

PRIVACY POLICY (HWB-01-018)

Revision Summary Schedule Matrix			
Version	Date	Summary Of Change	Approved By
0	Mar 2026	Initial Draft pre-validation	N/A
1	April 2026	Initial release of document for compliance	CEO / Trustee
2	May 2026	Release of up-issue with extended content	CEO / Trustee

1. Policy Purpose:

The Headway Bristol Privacy Policy exists to ensure transparency regarding how personal data is collected from service users, employees and stakeholders, and how it is used, stored and shared.

It complies with the UK Data Protection Laws, informs users of their rights and outlines security measures to protect data and the individuals.

2. Key purpose includes:

Transparency:

- Informing individuals about how their personal information is processed, collected and used.

Legal compliance:

- Adhering to the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

Service & Safety:

- Ensuring personal data is used to provide appropriate support for individuals with acquired brain injuries and for safeguarding purposes.

Data Control:

- Defining how data is managed, stored and shared with third parties.

Data Subject Rights:

- Informing individuals about their rights to access, amend or delete their personal information.

This policy applies to information collected through Headway Bristol website, phone, email and social media.

3. Contents:

- [Introduction.](#)
- [Your Rights.](#)
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- [For All Individuals: Equality & Diversity Monitoring.](#)
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- [For Referees.](#)
- [For Supporters.](#)
- [For Filling in Online Surveys:](#)
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4. Introduction:

- Headway Bristol is a Registered Charity (No. 1007207) and a company limited by guarantee (No. 2659120). We support individuals aged over 18 years with a confirmed diagnosis of a brain injury, their families and carers across Bristol, North Somerset and South Gloucestershire.
- We are a registered data controller with the Information Commissioner's Office (ICO), with the registration number ZA230133. We are committed to protecting your personal information and being transparent about what data we hold.
- We process information about our staff, service users and about people with whom we work, including current, past and prospective employees, volunteers, trustees, members, donors and the families we support. We also hold information about people who have opted-in to receiving communications from Headway Bristol.

This privacy notice tells you what to expect us to do with your personal information, and includes

- Where we get personal information from.
- What information we collect.
- How and why your information is used.
- How we communicate with you (letter, email, phone, text).
- Where your information is kept and how long for.
- Who accesses your information.
- Our lawful basis for collecting and processing your data.

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5. Your Rights:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)

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- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- Your right to erasure - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- Your right to object to processing - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- Your right to withdraw consent - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact us using the details below.

6. Contact Us:

- By post: Headway Bristol, c/o Headway Bristol, Woodside Centre, Kingswood Foundation Estate, Britannia Road, Bristol, Avon, BS15 8DB.
- By telephone: 0117 462 6962.
- By email: info@headwaybristol.org.uk

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7. For All Individuals: Equality & Diversity Monitoring:

- We take equality and diversity seriously and may ask all individuals we work with to complete an equality monitoring form. While these forms do not ask for your name, we recognise that in a small organisation, certain combinations of information might make it possible to identify both personal and special category (sensitive) data about an individual.
 - **Lawful basis:** We process this information under **legitimate interests** (to ensure our services are fair and inclusive) and **substantial public interest** (specifically for monitoring equality of opportunity as defined in the Data Protection Act 2018).
 - **Your choice:** Providing this information is entirely voluntary. Every question includes a 'prefer not to say' option, and your decision will not affect the service or support you receive.

- **Confidentiality:** We use aggregation to protect your privacy (meaning we only report on broad groups, e.g., '10% of our service users/staff/volunteers,' rather than individual profiles). Identifiable raw data is deleted as soon as our statistical analysis is complete.

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8. Online Referral Form:

- This section applies to individuals filling in our online referral form, which is for the use of individuals self-referring, families and friends of those who might find our services beneficial, and professionals seeking to refer an individual.

Where we get personal information from:

- If you are referring yourself, then you choose to provide Headway Bristol with some information.
- If you are referring another individual, then please first ensure they are aware of this section of the privacy policy and authorise to your referring them and our policy terms. The referral form will record data about both the referee and the individual making the referral.

What information we collect:

- The form collects personal data:
 - Identity data: Name and date of birth
 - Contact data: Your email, and telephone number
 - The relationship of the referrer to the referee
 - Details about preferred times, days and any accessibility requirement
- Because we are a brain injury specialist, simply contacting us for support may reveal information about your health, or the individual you are referring. We treat the fact that you have reached out to us, and any information you share during that enquiry, as special category (sensitive) data, and we ensure it is handled with confidentiality.

How & why your information is used:

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We gather and use only the minimum amount of information we need to:

- Process the referral and contact you for further information if needed.
- Update you on the outcome of the referral (with the service user's consent).
- Maintain a record of who provided the information in the referral.

We would do otherwise only in exceptional circumstances, e.g. if your health or safety or the health and safety of another was at risk, or if disclosure of information is required by law.

How we communicate with you:

- Your details are kept on a list, and we aim to contact you only so much as is required to keep you updated about the specific service(s) you have requested from us and to keep you informed about changes and updates.
- Most of our contact with you to collect data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.
- Where possible, we seek to use formats of communication that suit your need and the content/urgency of the communication. If you have specific preferences about communication, you can record these on the referral form.
- Any information we collect from you, additional to that within the form, will be at your discretion and processed as is set out elsewhere in this policy.

Where your information is kept & for how long:

We keep both electronic and paper records. These records are secure, accessed only by those who need to do so, and securely disposed of after a set period.

- Service User Records: We store data about potential service users (as part of their assessment record) for 7 years to ensure we can respond to any future queries about the decision and to comply with the Limitation Act 1980.
- Referrer Records: We store data about individuals making a referral on another person's behalf while we assess suitability. Personal contact details for non-professional referrers (e.g., friends/family) will be reviewed and typically deleted 12 months after the referral process is closed. Names of professional referrers remain part of the formal 7-year record.

- You have the right to request erasure of your data. However, please note that we may be legally required or permitted to retain certain information (such as assessment records or safeguarding notes) for a set period to comply with our statutory obligations or for the defence of legal claims. If we cannot fulfil your request, we will explain the reasons why.

