



## Privacy Information – July 2019

### Privacy Policy

#### Who we are

Talking Outcomes delivers independent speech and language therapy to children in the home and/or educational setting. It is owned and directed by Jan Baerselman, Speech and Language Therapist, who is registered with the Health and Care Professions Council (HCPC) and the Royal College of Speech & Language Therapists (RCSLT).

Talking Outcomes operates a website at [www.talkingoutcomes.co.uk](http://www.talkingoutcomes.co.uk)

Talking Outcomes is committed to protecting the privacy of information provided by clients.

#### Collection of personal information

Information about you/your child may be collected via spoken or written information from you. With parental consent, information may also be collected from other professionals working with your child (such as teachers, nursery staff, childminders, NHS Speech and Language Therapists (SLT)). We may also collect information about family members where this relates to your child e.g. contact details for parents and relevant medical or developmental history.

You may use the Talking Outcomes 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. If your enquiry does not result in your child being seen by Talking Outcomes, then this personal information will be deleted one year after your enquiry has been dealt with. If your child is subsequently seen by Talking Outcomes 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.

#### Our use of personal information

Personal information collected by us via the Talking Outcomes website, email, telephone or face to face, is stored and used by us for the purpose of delivering your child's speech and language therapy.

Any sensitive personal details are stored in a secure and confidential case note system and processed in confidence. They shall only be used for the purposes of delivering appropriate speech and language therapy services to your child.

With your consent, information about your child's speech and language needs will be shared with other professionals involved in your child's care, when it is in your child's best interests. A record of your consent is kept within your child's case notes.

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 client details to any third parties.

## How we use personal information

We use this information:

- To prepare, plan and provide speech and language therapy services appropriate for your child's needs
- To communicate with you via post, email, telephone, text messages and sometimes WhatsApp in relation to:
  - confirming and preparing for appointments
  - general communication in between appointments
  - sending you reports and programmes for your child (password protected)
  - copying you in to communications with other professionals involved with your child (your child's initial/s rather than full name will be used in emails)
  - sending you resources
  - sending you invoices and receipts
- For clinical audit by another HCPC registered speech & language therapist to assess and improve our service. Results of audits are always presented with all client identities removed
- For management and administration, for example surnames of clients are included in our password protected client database
- For invoicing, parents' names and emails are included in our password protected secure accounting system on Xero.

Whenever personal identifiers are not needed for these tasks, if possible, we remove them from the information we use.

## How we store personal information

All information about you, your child 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. We use the secure electronic cloud-based system "Dropbox" which is compliant with general data protection regulations.

Documents which contain confidential information such as reports, and programmes are also individually password protected if they are sent out via email (other than to NHS recipients). The secure NHS Mail is used to send reports and information to NHS staff.

We also keep paper records which are stored in the locked Talking Outcomes office in a locked filing cabinet when not in use, in accordance with Data Protection Regulations.

Videos may be taken of you/your child with parental consent. These are temporarily stored on a password protected tablet. These may then be viewed by the SLT in order to make notes in a client record within 1 weeks of the child's appointment. The video is then deleted unless a specific arrangement is made with the client, and this is documented in the client's records.

When your child's information is taken out of the office base it will be kept with the Speech and Language Therapist or will be locked in the boot of the Speech and Language



Therapist's car (whichever is deemed to be the most secure at that time).

In accordance with law, all records will be kept securely for 7 years after discharge or until your child is 25 years old if they have an Education Health and Care Plan (EHCP). After this time all records relating to your child will be destroyed.

## Records of supervision of therapists and students:

- With your consent I will keep records of our supervision sessions. This includes dates attended / cancelled, your personal contact details and key paragraphs to remind me of themes discussed
- All supervisee details and correspondence will be stored securely and treated confidentially according to General Data Protection Regulations
- Information is stored on a password protected computer on Dropbox.
- Any paper based confidential information is stored securely in accordance with General Data Protection Regulations, in a locked filing cabinet.
- When our supervision relationship comes to an end, I will keep records of our supervision sessions for 6 years unless you request that these details are deleted sooner. I will shred all paper records and delete all electronic records at the end of this period. Financial records must be kept for 6 years to adhere to HMRC regulations.
- Should you wish to receive an electronic copy of your record this will be provided at no cost within 30 days
- Any information which I discuss in my personal supervision sessions will be anonymous and focussed around my own learning and development as a supervisor

## Our lawful basis for processing personal information

We process and store personal information to comply with our legal 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 please see <https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>

The Data Protection Act 2018 and General Data Protection Regulations 2018, The Data Protection Act 2018 and The General Data Protection Regulations 2018 lay 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.



Jan Baerselman is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view her ICO registration by visiting: <https://ico.org.uk/ESDWebPages/Entry/Z2570272>

## **Our responsibilities**

We are committed to maintaining the security and confidentiality of your child's record. We actively implement security measures to ensure their information is safe, and review 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.

## **Your rights**

Data protection legislation gives you, the parent, 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 that it is wrong.

## **How to access your child's records**

You can access the information we hold about you 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 your child's records 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:

Subject Access Requests  
Talking Outcomes  
37 Berewecke Road  
Winchester  
Hampshire  
SO22 6BL

If you have any further questions about how we use your information, please contact [jan@talkingoutcomes.co.uk](mailto:jan@talkingoutcomes.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.