

Privacy Policy November 2020

Who we are

Sound Talk Speech and Language Therapy (SLT) Ltd is registered with Companies House (Number 8901227).

Sound Talk SLT delivers independent speech and language therapy to children in their home and/or educational setting. It is owned and directed by Rachael Tuckley, Speech and Language Therapist, who is registered with the Health and Care Professions Council (HCPC), Association of Speech and Language Therapists in Independent Practice (ASLTIP) and Royal College of Speech and Language Therapists (RCSLT).

Sound Talk SLT operates a website at www.soundtalksalt.co.uk

Sound Talk SLT is committed to protecting the privacy of information provided by clients. The latest version of this privacy policy will always be available at www.soundtalksalt.co.uk/privacy

Collection of personal information

Information about your child may be collected directly from your child and via spoken or written information from parents/carers. With parental consent, spoken and written information may also be collected from other professionals working with your child (such as Teachers, Nursery staff, Childminders, NHS Speech and Language Therapists, Audiologists, Educational Psychologists and other health, education and social care professionals). We may also collect information about family members where this relates to your child e.g. contact details for parents and relevant medical or developmental history.

You may use the Sound Talk SLT website without providing any personal information. However, if you wish to make an enquiry via the website, you are requested to provide relevant contact details, such as your name, e-mail address and contact telephone number to enable us to respond to your enquiry. You may add comments or queries which might also contain personal information.

If your enquiry does not result in your child being seen by Sound Talk SLT then this personal information will be deleted after 6 months. If your child is subsequently seen by Sound Talk SLT these details may be added to their personal record.

The Sound Talk SLT website contains links to other internet sites which are outside our control and are not covered by this privacy policy. We are not responsible for data which you provide through any such linked websites.

Our use of personal information

Personal information collected by us via the Sound Talk SLT website, email, telephone, text message or face to face, is stored and used by us for the purpose of delivering your child's speech and language therapy.

Any sensitive personal details are stored in our secure and confidential systems and processed in confidence by Sound Talk SLT and shall only be used for the purposes of delivering appropriate speech and language therapy services to your child.

With your consent, information about your child's speech and language needs will be shared with other professionals involved in your child's care, when it is in your child's best interests. A record of your consent is kept within your child's case-notes.

Unless we are required to do so by law, we will not disclose any personal information collected to any person other than as set out above.

We do not employ agents to process personal data, for example we do not use specialist mailing companies to send out communications. We do not give or sell client details to any third parties.

How we use personal information

We may use your child's personal information for the following purposes:

- To prepare, plan and provide speech and language therapy services appropriate for your child's needs
- To communicate with you via post, email, telephone, mobile messages in relation to:
 - confirming and preparing for appointments
 - general communication regarding appointments
 - sending you reports and programmes for your child (password protected)
 - copying you in to communications with other professionals involved with your child (your child's initials rather than full name will be used in emails)
 - sending you resources
 - sending you invoices
- For clinical audit, supervision and feedback to assess and improve our service. Case studies, clinical supervision, results of audits and testimonials are presented with all client identities either anonymised or removed.
- For management and administration, for example client initials on invoices are included in our book-keeping system.

Whenever personal identifiers are not needed for these tasks, if possible we remove them from the information we use.

How we store personal information

Information about you, your child and their speech and language therapy is stored securely in our systems to ensure that we have a complete record of our service to them.

We store your child's data:

- a) on a secure electronic cloud-based system called "WriteUpp" which is compliant with General Data Protection Regulations <https://www.writeupp.com/secure/>.
- b) on an encrypted, password protected drive which is only accessible via a password held by Sound Talk SLT Therapist/s
- c) on paper records, which are kept in a locked filing cabinet at Sound Talk SLT's business address, which is only accessible to Sound Talk SLT Therapist/s (except when in use). Any paper based confidential information such as assessments are stored securely in accordance with Data Protection Regulations.

