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## Privacy Policy

When you use Sally Riley Speech and Language Therapy (Sally Riley 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. Sally Riley assumes the function of data controller and supervises compliance with the General Data Protection Regulation (GDPR) within the business.

### 1. Information we collect

Sally Riley SLT holds personal data as part of conducting a professional service. The data falls 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.

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 details
- Description of family
- Educational placements
- Pre- and post-natal history: this can include information relating to the 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 Educational Health and Care Plans (EHCP), 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.

#### 1.4. General administrative records

Sally Riley SLT may hold information regarding attendance reports and accident report forms.

#### 1.5. Financial Records

A financial record pertains to all financial information, e.g. invoices, receipts, information for HMRC. Sally Riley 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 we get our information**

Personal data will be provided by the client, or in the case of a child (under 16 years), their parent(s)/guardian(s). This information will be collected as part of a case history form prior to, or on the date of, first contact.

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 we use the information we collect**

We use the information we collect to provide assessment and therapy as per the relevant professional guidelines, as well as to maintain the general running of the business, such as running our booking system, keeping our accounts and updating you of any changes in policies or fees.

Information may also be used for research purposes, with the written consent of the client or parent/guardian.

### **4. Data retention periods**

These 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.

#### 4.1. Client records

Sally Riley SLT keeps both physical and electronic records of data in order to provide a service. The preferred format for clinical data is paper. Clinical records are kept securely until your child is 25 years old. After this time all records relating to your child will be destroyed.

Video or voice recordings relating to a client may be recorded with consent, analysed and then destroyed. Consent will be sought if, for clinical reasons, recordings are to be kept for longer.

#### 4.2. Financial records

Sally Riley SLT keeps electronic records of financial data from those who use our services 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.

#### 4.3. Contact data

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

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.

## 5. Information we share

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:

[www.hcpc-uk.org/assets/documents/10004EDFStandardsconduct.performanceandethics.pdf](http://www.hcpc-uk.org/assets/documents/10004EDFStandardsconduct.performanceandethics.pdf)

We will only share your Personal Identifying Information (PII) with third parties when we have express written permission by letter or email to do so. Third parties may include: hospitals, GPs, other allied health professionals, educational facilities.

Personal information may also be shared if the following circumstances apply:

### 5.1. For legal reasons

We will share personal information with companies or organisations 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 Safeguarding Children Act 2004
- protect against harm to the rights, property or safety of Sally Riley SLT, our service users or the public as required or permitted by law.

### 5.2. To meet financial requirements

Sally Riley SLT is also required to share financial data with an assigned accountant in order to comply with local tax laws. Sally Riley will gain a copy of the accountant’s own data protection policy.

## 6. How and when we obtain consent

Prior to initial assessment or consultation, a link to the data protection policy will be provided to clients along with a client contract. A consent form will need to be signed by the client prior to commencing the service. Copies of the signed consent forms and client contract will be given to both parties. Should a client wish to withdraw their consent for data to be processed, they can do so by contacting Sally Riley SLT.

## 7. 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:

#### 7.1. By limiting the data 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. 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.

#### 7.2. By transmitting the data in certain specified circumstances only

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

#### 7.3. By disposing of/destroying the data once the individual has ceased receiving treatment

Within 25 years of the completion of this treatment apart from the special categories of personal data as set out at section 4 above. Where data is required to be held by us for longer than the period of 25 years, 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.

#### 7.4. By retaining the data for only as long as required

Which in this case is 25 years except for circumstances in which retention of data is required in circumstances set out at part 4 above or in certain specific circumstances as set out at Article 23(1) of the GDPR.

#### 7.5 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.

### **8. 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 Safeguarding Children Act 2004.

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

A copy of the record 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:

Sally Riley SLT  
41 Springdale Gardens  
Didsbury  
Manchester  
M20 2SS

### **9. Security**

Sally Riley SLT 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 persons working in, and with Sally Riley SLT, in a professional capacity are briefed on the proper management, storage and safekeeping of data.

All data used by Sally Riley SLT, including personal data may be retained in any of the following formats:

- electronic data
- physical files.

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

Where applicable, Sally Riley SLT may convert physical files to electronic records to allow us to provide a better service to clients.

Sally Riley SLT understands that the personal data used in order to provide a service belongs to the individuals involved. Data is stored securely in our systems. Paper records are kept in locked cabinets at the business address of Sally Riley SLT and electronic data is stored on an encrypted computer file store.

Video recordings maybe taken with parental/carer's consent. These ae temporarily stored on a password-protected tablet or mobile phone. The video is deleted once used for clinical purposes.

The minimum amount of confidential information will be taken out from the business address of Sally Riley SLT. When it is taken out it will be kept with the person working in, and with Sally Riley SLT, in a professional capacity or locked in the boot of a car, whichever is deemed to be the most secure at that time.

## **10. Security Policy**

Sally Riley SLT understands that requirements for electronic and physical storage may change with time. As such, the data controller Sally Riley reviews the electronic and physical storage options available to Sally Riley SLT every 12 months.

## **11. Your rights**

Data protection legislation gives you 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 it is wrong.

If you have any further questions about how we use your information, please contact [sally@sallyrileyslt.com](mailto:sally@sallyrileyslt.com)

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.