_hcxT

We use the online platform MailChimp to send many of our marketing communications. They have their own Privacy Policy and Terms on their website which we would encourage you to read:

<https://mailchimp.com/legal/>

5. Statistical data

We collect statistical data which helps us to assess our services and evidence the impact of our work. This data is often required by grant funders in our final reporting to them and we also use this data in other ways to publicise our work. This data will only ever be used and presented anonymously; i.e. no personal data will be shared.

6. Media

We create, use and share audio and visual media at Headway Cambridgeshire as it is an important way for us to show who we are, tell our story and explain our services.

Quite often clients and their families will appear in our media, such as photographs, videos and audio clips.

Where media is focussed on an individual we will only publish this if we have your consent; i.e. if you have completed and returned to us the appropriate consent form.

On some occasions it may not be possible to obtain consent for every individual. For example, if we are holding a large event and we have a photographer there. On these occasions we will post clear notices advising that the event is being recorded and asking any individuals who are not happy with this to let a member of staff know.

Should you appear in any of our media you can ask us to remove it from the public domain at any time. Should you wish to do so, please contact us, giving your name, relationship with Headway Cambridgeshire and the location of the media. We will then endeavour to remove it and suppress any other instances including your image, voice or other data.

Email: **info@headway-cambs.org.uk**

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

7. How we protect your data

Access to your data is limited and it is only used in accordance with this Privacy Notice for the purposes for which the data was obtained.

We store data both physically and digitally and take all reasonable precautions to make sure that the data disclosed to us is kept secure. Our physical files which contain personal data are kept in locked cabinets in a secure building. Our digital files are held on a password protected server which is controlled by a strict password policy. These files are only accessible by trained staff and our data hosting providers, who have been fully vetted and are subject to the requirements laid out in this Privacy Notice. We are protected from hacking on the internet by a Stateful Inspection Firewall which is password protected.

In some instances we may need to share data with a third party, such as with other health professionals when we liaise regarding a specific client or to help us deliver a service or project.

We may be required by law to share your data, such as in cases of criminal or tax investigations.

We may also share your data with the emergency or statutory services if we reasonably assess that there is a serious risk of harm to either you or any another individual.

When we do share data we do all that we can to make sure that it is protected. Digital files will be password protected and only accessible by the parties that require the information.

We will not, under any circumstances, sell or share your data to a third party for their own purposes or for financial gain. You will, therefore, not receive any third party marketing or communications as a result of sharing your data with us. Similarly, we will not purchase data from any third parties for our own use.

All of our staff receive regular data protection training and are committed to the values of the charity, which include upholding the rights of our clients, supporters and volunteers. We remove all data access privileges at the point any member of staff leaves the organisation.

In the unlikely event that a data breach occurs then we will notify any data subjects affected within ten working days and complete a full assessment of the events that led to the breach within 30 working days.

We review our data protection practices regularly to ensure we maintain best practice and keep your data secure.

8. How long we hold your data for

All data we hold in respect of financial transactions, such as client payments or donations, will be held for as long as we are legally required to for tax or accounting purposes. This may be up to six years after a transaction.

For all other data, we will hold this for as long as is necessary for the purpose it was intended and no longer. We will take into account guidance from the Information Commissioner's Office (ICO) in this respect.

Should you request that we no longer process your data for the purposes of direct marketing communications then we may need to add some of your details to a suppression file to make certain that we comply with your request and you receive no further communications.

9. Your rights and how to access your data

It is always your choice whether or not you give us your data and we want to make sure you have as much control as possible when you do provide us with it.

Under data protection legislation you have a right to see any data that we hold about you. This is called a Subject Access Request (SAR). Should you wish to access the data we hold about you then please contact us in the first instance to discuss the matter:

Email: **info@headway-cambs.org.uk**

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

To process any SAR we will require proof of identity. For anyone acting on behalf of another data subject we will also need you to provide proof that you have legal authority to request the data subject's information.

You also have the right to ask us to rectify or erase your data or restrict its usage. However, in some instances, we may not be able to provide our services or fulfil our legal responsibilities without certain data. This is specifically applicable to clients and their families where we may have a contract in place to provide services. Once again, please contact us should you wish to discuss this.

10. Your responsibility to inform us of changes

It is important to us that the information we hold about you is accurate and up to date. Please let us know if there are any changes to this information. You can contact us using the details in point 9 above.