Who accesses your information:

- During the process of deciding if our services are suitable, data is shared among a team of senior Headway Bristol staff who collect further information and perform assessments. All our staff are subject to confidentiality agreements.
- We may also share your information (personal or special category), but only in adherence with data processing laws. We will only share special category information with other organisations where that is necessary for legal reasons, or where there are other substantial public interest grounds. Organisations with whom we share data might include:
 - Charities and public sector organisations that may have referred you to us, may be providing services to you or that we may be working in partnership with.
 - Health professionals (such as GPs)
 - Carers and family members (where you are comfortable with this)
 - Local council social work departments
 - The Police, Courts or Charity Commission
 - Safeguarders and other parties in connection with adult protection
 - Lawyers or other representatives that may be acting on your behalf
 - Statutory bodies in connection with legal and formal processes.
 - Third parties working on our behalf (for example, to support our IT systems, or to send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own purposes.

Our lawful basis for collecting & processing your data:

We process your personal data and special category data only when the law allows us to. Most commonly, we rely on the following legal grounds:

- **For personal data (names/contact information):** We process this under Legitimate Interests. It is necessary for us to know the source of a referral to provide safe support and maintain accurate records.
- **For special category data (Health information):** We process this because it is necessary for the provision of health or social care treatment or, where applicable, based on your explicit consent.

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9. For Service Users & Potential Service Users:

- This section applies to Well-being Centre and One-to-one Outreach service users, as well as individuals contacting the carers support service and the crisis support service. It also applies to potential service users who are undergoing an assessment to see if our support is right for them.
- Where service users choose to become supporters, for example by attending out-of-hours fundraising events, then we collect and process their data as is set out in that section.

Where we get personal information from:

- You choose to provide Headway Bristol with some information. For example, when you make contact about registering with us for our services or start to receive our services, we collect information about you. We also collect the information you provide when choosing to complete surveys, join in events or contact us with feedback and ideas.
- Our staff create records about you, for example by filling in records of the sessions you attend.
- We might receive information about you from third parties, including agencies who are referring you to us, professionals and other support agencies (such as health professionals, social care professionals, other voluntary organisations or charities), banks, payment processors, and carers or members of your family.

What information we collect:

We may collect and use personal data. This could include:

- Identity data: Name, date of birth and gender.
- Contact data: Your address, email, and telephone numbers, as well as contact details for next of kin, GP or health visitor.
- Contact we have had with you.
- Information about lawyers or other representatives we may encounter in the delivery of services
- Information about how you use the Headway Bristol website, the device you use to access it, your IP address and access location.
- Credit card and/or bank details.
- Any other personal information shared with us, including likes, dislikes and responses to satisfaction surveys to help us provide a better service.
- Finance, such as income, financial details or employment information.
- Information that third parties might require to run services we procure or arrange. In the past this has included National Insurance numbers.
- Photos, videos and audio recordings (these fall under a separate media release statement provided to service users).

We may also collect and use the following types of special category (sensitive) data:

- Health data: e.g. details of brain injuries, medical history, medications and support needs.
- Diversity information: e.g. your race, religion or sexual orientation.

During your assessment and the delivery of our services, we may collect information that is sensitive in nature, depending on the context. This is likely to be:

- Incidents: Records of accidents or health and safety incidents that occur during your time with us.
- Criminal record data: Information about criminal convictions (committed by or against an individual). We process this to ensure the safety of our service users and staff, in accordance with our Appropriate Policy Document.

How and why your information is used:

- We gather and use only the minimum information we need to provide you with services and support that you have requested from us and that meet your needs. We would do otherwise only in exceptional circumstances, e.g. if your health or safety or the health and safety of another was at risk, or if disclosure of information is required by law.

- Our ability to provide safe and appropriate services is dependent on the information provided by professionals, carers, service users or potential service users. If professionals, carers, service users or potential service users are uncomfortable with the kind or detail of the information we require, then we are happy and willing to discuss this and explain further why we request the information and how it is used or stored. Regrettably we may not be able to provide services without the information we need to do so safely and suitably.
- If we wish to use your information in any other way, then this would be the subject of a separate agreement. We will always ask for your explicit consent beforehand and explain what your options are if you change your mind. You are welcome to refuse these requests.

How we communicate with you (letter, email, phone, text):

- Your details are kept on a list, and we aim to contact you only so much as is required to keep you updated about the specific service(s) you have requested from us and to keep you informed about changes and updates.
- Most of our contact with you to collect data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.
- Where possible, we seek to use formats of communication that suit your need and the content/urgency of the communication. If you have specific preferences about communication, you can record these on the forms we complete when introducing you to our services.
- We may also contact you with marketing communications, such as about special events or new services. You can elect not to receive these communications using the forms we complete when introducing you to our services. You can change your mind at any time.

Where your information is kept & how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so, and securely disposed of after a set period.
- In general, we store data about service users while they are accessing our services. If they choose to leave our service, their information is deleted after one year. There could be situations where records are retained for a longer period, such as if we are subject to separate legal obligations which require us to do this. We retain payment and finance records for 7 years.

- Additionally, we store the contact details you provide in a third-party customer relations management database called Charity Manager CRM (www.charitymanager.co.uk). The personal data they process is not transferred or stored outside the UK, and you can review their full terms and conditions on their website.
- You have the right to request erasure of your data. However, please note that we may be legally required or permitted to retain certain information (such as assessment records or safeguarding notes) for a set period to comply with our statutory obligations or for the defence of legal claims. If we cannot fulfil your request, we will explain the reasons why.

Who accesses your information:

- Information is shared internally with those who require it to provide you – suitably and safely – with the services you have requested. All our staff are subject to confidentiality agreements.
- We may also share your information (personal or special category), but only in adherence with data processing laws. We will only share special category information with other organisations where that is necessary for legal reasons, or where there are other substantial public interest grounds. Organisations with whom we share data might include:
 - Charities and public sector organisations that may have referred you to us, may be providing services to you or that we may be working in partnership with.
 - Health professionals (such as GPs)
 - Carers and family members (where you are comfortable with this)
 - Local council social work departments
 - The Police, Courts or Charity Commission
 - Safeguarders and other parties in connection adult protection
 - Lawyers or other representatives that may be acting on your behalf
 - Statutory bodies in connection with legal and formal processes.
 - Third parties working on our behalf (for example, to support our IT systems, or to send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services and we have a contract in place that requires them to keep your information secure and prevents them from using it for their own purposes.
- We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them. We only share information to third parties listed below: i.e. Charity Manager CRM.

