



Headway Brain Injury Services and Support

Looking After Your Personal Data

A Privacy Notice for Headway Clients

The purpose of this document

Headway takes the responsibility of looking after your personal information very seriously. This document explains what information we keep and why, and how we make sure that it is kept safe and secure.

There is a full version of the Headway Data Protection Policy available on our website at <https://headway.ie/privacy-policy>

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Why we keep information

We look for information from you for a variety of reasons. These are:

- To provide you or your family member with rehabilitation services
- To send you newsletters or information mailings or emails
- For fundraising purposes
- For research purposes

When we ask for your personal information, we will always explain what we are using the information for. We will not use information that we get for one reason for a different purpose without first asking your permission.

What allows us to keep your data?

Data Protection law, the GDPR (short for the General Data Protection Regulation) tells us we must be clear on the basis for allowing us to keep and use your data. There are a different reasons for different circumstances:

Consent

We use your **consent** as the main basis for keeping and using your data. This means that you agree for us to have and use it and you are made aware of that. If you prefer, you can give your consent for us to gather data for one purpose but not another (for example, you might want to give us your consent to have your data for the purpose of providing a service, but not for research or fundraising purposes). It also means that you can withdraw your permission for us to have it at any point. Most of the information we hold on you is held on this basis. We record the consent you give us and we make sure that you are giving it freely and fully informed.

Contract Performance

Some people who contact us have not had an opportunity to give us their full permission to hold their contact information, but we sometimes need this to be able to send out a letter or a response to a query. We hold and use that

contact information just for that purpose on the basis of **contract performance**.

Vital Interest

In an emergency we might use your data without your explicit permission, for example to save your life. This is called protecting your **vital interest**. The circumstances where this applies are explained when you sign our confidentiality notices.

Legitimate Interest

We hold information about your next of kin or emergency contact person. We don't ask their permission (consent) directly for this, but we use that information on the basis of **legitimate interest**. We use the same basis for holding CCTV footage at our premises (where that applies).

What information do we hold?

We hold all the information that we need in order to provide you with a quality service. In the case of our rehabilitation services or our research projects, this means that we might have to hold a large amount of information about you, including your medical history, your attendance at Headway and other sensitive information such as medical reports and rehabilitation progress reports.

We recognise that this means we have to take special care of this sensitive information to make sure it is kept safely. We have special systems with extra layers of security to protect that information so that only those who need access to it can see it.

For reasons other than providing rehabilitation services or research, we will hold only basic information. In most cases this will be contact information, such as name, address, telephone number and email address.

Some of our premises are protected by CCTV. In this case, we hold the CCTV footage which can be used to identify anyone entering and exiting a building.

The following table summarises the information we hold for which purpose.

Purpose	Personal data we hold for this purpose
Rehabilitation Service Provision	Name, address, date of birth, telephone, email address, emergency contact info, GP contact info, referral information, country of origin (optional), language (optional), ethnic background (optional), religion (optional), citizenship status, living and working situation, brain injury circumstances, details and hospitals attended, current needs and difficulties, medication, substance use history, brain injury service history, current medical status (including medication, allergies, seizure history), rehabilitation assessment and progress records, identified needs, photograph, consents (including email opt in and SMS opt in).
Statistics to improve our services	None. All data for this purpose is anonymous.
Information mailings and events	Name, email address, postal address (where relevant), consents, reported relationship to brain injury
Fund-raising and development	Name, email address, postal address (where relevant), consents, reported relationship to brain injury, donation history.
Purchases and Donations	Name, email address, telephone number, order/donation details, delivery address.
Website Optimisation and Functioning	Headway uses website cookies for tracking site visitors. The Headway website cookie policy explains which cookies we use for which purposes and is available at https://headway.ie/cookies/
Premises Security	CCTV images from property entrances and carpark area in the Dublin premises.
Research	Informed consent, name, address, date of birth, injury status, injury history.

Who looks after it?

The person with overall responsibility for managing the security of all information is the Information and Support Manager. Different Headway staff members may play different roles in helping to keep your information accurate and up to date. For example, if we provide you with services, your keyworker will be responsible for keeping your information up to date.

The Information and Support Manager is Richard Stables, and you can contact him at stablesr@headway.ie or by telephone at 01 810 2099

How do we look after it?

We hold your information in systems which are kept as secure as possible. Some information is kept on paper and some is kept electronically. In both cases we have security systems in place to prevent unauthorised access to your information and to prevent it from becoming damaged.

How long is it kept for?

We do not generally keep your personal information longer than is needed for the purpose. But Headway follows HSE guidance for the period that we hold your rehabilitation service records. The minimum period set down for the retention of records is eight years.

There is a full list of the retention periods for different types of records in the Headway Data Protection Policy.

Who do we share your information with?

We share information with other people only with your permission, in order to provide you with a service. We only share the information that those people need to know, and we share it in a way that we can ensure it is secure.

There are certain circumstances in which we are obliged to share the information we hold about you with other people without you giving permission. These circumstances will be fully explained to you when you come into our service. They include

- Any situation in which you pose a danger to yourself or to other people

- Any situation which tells us about the possibility of harm to a child or vulnerable adult
- Any situation required by a court of law
- Any situation required by Gardai for investigating a crime

The full version of the Headway policy on Data Protection lists all the possible reasons we might give your information to another person without your permission.

What are my rights?

Under the law, you have the right to access the information we hold about you. If you find that any of the information is incorrect, you also have the right to have it changed. You can also request to have your records erased.

You can use the form at the end of this document to make a request for a copy of your information, for it to be corrected or erased. We will comply with that within one month of receiving it.

Where can I get more Information?

You can request a copy of our full Data Protection Policy from any Headway Staff member or you can download it from our website at headway.ie/data-privacy

Details about Headway

All personal data is kept on behalf of Headway Brain Injury Services and Support. The company name is Headway (Ireland) clg. Our address is:

Headway, Blackhall Green, Off Blackhall Place, Dublin 7

Telephone: 01 604 0800

Can I make a complaint?

Yes. If you are not happy with an aspect of our Data Protection Policy, you can make a complaint to Headway, by contacting us at

Headway, Blackhall Green, off Blackhall Place, Dublin 7 or by telephoning at 01 604 0800. Or, you can send an email to info@headway.ie

Personal Data Request Form

Information Manager
Headway
Blackhall Green,
Off Blackhall Place
Dublin 7

[Date]

Dear Sir/Madam,

I wish to make an access request under Article 15 of the General Data Protection Regulation (GDPR)

- I wish to have a paper copy of any information you keep about me, on computer or in manual form.*
- I wish to receive a copy of any information you keep about me in a portable electronic format*
- I wish to have all information you retain about me deleted from your system*
- I wish to have information you have about me corrected (please specify)*

Regards

(signed)

[your name]

Name: *(please print)* _____

Email: *(please print)* _____

Address *(please print):* _____

Request in writing should be made and signed by the applicant in person. Within the terms of the GDPR, Headway will respond to your request for personal data within one month of date of request. Requests should be submitted to: Information Manager, Headway, Blackhall Green, Off Blackhall Place, Dublin 7