



Speech Therapy &
Dyslexia Services

PRIVACY POLICY

1. Introduction

This privacy policy applies to all services provided by Words Speech Therapy and Dyslexia Services.

I am committed to ensuring your privacy is protected when you use my services. Should you share or be asked to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy policy.

I update this policy to ensure compliance with current data protection regulation. I therefore encourage you to check this policy regularly to ensure that you continue to be comfortable with the measures in place to protect your privacy.

2. Who Am I and What Do I Do?

I am Sarah Murray trading as Words Speech Therapy and Dyslexia Services. I am registered as a Speech and Language Therapist with the Health and Care Professions Council (HCPC) and am a professional member of the Professional Association of Teachers of Teachers of Students with Specific Learning Difficulties (PATOSS). I am based in KT22 and operate a website at www.wordsspeechtherapy.co.uk.

I am registered with the Information Commissioner's Office (ICO) under registration number Z5994435. For my business operations, including insurance, finance and legal obligations, I act as data controller. For services provided on behalf of other training providers or for the assessment and teaching of minors, I act as a data processor and use personal information under the strict instructions of those contracts.

3. What Personal Information Do I Collect?

I collect personal information as strictly necessary and relevant to deliver services, communicate with you, or ensure payment.

- At the point of enquiry, basic information which identifies you individually such as your name, email address and/or phone number as well as the reason for enquiry.

If your child or yourself (a person aged 18 or over) become a regular client I may need to collect further information such as:

- Client's full name, date of birth, gender, pronoun preferences, next of kin, emergency contact details.
- Information about health ('Special Category Data' see section 4), developmental information, educational history and school information.
- Completed questionnaires, assessment forms and checklists, session notes, therapy programmes, evaluations and reports.

- Correspondence during therapy.
- Information provided to me, with your consent, by a third party such as parents, school or another professional involved with the client.
- Payment information.

4. Why Do I Collect This Information?

I gather information for:

- Communication (via email or phone) to provide you with the information and services you request, to fulfil the contracts we have agreed together or to notify you of any changes to my service.
- Internal record keeping to plan and provide services which meet professional standards.
- Clinical audit to assess and improve my service.
- Management and administration to operate my business efficiently, including financial records and accounting.

Wherever possible, personal identifiers are removed if not necessary for these activities.

5. What Allows Me to Collect and Use Your Information?

Personal information is processed strictly for the purpose of providing a high quality service. With your written consent, this includes communicating appropriately and effectively with others as part of my duty of care to you (a client aged 18 and over) or you and your child (if a parent or person with parental responsibility is referring a child under 18).

As it is both a necessity for my service delivery and of benefit to you, my lawful basis for processing your personal data is one of 'legitimate interest'. For specific data, it is one of 'consent'.

- Information relating to an individual's health, including any medical diagnosis, is classified as 'Special Category Data'. The GDPR specifies that health professionals who are 'legally bound to professional secrecy' may have a lawful basis for processing such data. As an HCPC registered Speech and Language Therapist I am legally bound to keep client information confidential and it is under this condition that I process and store personal information.
- Where I rely on consent to process specific data, you can withdraw consent at any time. This, for example, applies to the images, video or audio recordings used for assessment or therapy. Please be aware that when a child reaches a certain age or level of maturity, they may be required to give consent for their own personal data to be used. For example, consenting to assessment for exam access arrangements. In most circumstances, it is assumed that a child's consent is not required for sharing their personal data with their parents or a person with parental responsibility. However, if a child expressly withholds this consent I may be bound to confidentiality unless there is a professional or legal requirement to disclose.

6. Where Do I Get Personal Information From?

Personal data is generally provided by you directly. This may be through submission of the website contact form, completion of questionnaires or checklists, email and phone discussion, sharing of written

reports and communication as we work together. Sometimes, personal data is supplied by the child or young person themselves or, with your consent, by a third party.

By using my website you are accepting and consenting to the practices described in this policy. Cookies help create a better website and the only personal information I collect from visitors to my site is what they choose to share on the contact form. My website contains links to other relevant websites which are outside my control and not covered by this privacy policy. Once you leave my site I cannot be responsible for the protection and privacy of any information which you provide through any such linked websites. Please be cautious and refer to the privacy of the website in question.

7. How is Your Information Stored?

All information I collect is stored using the following methods:

- Secure servers used by my website provider.
- Most information is stored on a GDPR compliant secure iCloud account and backed up on an encrypted solid-state drive in electronic client files.
- All your information is archived 12 weeks after our last contact. Client files are also purged when archived so that no information is retained any longer than is necessary.
- Any paper-based information is stored in a locked filing cabinet whilst we are working together and may be scanned and stored electronically when files are archived.
- All other paper-based information, such as completed test forms, are retained in a locked storage space for one year then securely destroyed.
- When providing an assessment or therapy session the minimum amount of confidential information will be taken from my base and restricted to that which is necessary. This will be anonymised wherever possible and kept with the therapist or in a locked space at all times.

Information may be stored outside the UK but within the EU. I do not store information outside the secure systems provided by third-party providers.

8. How Long Do I Keep Information For?

I retain your personal data information securely and only for as long as necessary for a legitimate and lawful reason. After this time, all data is securely deleted unless there is a legal reason for it to be kept longer.

Information	Retention time
Enquiry (phone, email or website)	Until your enquiry has been dealt with, usually within 14 days. If you then request a service the information is transferred to your client file otherwise it is securely destroyed.
Email communication	12 weeks from last contact after which emails may be copied to electronic client file or deleted.
Images, audio and video recordings	Permanently deleted from the device on which they were made within 24 hours. No audio or video recordings are retained beyond their inclusion in the assessment process or therapy session.

Paper-based Information	12 weeks after last contact it is scanned into electronic client file or securely destroyed. Completed test forms are retained for one year then securely destroyed.
Electronic Client Files	If 16 or under at the time of the final contact, until the age of 25. If 17, when last seen, until the age of 26. If 18 or older, for 7 years after the final contact.

9. Your Rights

You have the right to ask for a copy of your personal information. To do so you should make a subject access request. A copy will then be provided free of charge within 30 days of receipt of all the necessary information. Please note there are some exemptions which means you may not receive all the information you ask for.

If you believe that any information I have about you is incorrect or incomplete or you want me to delete or stop using your personal information please contact me via email. Please note that I am required to retain certain information for legal and accounting purposes, which may limit my ability to fully erase your data.

10. Who Do I Share Information With?

- Routinely, it is only me who will have access to your information.
- All my work with you and any information I have about you is confidential except in situations when I have a legal obligation to share, such as a safeguarding concern.
- I will liaise and share relevant information with other professionals only with your written consent to do so.
- Personal information is only used for the purpose of providing a service which meets professional standards. Your personal information is never distributed to third parties unless I have your explicit permission or am legally required to do so.
- In exceptional circumstances I may need to share limited information with my insurer, accountant or professional bodies of which I am a member.

11. How to Get in Touch

If you have a concern about how I am using your personal information please contact me in the first instance.

e: sarah@wordsspeechtherapy.co.uk

m: 07742 915 921

If we cannot resolve your concern together, then the ICO are there to clarify and explain your rights.

w: www.ico.org.uk

t: 0303 123 1113