Our lawful basis for collecting & processing your data:

- We process your personal data and special category data only when the law allows us to. Most commonly, we rely on the following legal grounds:

Personal Data:

- **Legitimate interests:** We collect or use your information because it benefits you, our organisation, or someone else, without causing an undue risk of harm. Our legitimate interest is to deliver our core services and manage our charity effectively.
- **Consent:** We have permission from you after we gave you all the relevant information. You have the right to withdraw your consent at any time.
- **Contract:** We use the information to carry out a formal contract with you. This applies to specific services where a written agreement is in place.
- **Vital interests:** Collecting or using the information is necessary when someone's life or health is at urgent or serious risk (for example, in a medical emergency).
- **Legal obligation:** Where necessary to comply with a legal or regulatory obligation, such as an order from a court or a requirement to report a crime.

Special category and criminal offence data:

Data protection law requires an additional legal basis to use special category or criminal record information. We process this under the following conditions:

- **Non-profit activities:** We process sensitive data in the course of our legitimate activities as a non-profit body. This applies to information about our service users, provided we do not share it externally without your knowledge or consent.
- **Explicit Consent:** Where you have given us clear, written permission to process your health data for specific aspects of your care or to share it with named third parties (such as your GP).
- **Substantial public interest:**
 - **Safeguarding:** To protect individuals at risk from neglect or physical, mental, or emotional harm.
 - **Criminal Offence Data:** We process information about criminal convictions or allegations (committed by or against an individual) where necessary for safeguarding purposes or to ensure the safety of our staff and other service users.

- **Social protection:** Where processing is necessary for the purposes of social protection law, such as supporting your access to statutory rights, health and social care services, or government benefits.
- **Vital interests:** Where processing is necessary to protect your life or someone else's when you are physically or legally incapable of giving consent.

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10. For Employees:

Where we get personal information from:

You choose to provide Headway Bristol with some information when you apply for your role, during interview or assessment, during pre-employment checks, and when you update your personal details each year of your employment. You may also provide personal information during your regular supervisions with line managers and in the course of work.

We may also collect information from:

- Recruitment agencies.
- Referees.
- Relevant professional bodies.
- The UK's Disclosure and Barring Service.
- Providers of occupational health services.
- Credit reference agencies.
- HMRC, DWP and other statutory agencies.

What information we collect:

We may collect and use personal data. This could include:

- Identity data: Name, date of birth and National Insurance number
- Contact data: Your address, email, and telephone numbers, as well as emergency contact details for next of kin.
- Contact we have had with you.
- Photos, videos and audio recordings (these fall under a separate media release statement provided to staff.)

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- Information about how you use the Headway Bristol website, the device you use to access it, your IP address and access location.
- Records of your attendance and timekeeping, (such as attendance at events, training and places of work)
- Details from your CV and job application, including education, qualifications, relevant experience and whether you have a car and full driving licence
- Records of your interview(s) and any tests
- Details of referees/references
- Your role title, salary and contract
- Information that arises during reporting and managerial processes (e.g. performance reviews)
- Career details such as role and job description changes
- Information about training received and policies signed
- Information from procedures relating to disciplinary, grievance and capability issues
- Your bank account details (for pensions and salary)

We may also collect and use the following types of special category (sensitive) data:

Diversity information: Your race, religion, or sexual orientation.

- During your application, interview and work, you may disclose (or we may have a legal requirement to collect) information that could be deemed special category (sensitive) data, depending on the context. This is likely to be.
- Leave and attendance records: Information regarding past leaves of absence (e.g., maternity or sickness) to verify employment history or to ensure we can support your wellbeing.
- Information for records at work, for example about accidents or health and safety incidents.
- Health and disability information: To ensure we meet our legal duty to provide reasonable adjustments during recruitment and appointment process and to assess your fitness for the specific requirements of the role.
- **Criminal record data:** Where a role requires a DBS check, we process information about criminal convictions or offences. We handle all such data in accordance with our **Appropriate Policy Document**.

Legal identity and right to work:

- We also have a legal requirement to collect information to establish your **right to work** (e.g., passports, visas, and national identifiers). While these documents are processed

to verify your identity, we recognise they may incidentally reveal sensitive information such as your nationality or ethnic origin.

How and why your information is used:

- To employ you, we need to use your personal data. This is to fulfil the various practical and legal requirements related to the administration of your contract of employment.

How we communicate with you (letter, email, phone, text):

- Most of our contact with you to collect this data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.

Where your information is kept & how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so. They are retained for the duration of an individual's employment, and then securely disposed of after a set period, which varies according to the kind of data.

Record Type	Retention Period
General personnel files	6 years after employment ends
Payroll & tax	6 years plus current financial year
Statutory sick pay	3 years from end of tax year
Maternity / paternity leave	3 years from end of tax year
Unpaid parental leave	Up to 18 years (until child is 18)
Working time records	2 years from the date they were established
Right to work checks	2 years after employment is terminated
Accident report	3 years minimum
Hazardous exposure	40 years

- While you have the right to request the erasure of your data, please be aware that as an employee, we have statutory and insurance obligations to retain your core records for 6 to 7 years after you leave the charity. During this time, your data will be securely

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archived and only accessed if required for legal, tax, or safeguarding purposes. Records related to workplace injuries or pension data may need to be kept for much longer (up to 40 years) for insurance purposes.

Who accesses your information:

- We strictly limit access to your personal data to those who require it to perform their professional duties. All our staff are subject to confidentiality agreements.

Internal:

Within the organisation, your information may be accessed by:

- Staff performing a HR role: For managing your employment contract, recruitment, onboarding and personnel files.
- Staff performing a payroll and finance role: To process your salary, expenses, tax contributions (PAYE) and pension records.
- Your line manager: For day-to-day management, performance appraisals and addressing any workplace issues or grievances.
- Staff performing IT roles: For the administration of your work accounts, system security and monitoring of company equipment.
- Senior management and trustees: In limited circumstances, such as for strategic planning or during complex disciplinary or legal matters.

External/Third Parties:

We may share your data with external organisations where it is necessary for your employment or required by law:

- Nominated referees: We will only contact your referees to verify your employment history if you are a finalist or have been made a conditional offer.
- HM Revenue & Customs: For tax and National Insurance purposes.
- Pension providers: To manage and administer your workplace pension scheme.
- Benefit providers: Such as health insurance companies or childcare voucher schemes.
- Occupational health: To support your health and wellbeing in the workplace or to manage sick pay.

