



Independent Speech and Language Therapist
www.communicate-therapy.com

Privacy Policy

This should be read in conjunction with Communicate's Terms and Conditions and Safeguarding Policy. We value your privacy and are committed to protecting your personal information.

Statement of intent

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 queries please contact us.

Who are we

Communicate delivers Independent Speech and Language Therapy Service to children and young adults in their home and/or education setting. It is managed and owned by Jenny Treen-Smith, an independent Speech and Language Therapist (SLT), who is registered with the Royal College of Speech and Language Therapy (RCSLT), Association of Speech and Language Therapy Independent Practice (ASLTIP) and with the Health and Care Professions Council (HCPC).

Jenny Treen-Smith is registered data controller (Registration Number ZA767530) and work in accordance with Information Commissioners Office (ICO). You can view her ICO registration on <https://ico.org.uk/ESDWebPages/Entry/ZA767530>

COMMUNICATE operates a website at www.communicate-therapy.com, a Facebook page at <https://www.facebook.com/communicatespeechtherapy> and an Instagram page at <https://www.instagram.com/communicatespeechtherapy/>

The website contains links to other internet sites which are outside her control and are not covered by this privacy policy. We are not responsible for data which you provide through such linked websites.

1. Information we collect

Communicate collect personal information that is voluntarily provided at the point at which you express an interest in obtaining information about the service. Communicate holds personal data as part of conducting a professional service and this comes 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 via spoken or written information, processed and held both in manual and electronic formats pertaining to the service users and their care. Speech and language problems can be complex, and a wide range of information may be collected in order to

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Privacy Policy

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, email address
- Personal details: Date of birth
- Other contacts: Name and contact details of GP and any other relevant healthcare professionals involved.

For child services:

- Parent/guardian details
- Description of family
- Educational placement
- 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 illness, 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.

For adult services:

- Employment/vocational history
- Mental health

1.2 Educational records

Relevant Educational, Health and Care Plans (EHCPs), 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, emails, text messages and transcripts of phone. Audio and video files may also be collected and stored.

1.4 General administrative records

Communicate 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, information for Revenue. Communicate may hold data in relation to online 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 data of the first contact.

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Privacy Policy

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 Communicate use the information

Communicate 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 electronic 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(s)/guardian(s).

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 need, 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

Communicate keeps electronic records of clinical data in order to provide a service.

- The preferred format for clinical data is electronic where possible.
- Communicate complies with Health and Care Professionals Council (HCPC) guidelines and must securely store the records until 7 years after treatment OR in the case of paediatric client, the client reaches the age of 25. Following this period the records will be deleted
- Referral information not resulting in receiving a service from Communicate: 1 month.
- Video records/voice recordings relating to client care/videoconferencing records may be recorded with consent, analysed and kept for clinical reasons. If written consent is provided to use recordings for training purposes, the client will have the option to withdraw consent at any time.

3.2.2 Financial records

Communicate keeps electronic records of financial data from those who use our service.

- Financial Data is kept for 6 years to adhere to revenue guidelines.
- Financial Data (including non-payment of bills) can be given to

Financial data cannot be removed before 6 years; however, it can be shared with you to allow for any correction or for you to make a MED1, or health insurance claim.

3.2.3 Contact Data

Contact Data is kept for 6 years to allow processing of Financial Data if requested. (This may be retained for longer for safety, legal, request or child protection reasons).

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.

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Privacy Policy

4. Will your Information be shared with anyone?

We do not share personal information with companies, organisations and individuals outside Communicate 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. I require opt-in consent for sharing of any sensitive information.

Third parties may include: hospitals, GP's other allied health professionals, educational facilities.

4.2 For legal reasons

We will share personal information with companies or organisations outside of Communicate 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 and Social Work Act 2017
- To protect against harm to the rights, property or safety of Communicate, our service users or the public as required or permitted by law.

4.3 To meet financial requirements

Communicate also is required to share financial data without financial and legal advisors in order to comply with local tax laws.

4.4 For processing by third parties/external processing

4.4.1 Transfer of personal data outside the European Economic Area (EEA).

In certain instances, personal data may be transferred outside the EEA e.g. to US or other countries. This would be for specific purposes such as web-based appointment scheduling. In such instances, Communicate will use third parties which meet the privacy standards of GDPR.

Companies which Communicate use to comply with GDPR obligation to implement appropriate technical measures to protect data. These are:

Pathway Software (UK) Limited – WriteUpp

- Client contact details, appointment scheduling, session notes, assessments, reports
- To accurately document the status and progress of clients
- To store additional information such as letters and reports from allied health professionals
- Client contact address / name and financial/billing information
- Accounting and billing

Spoton.net

Our site is hosted by Spoton.net Limited (registered company number 06139437 in England and Wales). Spoton.net logs all requests in order to determine the causes of reported faults and to detect and block suspicious traffic. The log records the time of the request, your IP address, the requested resource, the referring site (if specified by your browser), and your browser's user agent string (which will usually include the name and version of your browser and operating system). Log files are deleted after ninety days.

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Privacy Policy

Cloudflare

Our site is served through Cloudflare. Cloudflare helps our site load faster by storing copies of our content in data centres around the world and defends our site from attacks by logging requests to detect and block suspicious traffic. For more information on how Cloudflare handles the data it collects, see Cloudflare's privacy policy www.cloudflare.com/privacypolicy.

