

## SSLT Ltd Privacy Policy

### **Who we are?**

Surrey Speech Therapy Ltd (SST) is registered with Companies House no. 11269372. SST delivers independent speech and language therapy to children in their homes and/or educational setting. It is owned and directed by Mrs Claire Elliott, Specialist Speech and Language Therapist, who is registered with the Health Care Professions Council (HCPC).

SST operates the following website: [www.surreyspeechtherapy.co.uk](http://www.surreyspeechtherapy.co.uk).

SST is committed to protecting the privacy of information provided by clients.

### **Collection of personal data/Patient Identifiable Information (PII)**

Information about your child may be collected over the phone or via email. Initial enquiries may also come through SST's Facebook page, but parents will be directed to give personal information via email / website thereafter.

After receiving parent's consent, SST may also liaise and share information with your child's nursery/school, NHS/Surrey County Council Speech and Language Therapists, childminders etc. This allows the best possible care for your child.

If an enquiry does not result in your child being seen by SST then any personal information will be deleted/destroyed once your enquiry has been dealt with. If your child is subsequently seen by SST these details may be added to their personal record.

### **Use of PII**

PII collected by SST's website, email, phone or face to face is stored and used solely for the purposes of delivering your child's speech and language therapy.

SST has set up 2 step verification to improve the security of emails and PII storage.

Unless we are required to do so by law, we will not disclose any personal information collected to any person.

We do not employ agents to process personal data, for example specialist mailing companies to send out communications. Data is ONLY used legitimately to support your child's communication needs. SST will not use your data in marketing. We will never sell client details to any third parties.

If you choose to follow SST's Facebook page, and make any comments or queries via this social media platform, we are not responsible for the data which you provide to this site. However, SST do advise secure messaging or emailing if you have a specific query related to your child.

### **How we use PII:**

We use your information:

- To prepare, plan and provide speech and language assessment and therapy services to meet the needs of your child.
- To communicate with you via post, email, telephone, mobile texts, What's app (some parents prefer this method, particularly for sharing video content) and SMS in relation to:

- \*Confirming and preparing for appointments.
- \*General communication in between appointments.
- \*Sending you reports and programmes for your child. (Your child's initials will be used to preserve confidentiality).
- \*Copying you into communications with other professionals involved with your child. (Your child's initials will be used to preserve confidentiality).
- \*Sending you resources.
- \*Sending you invoices and receipts.

- For clinical audits and to improve our service. Results of these audits are always presented with all client details removed.
- For management and administration e.g. invoicing.

SST will always remove personal identifiers (i.e. initials only in paper diary entries) where possible.

**How we store PII:**

All information about you, your child and their speech and language therapy progress notes are stored securely on Google Drive. SST uses 2 step verification to access this account. No data is stored on a Desktop device, and when it is, this is only temporarily whilst it is being uploaded to Google Drive cloud storage. Documents which contain confidential information such as reports or targets will be shared with the child's initials only. Any paper based confidential information is stored in a locked filing cabinet.

Videos may be taken of clients with parental consent. These are temporarily stored on the therapist's device, which is password protected. These will then be viewed and analysed by the therapist – notes will be written in relation to them within 24 hours of the session. The video will then be deleted.

The minimum amount of confidential information will be taken out of the SST office base. Information which is taken out of the office base will be stored in the therapist's work bag which is kept with her at all times (it'll never be left in the car).

In accordance with the 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. Claire Elliott is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view her ICO registration by visiting: [www.ico.org.uk](http://www.ico.org.uk). Her registration reference is: ZA271906

#### **Our lawful basis for processing PII**

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, and audit these regularly. We will not release your personal details to any third party without first seeking your consent, unless this is allowed for 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 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 SST holds about you by writing to us at the address given below. 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 Request  
Surrey Speech Therapy Ltd  
3 Dunlin Close  
Redhill  
Surrey  
RH1 5HJ*

If you have any further questions on how we use your information, please contact Claire at [Claire@surreyspeechtherapy.co.uk](mailto:Claire@surreyspeechtherapy.co.uk)