11. How to make a query or complaint

If you have a query about anything in this Privacy Notice or how we use your data then please contact us:

Email: **info@headway-cambs.org.uk**

Phone: **01223 576550**

Post: **The Old Maltings, 135 Ditton Walk, Cambridge, CB5 8PY**

Should you wish to make a complaint then please send this to us in writing. Your complaint will be passed to our Chief Executive and we will aim to resolve the matter as quickly as possible, usually within ten working days.

If you are unhappy with our response to your complaint then you are able to raise this with the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights.

Website: **www.ico.org.uk**

Phone: **0303 123 1113**

We are registered with the ICO as a Data Controller. Our registration number is: **Z5992036**

12. Changes to our Privacy Notice

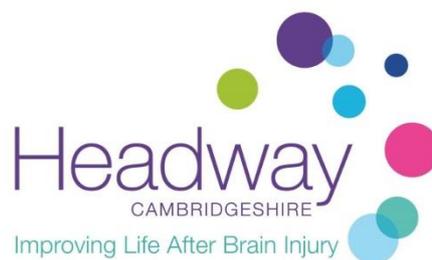
We will occasionally need to update our Privacy Notice. We will advise you where possible when we do this but we please ask you to also check it periodically to make sure that you are aware of its contents and are happy with the implications with regards to your data.

You can check the latest version of our Privacy Notice online at:

www.headway-cambs.org.uk/privacy-notice

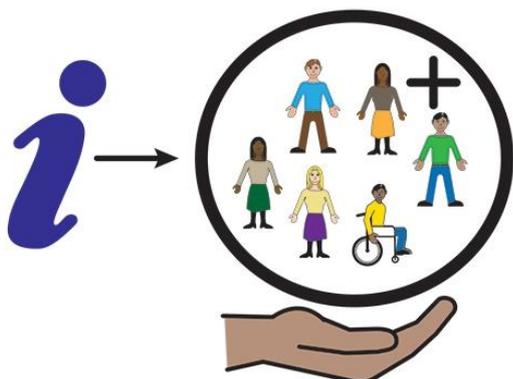
(Last updated: 21/05/2018)

How we look after your personal information at Headway Cambridgeshire



Your personal information

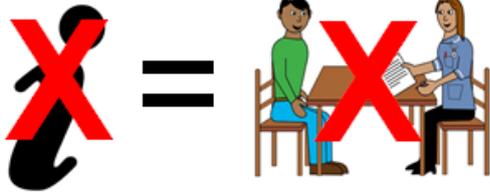
private information



We, Headway Cambridgeshire, hold personal information about the people we provide services to.



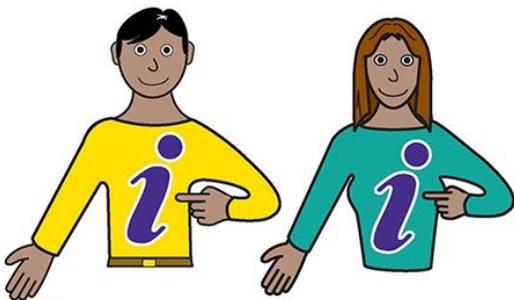
We need this information so that we can assess your needs and provide you with support.



Without this information we may not be able to provide you with our services.

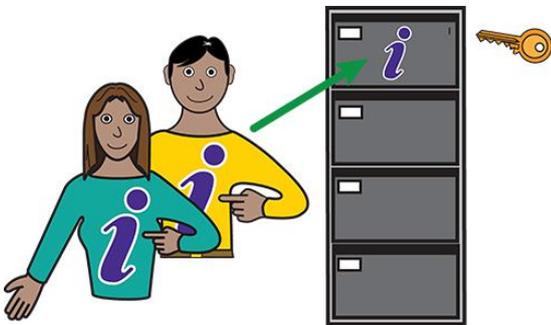
Your personal information

information about me



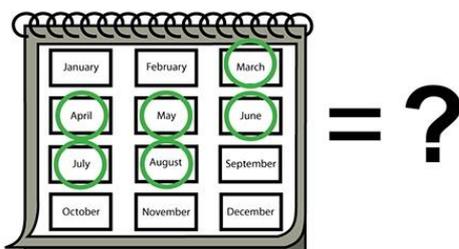
This information could include:

- your name
- your contact details
- your family details
- your health details
- which services we provide



We do our best to always protect your personal information.

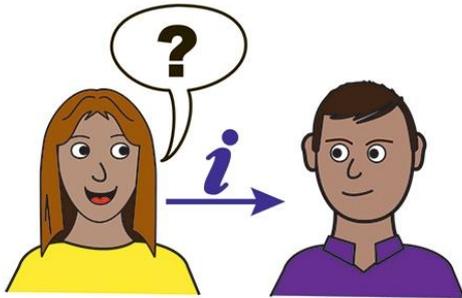
how long



We keep hold of your information for as long as it is needed and for as long as the law requires us to.