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- Regulatory and legal bodies: Including the Information Commissioner's Office, the police (if required for the prevention or detection of crime) or the Equality and Human Rights Commission.
- recruitment laws.
- Professional advisers: Such as external lawyers, auditors or consultants.
- Third-party service providers: Such as payroll processors, IT hosting services, online questionnaires or background check providers.

We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

Data Safeguards:

- All individuals or organisations who access your data are subject to a duty of confidentiality. We ensure that third-party providers have adequate security measures in place to protect your information.

Emergency Situations:

In the event of an emergency involving your health, safety or wellbeing, your information may be shared with:

- Emergency services and healthcare professionals: To provide medical assistance or mitigate risk of serious harm to you or others.
- Your nominated emergency contact (next of kin): We may contact them to provide support or notify them of your situation. We will only share information that is necessary and proportionate to the circumstance.

Our lawful basis for collecting & processing your data:

We process your personal data and special category data only when the law allows us to. Most commonly, we rely on the following legal grounds:

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- **Performance of a contract:** We process your data to fulfil our obligations under your employment contract, such as paying your salary, managing holiday entitlement, and ensuring compliance with signed confidentiality agreements.
- **Legal obligation:** We process data to comply with UK law, such as reporting tax to **HMRC**, checking your right to work in the UK, or meeting health and safety requirements.
- **Legitimate interests:** We may process data for our legitimate business interests, such as monitoring IT security, conducting performance reviews, and protecting the charity's reputation and assets, provided these interests are not overridden by your privacy rights.

Special Category & Criminal Offence Data:

Sensitive data - such as health information, trade union membership, or ethnic origin – and criminal record data require a higher level of protection. We process this under the following conditions:

- **Employment, social security and social protection:** To perform our statutory duties as an employer, such as managing statutory sick pay, maternity pay, or making reasonable adjustments for a disability under the **Equality Act 2010**.
- **Substantial public interest:**
 - **Criminal Record Data:** We carry out DBS checks to ensure the safety of our beneficiaries and the integrity of our services.
 - **Safeguarding:** We keep records of safeguarding concerns or incidents to protect individuals at risk.
 - **Equality Monitoring:** We may process sensitive data for equality of opportunity monitoring or to prevent fraud.
- **Vital interests:** In rare cases, we may share health data with emergency services to protect your life if you are physically or legally incapable of giving consent.

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11. For Trustees:

Where we get personal information from:

- You choose to provide Headway Bristol with some information when you apply for your position, during interviews and assessments, during pre-employment checks and when

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you update your personal details and conflict of interests document each year you hold office. Once in post, you may also provide personal information during regular meetings with our CEO and in the course of your duties.

We may also collect information from:

- Recruitment agencies.
- Referees.
- Relevant professional bodies.
- UK institutions and registers such as Disclosure and Barring Service, the Charity Commission Register, Companies House and the Insolvency Service.
- Providers of occupational health services.
- Credit reference agencies.
- HMRC, DWP and other statutory agencies.

What information we collect:

We may collect and use personal data. This could include:

- Identity data: Name, date of birth and Companies House personal code.
- Contact data: Your address, email, and telephone numbers, as well as emergency contact details for next of kin.
- Contact we have had with you.
- Photos, videos and audio recordings (these fall under a separate media release statement provided to trustees.)
- Information about how you use the Headway Bristol website, the device you use to access it, your IP address and access location.
- Records of your attendance and timekeeping, (such as attendance at events, training and places of work)
- Copies of documentation required to prove your identity and help us complete legal checks to show you are a fit and proper person and not disqualified in any way.
- Details from your CV and job application, including education, qualifications and relevant experience.
- Records of your interview(s) and any tests
- Details of referees/references
- Information that arises during reporting and managerial processes
- Details relating to your role, such as title and tenure
- Information about training received and policies signed

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- Information from procedures relating to disciplinary, grievance and capability issues
- Your bank account details (for expenses)

We may also collect and use the following types of special category data, which you may provide when completing staff surveys or giving updates.

- Information to assess our organisation's diversity, equity and inclusion (e.g. information about gender, race and sexual orientation).

During your application and interview, you may disclose (or we may have a legal requirement to collect) information that could be deemed special category data, depending on the context. This is likely to be

- Health and disability information: To ensure we meet our legal duty to provide reasonable adjustments during recruitment and appointment process and to assess your fitness for the specific requirements of the role.
- Attendance records: Information regarding past leaves of absence for the purposes of good governance and to ensure we can carry out our duty of care to your wellbeing.
- Information for records at work, for example about accidents or health and safety incidents

Identity and eligibility to act:

- We have a legal requirement to ensure our trustees are eligible to serve. This includes:
 - Identity Verification: To comply with Companies House requirements (where applicable), trustees must verify their identity using the official government service.
 - Eligibility Checks: We collect information (e.g., passports or visas) to ensure you are not disqualified from acting as a trustee and that your immigration status permits you to hold this position.
- While these documents are processed primarily to verify your identity and legal eligibility, we recognise they may incidentally reveal sensitive information such as your nationality or ethnic origin.

How & why your information is used:

- To administer your volunteering role and fulfil the various practical and legal requirements related to it, we need to use your personal data.

How we communicate with you (letter, email, phone, text):

- Most of our contact with you to collect this data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.

Where your information is kept & how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so. We retain trustee information only for as long as is necessary to satisfy the purposes for which it was collected, including legal, accounting or reporting requirements. Our retention schedule is as follows:

Record Type	Retention Period
Trustee personnel files (Contact info, CV, ID)	6 years after the trustee leaves
Trustee meeting minutes	Permanently
Conflict of interest forms	10 years from date of entry
Trustee eligibility declarations	6 years after trustee leaves
DBS certification information	6 months (record only that a check was satisfactory)
Expense claims and receipts	6 years from end of financial year
Unsuccessful Trustee applications	6-12 months after recruitment window
Statutory filings (e.g. annual returns)	If the charity exists (kept by charity commission)

- For trustees, the right to erasure is not an absolute right. You can request to be removed from marketing communications, and to have data deleted that is excessive or beyond the retention period. It is not possible to delete data pertaining to the following areas
- Legal obligations: We are legally required to keep trustee names and appointment dates for the Charity Commission or Companies House.
- Public interest/official authority: Maintaining a record of who governed the charity is considered a matter of public accountability.
- Legal claims: We need the records to defend the charity against future legal challenges (protected by the Limitation Act 1980).

