

# Head First Privacy Notice for Clients

**Data Controller:** Head First (Assessment, Rehabilitation & Case Management) Ltd  
"Head First"  
Grove Mills, Cranbrook Road, Hawkhurst, Kent TN18 4AS  
Tel: 01580 752275, Email: [info@head-first.org](mailto:info@head-first.org)

**Data Compliance Manager:** Jo Clark-Wilson

## Introduction

This notice applies to anyone who receives case management or expert witness services (our clients, referred to in this notice as "you") provided by Head First (referred to here as "we").

In providing these services to you, we aim to maintain the highest possible standards and ensure that the service you receive is bespoke and tailored to you. We therefore collect information and keep records about you, so that we can identify, recommend, coordinate and manage any intervention required to address your particular health, social, care, and rehabilitation needs.

Maintaining your privacy is important to us and we are committed to meeting our data protection obligations. To do this we must comply with six data protection principles, ensuring the personal information we hold about you is:

1. Processed lawfully, fairly and in a transparent manner
2. Collected only for legitimate purposes that have been clearly explained
3. Adequate, relevant and limited to what is necessary for those purposes
4. Accurate, and where necessary, kept up to date
5. Kept in a form that permits your identification only as long as needed
6. Processed in a way that ensures appropriate security of the data

## How we use your information

The information we collect and keep about you on our records, is used to:

- Provide a basis for all decisions made with and for you by your Case Manager
- Make sure the service you receive is safe, effective, caring and responsive
- Ensure we work collaboratively and effectively with other organisations or individuals involved in providing support, care, rehabilitation or other services to you
- Collect and supply evidence and clinical reasoning

We may also use or share your information to ensure public safety; to investigate concerns or complaints; or to audit, evaluate and plan so as to maintain the highest standards of service.

## The information we collect

During the course of our involvement with you we collect information from the initial referral stage and update it throughout the time that you receive case management services. Information sources include you and your family, other professionals and services, medical records and reports. We collect, use and process a range of information about you, including:

- Your contact details including name, address, email and phone number
- Personal information such as your date of birth and gender
- Details of your accident or injury and how it affects you and your life
- Details of your preferences, skills and strengths
- Details of any difficulties you are encountering
- Information about your living circumstances and family relationships
- Information about our financial situation including benefits you receive
- Information about your education and work
- Contact details of your next of kin
- Contact details of others providing support to you such as your GP, care agency, support workers, financial deputy, solicitor, social worker, etc.

We may also collect, use and process special categories of personal information, such as:

- Information about your health, including medical reports and correspondence
- Information about your ethnicity, religious beliefs and sexual orientation
- Information about any criminal convictions and offences

## Lawfully processing your information

We only process your information when the law allows us to. In accordance with the Data Protection Act 2018 (DPA 2018), we collect, store and share information about you primarily to **fulfil our contract** with you, or your representative, to provide case management services to you, and to comply with our **legal obligations** as required by our registration authorities.

We may also process your data where it is necessary for our **legitimate interests** (or those of a third party), so long as your fundamental rights and freedoms do not override these interests. If the occasion arises, we may share information about you in order to protect your **vital interests** or the vital interests of someone else.

Whilst we seek your agreement regarding the case management input you receive from us, we do not rely on your consent to process information about you in the course of providing this service. From time to time, we may wish to use your data for another reason, such as research or training, in which case we will seek your express consent for this purpose.

## Protecting your information

We have robust systems and procedures in place to ensure your information is stored and shared securely. Case notes and documents are kept in a secure database and hard copies in locked cabinets. Information may also be stored in on our secure email servers and in password-protected electronic documents.

In addition to your Case Manager, other personnel at Head First may access to your information in order to fulfil managerial, administrative, human resources, accounts and payroll duties. Anyone who receives information from us about you only has as much information as necessary to carry out their role. All those with access to your personal data are duty bound to keep it confidential and secure. Should the need arise there is a protocol in place to contain, deal with and report any data breaches to the Information Commissioner's Office (ICO). Where Head First engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We will only store your personal information for as long as we are legally obliged to. This may include a period beyond our involvement with you, in which case it will be archived securely until such time as it may be securely and effectively destroyed or permanently erased from our IT systems. In some circumstances we may anonymise your data so that it no longer permits your identification, in which case we may retain such information for a longer period.

### **Sharing your personal data**

In order to provide an effective personalised clinical case management service to you, we work closely with other individuals involved in your care, support and rehabilitation. We may therefore seek information from, or share personal information as appropriate, with your:

- GP and other medical consultants
- NHS and other healthcare services
- Social services
- Care agencies
- Care staff or support workers
- Rehabilitation professionals and services
- Financial deputy or trustees
- Benefits agency
- Litigation solicitor

Where you require intervention other than care or rehabilitation, we provide only the minimum information that is necessary to meet your needs, with organisations such as:

- Property and accommodation services
- Public services such as the police or DVLA
- Holiday and leisure services
- Domestic services
- Insurance companies

### **Your rights in relation to personal data**

As a data subject you have the right to access and control the data that we hold about you. With regard to your personal information, you can:

- Request access to your personal information

- Request correction or deletion if our information is inaccurate or unnecessary
- Withdraw consent (where we process data based on your having given consent)
- Data portability – request the data we hold be passed to another service
- Request restriction or object to our processing of your personal data

Should you wish to exercise any of these rights, you should make a data subject access request by contacting our data compliance manager using the contact details above. We will endeavour to meet your requests but there may be instances where we cannot comply, for example, we cannot delete information we hold if we are required by law to keep it.

If you are unhappy or concerned about the way that we manage your data, you should address this with your Case Manager in the first instance and, if necessary, in writing to our data compliance manager. If your concerns are not resolved to your satisfaction you can lodge a complaint with the UK supervisory body for data protection issues, the Information Commissioner's Office (ICO) via this link [ICO complaints](#) or by calling them on 0303 1231113.