

Exeter Speech & Language Therapy Privacy Policy

This privacy policy explains the personal information collected by Exeter Speech & Language therapy, why it is held and processed, who it might be shared with and your rights under UK Law.

About Exeter Speech & Language Therapy

Exeter Speech & Language Therapy provides independent speech and language therapy to children in the home or educational setting. It is managed by Ceris Clark, Speech and Language Therapist, who is registered with the Health and Care Professions Council (HCPC), a member of The Royal College of Speech and Language Therapists (RCSLT) and a member of The Association of Speech and Language Therapists in Independent Practice (ASLTIP).

Ceris Clark (Speech and Language Therapist) is registered with the Information Commissioner's Office (ICO).

Exeter Speech & Language Therapy operates a website at

www.exeterspeechandlanguagetherapy.com

Exeter Speech & Language Therapy is committed to protecting the privacy of information provided by clients.

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1 Lawful Basis for Collecting and Processing your Information

Under UK data protection law, I must have a “lawful basis” for collecting and using your personal information. The lawful bases applicable fall under the following categories:

- **Contractual Obligations:**

I process your information to enable me to deliver the services that I offer. This includes clinical activities and communicating with you, and others whom you may contract me to contact, regarding your child's care.

- **Legal Obligations:**

I'm required to collect and use your information to enable me to comply with UK healthcare law and professional requirements, such as HCPC guidelines for maintaining accurate records.

- **Legitimate Interests:**

Information is processed to enable the efficient and professional operation of my business and therapy services.

- **Consent:**

Your explicit consent is obtained for sharing information with other professionals and for taking audio/video recordings (for the purposes of assessment or therapy) during sessions.

2 The Information I Collect

2.1. Healthcare Records

A healthcare record refers to all information collected, processed and held, both in manual and electronic formats, pertaining to a client and their care. In order to provide a high-quality service, a range of information may be collected. Examples of data collected and held include the following:

- Contact details: Name, address, phone number and e-mail address
- Personal details: Date of birth and NHS number
- Other contacts: Name and contact details of the child's GP and any other relevant healthcare professionals involved
- Parent/carer details
- Description of family and family history
- Educational placements
- Pre- and post-natal history: This can include information relating to the mother's pregnancy and the child's birth
- Developmental data: Developmental milestones, feeding history and audiology history
- Medical details: Such as any relevant illnesses or prescribed medications and reports from other medical and allied health professionals

2.2. Educational Records

These may include relevant Education, Health and Care Plans (EHCPs), individual education plans (IEPs) and other school or nursery reports.

2.3. Clinical Records

Data relating to your child's communication skills may be gathered and stored, including assessment forms, reports, case notes, emails, text messages, and phone call transcripts. Audio and video recordings may also be collected and securely stored temporarily.

2.4. Financial records

A financial record pertains to any financial information concerning Exeter Speech & Language Therapy, such as invoices, receipts, and information required for His Majesty's Revenue and Customs (HMRC) purposes. This may include data about card payments, bank account details and

transaction records. Stored information may include the invoice payer's name, the client's name and address, and a log of invoices and payments received.

3 Where I Gather My Information

I gather information from various sources to ensure your child receives the best possible care.

Personal data will be gathered from the parent/carer, normally via a case history form prior to the initial appointment. Information may also be collected from relevant third parties such as schools, medical professionals and allied health professionals, with prior consent from the parent/carer.

Clinical information such as assessment results will be collected from direct work with your child.

You are welcome to browse my website without providing any personal information. However, if you wish to make an enquiry, you will be required to provide contact details including your telephone number and email address. By submitting an enquiry, you are consenting to your personal details being held temporarily by Exeter Speech & Language Therapy. If you decide not to proceed with my services after making an enquiry, I will delete your contact information once I have addressed your query. For clients who proceed to engage my services, these details will be added to their child's clinical record.

4 How I Use Your Information

The information gathered by Exeter Speech & Language Therapy is used and stored to provide assessment and therapy for your child. Examples of how I use data include:

- Activities related to preparation and delivery of assessment and therapy sessions, to meet your child's needs.
- Communications with you via post, email, telephone, WhatsApp or SMS message, related to your child's care or payment for services.

- Administrative purposes related to processing invoices and payments, and maintaining accurate business records.
- For clinical audit to assess and improve my services, using anonymised data only.
- Information may also be used for research purposes, with the prior written consent of the parent/carer.

5 How Long I Keep your Information For

In accordance with UK law, all records will be kept securely until your child is 25 years old or, if still receiving treatment at the age of 17, until they are 26 years old. After this time all records relating to your child will be securely destroyed.

I keep electronic/paper records of financial data from those who use my services.

HMRC 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. Financial Data is therefore kept for 6 years to adhere to these guidelines and can be provided to HMRC at their request.

6 Security

All data used by Exeter Speech & Language Therapy, including personal data, may be retained in any of the following formats:

1. Electronic Data
2. Physical Files

Where applicable, I may convert physical files to electronic records.

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

6.1

Client records are stored securely using WriteUpp, a healthcare-specific cloud-based platform that complies with UK data protection laws.

6.2

Other clinical documents in process are password-protected and temporarily stored in a OneDrive account, accessible only to Ceris Clark, via multi-factor identification. These documents are transferred to the secure WriteUpp system once complete.

