

# **Privacy Statement**

#### WAVE Trauma Centre is committed to protecting and respecting your privacy.

This privacy statement describes how WAVE collects and uses personal information you provide to us.

WAVE is registered with the Information Commissioner's Office (ICO) as 'WAVE Trauma Centre'.

#### Information we collect

All information you provide will be carefully protected and stored in our secure databases. We will keep this information confidential in accordance with the Data Protection Act 1998, except where disclosure is required by law.

We may obtain personal information from you when:

- You enquire about WAVE's services or trauma education programmes. This information may include your name, address, job title and function, email address, telephone number, fax number or a completed referral form or other related details.
- You register with WAVE to receive services. This information will include personal data as above, including medical and associated information in order to help us assess which services are most appropriate for you. You will be provided with a form of consent, which will require your signature regarding how this information is used, stored and reported. Wherever possible once registered with WAVE we use aggregated or anonymous information which does not identify individual clients for example, we allocate WAVE client codes across all services rather than names to protect privacy.
- When you make a donation to WAVE and/or engage in Gift Aid, WAVE will hold the
  relevant data regarding your name, home address, telephone number and if
  appropriate a completed gift aid form. These will be stored safely on a secured server.
- Information that you provide voluntarily on our website (<a href="www.wavetrauma.org">www.wavetrauma.org</a>), Facebook (https://www.facebook.com/pages/WAVE-Trauma-Centre/) or other web based programmes.
- Information provided in job applications and held in relation to our current and former employees. When an individual applies to work at WAVE, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example lift references or obtain 'disclosure' from the Criminal Records Bureau (CRB) we will inform the applicant beforehand unless the disclosure is required by law.
- Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed and it will then be destroyed. We retain

depersonalised statistical information about applicants to help inform our recruitment activities and to complete our fair employment annual statutory returns.

For successful applicants, once they commence employment with WAVE we will compile a personnel file relating to their employment. This will be securely stored and only used for purposes relevant to their employment. When employment with WAVE has ended, the file will be retained in accordance with the document retention policy.

- Information will be held if you are a registered volunteer at WAVE. A volunteer file is completed for each volunteer, including their name, address and telephone number. Where we want to disclose information to a third party for example lift references or obtain 'disclosure' from the CRB we will not do so without informing the applicant for volunteering beforehand unless the disclosure is required by law.
- Details of all WAVE transactions and services you take part in.
- Collate feedback on services. We only use personal information if we have to follow up on any issues arising from the feedback.
- Images, video and sound recordings. WAVE may take photographs/video/sound recordings at its events for use in printed and electronic media for education and promotional purposes. Some images or recordings may be selected for permanent preservation in WAVE's Archive as a record of the organisation's community and educational activity and may also be used for research, publication, education, displays and exhibitions. Consent will be sought and you will be informed of this privacy statement prior to any recording.

## How we use your information

We will use your personal information:

- To provide you with the services, products or information you have requested or that we feel may be of interest to you, where you have given permission to be contacted in this regard. For example we may use information about those who have accessed a particular service to carry out a survey or research study to find out if they are happy with the level of service they received. When people do engage in our services, they remain free to disengage at any time.
- For administration purposes including monitoring and evaluation and reporting to funders.
- For the purposes of contributing to interactive sections of our website; trauma education programmes; social media; and online communication processes.
- To assist with WAVE's organisational planning, sustainability and fundraising processes and maintenance of organisational records

WAVE may be required to share your information with our funders, service providers, associated organisation's and agents for the purposes described above. You may choose to opt out at any time. WAVE will only share information if these organisations' have confirmed they have the appropriate data safeguards required by the Information Commissioner's Office.

#### **Cookies and Analytics**

When someone visits <u>www.wavetrauma.org</u> we collect standard internet log information and details of visitor behaviour patterns. We do this to find out the numbers of visitors to various

parts of the site. We do not attempt to find out the identities of those visiting the website, nor do we associate any data garnered from this site with any personally identifying information from any source.

If we want to collect identifiable information we will be up front about this and we will explain why it is required and what we intend to do with it. For example, if you complete a contact form on the website. We will collect your name, email address and any other information forwarded in that email for action thereafter.