Google Analytics

We use Google Analytics to track visitor interaction with our site in order to produce statistical reports. Google collects details of the pages you view and the time you viewed them, the features of your browser, and your IP address. We have enabled IP anonymisation (<https://support.google.com/analytics/answer/2763052>) so that Google will not store your complete IP address. For more information on how Google handles the data it collects, see Google's privacy policy.

To opt out of Google Analytics tracking on our site, see the Google Analytics section of our cookie policy. To opt out of Google Analytics tracking on all sites, use the Google Analytics Opt-out Browser Add-on <https://tools.google.com/dlpage/gaoptout>.

Mapbox maps

When you view a page containing Mapbox maps, your browser connects to Mapbox. For more information on how Mapbox handles the data it collects, see Mapbox's privacy policy <https://www.mapbox.com/legal/privacy>.
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN?mode=edit>

5. How and when we obtain consent

A consent form will need to be signed via email. Users will be directed to read the privacy statement and to tick to agree to the terms. Services cannot be initiated without ticked consent to our set privacy policy.

6. How we protect your data

In accordance with 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. Furthermore, all data collected by us will be adequate, relevant and limited to what is necessary, in relation to the purpose 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 or electronically only 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 third parties.

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Privacy Policy

6.4 By disposing of/destroying the data once the individual had ceased receiving treatment

Within 7 years the completion of this treatment apart from the special categories of personal data as set out at 1.1 above. Where data is required to be held by us for longer than the period of 7 years, we will put in place appropriate technical and organisation measures to endure 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

In this case it is 6 years except for circumstances in which retention of data is required in circumstances set out at part 1.1 above or in certain specific circumstances as set out in 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 Your rights

Data protection legislation gives you the right to copy of information we hold and to ask for your records to be amended if you believe that it is inaccurate. E.g., changing a home address.

7.1 Adult clients

Adults have the right to request data held on them as per article 15 of GDPR. A request must be made in writing to the address given below.

7.2 Children

For children under the age of 16, data access requests are made by their guardians by writing to us at the address given below. When a child turns 16, then they may make a request for their personal data.

As information is processed on the legal basis of 'legitimate interest', it is not possible to request erasure of personal information. You have the right to request a copy of the personal information that is held about you or your child. This is called a Subject Access Request, and it is free of charge. All requests will be proceeded and completed with 30 days of receipt.

This request should be made in writing to:

Subject Access Requests

COMMUNICATE

14 Queens Close

Chippenham

Wiltshire

SN15 4SB

Further information regarding accessing your personal data is available in the document 'Rights of Individuals under the General Data Protection Regulation', downloadable from: www.gdprandyou.ie

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Privacy Policy

8 Security

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

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

1. Electronic Data
2. Physical Files (which will be scanned, uploaded and then shredded)

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

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

8.1 Data Security

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

8.1.1 Electronic Data

All electronic data is contained in the following systems:

WriteUpp:

- This system is physically located in the European Union.

- This system provider is aware of their requirements for GDPR compliance
- The system has an internal administrator / Database owner
- This system has a Live Update for security enabled
- All persons working in Communicate have read/write access only to records appropriate to the role that they are carrying out
- All persons require a Log on and Password in order to access the records
- A copy of the files are not made on the users' computer when in use
- The data controller in Communicate can remove or delete users
- The data controller in Communicate can change user's passwords

Client phone numbers are not stored on a mobile phone; however, text messages through WhatsApp sent to and from Communicate may remain on the telephone for a short time before transferring information to an electronic record and then deleted. Communicate will only refer to your child by initial or first name in text. The mobile phone is encrypted with thumb print recognition and passcode.

Videos may be taken of clients with parental consent. These are temporarily stored on an encrypted and password protected tablet. These may then be viewed by the therapist in order to make notes in a client record within 24 hours of the child's appointment and/or to be used in the coaching session with the carer.

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Privacy Policy

8.2 Security Policy

8.2.1 Communicate understands that requirements for electronic and physical storage may change with time and the state of the art. As such, the data controller in Communicate reviews the electronic and physical storage options available to Communicate every 12 months.

8.2.2 All persons working in Communicate are aware and briefed on and refresh the requirements for good data hygiene every 12 months. This briefing compliance is monitored by Communicate 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 Communicate locations
- Use of non-identifiable note taking options (initials, not name).
- The awareness of Communicate procedure should a possible data breach occur, either through malicious (theft) or accident (loss) of devices or physical files

Legal Obligation and Good Practice

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 must be adhered to.

These standards apply to the way in which information is processed and shared.

Standard 2.6 - Work with colleagues: 'You must share relevant information, where appropriate, with colleagues involved in the care, treatment or other service 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.

The full document can be found at:

<http://www.hcpc.org/assets/documents/10004EDFStandardsofconduct,performanceandethics.pdf>

Further information about data protection legislation and your rights is available from the Information Commissioners Office at www.ico.org.uk or by calling 0303 123 1113, 9am to 5pm, Monday to Friday.

Complaints

For complains regarding the handling and processing of personal data, please contact the Information Commissioners Office (ICO) at:

Website: [Make a complaint](#)

ICO Helpline: 0303 123 113

Data Protection Compliance

Our appointed compliance officer in respect of our data protection activities is:

Jenny Treen-Smith Contact details: jenny@communicate-therapy.com or telephone_07939009105

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Accessibility of this document

This document is available to be viewed at www.communicate-therapy.com and can be emailed to clients who use Communicate services on request.

Monitoring and review

Policy agreed and published:	September 2024
Next review:	September 2025