6.3

Video or voice recordings may be taken with parental consent, as part of assessment or therapy. Where possible, these will be taken on a device owned by the parent/carer. Where this is not possible, video recordings will be stored on a password-protected iPad and deleted once relevant notes are added to the clinical record and as soon as the recording is no longer needed.

6.4

Client mobile numbers may be stored on a password protected mobile phone. SMS or WhatsApp messages sent to Exeter Speech & Language Therapy may remain on the phone. I will refer to your child via their first name initial only, when using SMS message or WhatsApp, and will aim to use WhatsApp business over SMS message (due to the greater security with message encryption that it affords).

6.5

All physical files will be stored within a lockable filing cabinet, located at the therapist's address. Only Ceris Clark has access to these records.

6.6

In emails, I will use initials instead of full names. To safeguard your privacy, I send all sensitive information via password-protected PDF file, with passwords shared separately via encrypted email, through the WriteUpp platform.

6.7

Electronic financial data is stored in a multi-factor identification password protected folder in Microsoft OneDrive, only accessible to Ceris Clark.

All staff working for Exeter Speech & Language Therapy abide by an acceptable use policy in relation to technology. They are aware of, briefed on, and refresh the requirements for good data management and processing annually. This briefing compliance is monitored by Exeter Speech & Language Therapy's data controller and includes, but is not limited to:

- Awareness of ensuring client conversations occur in secure locations.
- Enabling auto-lock is enabled on devices if leaving them unattended.
- Use of non-identifiable note taking options (initials, not names).
- Awareness of Exeter Speech & Language Therapy procedures should a possible data breach occur.

7 Sharing Information with Others

I do not share personal information with individuals, companies or organisations outside of Exeter Speech & Language Therapy unless one of the following applies:

7.1 With Your Consent

I will only share personal information regarding your child with third parties when I have express written permission from you (the parent/carer) to do so. I require opt-in consent for the sharing of any sensitive information. Third parties may include: GPs, allied health professionals and educational staff.

7.2 For Legal Reasons

I may share personal information with organisations outside of Exeter Speech & Language Therapy 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, 1989, the Children Act, 2004, The Children and Social Work Act, 2017, and any other relevant UK legislation
- To protect against harm to the rights, property or safety of Exeter Speech & Language Therapy, my clients or the public, as required or permitted by UK law

7.3 For Financial Reasons

I do not currently employ an accountant. Should this change in the future, I will be required to share financial information with them as part of their service.

7.4 For Reason of Lone Working

In order to maintain safety when lone working, for home visits, the property number and postcode will be shared with my next of kin.

8 How I Protect your Data

Prior to any initial assessment, clients will be signposted to this privacy policy and given the consent form detailed at the end of Exeter Speech & Language Therapy's Terms and Conditions. The consent form will need to be signed by the client prior to services commencing.

Should a client wish to withdraw consent for their data to be processed, they can do so at any time by contacting Exeter Speech & Language Therapy using the details at the end of this policy.

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

8.1

All data collected by me will be collected solely for the purposes set out above. 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 7.2. Furthermore, all data collected by me will be adequate, relevant and limited to what is necessary in relation to the purposes for which it is collected. This includes the assessment, diagnosis and treatment of speech, language and communication disorders.

8.2

Data (on paper or electronically) will only be shared and transmitted when required, and as set out in section 7.

8.3

By keeping only the data that is required.

8.4

By retaining the data only for as long as required, as set out in section 5, except in certain specific circumstances set out at Article 23(1) of the GDPR.

8.5

By destroying the data securely and confidentially, after the period of retention has elapsed. This could include the use of physical shredding facilities or, if requested by the individual, the return of personal records to the individual.

8.6

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

9 Your Rights and Choices

Under UK data protection laws, you have several important rights regarding your child's information including:

- The right to be informed about the personal data I hold and why I hold it.
- The right to access a copy of the data that I hold about you/your child, by contacting me directly.
- The right to request that a record is amended if you believe that it is wrong.
- The right to ask me to delete your personal information.
- The right to ask me to limit how I can use your personal information.
- The right to object to the processing of your personal data.
- The right to ask that I transfer the personal information you give me to another organisation, or to you.
- The right to withdraw your consent at any time.

To access a copy of your child's records, please submit a written request via email. I will require you to provide a copy of your signature to verify against my records, before the release of any data. Records will be provided within 30 days of receiving all necessary information.

10 Your Rights and Choices

In the unlikely event of a data breach, I adhere to a structured response procedure:

10.1 Immediate Action

I will quickly identify and contain the breach, assess the potential risks, notify those affected, and report the incident to the Information Commissioner's Office (ICO) when necessary.

10.2 Follow-up Measures

I will conduct an investigation into the cause of the breach, take steps to prevent its recurrence and document my findings to avoid future incidents.

11 How to Contact Exeter Speech & Language Therapy

General Inquiries: For general questions, please email me at ceris@exeterspeechandlanguagetherapy.com. I aim to reply within 3 working days, though this may not be possible during busy periods or times when I am on annual or sick leave.

Formal Requests: Please submit a formal request via email to ceris@exeterspeechandlanguagetherapy.com. A signature will be requested to confirm identity, prior to the release of any client records.

Document Updates: This privacy policy was last updated in January 2025 and will be reviewed annually, or upon any change in UK data protection law.

Additional Information: For further details on UK data protection, you may contact the Information Commissioner's Office:

Phone: 0303 123 1113

Website: www.ico.org.uk

By using my services, you confirm that you have read, understood and agreed to this privacy policy.