- Permanent archives: Minutes of meetings documenting board decisions are usually exempt from erasure because they form the 'historical record' of the organisation.

Who accesses your information:

We strictly limit access to your personal data to those who require it to perform their professional duties. All our staff are subject to confidentiality agreements.

Internal:

- The CEO (as primary 'data custodian' for the board), who manages the Register of Trustees, coordinates meetings, handles Companies House or Charity Commission filings and ensures conflict of interest forms are updated. They also report directly to the board.
- Senior staff, who need contact details to send board papers, invite trustees to events or contact them in an emergency.
- Finance Manager, who oversees the charity's accounts, processes expense claims, verifies bank mandate signatories and includes required trustee names in the Annual Report and Accounts.
- Staff performing HR roles, who may support with the logistics of recruitment, conducting DBS checks, and maintaining the physical or digital 'personnel' files for the trustees.

External/Third Parties:

- External regulator, auditors and official oversight bodies, including
 - Auditors, who will check 'related party transactions' (making sure trustees aren't unfairly profiting).
 - Charity Commission, who will access the names and addresses of 'the persons in control' for the public register,
 - The Board of Trustees, who may see the Register of Interests of their fellow board members to ensure transparent decision-making and manage potential conflicts during meetings.
- Regulatory and legal bodies: Including the Information Commissioner's Office or the police if required for the prevention or detection of crime.
- Professional advisers: Such as external lawyers, auditors or consultants.
- Third-party service providers: Such as online questionnaires or background check providers.
- Nominated referees: We will only contact your referees to verify your employment history if you are a finalist or have been made a conditional offer.

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We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

Data Safeguards:

- All individuals or organisations who access your data are subject to a duty of confidentiality. We ensure that third-party providers have adequate security measures in place to protect your information.

Emergency Situations:

In the event of an emergency involving your health, safety, or wellbeing, your information may be shared with:

- Emergency services and healthcare professionals: To provide medical assistance or mitigate risk of serious harm to you or others.
- Your nominated emergency contact (next of kin): We may contact them to provide support or notify them of your situation. We will only share information that is necessary and proportionate to the circumstance.

Our lawful basis for collecting & processing your data:

- We process your personal data and special category (sensitive) data only when the law allows us to. Most commonly, we rely on the following legal grounds:

Personal Data:

- **Legal obligation/Safeguarding:** As a registered charity, we must process certain data to comply with the Charities Act 2011 and safeguarding legislation. This includes:
 - Maintaining a Register of Trustees and reporting to the Charity Commission (and Companies House if applicable).
 - Performing DBS checks and maintaining safer recruitment records to ensure our 'controllers' are fit to serve.
- **Legitimate interests:** We process trustee data to ensure the effective governance and safe operation of the charity. This includes:

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- Communicating board papers and strategic updates.
- Managing conflicts of interest to protect the charity's reputation.
- Promoting the charity by listing trustee names and biographies in our Annual Report or on our website.
- Reimbursing out-of-pocket expenses incurred while performing board duties.

Special Category (sensitive) Data:

Where we process more sensitive information (such as health data for accessibility or criminal record checks), we do so under:

- **Statutory purposes:** To comply with the Equality Act 2010 (e.g. to make reasonable adjustments for meetings).
- **Substantial public interest:** Specifically for safeguarding individuals at risk, 'Integrity of Professional Bodies' or 'Protective Functions' regarding the suitability of individuals to run a non-profit organisation.

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12. For Volunteers:

Where we get personal information from:

- You choose to provide Headway Bristol with some information when you apply for your position, during interviews and assessments, during pre-employment checks and when you update your personal details each year of your involvement with the charity. Once in post, you may also provide personal information during regular supervisions with our Volunteer Coordinators and other staff.

We may also collect information from:

- Referees.
- Relevant professional bodies.
- UK institutions and registers such as Disclosure and Barring Service.

If a former service user applies to become a volunteer, we employ a 'fresh start' approach. This includes:

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- A standardised interview: all applicants are asked the same set of questions, which are based on the role description.
- Opportunity to disclose applicants can choose what they share. If they want to discuss how their lived experience as a service user makes them a better volunteer, they can bring it up.
- Separate Panels: Where possible, staff conducting interviews are not those who knew the individual as a service user.
- Explicit Consent: If we need to verify something from their past involvement with Headway Bristol, then we will ask the applicant for written permission to access those specific records for recruitment

What information we collect:

We may collect and use personal data. This could include:

- Identity data: Name and date of birth.
- Contact data: Your address, email, and telephone numbers, as well as emergency contact details for next of kin.
- Contact we have had with you.
- Photos, videos and audio recordings (these fall under a separate media release statement provided to volunteers.)
- Information about how you use the Headway Bristol website, the device you use to access it, your IP address and access location.
- Records of your attendance and timekeeping, (such as attendance at events, training and places of work)
- Details from your application for the role, including education, qualifications and relevant experience.
- Records of your interview(s)
- Details of referees/references
- Information that arises during reporting and managerial processes
- Details relating to your role, such as title and duration of your association with Headway Bristol.
- Information about training received and policies signed
- Information from procedures relating to disciplinary, grievance and capability issues

We may also collect and use the following types of special category data, which you may provide when giving information, completing staff surveys or giving updates.

- Information to assess our organisation's diversity, equity and inclusion (e.g. information about gender, race and sexual orientation).

During your application and interview, you may disclose (or we may have a legal requirement to collect) information that is **sensitive in nature**, depending on the context or content. This is likely to be:

- **Health and disability information:** To ensure we meet our legal duty to provide reasonable adjustments and to assess your fitness for the role.
- **Attendance records:** Information regarding past leaves of absence (e.g., maternity or sickness) to verify **previous volunteering or work** history or support your wellbeing.
- **Workplace incidents:** Information for records at work, such as accidents or health and safety incidents.
- **Identity and eligibility:** We collect information (such as passports or visas) to verify your identity and ensure your immigration status allows you to volunteer with us. While these are processed to verify identity, we recognise they may incidentally reveal sensitive information like nationality or ethnic origin.
- **Criminal record data:** Where a role requires a DBS check, we process information about criminal convictions or offences. We handle all such data in accordance with our **Appropriate Policy Document**.