WAVE's website system uses cookies. Cookies are small files stored on the hard drive of your computer. They allow us to improve our site and deliver a better service. Our website uses an 'Opt In' to Cookies system. This allows users to opt-out of Cookie use.

Most web browsers allow some control of most cookies through the browser settings. This means you can set your browser to refuse cookies, or to warn you before accepting them. To find out more about cookies, including how to see what cookies have been set and how to manage them, visit www.aboutcookies.org or www.allaboutcookies.org

### How we protect your data

The data that we collect from you is kept secure, accurate and up to date at WAVE's offices and backed up on external sources stored offsite compliant with UK law regarding protection and storage of data.

All information you provide is stored on secure servers. In relation to direct casework services such as Advice and Welfare and Advocacy, WAVE utilizes the Advice Pro Online System, which is registered with the Information Commissioners Office. Advice Pro is supported and maintained by ACM Solutions (Advanced Case Management Solutions Ltd) who are registered as a 'data processor'. The Company complies with its statutory obligations under the provisions of the Data Protection Act 1998. The data is hosted remotely at a secure data centre based in the UK, in Dundee (called *Bright Solid* who were used by the UK Government in executing the latest General Census). WAVE will only retain data for as long as is necessary for the purposes for which it is used.

CORE Evaluation System (Clinical Outcomes in Routine Evaluation) - CORE

WAVE has purchased CORE PC, the PC version of CORE Evaluation System in order to monitor and evaluate our Counselling service and Psychological therapies service. CORE PC has a range of powerful clinical and management reporting functions to help us maximize the benefits of using CORE for our clients, therapists, supervisors and managers. Similarly to the packages named above, it is purchased on an annual license basis. Features of CORE PC include clinical change (pre and post outcome measures), data analysis and reports, Therapist appraisal, medication review etc. WAVE currently use a computer based system through a server to store all data, any paper version of core will be destroyed after use and no identifiable information will be used. WAVE makes use of client codes for this purpose.

#### Your rights

Your rights, with regard to how we handle and process your information are clearly defined in the Data Protection Act 1998 (DPA). You may find more information about the DPA our obligations and the rights provided to you by it on the ICO website (http://ico.org.org/).

If we hold information about you we will:

- Give you a description of it;
- Tell you why we are holding it;
- Tell you who it could be disclosed to; and
- Let you have a copy of the information in an intelligible form.

If you would like a copy of the information held please forward a request in writing to:

The Data Controller
WAVE Trauma Centre
5 Chichester Park South
Belfast
BT15 5DW

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. Under the Data Protection Act 1998 however you have the right to ask for a copy of the information we hold about you. Any subject access requests may be subject to a charge up to £10 to meet administrative costs. However, the first application will bear no cost.

For more information please refer to WAVE's Data Protection & Confidentiality Policy.

This privacy statement only applies to WAVE's collection of information. If you follow a link to any third party from our website please ensure you familiarize yourself with their privacy policy before sharing your personal information.

### Disclosure of personal information

In most circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example we will need to share personal information with the organization concerned and with relevant bodies. As indicated above, we only keep information we need to carry out work and keep clients safe.

We may also need to disclose your information if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so.

### **WAVE's Data Protection policies and procedures**

WAVE adheres to all applicable Data Protection and Privacy laws. Please refer to our Data Protection & Confidentiality Policy, IT Policies and Form of Consent etc which are available upon request.

### **Complaints or queries**

WAVE ensures the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If at any point you believe the information we process on you is incorrect, you can ask to have the information corrected or deleted. If you wish to raise a complaint about how we have handled your data, you can contact our Data Controller at the address overleaf who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner at the following address:

Information Commissioner 51 Adelaide Street Belfast BT2 8FE

This privacy statement does not provide an exhaustive list of all aspects of WAVE's collection and use of personal data. We are happy to provide any additional information or explanation. Any requests for this should be sent to the address below

## Changes to our privacy policy

If your personal details change, please help us to keep your information up to date by notifying your allocated WAVE Centre or WAVE Trauma Centre Headquarters, 5 Chichester Park South, Antrim Road, Belfast BT15 5DW. Email <a href="mailto:adminhq@wavetrauma.org">adminhq@wavetrauma.org</a> Tel: 028 9077 9922

We keep our privacy notice under regular review. This privacy notice was last updated on the 22<sup>nd</sup> May 2018.