 **CLIENT PRIVACY NOTICE**

**This privacy notice is meant to help you understand what data I collect, why I collect it, and what I do with it. It should be read alongside my Terms and Conditions document.**

**Before an initial consultation, clients and/or parents/guardians will be asked to sign, and keep a declaration indicating that they have read and understood the terms and conditions, and privacy notice of my practice.**

Jenny Clarkson assumes the function of data controller and supervises the compliance with General Data Protection Regulation (GDPR) within the business.

# Information collected.

*Jenny Clarkson, Speech and Language Therapist* holds personal data as part of conducting a professional service. The data collected as follows under the headings: healthcare records, educational records, clinical records, general administrative records, and financial records.

## 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. 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, e-mail 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 placements.
	+ 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 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.

## Educational records

Educational Health and Care Plans, current targets and objectives, progress notes from educational staff and school reports may be held.

## 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 voice. Audio and video files may also be collected and stored.

## General administrative records

*Jenny Clarkson, Speech and language Therapist* may hold information regarding attendance reports and accident report forms.

## Financial records

A financial record pertains to all financial information concerning the practice, e.g. invoices, receipts, information for Revenue. *Jenny Clarkson Speech and Language Therapist* 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.

# Where information is sourced

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).

# How I use the information that I collect

I use the information that I collect to provide assessment and therapy as per my relevant professional guidelines, as well as to maintain the general running of the business, such as running an electronic booking system, keeping my 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.

## Data retention periods

The retention periods 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.

In accordance with professional guidelines, all records will be kept securely until a child is 25 years old.

Basic contact data will be collected during our first point of contact, such as ‘phone number, address etc. If no further contact is made after 6 weeks, these details will be destroyed.

Following the retention deadline, all data will be destroyed under confidential means

### Clinical Records

*Jenny Clarkson Speech and Language Therapist* keeps both physical and electronic records of clinical data in order to provide a service. Video records/ voice recordings relating to client care/videoconferencing records may be recorded with consent, analysed and then destroyed. If written consent is provided to use recordings for training purposes, the client will have the option to withdraw consent at any time.

### Financial Records

### *Jenny Clarkson Speech and Language Therapist keeps* electronic/paper records of financial data from those who use my services. As per government guideline, these will be kept 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.

### Contact Data

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

## 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

# Information I share

I do not share personal information with companies, organisations and individuals outside unless one of the following circumstances applies:

## With your consent:

I will only share your Personal Identifying Information (PII) to third parties when I have express written permission by letter or email to do so. I require opt-in consent for the sharing of any sensitive information.

Third parties may include: hospitals, GPs, other allied health professionals, educational facilities, NHS Speech and Language therapists.

## For legal reasons:

I 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 Children Act (2004) as amended by the Children and Social Work Act (2017)
		- To protect against harm to the rights, property or safety of Jenny Clarkson, my service users or the public as required or permitted by law.

## To meet financial requirements:

*Jenny Clarkson Speech and Language Therapist* also is required to share financial data in order to comply with local tax laws

# How and when I obtain consent

Prior to initial assessment or consultation, a copy of this Privacy Policy will be provided to clients along with my Terms and Conditions policy. A consent form will need to be signed by the client prior to commencing the service.

Should a client wish to withdraw their consent for data to be processed, they can do so by contacting Jenny Clarkson, Speech and Language Therapist.

# How I protect your data

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

## **By limiting the data that I collect in the first instance**

All data collected by me will be collected solely for the purposes set out 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 me 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.

## By transmitting the data in certain specified circumstances only

Data will only be shared and transmitted, be it on paper, or electronically when required to be shared with a third party. Information containing personal data will be sent via a password protected email.

## By keeping only the data that is required

## By retaining the data for only as long as is required

Data will be kept as outlined in Section 3.2, following professional guidelines.

##  By destroying the data securely and confidentially after the period of retention has elapsed.

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

# Protecting your Rights to your Data

## Access to your data

You have the right to request a copy of the personal information that is held about you and your child. 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. This is called a Subject Access Request and it is free of charge. All requests will be processed and completed within 30 days of receipt.

## Permission

You have the right to withdraw your permission at any time. You have the right to change previously agreed aspects of consent, for example, video recording.

## Erasure of data

As information is processed on a legitimate basis, it is not possible to request an erasure of personal information. However, you can request that incorrect information is changed, for example, a change in address.

# Security

*Jenny Clarkson Speech and Language Therapist*, as with most providers of healthcare services is aware of the need for privacy. As such, I 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.

## Data Security

### Electronic Data

Any information that is stored electronically is kept on a password protected hard drive, any emails containing personal information are sent password protected.

### Physical Files

Case notes and personal data are kept in a locked filing cabinet, and the key is kept separately. Case notes are kept out of view when travelling

### Review

This policy will be reviewed annually. A data breach risk assessment will be conducted annually in conjunction with this. Any significant breaches in data security will be reported to the ICO.

## Further queries can be directed to

**Jenny Clarkson**

**Independent Speech and Language Therapist**

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