How & why your information is used:

- To administer your volunteering role and fulfil the various practical and legal requirements related to it, we need to use your personal data.

How we communicate with you (letter, email, phone, text):

- Most of our contact with you to collect this data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.

Where your information is kept and how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so. We retain trustee information only for as long as is

necessary to satisfy the purposes for which it was collected, including legal, accounting or reporting requirements. Our retention schedule is as follows:

Record Type	Retention Period
Volunteer File	6 years post departure
Unsuccessful applications	6-12 months minimum
Accident reports	3 years minimum
Visa/Right to volunteer	Duration of service

- While you have the right to request the erasure of your data, please be aware that as a volunteer, the right to erasure is limited by our need to retain records for safeguarding and insurance purposes. We maintain core volunteer files for 7 years to ensure we can defend the charity against potential legal claims or address historic safeguarding enquiries.

Who accesses your information:

- We strictly limit access to your personal data to those who require it to perform their professional duties. All our staff are subject to confidentiality agreements.

Internal:

Within the organisation, your information may be accessed by:

- Staff performing the Volunteer Coordinator role: For managing your recruitment, onboarding, training, personnel files, performance appraisals and addressing any workplace issues or grievances.
- Staff performing IT roles: For the administration of your work accounts, system security and monitoring of company equipment.
- Senior management and trustees: In limited circumstances, such as for strategic planning or during complex disciplinary or legal matters.

External/Third Parties:

We may share your data with external organisations where it is necessary for your employment or required by law:

- Nominated referees: We will only contact your referees to verify your employment history if you are a finalist or have been made a conditional offer.
- Occupational health: To support your health and wellbeing in the workplace.
- Regulatory and legal bodies: Including the Information Commissioner's Office or the police if required for the prevention or detection of crime.
- Professional advisers: Such as external lawyers, auditors or consultants.
- Third-party service providers: Such as IT hosting services, online questionnaires or background check providers.
- Staff managing educational programmes you are enrolled in, if your voluntary work forms a part of this.

We do not sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

Data safeguards:

All individuals or organisations who access your data are subject to a duty of confidentiality. We ensure that third-party providers have adequate security measures in place to protect your information.

Emergency situations:

In the event of an emergency involving your health, safety, or wellbeing, your information may be shared with:

- Emergency services and healthcare professionals: To provide medical assistance or mitigate risk of serious harm to you or others.
- Your nominated emergency contact (next of kin): We may contact them to provide support or notify them of your situation. We will only share information that is necessary and proportionate to the circumstance.

Our lawful basis for collecting and processing your data:

- We process your personal data and special category (sensitive) data only when the law allows us to. Most commonly, we rely on the following legal grounds:

Personal data:

- Legal obligation: We process certain information because we are legally required to do so by UK law. This includes checking your right to volunteer (visas/immigration status) and maintaining health and safety records (such as an accident book).
- Legitimate interests: Necessary for our day-to-day management as a charity, including coordinating tasks, reviewing applications, and maintaining training records.
- Vital interests: Storing emergency contact details to protect your life or health in the event of a serious incident while volunteering.

Special category and criminal offence data:

- Sensitive data, such as health information or criminal record data, requires a higher level of protection. We process this under the following conditions:
- Employment, social security and social protection: To comply with the Equality Act 2010, such as making reasonable adjustments for a disability or health condition.
- Substantial public interest:
 - Criminal Record Data: Carrying out DBS checks to ensure the safety of our beneficiaries and the integrity of our services.
 - Safeguarding: Keeping records of any safeguarding concerns or incidents to protect adults at risk.

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13. For student placements:

- For student placements, many of the details about data collection and processing will be just the same as those that apply to volunteers, outlined in the section above. However, unlike standard volunteering, your student placement is a part of your formal education. To support your learning and meet the requirements of your course, we will share certain information with your university, college or training provider.

What we share:

We will share information with your tutor, placement coordinator or clinical lead regarding:

- **Attendance and hours:** To verify you have completed the required time for your qualification.
- **Performance and progress:** Providing feedback on your skills, competencies and how you are meeting your learning objectives.
- **Supervision records:** Summary notes from your formal supervision or mentor sessions.
- **Health and safety/safeguarding:** Any incidents or concerns that occur during your placement that may affect your wellbeing or your ability to carry out your role.

Lawful basis for sharing:

We share this information based on **Performance of a Contract** (to fulfil the placement agreement between you, us, and your university) and our **Legitimate Interest** in ensuring you receive the necessary professional support to qualify for your chosen career.

Sensitive information:

If you have requested **reasonable adjustments** due to a disability or health condition, we will only share the details of those adjustments with your university with your **explicit consent**, or where it is necessary to ensure your safety across both environments.

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14. For job applicants:

Where we get personal information from:

- You choose to provide Headway Bristol with some information when you apply for your role, during interviews and assessments, and subsequently by email during pre-employment checks.

We may also collect information from

- Recruitment agencies.

- Referees.
- Relevant professional bodies.
- The UK's Disclosure and Barring Service.
- Credit reference agencies.
- HMRC, DWP and other statutory agencies.

What information we collect:

We may collect and use personal data. This could include:

- Identity data: Name and date of birth.
- Contact data: Your address, email and telephone number.
- Contact we have had with you.
- Details from your CV and job application, including education, qualifications, relevant experience and whether you have a car and full driving licence
- Records of your interview(s) and any tests
- Details of referees/references

During your application and interview, you may disclose (or we may have a legal requirement to collect) information that could be deemed special category (sensitive) data, depending on the context. This is likely to be

- Leave and attendance records: Information regarding past leaves of absence (e.g., maternity or sickness) to verify employment history or to ensure we can support your wellbeing.
- Information regarding health and safety incidents (e.g. accidents that occur during the interview or assessment process).
- Health and disability information: To ensure we meet our legal duty to provide reasonable adjustments during recruitment and appointment process and to assess your fitness for the specific requirements of the role.
- **Criminal record data:** Where a role requires a DBS check, we process information about criminal convictions or offences. We handle all such data in accordance with our **Appropriate Policy Document**.

Legal identity and right to work:

- We also have a legal requirement to collect information to establish your **right to work** (e.g., passports, visas, and national identifiers). While these documents are processed

to verify your identity, we recognise they may incidentally reveal sensitive information such as your nationality or ethnic origin.

