

## **QEF Neuro Rehabilitation Services**

### **Privacy Policy**

QEF Neuro Rehabilitation Service understands that privacy and the security of your personal information is extremely important. Because of that, this policy sets out what we do with your information and what we do to keep it secure. It also explains where and how we collect your personal information, how long we will keep it, who we share it with as well as your rights over any personal information we hold about you.

#### **What information do we have or hold on you?**

We may collect personal information about you when we are contacted regarding any aspect of our work that impacts on you e.g. neurorehabilitation and transitional support for adults following a brain injury or neurological illness. We will ensure that we only collect enough information in order to allow us to provide the appropriate service, report to our funders, and which is reasonable and fair. The sort of information we will hold will include:

- Personal Information relevant to the service you are accessing, such as your contact details, date of birth, National Insurance number, NHS number, financial details and any feedback you give to us;
- Information about the services that we provide to you (including for example, the things we have provided to you, when and where, what you paid, the way you use our Service, and so on);
- Clinical information about the care you received including medical and therapist notes, rehabilitation goals and assessment reports;
- Any clinically relevant lifestyle information, such as smoking, alcohol or weight;
- Information about how you have used our services for example, we try to identify how we have worked with you. If you use our website, we try to identify when and how you use it through the use of cookies;
- Sensitive personal information regarding your racial/ethnic origin and your health including disabling conditions, hospital visits, discharge notes, medication records, treatment received, images of scans or X-rays, and allergies.

Please note that providing your personal information is a condition of using our service so if you are unable to share this information with us then we will be unable to help you.

## **Lawful basis**

The GDPR requires us to rely on one or more lawful grounds to process your personal information. These are the grounds we think are relevant:

- Where you've given us your consent for us to use your personal information in a certain way. For example, we are seeking your consent at the end of this form for a lot of the processing we undertake.
- Where necessary so that we can comply with a legal obligation. For example where we need to share your personal information with regulatory bodies which govern our work and services.
- Where it is in your/someone else's vital interests. For example a Best Interest Decision will be made by a multi-disciplinary team in cases where you may lack capacity or where you are at risk of causing harm to yourself or others.
- Some processing is undertaken on the basis that it is in our legitimate interests and not overridden by your rights. For example information about how you have used our services.

## **How we use your information**

Personal information which you supply to us may be used in a number of ways, for example:

- to provide the services you requested;
- help us understand more about you and to improve our service;
- to ensure efficient and accurate administration of your request;
- to process your request or payment;
- to manage your case or complaint;
- help answer your questions and solve any issues you have;
- for statistical analysis to:
  - provide services to the wider community through the use of anonymised information
  - support a grant or funding application through the use anonymised information
  - report to existing funders
  - inform annual reports

We will keep your personal information for 20 years after which it will be securely destroyed. If you lack capacity at the time that you stop using our service then your records will be kept for 75 years.

### **How we will ensure your information is kept safe**

We take security measures to protect your information including:-

- ensuring only authorised personnel have access to administrative areas of the building;
- storing paper-based information in lockable areas;
- limiting access to paper-based and electronic information to those who need to see it;
- running through ID verification questions before disclosing information over the telephone;
- implementing access controls to our information technology
- disposing of data at the end of the retention period
- information will only be transferred outside of the UK with your consent and if specified secure conditions are met.

### **How we share your information**

Your rehabilitation goals, progress and associated notes will be disclosed to:-

- Your funder including solicitors, insurance companies and employers;
- The referring agent for example Social Services, Clinical Commissioning Groups or Community Interest Companies;
- Health care practitioners within the NHS, at other organisations or in private practice, including your GP, hospital consultants/specialists, local therapy teams;
- Someone with a Power of Attorney or a court appointed deputy to act on your behalf in financial or medical decisions.

We may disclose your personal data to third parties when permitted to do so including:

- where we are acting as the data processor for another data controller;
- where we have a contract with a processor acting on our behalf;
- if we have a lawful basis for doing so;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. This includes providing your personal data to other organisations, such as the Police or Safeguarding Team for the purposes of prevention and detection of crime.

We will not disclose your data to anyone else without your consent.

## **Your rights**

We will ensure you can exercise your rights in relation to the personal data you provide to us.

You have the right: of access; to rectification; to erasure; to restrict processing; and to object. You have the right to data portability and where QEF use an industry standard application, we will provide portable data formats. If you wish to exercise these rights please contact [dataprotection@qef.org.uk](mailto:dataprotection@qef.org.uk) There is an additional right relating to automated decision making but QEF does not undertake any automated decision making activities.

If you have any privacy-related questions or unresolved problems relating to the use of your personal data, you may complain to us by contacting us at [dataprotection@qef.org.uk](mailto:dataprotection@qef.org.uk)

You also have the right to complain to the Information Commissioner's Office about our collection and use of your personal data. They can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, [www.ico.org.uk](http://www.ico.org.uk)

## **Changes to our privacy notice**

We keep our privacy notice under regular review and we place any updates on this web page. This privacy notice was last updated on 23 May 2018.

## **Further information**

For further information on how your information is used, how we maintain the security of your information, your rights to access information we hold on you, or details on how long we hold your information, please contact us at [neurorehab@qef.org.uk](mailto:neurorehab@qef.org.uk) or write to us at:

QEF Neuro Rehabilitation Service, Brain Injury Centre, Banstead Place, Park Road, Banstead, Surrey, SM7 3EE

## **Consent**

- I agree that QEF can hold, use and share information about me (as detailed above).
- I do not agree that QEF can hold, use and share information about me (as detailed above). Please detail below any concerns you may have or any restrictions/modifications you would like made below and our staff team will discuss these you

If you are over the age of 13 and wish for someone to act or speak on your behalf, please complete their contact details below.

Name: .....Relationship to client:.....

Address.....  
 .....

Postcode: .....

Mobile: .....Email: .....

Please indicate when you would like QEF to contact the person named above:-

To make appointments on my behalf YES  NO

To discuss progress, recommendations and outcomes YES  NO

If you want to change your decision at any time in the future, please let us know in writing.

If there is a Power of Attorney in place or a court appointed deputy, please attach a copy of the document.

Print name.....

Signature.....

Date.....

A Best Interest Decision has been made by the team as follows:-

Team in attendance on date:

Decision