



Central Speech & Language Therapy Security Policy

Central Speech & Language Therapy will be referred to as CSLT throughout the Privacy Policy

Policy

CSLT is committed to protecting your personal information and adheres to General Data Protection Regulation (GDPR). This Privacy Policy outlines the process for ensuring personal information is handled lawfully.

The policy outlines the information obtained, the purpose of information collection, information storage, information sharing and informed consent.

This privacy policy can be reviewed at any time and all service users will be informed of any important changes.

- **Personal Information Collection** is required to provide the best standard of care. Some of the information required that relates to your child and/or family members may be sensitive in nature.

Information includes child's name; date of birth; address; parent/carer contact details (phone & email); GP practice; registered nursery/school; medical diagnosis; developmental history; signed consent for information sharing; photographs/videos for clinical and therapeutic use; electronic clinical/therapy case notes; email correspondence; reports; minutes of meetings and multi-disciplinary information.

Information may be obtained from the client, parent/carer and/or other professionals involved with your child (with consent).

Verbal information can be obtained via face to face, telephone, online meeting communication.



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Written information can be obtained via email, SMS, WhatsApp and/or social media platforms if requested by the parent/carer (including Facebook, Instagram, LinkedIn and Association of Speech & Language Therapists in Independent Practice ASLTIP message).

IMPORTANT NOTE: Please be aware that email and social media messaging platforms are not secure ways of sharing personal information and parents/carers do so **at their own risk**.

CSLT will not share personal sensitive data through social media channels and advise individuals to email avoiding the use of full names and identifiable information, *we suggest using initials only*.

Holding personal information

All personal data is used solely for the purpose of providing services and comply with legal obligations.

We will use your personal data to:

- Register you as a new client
- Manage payment
- Maintain professional and therapeutic relationships and liaison
- Update on our services.

Data sharing & storage

CSLT will only share personal information with external agents when it is in the best interest of the child and in line with professional best practice guidelines. This may include your child's GP, education setting, Educational Psychologist, legal guardian(s)/carer(s), social work department. Consent would be required for each instance of sharing information.

CSLT will not share your details with third parties for marketing purposes.

In essential circumstances your personal data may be shared with our contracted IT service provider, the internal administration team, professional advisors i.e. auditors, insurers, HMRC and regulatory authorities.



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All data is stored electronically in a secure manner with password protection and encryption measures. Central Speech & Language Therapy use Microsoft 365. All reasonable measures have been put in place to prevent any accidental loss, use or access.

Electronic information is held within encrypted laptops/desktop using Microsoft 365. (<http://info.microsoft.com/rs/157-GQE-382/images/EN-AU-CNTNT-Whitepaper-Prepare-for-GDPR-today-with-M365%5B1%5D.pdf>).

We also limit access to your personal data to those employees, associates and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

CSLT adhere to protocols when dealing with any suspected confidentiality and/or data breaches. You will be notified if your data is involved in any instance. CSLT will also inform the relevant regulatory body within 72 hours of any identified breach.

Data retention

CSLT will hold your enquiry data for four months and delete at this point if you do not proceed with direct intervention.

If you proceed with direct intervention CSLT is required to open and maintain a case file in line with data retention laws for children's records.

- Until the child is 25 or 8 years after their death if sooner.
- If the child's medical condition e.g. diagnosed learning disability, Down's Syndrome could be relevant to an adult condition, or have genetic implications for their family, records must be kept until the client's death.

We may retain your data to satisfy any legal, accounting, or reporting requirements for 6 years after you cease to be a client for tax purposes.



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Please contact CSLT if you wish to request data deletion – this can be granted in certain circumstances. CSLT may contact the professional regulatory body for guidance on the matter before a final decision is mutually agreed.

Requesting your clinical record

GDPR allows you to request certain access to the data CSLT maintain about you and your child.

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

In relation to a Subject Access Right request, there is no charge or rejection of request except in circumstances deemed to be unfounded or excessive. If you wish to make a Subject Access Request, please send the request to info@centralslt.com FAO Director Michelle Beagley. CSLT aim to respond to all reasonable requests within 4-6 weeks, if there is any delay you will be notified in writing.

Updating your data

CSLT have a duty of care to maintain accurate, up to date personal data. At times, you may be asked to confirm if your data is accurate.

Please notify CSLT if there are changes to your personal data at your earliest opportunity.

Grievance

If you have any concerns relating to your data protection that cannot be resolved with CSLT directly, you can contact/complain to the Information Commissioner's Office (www.ico.org.uk).

All CSLT clients accessing services will be required to sign, date and return a Terms, Conditions, Consent & Cancellation Form (stored in the client file).



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