



PRIVACY POLICY

About us

Harrow Speech and Language Therapy (HSLT) is traded by Neera Kavia (Speech and Language Therapist registered with the Health and Care Professions Council, Royal College of Speech and Language Therapists and the Association of Speech and Language Therapists in Independent Practice). HSLT provides Speech and Language Therapy Services to children in the home and/or educational setting.

Terms and Conditions and Service Level agreements are held between the Speech and Language Therapist and parent/carer or the Speech and Language Therapist and school whereby a signature is required.

HSLT is committed to protecting the privacy of information provided by clients. As part of the new data legislation coming into force on 25th May 2018, we need to obtain your explicit consent to communicate with you in regards to your child via email, telephone and messaging service. With parental consent, information may also be collected from other professionals e.g. nursery staff, school staff, medical professionals. Information may be collected on the family's history in relation the child i.e. medical, developmental, assessment results, information on diagnosis, audio/video recordings, clinical observations and administrative information such as name, date of birth, email addresses, telephone numbers, addresses, bank details. We will not disclose any personal information to any person other than stated above unless we are required to do so by law.

Website/Social Media use:

Use of the website (www.harrowspeechtherapy.com) can be used without providing any personal information. However, when making an enquiry via the website or by telephone, you will be requested to provide relevant details such as name, telephone number, home address/school address and email address to be able to respond to your request. If your enquiry does not result in your child being seen by Harrow Speech and Language Therapy Services then this personal information will be deleted within 28 days. However, if your enquiry results to Harrow Speech and Language Therapy Services being used then personal information will be stored on an electronic cloud based system called "Writeupp."

Social Media e.g. Facebook, Instagram and Twitter is used for sharing information and marketing purposes. Testimonials written by parents (with

names initialised) and photographs of children are put up time to time with consent gained. Consent forms are required to be filled in by the child's parents/carers to ensure that permission has been given to use personal details of clients' and photographs/videos before being used on these websites/apps.

The child's parents/carers are free to change their mind and withdraw consent at any point.

The website and pages on social media may contain 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.

Using personal information

Information is used to prepare, plan and provide speech and language therapy services appropriate for your child's needs. Communication via post, email, telephone, SMS, messaging service and face to face is used to:

- confirm appointments i.e. day, time, place
- confirm meetings i.e. day, time, place
- answer questions in relation to your child's speech and language therapy input
- sending reports, assessment summaries and programmes (password protected)
- sending therapy resources
- copying the parents/carers of the child into communications with other professionals involved with your child whereby your child will be addressed using their initials
- Sending invoices/receipts
- Inviting your child to Speech and Language Therapy groups relevant to them
- Sending information on websites, resources, books, seminars, groups relevant to your child's needs

Information sent about your child's data such as reports, programmes etc. about your child will be anonymous using a WriteUpp reference number to identify you.

Information may also be shared for a clinical audit. However, all client identities will be removed.

Storing personal Information

All personal information is stored in the following ways-

1. Using a secure electronic cloud-based system called "WriteUp" which is compliant with general data protection regulations. This system requires a password to be accessed and is only held by Neera Kavia.
2. Password protected documents i.e. reports are stored on an encrypted and password protected file on the laptop which is kept in a locked drawer which can only be accessed by Neera Kavia.
3. Any hard copies used i.e. assessments or documents given to the Speech Therapist will be stored securely in accordance with Data Protection Regulations.
4. Videos/photos may be taken of clients with parental consent. These are temporarily stored on an encrypted and password protected laptop/tablet. The parent and Speech therapist will only view these unless consent is given for other professionals to view it.
5. Name of client's parent/carer and telephone is kept on the SLT's mobile phone.
6. Bank statements and invoices which may contain the client's name and bank details will be kept for a full 7 year period by HMRC for tax purposes.

Confidential information will be carried to and from the Speech and Language Therapist's office base to the child's setting i.e. home, nursery, and school. When your child's information is taken out of the office it will be kept in a folder with the Speech Therapist or locked in the therapist's boot (whichever is deemed to be the most secure at the time).

Information will be stored until your child is 25 years in accordance with the law (or 26 years if the child's therapy was concluded at the age of 17 years). After this time period, all records will be deleted/destroyed.

Accessing clients' data

Neera Kavia has access to all clients' records. If under any circumstance, a contractor is involved in carrying out work for Neera Kavia i.e. during maternity leave, information will be shared with them about the client that is relevant for them to know in order to provide an appropriate service. The contractor will only begin to see the child if they have the relevant experience, hold an up to date DBS and consent is gained from their parent/carer.

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 appropriate 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 visit <http://www.hcpc-uk.org.uk/assts/documents/10043DFAstandardsofconduct.performaneandethics.pdf>

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.

Neera Kavia is registered with the Information Commissioner’s Office (ICO) as a Data Controller. Information on her registration can be found on: <https://ico.org.uk/ESDWebPages/Entry/ZA172586>

Our lawful basis for processing personal information

Under article 6-1-f of the GDPR, our lawful basis for processing and storing personal information is one of ‘legitimate interest.’ Without processing your child’s personal information, an adequate service cannot be provided. As it is both a necessity for our service delivery and of benefit to your child, we have a legitimate interest to process and store their data.

We will process the personal data as necessary to perform the contract we have with you, for the school settings’ own legitimate interest, requested reports and to comply with legal obligation or based on your consent.

Data relating to an individual’s health is classified as ‘Special Category Data’ under section 9 -2-h of the GDPR. We are legally permitted to store and use your health data and communicate this with other professionals involved in your care for health- related purposes (assessment, diagnosis, and treatment), because we are bound by the confidentiality rules of our own professional bodies.

Our responsibilities

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

Personal details will not be shared with any third party without consent unless required by law.

Changes to this privacy policy may be amended to ensure it is compliant with the current data protection regulation.

Your rights

As the parent/carer you have various rights in accordance with the Data Protection Legislation. You have the right to:

- request a copy of information we hold about your child and know how this data has been processed
- ask for your record to be amended if you believe it is wrong
- erasure meaning that you are able to withdraw consent and ask for your personal data and that of your child to be deleted.

How to access your child's records

Your child's records can be requested by writing to us with a signature. This can be requested by writing to:

Neera Kavia
1 Chart Cottages, Green Lane, Stanmore, Middx, HA7 3AB

Further information about data breach, data protection legislation and your rights are available from the Information Commissioner's Office (ICO) website.

Our privacy policy is reviewed regularly. Parents/carers will be notified by email of any changes to the statement.