

Privacy Policy Statement for Maria Boot-Handford Speech and Language Therapy (SLT)

When you use Maria Boot-Handford SLT you trust me with your information. This privacy policy is meant to help you understand what data I collect, why I collect it, and what I do with it. If you have any questions please contact me.

Maria Boot-Handford assumes the function of data controller and supervises the compliance with General Data Protection Regulation (GDPR) within the business.

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1. Information I collect

Maria Boot-Handford SLT holds personal data as part of conducting a professional service. The data follows under the following headings:

1. Healthcare records.
2. Educational records.
3. Clinical records.
4. General administrative records.
5. Financial records.

1.1 Healthcare records

A healthcare record refers to all information collected, processed and held both in manual and electronic formats pertaining to the service user and their care. Communication difficulties can be complex; a wide range of information may be collected in order to best meet the needs of your child and to maintain a high quality service which meets best practice requirements.

In order to provide a high quality service, a range of information may be collected.

Examples of data collected and held on all current and active cases include the following:

- Contact details: Name, address, phone numbers, e-mail address.
- Personal details: date of birth.
- Other contacts: name and contact details of GP and any other relevant healthcare professionals involved.
- Parent/carer details.
- Description of family.
- Educational placements.
- Pre- and post-natal history: This can include information relating to mother's pregnancy, and child's birth.
- Developmental data: developmental milestones, feeding history, audiology history.

- Medical details: such as any relevant illnesses, medications, and relevant family history
- Reports from other relevant allied health professionals such as: Audiology, Psychology, CAMHS (Child & Adolescent Mental Health Services), Occupational therapy, Physiotherapy, Ophthalmology.

1.2 Educational records

Relevant Individual Educational Plans (IEPs), progress notes from educational staff and school reports may be held.

1.3 Clinical records

Specific data in relation to communication skills may be collected and held, such as assessment forms, reports, case notes, e-mails, text messages and transcripts of phone. Audio and video files may also be collected and stored.

1.4 General administrative records

Maria Boot-Handford SLT may hold information regarding attendance reports and accident report forms.

1.5 Financial records

A financial record pertains to all financial information concerning the practice, e.g. invoices, receipts, information for Revenue. Maria Boot-Handford SLT may hold data in relation to: on-line purchasing history, card payments, bank details, receipts and invoices. Information will include name of bill payer, client name, address and record of invoices and payments made.

2. Where I get my information

Personal data will be provided by the child's parent/s or carer/s. This information will be collected as part of an initial case history (when SLT input commences) or through liaison during the period of SLT care.

Information may also be provided directly from relevant third parties such as schools, medical professionals and allied health professionals, with prior consent from the parent(s)/guardian(s).

3. How I use the information that I collect

I use the information to provide assessment and therapy as per the relevant professional guidelines, as well as to maintain the general running of the business, for example updating you of changes in policies.

Information may also be used for research purposes, with the written consent of the child's parent/guardian.

3.1 Data retention periods

The retention periods are the suggested time periods for which the records should be held based on the organisation's needs, legal and/or fiscal precedence or historical purposes. Following the retention deadline, all data will be destroyed under confidential means.

3.1.1 Client Records

3.1.2 Clinical Records

Maria Boot-Handford SLT keeps both physical and electronic records of clinical data in order to provide a service.

- The preferred format for clinical data is electronic.
- Clinical data will be confidentially destroyed after the child's 25th birthday.

- Video records/ voice recordings relating to client care/videoconferencing records may be recorded with consent, analysed and then destroyed. If written consent is provided to use recordings for training purposes, the client will have the option to withdraw consent at any time.

3.2 Financial Records

Maria Boot-Handford SLT keeps electronic and paper records of financial data from those who commission my service.

Section 886 of the Direct Tax Acts states that the Revenue Commissioners require records to be retained for a minimum period of six years after the completion of the transactions, acts or operations to which they relate. These requirements apply to manual and electronic records equally. Therefore, financial data is kept for 6 years to adhere to Revenue guidelines. Financial data (including non-payment of bills) can be given to Revenue at Revenue's request.

3.3 Contact Data

Contact Data is kept for 6 years to allow processing of Financial Data if required. (This may be retained for longer for safety, legal request, or child protection reasons.)

3.4 Exceptions

If under investigation or if litigation is likely, files must be held in original form indefinitely, otherwise files are held for the minimum periods set out above.