How and why your information is used:

- To manage your application, we need to process certain personal information about you. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements.

How we communicate with you (letter, email, phone, text):

- Most of our contact with you to collect this data will be in person, by letter, email (either directly or via forms that are completed and shared), over the telephone or in online meetings.

Where your information is kept and how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so. We retain information only for so long as is necessary to satisfy the purposes for which it was collected, including legal, accounting, or reporting requirements. Our retention schedule is as follows:

Applicant Type	Retention Period
Unsuccessful candidates	6-12 months
Talent pool	Until consent is withdrawn (usually reviewed every 2 years)

- If you apply for a role at Headway Bristol and are unsuccessful, we will usually retain your application and interview notes for **12 months**. While you have the right to request erasure, we may retain this information for the duration of this period to ensure we can demonstrate a fair recruitment process and defend against potential legal claims under the Equality Act 2010.

Who accesses your information:

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- We strictly limit access to your personal data to those who require it to perform their professional duties. All our staff are subject to confidentiality agreements.

Internal:

Within the organisation, your application is accessed by:

- Staff performing recruitment roles. To coordinate your application, communicate with you, and manage your candidate file, assess your suitability for the role, review your experience and record interview notes.
- Senior management/Trustees: In limited cases where high-level approval is required for a specific appointment or to oversee fair recruitment practices.

External Third Parties:

We only share your data with external organisations when it is necessary for the recruitment process or required by law:

- Nominated referees: We will only contact your referees to verify your employment history if you are a finalist or have been made a conditional offer.
- Professional advisers: Such as legal counsel, should we need to defend against a legal claim related to the recruitment process.
- Regulatory and legal bodies: Including the Information Commissioner's Office or the Equality and Human Rights Commission (EHRC) if we are required to demonstrate our compliance with recruitment laws.

Data security:

- We do not sell your data to third parties. All external providers are contractually bound to process your data securely and only for the purposes we have specified.

Emergency situations:

- In the event of an emergency involving your health, safety or wellbeing, your information may be shared with emergency services and healthcare professionals to provide medical assistance or mitigate risk of serious harm to you or others.

Our lawful basis for collecting and processing your data:

- We only process your personal data and special category (sensitive) data when the law allows us to. For job applicants, we rely on the following legal grounds:

Personal data:

- Performance of a contract: To take steps at your request prior to entering into an employment contract (e.g., assessing your CV and inviting you to an interview).
- Legal obligation: To comply with UK law, such as verifying your Right to Work in the UK or meeting our statutory safeguarding duties.
- Legitimate interests: To manage the recruitment process efficiently, ensure we hire the right person for the role, and defend against legal claims, provided these interests do not override your rights.

Special category and criminal offence data:

- Sensitive data requires a higher level of protection. We process this under the following conditions:
- Employment, social security and social protection: To process health data for reasonable adjustments during the recruitment process, or to assess fitness for the specific requirements of the role.
- Substantial public interest:
 - Criminal Offence Data: We process information about criminal convictions (DBS checks) because it is necessary to protect the safety and wellbeing of our service users.
 - Equality of Opportunity: We process diversity monitoring data (e.g., race or disability) to ensure we are an equal opportunities employer, where you have chosen to share this with us.
 - Statutory Requirements: To process identity documents that may incidentally reveal sensitive information (like nationality) in line with our legal duties.

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15. For Referees:

Where we get personal information from:

- An applicant for a role at Headway Bristol will have provided us with your personal details and indicated that you are a suitable referee.

What information we collect:

Our application form requests they provide your:

- Name
- Address
- Telephone number
- Email address
- The capacity in which they know you

How and why your information is used:

- We use this information to gather references for our applicant.

How we communicate with you (letter, email, phone, text):

- In almost all cases we will email you, but in some instances, we may contact you by phone.

Where your information is kept and how long for:

- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so. We retain information only for so long as is necessary to satisfy the purposes for which it was collected, including legal, accounting or reporting requirements. Our retention schedule is as follows:

Applicant Type	Retention Period
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Unsuccessful candidates	6 months
Successful candidate	6 years after the individual's employment ends
Talent pool	Until consent is withdrawn (usually reviewed every 2 years)

- If you exercise your right to erasure, we will keep some basic personal data to make sure we do not contact you or inadvertently process your data again in future.
- References provided in confidence are generally exempt from subject access requests to protect your privacy.

Who accesses your information:

We strictly limit access to your personal data to those who require it to perform their professional duties. All our staff are subject to confidentiality agreements. Within the organisation, your information may be accessed by:

- Staff performing recruitment roles. Including those coordinating recruitment, communicating with the applicant and referees, assessing the candidate's suitability for the role, review their experience and record interview notes.
- Senior management/Trustees: In limited cases where high-level approval is required for a specific appointment or to oversee fair recruitment practices, these staff may have access to information from applications.

Our lawful basis for collecting and processing your data:

- We only process your personal information when the law allows us to. For processing the names and contact information of referees, we rely on the following legal grounds:

Personal data:

- **Legitimate interests:** It is in our legitimate interest as an employer to verify an applicant's employment history, qualifications and suitability for the role to ensure we make informed hiring decisions. This includes performing 'safer recruitment' checks to ensure the safety and wellbeing of the vulnerable adults we support. We also have a legitimate interest in processing your contact details for this purpose, as provided to us by the applicant.

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16. For Supporters:

- This section applies to those involved in fundraising for and donations to Headway Bristol.

Where we get personal information from:

- You choose to provide Headway Bristol with some information. For example, if you donate to us, fundraise for us, purchase an item from us, take part in an event or agree to receive updates then we collect information about you.
- Some information may come from third parties. These could include fundraising websites like JustGiving, event organisers, or our banks and payment processors.

What information we collect:

We may collect and store personal information. This could include:

- Identity data: Name and date of birth.
- Contact data: Your address, email, and telephone numbers.
- Engagement: Records of contact we have had with you and past donations to Headway Bristol.
- Digital: Website usage, IP address, and access location.
- Financial: Credit card and/or bank details. (If you donate through JustGiving, your card data is processed by them, and we do not see it.)
- Gift Aid: Whether you are a UK taxpayer so we can claim Gift Aid.
- Feedback & Participation: Any information you share via event feedback forms or surveys.
- Media: Photos and recordings of events. If an event is being recorded, we will advertise this and explain how you can opt out (this is managed in line with our separate media release statement).

