



This privacy policy sets out how S L Therapy London Ltd uses and protects any information that you give S L Therapy London Ltd when you use this website.

S L Therapy London Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

S L Therapy London Ltd may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 1st May 2019.

Director: Sarah Lyons assumes the function of data controller and supervises the compliance with General Data Protection Regulation (GDPR) within the business.

1. Information we collect
2. Where we get our information
3. How we use the information we collect
4. Information we share
5. How and when consent is obtained
6. How we protect your data
7. Protecting your rights to data
8. Security of your personal data
9. How we use cookies
10. Links to other websites
11. Controlling your personal information

1 Information we collect

S L Therapy London holds personal data as part of conducting a professional service. The data follows 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, 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.

For adult services (16 years +):

- Employment/vocational history
- Mental health

1.2 Educational records

Relevant Individual Educational Plans (IEPs), 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, e-mails, text messages and transcripts of phone. Audio and video files may also be collected and stored.

1.4 General administrative records

SL Therapy London 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 - S L Therapy London 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.

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 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).

3 How we use the information that we collect

We 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/guardian.

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 needs, 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

S L Therapy London keeps both physical and electronic records of clinical data in order to provide a service.



- The preferred format for clinical data is *electronic*.
- 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.

3.2.2 Financial Records

S L Therapy London keeps electronic/paper records of financial data from those who use our services.

Section 886 of the Direct Tax Acts states that the Revenue Commissioners require records to be retained 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.

- Financial Data is kept for 6 years to adhere to Revenue guidelines.
- Financial Data (including non-payment of bills) can be given to Revenue at Revenue's request.

3.2.3 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.)

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.

4 Information we share

We do not share personal information with companies, organisations and individuals outside *S L Therapy London* 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. We require opt-in consent for the sharing of any sensitive information.



Third parties may include: hospitals, GPs, other allied health professionals, educational facilities.

4.2 For legal reasons:

We will share personal information with companies or organisations outside of *S L Therapy London* 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 First Act 2015.
- To protect against harm to the rights, property or safety of S L Therapy London our service users or the public as required or permitted by law.

4.3 For processing by third parties/external processing

The following third parties are engaged for processing data:

Who	Type of data	Purpose
Administrative staff	Record keeping, typing, correspondence.	Updating records
Therapists	Record keeping, report writing typing, correspondence.	Service delivery

5 How and when we obtain consent

Prior to initial assessment or consultation, a referral form will need to be signed by the client prior to commencing the service. (A copy of the data protection policy for S L Therapy London and website can be mailed and/ or a hard copy can be provided on request) The referral form has a statement that must be agreed to stating the parents/ guardians/ client have read the data protection statement and agree to S L Therapy London services and data protection policy.

Should a client wish to withdraw their consent for data to be processed, they can do so by contacting S L Therapy London.

6 How we protect your data

In accordance with the General Data Protection Regulation (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 5.1. Furthermore, all data collected by us 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.

6.2 By transmitting the data in certain specified circumstances only

Data will only be share and transmitted, be it on paper, 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 other third parties.

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

Data is required to be held for 15 years. We put in place appropriate technical and organisational measures to ensure 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

Which in this case is 15 years after the completion of therapy or until the client is 25 years old (whichever is sooner). 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 at 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 Protecting your Rights to Data

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

7.2 Children

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. However, this is subject to adherence with the Children First Act.

8 Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

S L Therapy London, 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 *S L Therapy London* in a professional capacity are briefed on the proper management, storage and safekeeping of data.



All data used by *S L Therapy London*, including personal data may be retained in any of the following formats:

1. Electronic Data
2. Physical Files

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

Where applicable, *S L Therapy London* may convert physical files to electronic records to allow us to provide a better service to clients.

8.1 Data Security

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

8.1.1 Electronic Data

All electronic data is contained in the following systems:
e.g. Email system, Dropbox, shared folders, etc.

S L Therapy London use the following systems

- Writeupp
- Dropbox Business
- Toolkit Webmail
- Please contact these providers for their GDPR policies.

8.1.2 Physical Files

All physical data is located in: *Business premises of S L Therapy London*

- These records *are* kept in a container secured with a lock and key.



8.2 Security Policy

- 8.2.1 *S L Therapy London* understands that requirements for electronic and physical storage may change with time and the technological advancements. As such, the data controller in *S L Therapy London* reviews the electronic and physical storage options available to every *12 months*
- 8.2.2 All physical devices used by persons working in *S L Therapy London* which may contain any identifiable are encrypted and have wipe abilities.
- 8.2.3 All persons working in *S L Therapy London* are aware and briefed on, and refresh the requirements for good data hygiene every *12 months*. This briefing compliance is monitored by the *Director – Sarah Lyons* and includes, but is not limited to:
- Awareness of client conversations in unsecure locations.
 - Enabling auto-lock on devices when leaving them unattended
 - Use of non-identifiable note taking options. (initials, not names).
 - The awareness of *S L Therapy London* procedure should a possible data breach occur, either through malicious (theft) or accident (loss) of devices or physical files.

9.0 How we use cookies

- 9.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 9.2 We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 9.3 Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.
- 9.4 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.



10 Links to other websites

10.1 Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

11 Controlling your personal information

11.1 You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes

- if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by emailing us at enquiries@sltherapylondon.com

11.2 We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

11.3 We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

11.4 You may request details of personal information which we hold about you under the Data Protection Act 1998. A small fee will be payable. If you would like a copy of the information held on you please write to **5 Fitzhardinge Street, Marylebone, London, England, W1H 6ED.**

11.5 If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect.