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| Privacy Policy |

**Who am I:**

Karen Gregg is a qualified independent speech and language therapist. She is a sole trader operating under the trade name of The Speech Hut Sussex. Karen Gregg delivers independent speech and language therapy to children and young adults in their home and/or educational setting. Karen Gregg is a registered member of The Royal College of Speech and Language Therapists (RCSLT), The Health and Care Professionals Council (HCPC) and The Association of Speech and Language Therapists in Independent Practice (ASLTIP).

The Speech Hut Sussex operates a website at [www.thespeechhutsussex.co.uk](http://www.thespeechhutsussex.co.uk).

As an independent Speech and Language Therapist I am committed to protecting the privacy of information provided by my clients.

**Collection of Personal Information:**

The following list provides some examples of personal information that may be collected:

* Child’s name, date of birth, home address, medical history, education details, speech and language history, developmental milestones.
* Parent or carer names, phone numbers, email addresses, home address, details of any speech, language or learning difficulties.
* Family structure details.

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 Speech and Language Therapists). 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 access The Speech Hut Sussex website without providing any personal information. If you wish to make an enquiry via the website

however, you are requested to provide relevant contact details, such as your name, contact telephone number and email address 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 Karen Gregg (The Speech Hut Sussex) then this personal information will be deleted once your enquiry has been dealt with. If your child is subsequently seen by Karen Gregg (The Speech Hut Sussex) these details may be added to their personal record.

The website may contain links to other internet sites which are outside of my control and are not covered by this privacy policy. I am not responsible for data which you provide through any such linked websites.

**Use of Personal Information:**

Personal information is collected by myself via email, telephone, face to face contact or through The Speech House Sussex website.

This information is stored and used 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 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 I am required to do so by law, I will not disclose any personal information collected to any person other than as set out in your child’s consent form.

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

**How I use personal information:**

I use collected personal information 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 and SMS in relation to:
* confirming and preparing for appointments.
* general communication in between appointments.
* sending you reports and programmes for your child (these are sent via My Therapy Tracker and are encrypted. There is also a
* client view option for you to access these documents in a secure way with your own password).
* communicating with other professionals involved with your child (initials rather than full name will be used in emails).
* sending you/your child’s education setting therapy resources.
* sending you invoices and receipts.
* For clinical audit to assess and improve my service. Results of audits are always presented with all client identities removed.

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

**How personal information is stored:**

All information about you, your child and their speech and language therapy is stored securely in accordance with data protection regulations.

I use a secure electronic cloud-based system called ‘My Therapy Tracker’ which is compliant with general data protection regulations (GDPR). Prior to being uploaded to this system documents are temporarily stored on a private hard drive which is only accessible via a password held by myself. Documents which contain confidential information such as reports and programmes are written directly onto My Therapy Tracker and are encrypted. These are also available to view on the ‘Client View’ function which is only accessible by parents/carers with their own password.

Any paper based confidential information such as assessments are stored securely in accordance with Data Protection Regulations.

Videos may be taken of clients with parental consent. These are temporarily stored either on a private hard drive or an encrypted and password protected ipad. These may then be uploaded to the client file on My Therapy Tracker and securely saved as appropriate. Videos can also be uploaded by parents/carers directly onto ‘Client View’ in My Therapy Tracker which is password protected. Videos may be viewed by the SLT in order to make notes in a client record within one month of the child’s appointment. The video is then deleted if not required for therapy input or monitoring progress.

The minimum amount of confidential information will be taken out of my home base. When your child’s information is taken out of the home base e.g. on a school visit, it will be kept on my person or will be locked in the boot of my car (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. All records relating to adults will be kept for 8 years and then destroyed thereafter.

**Meeting 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: <https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>

**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.

I am registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view my ICO registration by visiting: <https://ico.org.uk/ESDWebPages/Entry/ZA784006>

**Lawful basis for processing personal information:**

My lawful basis for processing and storing personal information is one of ‘legitimate interest’ (under article 6 of GDPR). I cannot adequately deliver a service to your child without processing their personal information. As it is both a necessity for my service delivery and of benefit to your child, I have a legitimate interest to process and store this 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.

**My responsibilities:**

I am committed to maintaining the security and confidentiality of my client’s records. I actively implement security measures to ensure their information is safe, and audit these regularly.

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

I am constantly working to ensure compliance with current data protection regulation.

**Your rights**:

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

• You have the right to a copy of information we hold about you or your child.

• You have the right to ask for your record to be amended if you believe that it is wrong.

**How to access yours or your child’s records**:

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

A copy of your child’s records is provided free of charge. We will provide 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, Karen Gregg (The Speech Hut Sussex), 17 Belsize Road, Worthing, West Sussex, BN11 4RH.

If you have any further questions about how I use your information, please contact info@thespeechhutsussex.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.

Written by Karen Gregg (Speech and Language Therapist) September 2020