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This Statement is informed by:  
Aiseiri Data Protection Policy and Procedures  
Aiseiri Data Retention and Destruction Policy & procedures

## **Introduction**

The Aiseiri Group is a not for profit organisation with its registered office at. We work directly with you to offer addiction treatment and support services. We respect your privacy and are dedicated to ensuring that services we provide, reflect our commitment to treat all information shared with us with the utmost respect, sensitivity and confidentiality.

If you have any queries regarding the processing of your data you can contact the Data Protection Officer.

## **Purpose of this Privacy Statement**

We require certain information about you in order to be able to enter into a contract with you to provide our services to you. Therefore, we collect certain data about you at your initial contact, the assessment process, on admission and during the treatment programme, including after care.

This Privacy Statement describes what type of data we collect from you, how we will use your data in the provision of our services, and your rights in relation to how it is used.

## **Data Privacy Commitment**

We are committed to a high standard of protecting the privacy of your personal information.

All information we process about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for the purposes that we have clearly explained to you
- Relevant to the purposes we have told you about and only limited only to those purposes
- Accurate and kept up to date
- Kept only for as long as necessary for the purposes we have told you about
- Kept securely.

In Aiseiri we take the security of the information you entrust to us extremely seriously and that includes information which is personal to you, and those around you such as your family or next of kin.

## **What information does Aiseiri collect about me?**

Personal data is any information which identifies you, whether directly, (for example, your name), or indirectly, (for example, a case reference number, address, date of birth). All of the personal data which we collect is obtained from you directly, for example in writing by completing a form, making an enquiry or verbally during a session. We may also have information from persons you consent to supporting your assessment and treatment programme.

There are 3 key stages in the assessment and counselling treatment process that are relevant to the collection of your information:

- a) First Contact
- b) Assessment Process
- c) Treatment Programme including Recovery Support services

The personal data which we collect varies as you progress through each stage of the process and may include information which is considered to be 'special category data' such as information on your health, sex life, religious beliefs or political opinions. A general overview of the information which we collect at each stage is set out in the following table for ease of reference.

<b>First contact</b>	<p>Information at this stage is limited to data which is necessary to ensure a follow up call from one of our counselling team and to arrange an assessment if this is agreed with you. Information included such as your name/s, preferred contact number and possibly, your email address.</p> <p>You may also notify us of any disability or special requirement you may have in anticipation of your attendance.</p>
<b>Assessment Process</b>	<p>At the commencement of the Assessment Process, you will be asked to complete an Assessment Form which includes a section requiring you to provide your written consent to enable us to process your personal data for the purposes of carrying out the assessment. Details includes:</p> <ul style="list-style-type: none"> <li>➤ Name, address and contact details.</li> <li>➤ Name and contact number for an emergency contact person/support person</li> <li>➤ Next of kin/In case of Emergency contact</li> <li>➤ Name and contact details for your G.P.</li> <li>➤ Medical Card number if applicable</li> </ul> <p>An Assessment Questionnaire will be completed with you which includes a history of substance misuse and other elements which will be used to inform your future treatment planning.</p> <p>The information from assessment will be stored in a Client File which will be set up for you and scanned to eCASS.</p> <p>Each client is delegated a Client Number which is noted on your Client Record. Case notes which will be maintained as part of the treatment process.</p>
<b>Treatment</b>	<p>A Client record will be maintained for all clients to include as relevant for you:</p> <ul style="list-style-type: none"> <li>• Initial Contact Form</li> <li>• Assessment Process Records</li> <li>• Admissions Records</li> <li>• Treatment records</li> <li>• Recovery Support Programme Agreements</li> </ul>
<b>Recovery Support</b>	<p>Attendance records will be maintained.</p>
<b>Finance Department</b>	<p>Your personal data will be used to process all payments.</p>
<b>Catering Facilities</b>	<p>Your personal data may need to be shared with our catering facilities to respond to any special dietary requirements you may have.</p>

### **Purposes for which we use your personal data/ Why does Aiseiri need my information?**

Processing personal data is necessary so that we can provide effective addiction treatment services, tailored to the needs of each individual client. When we process your information, we do so to assist with assessment, and monitor progress as part of the treatment programme.

We also maintain records to meet safeguarding requirements for children, young people and adults at risk; to supervise and audit our processes; to gather statistical information for research and future service provision; and to implement robust policies and practice within Aiseiri. These tasks are necessary so that we can fulfil our wider legal obligations in terms of corporate governance, company and charity law.

Please note that information which has been gathered for statistical purposes is always anonymised.

### **What is the legal basis for processing my personal data?**

Aiseiri relies upon your explicit consent as the legal basis to process your personal data and as a condition of any processing activities associated with special category data. This consent is obtained in writing at the assessment stage and at admission before treatment begins.

We also rely upon our legitimate interests as a charitable organisation, compliance with our legal obligations and in extreme scenarios, to safeguard and protect an individual's vital interests.

### **Family Members/Next of Kin/Concerned Persons.**

If you are a family member or next of kin of the service user, the service user may have provided us with certain details about you such as name, address, relationship to service user, contact details in the case of an emergency or where there are safety concerns for the service user or we require you to collect the client on discharge.

Family members/support persons will also be required to be part of the assessment and treatment process.

### **Who has access to my records within Aiseiri.**

Your data is treated in the strictest confidence.

We have stringent protocols in place regarding the handling and storage of personal data.