4. Information I share

I do not share personal information with companies, organisations and individuals outside Maria Boot-Handford SLT unless one of the following circumstances apply:

With your consent:

I will only share your Personal Identifying Information (PII) to third parties when we have express written permission via the New Referral form, letter or email to do so. I require opt-in consent for the sharing of any sensitive information.

Third parties may include: hospitals, GPs, other allied health professionals, educational facilities.

For legal reasons:

We will share personal information with companies or organisations outside of Maria Boot-Handford SLT if disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process or enforceable governmental request.
- Meet the requirements of the Children First Act 2015.
- To protect against harm to the rights, property or safety of (name of business), our service users or the public as required or permitted by law.

5. How and when I obtain consent

A referral form will need to be signed by the parent/carer prior to commencing the service. Copies of the signed consent forms will be given to both parties.

Parents/ carers can access the privacy statement (also referenced in the new referral form) via the school SENCo.

6. How I protect your data

In accordance with the General Data Protection Regulation (GDPR), we will endeavour to protect your personal data in a number of ways:

6.1 By limiting the data that we collect in the first instance

All data collected by us will be collected solely for the purposes set out at 1 above and will be collected for specified, explicit and legitimate purposes. The data will not be processed any further in a manner that is incompatible with those purposes save in the special circumstances referred to in section 5.1. Furthermore, all data collected by us will be adequate, relevant and limited to what is

necessary in relation to the purposes for which it is collected which include, inter alia, the assessment, diagnosis and treatment of speech, language and communication disorders.

6.2 By transmitting the data in certain specified circumstances only

Data will only be shared and transmitted, be it on paper, electronically or verbally only as is required, and as set out in section 3.

6.3 By keeping only the data that is required when it is required and by limiting its accessibility to any other third parties

6.4 By retaining the data for only as long as is required

6.5 By destroying the data securely and confidentially after the period of retention has elapsed (e.g. after the child's 25th birthday)

This could include the use of confidential shredding facilities or, if requested by the individual, the return of personal records to the individual.

6.6 By ensuring that any personal data collected and retained is both accurate and up-to-date.

7. Protecting your rights to data

For children under the age of 16, data access requests are made by their guardians. When a child turns 16, then they may make a request for their personal data. However, this is subject to adherence with the Children First Act.

8. Security of your personal data

Maria Boot-Handford SLT, as with most providers of healthcare services, is aware of the need for privacy. As such, I aim to practice privacy by design as a default approach, and only obtain and retain the information needed to provide you with the best possible service.

Maria Boot-Handford SLT is briefed on the proper management, storage and safekeeping of data.

All data used by Maria Boot-Handford SLT including personal data may be retained in any of the following formats:

1. Electronic Data.
2. Physical Files.

The type of format for storing the data is decided based on the format the data exists in.

Where applicable, Maria Boot-Handford SLT may convert physical files to electronic records to allow us to provide a better service to clients.

8.1 Data Security

Maria Boot-Handford SLT understands that the personal data used in order to provide a service belongs to the individuals involved. The following outlines the steps which Maria Boot-Handford SLT use to ensure that the data is kept safe.

8.2 Electronic Data

All electronic data is held on a globally recognised ISO27001 certified and GDPR compliant server.

Where reports are emailed to relevant parties, they will be password protected and sent via Gmail or LCN mail servers.

8.3 Physical Files

All physical data is located in 54 Eversley Road, SE7 7LD. Only Maria Boot-Handford has access to these records. These records are kept in a container secured with a lock and key.

8.4 Security Policy

Maria Boot-Handford SLT understands that requirements for electronic and physical storage may change with time and the state of the art. As such, the data controller reviews the electronic and physical storage options available to Maria Boot-Handford SLT every year.

All physical devices used by persons working in Maria Boot-Handford SLT which may contain any identifiable PPI are not enabled with loss theft tracking and remote wipe abilities.

Maria Boot-Handford is aware, briefed on and refreshes the requirement for good data hygiene once a year. This briefing includes, but is not limited to:

- Awareness of client conversations in unsecure locations.
- Enabling auto-lock on devices when leaving them unattended, even within Maria Boot-Handford SLT locations.
- Use of non-identifiable note taking options (initials, not names).
- The awareness of procedure should a possible data breach occur, either through malicious (theft) or accident (loss) of devices or physical files.

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