

Privacy Policy Statement for Juliet Bick Speech & Language Therapy Services [JBSLT]

When you use **Juliet Bick - Speech & Language Therapy Services (JBSLT)** you trust us with your information. This privacy policy is meant to help you understand what data we collect, why we collect it, and what we do with it. We have tried to make it as simple as possible but if you have any questions please contact us.

Juliet Bick 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 we collect

JBSLT holds personal data as part of conducting a professional service. The data follows under the following headings: healthcare records, educational records, clinical records and general administrative 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 child and their parent or guardian. Speech and language problems can be complex, and a wide range of information may be collected in order to best meet the needs of the child, and to maintain a high-quality service which meets best practice requirements. To provide a high-quality service, a range of information may be collected.

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

- Contact details: Child's Name, address, Parent/guardian's name, phone numbers, e-mail address,
- Personal details: date of birth
- Other contacts: name and contact details of GP and any other relevant healthcare professionals
- 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 calls. Audio and video files may also be collected and stored.

2 Where we get our information

JBSLT will usually be working within a school setting in which instance information will be provided by school staff. There will be an agreement with the school that they are responsible for obtaining prior consent from the parent(s)/guardian(s). On occasion, other medical professionals and allied health professionals will provide information, with prior consent from the parent [s] / guardian [s].

Should JBSLT work with a child outside of a school setting the company will take responsibility for getting prior consent of the child's parent(s)/guardian(s).

3 How we use the information that we collect

We use the information we collect to provide assessment and therapy as per the relevant professional guidelines. Information may also be used for research purposes, with the written consent of the client or 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.

3.2 Client Records

3.2.1 Clinical Records

JBSLT keeps both physical and electronic records of clinical data in order to provide a service.

- Clinical data is retained until the child reaches 18 years old or 2 years after the last intervention if pupil is seen when they are 18 years old in a school setting.

- 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.

3.3 Exceptions

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

4 Information we share

We do not share personal information with companies, organisations and individuals outside of JBSLT unless one of the following circumstances apply:

4.1 With your, or your parent / guardian's, consent:

We will only share your Personal Identifying Information (PII) to third parties when we have express written permission by 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.

4.2 For legal reasons:

We will share personal information with companies or organisations outside of JBSLT 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 JBSLT, our service users or the public as required or permitted by law.

5 How and when we obtain consent

When a child starts at a school, at which JBSLT provides a service, the school will ensure that a consent form is signed by the parent / guardian. The form will include a written explanation stating that during their child's time at the school JBSLT services may sometimes work directly with a child or on other occasions provide specialist advice to teachers. They will also be made aware of this Privacy Policy Statement and offered a copy.

Should JBSLT work with a child outside of a school setting, a consent form will be signed by the parent(s)/guardian(s) prior to any assessment or other intervention. They will also be made aware of this Privacy Policy Statement and offered a copy.

Should the parent(s)/guardian(s) wish to withdraw their consent for data to be processed, they can do so by contacting JBSLT.

6 How we 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 4.2. 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, please refer to section 1.1.

6.2 By transmitting the data in certain specified circumstances only

Data will only be shared, be it on paper or electronically, 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 disposing of/destroying the data once the individual has ceased receiving treatment

When a child reaches the age of 18 years old the data will be destroyed. In the case of a pupil seen at the age of 18 years old the data will be destroyed two years after they last received an intervention.

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

We retain data until a child reaches 18 years old or if they receive an intervention when they are 18 years old, in a school setting, we will retain data for a further 2 years. The exception will be in circumstances in which retention of data is required as set out at part 3.1 above; or in certain specific circumstances as set out at Article 23(1) of the GDPR.

6.6 By destroying the data securely and confidentially after the period of retention has elapsed.

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

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

7 Protecting your Rights to Data

7.1 Children

For children under the age of 16, data access requests are made by their parent[s] / guardian[s]. 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 Data Security

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

9 Electronic Data

All electronic data is contained on an encrypted laptop which is used exclusively by JBSLT. All data is securely backed-up. Any email communications containing personal data are sent securely using email encryption.

10 Physical Files

All physical data is located in one of two places:

- Where a child currently attends school physical data is stored in a locked cupboard only accessible to Juliet Bick;
- Or at the business address of JBSLT within a locked filing cabinet.

11 Reviewing this Privacy Policy

Juliet Bick will update this document in accordance with any changes in policy, legislation or best practice recommendations. In addition, Juliet Bick will review this policy every 2 years.

Date of document: 17 September 2018

Review Date: 17 September 2020