Sharing your information

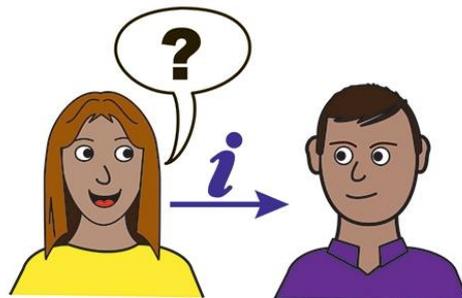
share information



To provide support we may sometimes need to pass your details on to another organisation.

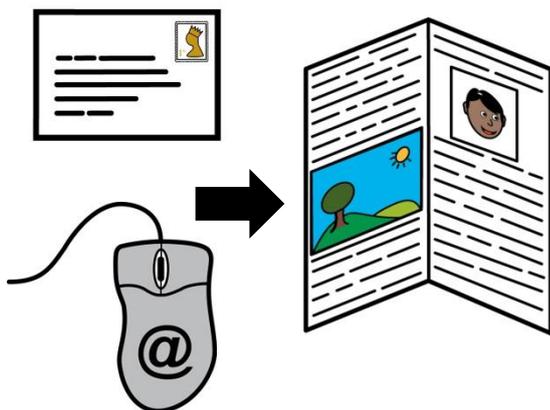


share information



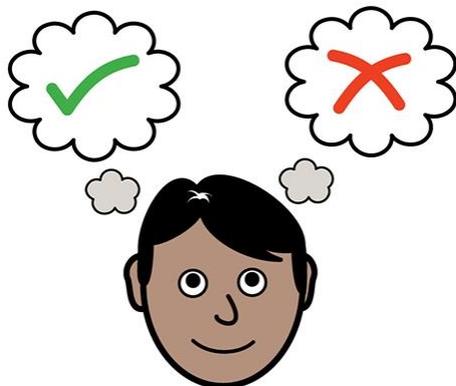
We may also need to share your information if there is a crime or a risk of harm.

Sending you information and asking your permission

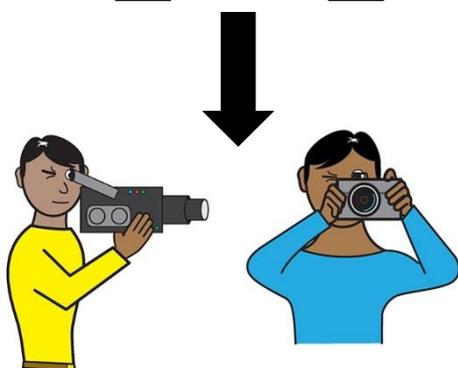
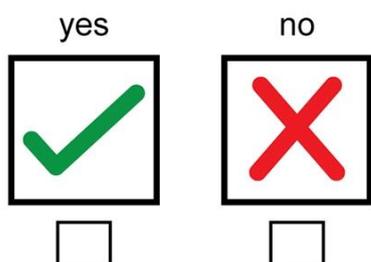


We will send you information about the services we provide.

consent



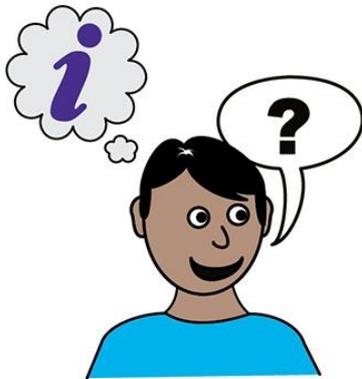
We will ask for your permission to send you other information. This could be about events or raising money for Headway Cambridgeshire.



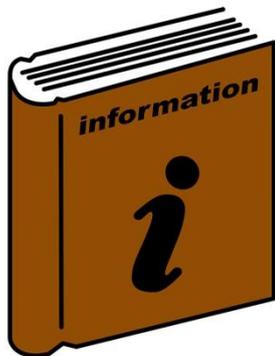
We will ask for your permission to photograph or film you, or record you speaking.

Find out more

ask for information



You can ask to see the information that we hold about you whenever you want.



You can find out more by reading our Privacy Notice on our website:

www.headway-cambs.org.uk/privacy-notice

phone for information



You can talk to us about this by calling or emailing us:

01223 576550

info@headway-cambs.org.uk