1. Access to client records is controlled and limited to authorised personnel only, (typically the Clinical team and the Operations Manager).
2. Our administration, catering and finance personnel involved in the management and administration of your contract with us will have access to the information they require to carry out their roles.
3. Other health and/or social care professionals and emergency services where appropriate.

### **Storage and Security.**

Aiseiri will take all appropriate measures to ensure that any personal data about you or any family members or next of kin is held confidentially and securely in Aiseiri files and systems.

All reasonable security measures are taken to prevent unauthorised access or disclosure including a general prohibition against removing client records and case notes from Aiseiri.

All of our Counsellors undergo routine supervision; however, the Supervisor does not have access to any client records.

### **How long does Aiseiri store my information?**

Aiseiri generally shall retain personal data only for the necessary period to comply with applicable legal requirements or as advisable in light of an applicable statute of limitations period.

Client Records are retained for 20 years unless a safeguarding issue has arisen or there is a risk of or ongoing litigation. Client Records are stored in date order for efficient and secure disposal.

Other records – finance etc

Promptly after the applicable storage period has ended, your data shall be:

- Securely deleted and destroyed.
- Anonymised or
- Transferred to storage (unless this is prohibited by law or an applicable records retention schedule).

### **Does Aiseiri share my information with outside third parties?**

We do not share your personal data with any third parties unless one of the following conditions apply:

- (i) you have provided your explicit consent.
- (ii) a disclosure is required by law to a third party such as a Court or Tribunal, a government department or agency or an Garda Síochána, for example: in pursuit of justice in the prosecution of a criminal offence.
- (iii) intervention is necessary for matters of life or death or for the prevention of harm to you or any individual or child.
- (iv) when it is necessary to report an allegation, concern or suspicion of abuse .

In most instances, a request of this nature will not involve direct access to your case file and will instead seek confirmation of your attendance at treatment.

### **Is my personal data transferred outside of the European Economic Area?**

We do not transfer any personal data information outside of the European Economic Area (“EEA”). Anonymised research material may be available to third level institutions outside the EEA including, but not limited to, the USA or Canada.

### **What legal rights do I have in relation to the personal data held about me by Aiseiri?**

Access - You have the right to request a copy of the personal data we hold about you using a Subject Access Request Form which you can access from Aiseiri staff or the Data Protection Officer (details below). We will require written verification of your request and proof of identity. A request made by a third party acting on your behalf, such as your solicitor, must be accompanied by a signed form of consent before any disclosure will be made.

The information furnished may be redacted if it would interfere with the rights of another individual including, but not limited to your spouse, child or other family member.

There is no charge to access this information and a response will be provided within one calendar month.

Rectification or erasure - If any personal data held by Aiseiri is incorrect, incomplete or not processed in compliance with applicable law or this policy, you have the right to have your personal data rectified, deleted or blocked (as appropriate).

Object to processing - You have the right to object to the processing of your personal data on the basis of compelling grounds related to your particular situation.

Data Portability - You have the right to request a copy of your personal data we hold about you in a commonly used and machine-readable format. We can provide your data either to you or to such other third party as you specify in your request.

Consent - If you have provided us with consent to process your data, you can withdraw that consent at any time by informing your counsellor.

### **Keeping your data Accurate, Complete and up to date.**

Please advise us as soon as possible regarding any changes to your data.

### **Who do I contact if I have questions about how Aiseiri handles my personal data?**

If you require any further information or have any queries on this privacy notice or in relation to data privacy in Aiseiri generally please contact:

The Aiseiri Operations Manager or

Data Protection Officer, Townspark, Cahir, Co. Tipperary E21 E206

Tel: 052 7441166 Email: [compliance@aiseiri.ie](mailto:compliance@aiseiri.ie)

Alternatively, further information can be found online via the Office of the Data Protection Commission website [www.dataprotection.ie](http://www.dataprotection.ie)

### **Complaints.**

In Aiseiri we are committed to finding a fair and lawful resolution to any problems or complaints which arise in the course of data processing. Please report any concerns you have to the Data Protection Officer using the above contact details.

The Data Protection Officer will liaise with relevant staff members to deal with the complaint.

If a complaint cannot be resolved by Aiseiri or a client feels that his/her concerns have not been resolved to his/her satisfaction, they have the right to complain to the Data Protection Commission.

## Retention Schedule for Service Users Data

Type of information	Schedule	Final disposition
Initial Contact Forms a) if client does not proceed to assessment b) If client proceeds to assessment	a) 1 month b) Included in Client File	Anonymise or destroy by confidential shredding and delete permanently form systems
Assessment Records a) If client proceeds to treatment b) If client does not proceed to treatment	Retained for a minimum of 1 year following the assessment process including any follow up information regarding non take up of the service	Destroy by confidential shredding and delete permanently from systems
Client Record	Retained for a minimum of 20 years following the end of the care services	Destroy by confidential shredding and permanently deleting from systems.
External referral forms (including HSE referrals)	To be included in the Client Record at assessment and will be retained for the same period as the record itself (see above)	Anonymise or destroy by confidential shredding and delete permanently form systems
Case notes	Retained in the Client Record for the same period as the record itself (see above)	Anonymise or destroy by confidential shredding and delete permanently form systems
Records of service users' subject to complaint or legal action	Retain until completion of proceedings, or on the advice of legal counsel	
Information for statistical/audit purposes	There will be no time limit as long as the information is anonymised.	Anonymise or destroy by confidential shredding and delete permanently form systems
Financial Information	7 years	