We are unlikely to collect special category data frequently, however, we may collect:

- **Accessibility and Health:** Information regarding accessibility requirements, allergies, or health conditions for certain activities to ensure your safety and comfort. In each case, we will explain exactly how this information will be used and why it is needed.

How and why your information is used:

- We gather and use only the minimum amount of information we need to enable you to donate to us, fundraise for us, purchase an item from us, take part in an event and/or receive updates about opportunities to support us. We would do otherwise only in exceptional circumstances, e.g. if your health or safety or the health and safety of another was at risk, or if disclosure of information is required by law.
- Our ability to provide safe and appropriate events depends on the information provided by those who wish to attend. If potential attendees are uncomfortable with the kind or detail of the information we require, then we are happy and willing to discuss this and explain further why we request the information and how it is used or stored. Regrettably, we may refuse potential attendees access to events if we don't have information we need to run them safely and suitably.
- If we wish to use your information in any other way, then this would be the subject of a separate agreement. We will always ask for your explicit consent beforehand and explain what your options are if you change your mind. You are welcome to refuse these requests.
- You choose if and how you wish to receive information from us. When we collect your information, there will be options that allow you to opt in to direct marketing communications from us about the work we do for brain injury survivors, fundraising appeals, products and services you can buy and other opportunities to support us.

How we communicate with you (letter, email, phone, text):

- Your details are kept on a list, and we aim to contact you only so much as is required to keep you updated about the specific option(s) you select, and only in the manner(s) you selected when initially providing consent.
- You can contact us at any time if you wish to change your preferences or unsubscribe.
- Most of our contact with you to collect data will be in person, by letter or email (either directly or via forms that are completed and shared) or over the telephone.

Where your information is kept and how long for:

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- We keep both electronic and paper records. These records are secure, accessed only by those who need to do so, and securely disposed of after a set period.
- Event attendees: In general, we store data about event attendees for one year, to handle feedback, queries, and future, related invitations. We may retain certain health and safety records, such as accident reports or event attendance logs, for up to 7 years (or longer in the case of minors). This is to ensure we can meet our legal obligations and defend against potential insurance or legal claims under the Limitation Act 1980. We will only keep the minimum information necessary for this purpose and will not use it for any other reason.
- Donations: We retain payment and finance records for 7 years for HMRC and audit purposes.
- If you have told us that you don't wish to be contacted for marketing purposes, we will keep your information on a suppression list.
- We respect your right to be forgotten and will always do our best to honour a request to erase your data wherever possible. However, because we must comply with legal, tax, and insurance requirements, this right is not absolute.
- If you ask us to delete your information, we will review your request carefully. If we cannot fulfil it, for example, because we are legally required to keep a record, we will write to you to explain exactly why.

Who accesses your information:

- We strictly limit who can access your personal information to those who have a genuine need to see it. All our staff are subject to confidentiality agreements. We do not sell or rent your data to third parties for marketing purposes.

Within our organisation:

Your information is accessed by our authorised staff and volunteers only where it is necessary for their role. For example:

- Staff performing **finance and fundraising roles** access donation records to process Gift Aid and manage our relationship with you.
- Our **event coordinators** access booking and accessibility information to ensure activities are run safely and effectively.

Outside our organisation:

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We may share your information with trusted third parties to meet our legal duties or to help deliver our services:

- **HMRC:** To process Gift Aid claims and meet our financial reporting obligations.
- **Event partners and venues:** We share minimal information (such as your name and any specific accessibility or dietary requirements) with venue staff to ensure your needs are met during an event.
- **Service providers:** We use trusted companies to perform tasks on our behalf, such as secure payment processors for your donations or email service providers to send you newsletters you have requested.
- **Professional advisers:** Where necessary, we may share information with our auditors, legal advisers or insurers.
- **Regulators and law enforcement:** We may share information with the Charity Commission, the Information Commissioner's Office (ICO) or the police if we are legally required to do so.
- **Your Nominated Emergency Contact** (next of kin) where required/provided: We may contact them to provide support or notify them of your situation. We will only share information that is necessary and proportionate to the circumstance.

Our lawful basis for collecting and processing your data:

For Financial Support & Donations:

Personal data:

- **Legal obligation:** We process your name, address, and donation history to comply with statutory duties, such as maintaining financial records and processing Gift Aid claims for HMRC.
- **Legitimate interests:** It is in our legitimate interest to manage our relationship with you, record your history of support, and send you information about our work by post, provided this does not override your privacy rights.

For Attending Events & Activities:

Personal data:

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- Performance of a contract: When you book a ticket or register, we process your information to fulfil our agreement with you (e.g., sending joining instructions or processing your booking).
- Legitimate interests: We process your data to administer the event effectively and ensure the safety and security of all participants.
- Consent: We rely on your consent to send you marketing communications or newsletters following the event. You have the right to withdraw this consent at any time.

Special category and criminal offence data:

- Explicit consent: Where you voluntarily provide health, disability, or accessibility information, we process this based on your explicit consent so we can make necessary adjustments.
- Substantial public interest: We may also process health data where it is necessary for safety or safeguarding purposes (e.g., managing severe allergies or ensuring the wellbeing of participants) in accordance with our duty of care.

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17. For Filling in Surveys:

- From time to time, we may invite you to complete surveys hosted on our website to gather your views on our digital platforms, services or activities. When you participate, we collect the information you choose to provide in your responses.
- **How we collect your data:** Our surveys are built using **Microsoft Forms** and are embedded or linked directly on our website. Participation is always entirely voluntary.
- **What we collect:** Most of our surveys can be completed anonymously. However, depending on the purpose of the survey, you may optionally choose to provide your contact details (such as your name and email address) – for example, if you wish for us to follow up on your comments.
- **How we use your information:** We use survey responses to analyse performance, improve our website and develop our services. If you choose to provide contact details, we will only use them for the specific purpose stated in that survey (e.g., to follow up on your feedback).
- **Data retention:** We store survey responses and any associated contact details for a maximum period of **1 year** from the date of submission, after which the data is permanently deleted.
- **Data sharing and security:** Your responses are securely stored within our Headway Bristol Microsoft 365 environment and are only accessible by authorised staff. We do not sell or share your personal details with third parties.

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18. How to Complain:

- If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.
- If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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