

## **PRIVACY POLICY**

### **WHO WE ARE**

- Interactions Speech and Language Therapy Ltd is a limited company delivering independent speech and language therapy services to children in educational settings.
- It is owned and managed by Anna Less and Linda Gilmour, Speech and Language Therapists, who are registered with the Health and Care Professions Council (HCPC), and members of the Royal College of Speech and Language Therapists (RCSLT).
- Interactions SLT operates a website at [www.interactionsspeechtherapy.co.uk](http://www.interactionsspeechtherapy.co.uk)
- Interactions SLT operates a Facebook page @interactionsslt
- Interactions SLT is committed to protecting the privacy of information provided by clients and staff.

### **DATA PROTECTION REGULATIONS 2018**

- The EU General Data Protection Regulation (GDPR) 2016 came into force in the UK in May 2018. These regulations govern the protection, processing and movement of personal data, and the legal rights of individuals to control information about themselves.
- GDPR seeks to give people more control over how organisations use their data. It enforces significant penalties for organisations that fail to comply.
- Interactions Speech and Language Therapy is registered with the Information Commissioner's Office (ICO) as a Data Controller (Registration number: ZB394379). You can view the ICO registration by visiting: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers>

### **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 without processing the personal information of our clients. As it is a necessity for our service delivery and in the best interests of the client, we have a legitimate interest to process and store the 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.
- 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."

### **COLLECTION OF PERSONAL INFORMATION**

- Information about a child we work with may be collected via telephone, website, email, written information, or face to face discussion.
- Information may be collected from staff in the child's education setting when the child is being seen as part of a contract with the setting. Information will only be provided from this source with signed parental consent.
- With parental consent, information may also be collected from other professionals working with the child (such as childminders, NHS Speech and Language Therapists, education support services, paediatricians and other health services).
- We may also collect information about family members where this relates to the child e.g. contact details for parents and relevant medical or developmental history.

### **WEBSITE**

- You may use the Interactions 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. If your enquiry does not result in further support from Interactions SLT then this personal information will be deleted once your enquiry has been dealt with. If you subsequently use services provided by Interactions SLT these details may be added to our records.
- The 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 to any such linked websites.

### **HOW PERSONAL INFORMATION IS USED**

- To prepare, plan and provide speech and language therapy services appropriate for the child's needs
- To communicate via post, email, telephone and text message for the purpose of:
  - arranging / confirming and planning for appointments
  - general communication in between appointments
  - receiving consent forms and other background information
  - sending reports and programmes for a child
  - copying relevant parties into communications with other professionals involved with the child
  - sending the resources necessary for the child's speech and language intervention
  - sending invoices
- For clinical audit to assess and improve our service (results of audits are always presented with all client identities removed)
- For management and administration (e.g. surnames of clients may be included in our accounting records)

### **STORAGE AND SHARING OF PERSONAL INFORMATION**

- Any personal information collected by us is stored and used for the purpose of delivering appropriate speech and language therapy services to the child.
- Any sensitive personal details are stored in a secure and confidential cloud based electronic patient database which is accessible only by Interactions SLT therapists (provided by 'Writeupp'). 'Writeupp' is ISO 27001:2013 certified. ISO 27001:2013 is an internationally recognised standard for information security management.

- Prior to being uploaded to this system, working documents may be temporarily stored on a password protected laptop which is only accessible by the speech and language therapist involved in the care of the child.
- With parental consent, information about a child's speech and language needs may be shared with other health and education professionals involved in the child's care, when it is in the child's best interests. A record of parental consent to share information is kept within the child's electronic record.
- Unless we are required to do so by law, we will not disclose any personal information to any person other than those essential to the child's care.
- Information may be shared against parental consent if there are safeguarding concerns and the sharing of information is deemed to be significant in relation to safeguarding the needs of the individuals involved.
- We do not give or sell client details to any third parties, or employ any outside agencies that may access or process personal information as part of their work.
- In written correspondence via email, client's initials rather than their full name will be used.
- Any electronic documents or reports sent by email will be sent as PDF to guard against alteration.
- Any paper based confidential information such as assessment record forms are stored in a file specific to each education setting. They are scanned and uploaded to the child's record on 'WriteUpp'. Once a paper document has been uploaded the original copy is either returned to the education setting, or shredded and disposed of.
- Where we have a contract with the child's education setting, information about that child will be shared directly with the school on an ongoing basis. It is the school's responsibility to share new information with the child's parents.
- Once information has been shared by us with another professional involved in the child's care, we take no further responsibility for how that person/organisation manages the information.
- When a child is discharged from our service, their electronic record is deactivated and archived.
- All archive records will be kept securely until the child is 25 years old. After this time all records relating to the child will be destroyed.

### **TRANSFER OF INFORMATION**

The nature of our work involves travel between our office base and the client's home or school. In order to provide an effective service it is necessary that confidential information is transported between these locations. The minimum amount of confidential information necessary to deliver the service will be transported. When client information is taken out of the office base it will be kept with the Speech and Language Therapist or will be locked in the boot of the Speech and Language Therapist's car (whichever is deemed to be the most secure at that time). No personal information will be left in a vehicle overnight.

### **OUR RESPONSIBILITIES**

- We are committed to maintaining the security and confidentiality of our client's records.
- We review our privacy policy and information governance procedures annually.
- We conduct a twice yearly information audit to ensure the quality and security of the information we hold.
- We will not release personal details to any third party without first seeking parental consent, unless this is allowed for or required by law.

- All staff representing Interactions SLT undertake Information Governance training, updated at least every 3 years, to ensure compliance with the most up to date data protection regulations.

#### **DATA BREACH**

- In the unlikely event that sensitive personal information regarding a child is lost, stolen or communicated to an unintended or unauthorised person, Interactions SLT will notify the child's parent/guardian as soon as possible. If it is agreed with the parent/guardian that the data breach presents a significant risk to the rights or freedoms of the child then the Information Commissioner's Office (ICO) will be notified of the breach.
- The parent/guardian will be kept fully informed of the advice from the ICO.

#### **THE RIGHTS OF THE DATA SUBJECT**

GDPR 2016 gives the following rights:

- The right to a copy of the information we hold about you or a child in our care.
- The right to ask for the record to be amended if you believe that it is wrong.
- The right to withdraw your consent at any time.

#### **HOW TO WITHDRAW CONSENT**

- At any time, you can withdraw consent to continue with the services we provide, or to any aspect of the storage, processing and sharing of personal information.
- If you wish to withdraw consent for any part of our service, please contact the therapist responsible for the child's care directly.

#### **HOW TO ACCESS YOUR RECORDS**

- A parent can access the information we hold about them or their child by writing to us at the address given below. Please apply in writing rather than by email, so that we receive an original signature. Please provide necessary contact details such as your name, address, email and telephone number so that we can contact you as soon as possible.
- We will provide access to the child's records within 30 days of receipt of all necessary information.
- A copy of the record will be provided free of charge if you would like to retain a copy.

Please make your request in writing to:

*FAO Data Protection Officer  
Interactions Speech and Language Therapy  
54 Gledhow Wood Grove  
Leeds  
LS8 1PA*

If you have any further questions about how we use your information, please contact Anna Lees, (Data Protection Officer) at [anna@interactionsspeechtherapy.co.uk](mailto:anna@interactionsspeechtherapy.co.uk)

Further information about data protection legislation is available through the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk)