



Alison Calow | Children's Speech & Language Therapist

BMedSci(Speech) MRCSLT MASLTIP

address: 7 Broadoak Road, Bramhall, Stockport, Cheshire, SK7 3BW

tel: 0161 948 9472 | mobile: 07968 050 230

web: www.salt4kids.co.uk | email: alison@salt4kids.co.uk

Privacy Policy

Alison Calow Speech & Language Therapist delivers independent speech and language therapy to children in the home and/or educational setting. Alison Calow SLT operates as a sole trader and is registered with the Health and Care Professions Council (HCPC), the Royal College of Speech and Language Therapists (RCSLT) and the Association of Speech and Language Therapists in Independent Practice (ASLTIP).

Alison Calow SLT operates a website at www.salt4kids.co.uk

Alison Calow SLT is committed to protecting the privacy of information provided by clients.

When you use Alison Calow Speech and Language Therapist (SLT) 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.

Alison Calow assumes the function of data controller and supervises the compliance with General Data Protection Regulation (GDPR) within the business.

1 Information we collect

Alison Calow SLT holds personal data as part of conducting a professional service. The data follows under the following headings: healthcare records, educational records, clinical records, general administrative records, and 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. 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 client, 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 clients 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/guardian contact 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: NHS Speech and Language Therapy, Audiology, Psychology, CAMHS (Child & Adolescent Mental Health Services), Occupational therapy, Physiotherapy, Paediatricians.

1.2 Educational records

Relevant Individual Educational Plans (IEPs), Education, Health and Care Plan (EHCP), progress notes from educational staff such as Special Educational Needs Coordinators (SENCO's), teachers 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, and text messages and transcripts of phone conversations.

1.4 General administrative records

Alison Calow 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. Alison Calow SLT may hold data in relation to: 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 we get our information

Personal data will be provided by a child's parent(s)/guardian(s) if under 18 years. This information will be collected as part of a case history form prior to, or on the date of first contact. Personal information may also be collected via the Alison Calow SLT website, email, telephone or SMS.

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).

You may use the Salt4kids website without providing any personal information. However, if you wish to make an enquiry via the website, you are requested to provide relevant contact details, such as your name, e-mail address and contact telephone number to enable us to respond to your enquiry. You may add comments or queries which might also contain personal information.

By providing personal information for initial contact by SMS, voicemail, phone call, e-mail or website enquiry you are consenting to personal details for yourself and the potential client being held temporarily by Alison Calow SLT. If your enquiry does not result in the client being seen by Alison Calow SLT then this personal information will be deleted once your enquiry has been dealt with. If the client is subsequently seen by Alison Calow SLT these details may be added to their 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 any such linked websites.

3 How we use the information that we collect

Personal information collected by us via the salt4kids website, email, telephone, SMS or face to face, is stored and used by us to provide assessment and therapy as per the relevant professional guidelines, as well as to maintain the general running of the business, such as keeping our accounts and updating you of any changes in policies or fees.

Any sensitive personal details are stored in a secure and confidential system and processed in confidence by Alison Calow SLT and shall only be used for the purposes of delivering appropriate speech and language therapy services to the client.

With your consent, information about the client's speech and language needs will be shared with other professionals involved in the client's care, when it is in the client's best interests. A record of your consent is kept within the client'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 employ agents to process personal data, for example specialist mailing companies to send out communications.

We do not give or sell the client details to any third parties.

Examples of how we use this information:

- To prepare, plan and provide speech and language therapy services appropriate for the client'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 the client (always password protected)
 - copying you in to communications with other professionals involved with the client (the client's initials rather than full name will be used in emails)
 - sending you therapy resources
 - sending you invoices and receipts
- For management and administration, for example surnames of the clients are included in our password protected accounting records
- Whenever personal identifiers are not needed for these tasks, if possible we remove them from the information we use.

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, including contact data

Alison Calow 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 is deleted/confidentially destroyed once a child reaches the age of 25 years.

3.2.2 Financial Records

Alison Calow SLT keeps electronic records of financial data from those who use our services.

HMRC require records to be retained for a minimum period of 6 years after the completion of the tax year in which the transactions, acts or operations are made. These requirements apply to manual and electronic records equally.

- Financial Data is kept for 6 years to adhere to HMRC guidelines.
- Financial Data can be given to HMRC at their request.

3.3 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 we share

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

4.1 With your 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. We require opt-in consent for the sharing of any sensitive information.

Third parties may include: hospitals, GPs, other allied health professionals, Educational Psychologists, educational facilities including SENCO's.

4.2 For legal reasons:

We will share personal information with companies or organisations outside of Alison Calow 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 Act 2004 and Working Together to Safeguard Children 2018.
- To protect against harm to the rights, property or safety of Alison Calow SLT, our service users or the public as required or permitted by law.

5 How and when we obtain consent

Prior to the initial assessment or consultation, a summary privacy policy and Alison Calow SLT Terms and Conditions will be provided to the parents/guardians of the child, and they will also be made aware of a link to the full privacy policy on the salt4kids website. A consent form will need to be signed by parents/guardians prior to commencing the service (this may be prior or at the initial assessment). Copies of the signed consent forms and terms and conditions will be given to both parties.

Services cannot be initiated without ticked consent to our privacy policy.

Should a client wish to withdraw their consent for data to be processed, they can do so by contacting Alison Calow SLT.

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 3.3. 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 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 only as is required, and as set out in section 4.

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

This would be once the child reaches 25 years of age for clinical data, including contact data, and 6 years for financial records as stated in section 3.2 above. We will put in place appropriate technical and organisational measures to ensure a level of security appropriate to the risk. These may include measures such as the encryption of electronic devices, pseudonymisation of personal data, and/or safe and secure storage facilities for paper/electronic records.

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

which in this case is until a child reaches 25 years of age, except for circumstances in which retention of data is required in circumstances set out at section 3.3 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 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 Your rights

Data protection legislation gives you various rights. For children under the age of 18, data access requests are made by their guardians. When a child turns 18, then they may make a request for their personal data.

The most important of these are as follows:

- You have the right to be informed about the personal data we hold and why we hold it.
- You have the right to access a copy of your and/or the client's data that we hold by contacting us directly.
- You have the right to ask for your record to be amended if you believe that it is wrong.
- You have the right to have your data erased in certain circumstances.
- You have the right to transfer your data to someone else if you tell us to do so and it is safe and legal to do so.
- You have the right to tell us not to actively process or update your data in certain circumstances.

7.2 How to access the client's records

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

A copy of the client's records is provided free of charge.

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

Please make your request in writing to:

Subject Access Requests
Alison Calow SLT
7 Broadoak Road
Bramhall
Stockport
SK7 3BW

8 Security

Alison Calow SLT as with most providers of healthcare services is aware of the need for privacy. As such, we 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.

All data used by Alison Calow 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, Alison Calow SLT may convert physical files to electronic records to allow us to provide a better service to clients.

8.1 Data Security

Alison Calow SLT understands that the personal data used in order to provide a service belongs to the individuals involved. All information about you, the client and their speech and language therapy is stored securely in our systems to ensure that we have a complete record of our service to them. The following outlines the steps which Alison Calow SLT uses to ensure that the data is kept safe.

8.1.1 Electronic Data

All electronic documentation is stored using the enterprise grade Microsoft Office 365 Cloud Platform secured using Multi Factor Authentication. Where documentation is stored locally, this is on hardware running Windows 10 operating system featuring full disk encryption safeguarding data in the event of loss or theft. Documents which contain confidential information such as initial questionnaires, therapy casenotes, reports and programmes are also individually password protected from the outset.

Client phone numbers may be stored on a mobile telephone and text messages sent to Alison Calow SLT may remain on the telephone. Alison Calow SLT will only refer to the client by their initials or first name in a text. The mobile phone is passcode protected.

8.1.2 Physical Files

Any paper based confidential information such as therapy casenotes, assessments, letters, reports from other agencies are stored securely in accordance with Data Protection Regulations, in:

- 7 Broadoak Road, Bramhall, Stockport, SK7 3BW
Only Alison Calow working in Alison Calow SLT has access to these records.

These records ARE kept in a container secured with a lock and key.

The minimum amount of confidential information will be taken out of the Speech and Language Therapist's office base. When the client's information is taken out of the office base, for example a therapy session, or a meeting about the client, it will be kept with the Speech and Language Therapist at all times.

8.2 Security Policy

- 8.2.1 Alison Calow SLT understands that requirements for electronic and physical storage may change with time and the state of the art. As such, the data controller in Alison Calow SLT reviews the electronic and physical storage options available to Alison Calow SLT annually.
- 8.2.2 Alison Calow SLT is aware of and refreshes the requirements for good data hygiene annually/regularly. This briefing compliance is monitored by the Alison Calow SLT data controller and includes, but is not limited to:
- Awareness of client conversations in unsecure locations.
 - Enabling auto-lock on devices when leaving them unattended, even within Alison Calow SLT locations.
 - Use of non-identifiable note taking options. (initials, not names).
 - The awareness of Alison Calow SLT procedure should a possible data breach occur, either through malicious (theft) or accident (loss) of devices or physical files.

9 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>

10 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.

Alison Calow is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view the ICO registration by visiting: www.ico.org.uk/ESDWebPages/Entry/ZA009437

10.1 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 GDPR). We cannot adequately deliver a service to the client without processing their personal information. As it is both a necessity for our service delivery and of benefit to the client, 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.

10.2 Our responsibilities

We are committed to maintaining the security and confidentiality of the client'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.

If you have any further questions about how we use your information, please contact alison@salt4kids.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.

Date of document: 07/10/2018

Review Date: 01/10/2019