Documents which contain confidential information that are disseminated electronically (such as reports and programmes) are individually password protected. Passwords are sent separately from the encrypted documents to ensure security.

Video and audio recordings and photos may be taken of clients with parental consent, for assessment and therapy purposes. These are temporarily stored on a password protected tablet. Following this, recordings and photos will be transferred to an encrypted drive and deleted from the tablet. Any recordings/photos will be stored electronically in encrypted form on a laptop until no longer deemed necessary to store, up to a maximum of three years, after which the file will be deleted. Copies of any recordings/photos can be sent electronically on parent/carer/client request within this three year time-frame. These files will not be shared with anyone without your consent.

When providing appointments at your child's home/school, the minimum amount of confidential information will be taken out of the Speech and Language Therapist's office. When your child's information is taken out of the office it will be kept with the Speech and Language Therapist or stored in a secure location (such as SLT's locked car boot or school/nursery staff room, whichever is deemed to be the most secure at that time).

In accordance with law, all records will be kept securely until your child is 25 years old. After this time all records relating to your child will be destroyed.

Meeting our professional obligations

It is a legal requirement for all Speech and Language Therapists to be registered with the Health and Care Professions Council (HCPC). The HCPC has clear standards of conduct, performance and ethics that all registrants must adhere to.

These standards affect the way in which we process and share information. Specifically:

Standard 2: Communicate appropriately and effectively

"You must share relevant information, where appropriate, with colleagues involved in the care, treatment or other services provided to a service user."

Standard 10: Keep records of your work

"You must keep full, clear, and accurate records for everyone you care for, treat, or provide other services to. You must complete all records promptly and as soon as possible after providing care, treatment or other services. You must keep records secure by protecting them from loss, damage or inappropriate access."

For further information the full document can be found at: <http://www.hcpc-uk.org/assets/documents/10004EDFStandardsofconduct,performanceandethics.pdf>

UK Data Protection Law and EU General Data Protection Regulations

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.

Rachael Tuckley is registered with the Information Commissioner's Office (ICO) as a Data Controller and Data Processor. You can view her ICO registration by visiting:
<https://ico.org.uk/ESDWebPages/Entry/ZA043043>

Our lawful basis for processing personal information

Our lawful basis for processing and storing personal information is one of 'legitimate interest' (under article 6 of GDPR). We cannot adequately deliver a service to your child without processing their personal information. As it is both a necessity for our service delivery and of benefit to your child, we have a legitimate interest to process and store their data.

Data relating to an individual's health is classified as 'Special Category Data' under section 9 of the GDPR. The regulations specify that health professionals who are "legally bound to professional secrecy" may have a lawful basis for processing this data. Speech and Language Therapists are legally bound to keep client information confidential and it is under this condition that we process and store personal information.

Our responsibilities

We are committed to maintaining the security and confidentiality of your child's record. We actively implement security measures to ensure their information is safe.

We will not release your personal details to any third party without first seeking your consent, unless this is required by law.

We are constantly working to ensure compliance with current data protection regulation.

Your rights

Data protection legislation gives you, the parent, various rights. The most important of these are as follows:

- You have the right to a copy of information we hold about your child.
- You have the right to ask for your record to be amended if you believe that it is wrong.

How to access your child's records

You can access the information we hold about you by writing to us at the address given below. Please apply in writing rather than by email, so that we receive an original signature to compare against the records we hold.

A copy of your child's records is provided free of charge. However repeated requests may incur a fee at the discretion of Sound Talk SLT.

We will provide you (parent/carer) access to your child's records within 30 days of receipt of all necessary information.

Please make your request in writing to:

Subject Access Requests - Sound Talk Speech and Language Therapy Ltd, 19 Ashford Rd, Heaton Chapel, Stockport, SK4 5JX.

If you have any further questions about how we use your information, please contact info@soundtalksalt.co.uk

Further information about data protection legislation and your rights is available from the Information Commissioner's Office or by calling 0303 123 1113, 9am to 5pm, Monday to Friday.