

## **PRIVACY POLICY**

Words Speech Therapy and Dyslexia Services provides independent speech and language therapy and dyslexia services to children and young adults in their homes, schools or colleges. It is run by Sarah Murray who is registered as a Speech and Language Therapist with the Health and Care Professions Council (HCPC) and is a professional member of the Professional Association of Teachers of Students with Specific Learning Difficulties (PATOSS). Words Speech Therapy and Dyslexia Services is based in KT22 and operates a website at [www.wordsspeechtherapy.co.uk](http://www.wordsspeechtherapy.co.uk).

### **UK Data Protection Law and EU General Data Protection Regulation (GDPR)**

Data Protection law lays down wide-ranging rules, backed up by criminal sanctions, for the processing of information about identifiable, living individuals. It also gives individuals certain rights in relation to personal data held about them by others. For the purpose of the Data Protection Act 1998, Sarah Murray is registered as the Data Controller for Words Speech Therapy and Dyslexia Services with the Information Commissioner's Office (ICO).

#### **My lawful basis for processing personal information.**

Legally all Speech and Language Therapists must be registered with the Health and Care Professions Council which has standards of conduct, performance and ethics. All members must adhere to these standards which include safe and effective practice in relation to confidentiality and record keeping.

Personal information is processed strictly for the purpose of providing a quality service to you. With your written consent, this includes communicating appropriately and effectively with others as part of my duty of care to you (a client aged 16 and over) or you and your child (if a parent or person with parental responsibility referring a child under 16).

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. Speech and language therapists are legally bound to keep client information confidential and it is under this condition that I process and store personal information.

#### **Consent**

Where I rely on consent, rather than 'legitimate interest', 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.

## **My responsibilities**

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.

## **Collection of personal information.**

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 telephone discussion, sharing of written reports and communication during the course of therapy. Sometimes, personal data is supplied by the child or young person themselves or, with your consent, by a third party (for example, a Local Authority, school or another professional).

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 Internet sites 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 exercise caution and refer to the privacy policy applicable to the website in question.

## **What I collect**

I collect a range of personal information which is limited and relevant to the particular service you request.

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

If your child or yourself (a young person aged 16 or over) becomes a regular client I may need to collect further information such as:

- Information about health ('Special Category Data' see above) and educational history
- Completed questionnaires, assessment forms and checklists, session notes, therapy programmes, evaluations and reports.

- Correspondence during therapy.
- Information provided to me by a third party, with your consent, such as a Local Authority, school or another professional.

### **What I do with the information I gather**

I gather information for the purposes of:

- Communication (via email, phone, WhatsApp or post) 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 recording 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.

### **Security and data storage**

Transmission of information via the Internet is not completely secure. Although I endeavour to protect your privacy, I cannot guarantee the security of your data transmitted to my site; any transmission is at your own risk. Once I have received your information, I will use strict procedures and security features to try to prevent unauthorised access.

The minimum amount of confidential information will be taken from my base and restricted to that which is necessary to the immediate assessment or therapy session. This will be anonymised wherever possible and kept with the therapist or in a locked space at all times.

Personal information is stored electronically in a double password-protected format and/or in paper form in a locked filing cabinet. Case notes are archived 8 weeks after the final contact. Any paper based information is scanned and stored along with electronic notes when these are archived. Case notes are purged when archived so that no information is retained any longer than is necessary.

Personal data is retained securely and only for as long as necessary for a legitimate and lawful reason. After this time, all data is securely destroyed 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 case notes otherwise it is destroyed.
General email communication	Approximately two months after which emails are copied and stored with case notes or destroyed.
Casenotes	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.

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 and reporting process or therapy session. If images of written work or a pen grip are included in an assessment report identifiers are removed and the report stored as case notes.
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### **Disclosure of information**

All my dealings 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 you're your written consent to do so.

### **Access to information**

You have the right to access the personal information that I hold about you. I will provide this except in limited circumstances in which I am not permitted to do so. Please make any requests in writing and include a signature. A copy will then be provided free of charge within 30 days of receipt of all the necessary information.

### **Controlling your personal information**

If you believe that any information I am holding about you is incorrect or incomplete or you want me to delete or stop processing your data please contact me as soon as possible. Requests will be considered on an individual basis as there may be a compelling reason to refuse if the data falls within a 'legitimate interest'. Please also be aware that the health data is a 'special category' in which the right to erasure does not apply.

Personal information is only used for the purpose of providing a quality service which meets professional standards and is never distributed to third parties unless I have your explicit permission or am legally required to do so.

### **Concerns or complaints**

Whilst I make every effort to protect your privacy, I will inform you immediately if a personal data breach is suspected or has occurred.

If you believe that I have breached a privacy law or code binding on us, please send an email marked 'urgent' to [sarah@wordsspeechtherapy.co.uk](mailto:sarah@wordsspeechtherapy.co.uk). I will aim to respond in a reasonable time (within 48 hours or less), manage your complaint and give you additional information about how it will be handled. You have the right to complain to the ICO if you believe I have not handled your complaint appropriately ([www.ico.org.uk](http://www.ico.org.uk)).