

## Simply Speaking UK Limited Privacy Policy



### **Who we are**

Simply Speaking UK Ltd is a registered business with Companies House. Company number: 6818401. We deliver Independent Speech and Language Therapy to children at our clinic location(s), or educational setting. Simply Speaking is directed by Michelle Scorey, who is a qualified Speech and Language Therapist and registered with the Health and Care Professions Council (HCPC).

Simply Speaking UK Ltd operates a website at [www.simplyspeaking.org.uk](http://www.simplyspeaking.org.uk)

Simply Speaking UK Ltd is committed to protecting the privacy of information provided by clients.

### **Collection of personal information**

Information about your child may be collected via spoken or written information from parents/carers. With parental consent, information may also be collected from other professionals working with your child (such as teachers, nursery staff, childminders, NHS staff). 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 make an enquiry initially via email or phone. If your enquiry does not result in your child being seen by a Simply Speaking SLT then this personal information will not be added to a personal record.

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 through such linked websites.

### **Our use of personal information**

Personal information collected by us via email, telephone 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 a secure and confidential system and processed in confidence by Simply Speaking staff 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 consent is kept within your child's casenotes.

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 sell your details to any third parties.

## **How we use personal information**

We use this information to:

- Prepare, plan and provide speech and language therapy services appropriate for your child's needs
- Communicate with you via post, email, telephone, mobile messages and SMS in relation to:
  - confirming and preparing for appointments
  - general communication between 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 will be used)
  - sending you resources
  - sending you invoices
- For clinical audit to assess and improve our service. Audits are presented with client identities removed.
- For management and administration, for example surnames of clients are included in book keeping records. Book keeping records will be kept up to 6 years.

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

## **How we store personal information**

All 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. Computers are password protected and filing cabinets are locked. Paper based records are stored securely in accordance with Data Protection Regulations.

All paper based clinical notes for children under our service up until August 2018 have had/will have their notes scanned by a professional company (Proscan). They deal with paper records securely to convert them to electronic data so that records can be stored on external hard drives. Proscan destroy paper records in a confidential manner. You can find information about them on [www.proscan-imaging.co.uk](http://www.proscan-imaging.co.uk) Proscan is a local business that helps manage data of many

health professionals. In accordance with current guidelines, therapy records must be kept until your child's 25<sup>th</sup> birthday. This provides a secure alternative to the storage of huge amounts of paper records. Should clinical guidelines set out by RCSLT, HCPC and ASLTIP change, digital records may be destroyed sooner. External hard drives are stored in locked cabinets. Proscan delete all digital files once the external hard drive has been approved by Simply Speaking.

As of September 2018, Simply Speaking will switch to a web based clinical notes system called My Therapy Tracker. Data is hosted in a secure data centre managed by their hosting partner with 24/7 manned security and restrictive pre-approved access only via the authorization security gate. All data transmitted across the web is secured with 2048-bit Secure Socket Layer (SSL) encryption. You can read more about this company on [www.mytherapytracker.com](http://www.mytherapytracker.com)

Videos may be made of clients with parental consent. These are temporarily stored for up to 24 hours after a child's appointment in a locked cabinet. The video is then deleted. Parents can request a copy of a video. Sometimes videos are made for training purposes but prior consent from parents would always be obtained.

The minimum amount of confidential information will be taken out of the office base. When your child's information is taken out of the office base it will be kept with the Speech and Language Therapist.

### **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 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.

Simply Speaking is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can review the ICO registration by visiting: [www.ico.org.uk/ESDWebPages/Entry/Z1673202](http://www.ico.org.uk/ESDWebPages/Entry/Z1673202)

### **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 the 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 the condition that we process and store personal information.

### **Our responsibilities**

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

We will not release your personal details to any third party without first seeking your consent, unless this is allowed or 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 the 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 your child by writing to us at the address below. Please apply in writing, so that we receive an original signature to compare against the records we hold.

We will provide access to your child's records within 30 days of receipt of all necessary information.

Please make your request in writing via our Accountant:

Subject Access Requests  
Simply Speaking UK Ltd  
**C/O Carbon Accountants**  
66 Botley Road  
Park Gate  
Southampton  
SO31 1BB

If you have any further questions about how we use your information please contact [michelle@simplyspeaking.org.uk](mailto:michelle@simplyspeaking.org.uk)

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