

## Privacy Notice

### **Who we are:**

Zara Humphry is a qualified Speech and Language Therapist offering independent speech and language therapy to children in their home and/ or educational setting (e.g. nursery/ preschool and school). Zara (Azahara) Humphry is registered with the Health and Care Professionals Council (HCPC Registration Number: SL00225). Zara Humphry is a member of the Royal College of Speech and Language Therapists (RCSLT) as well as The Associations of Speech and Language Therapists in Independent Practice (ASLTIP).

Zara Humphry operates a website at [www.communic8kids.co.uk](http://www.communic8kids.co.uk)

Zara Humphry is committed to protecting the privacy of information provided by clients.

### **Collection of Personal Information:**

Information about your child may be collected via spoken or written information from parents/ carers. With parental consent, information may also be collected from other professionals working with your child (such as teachers, childminders, NHS Speech and Language Therapist, Doctors etc.). We may also collect information about family members where this relates to your child (such as contact details for parents and relevant medical or developmental history).

You may use Communic8kids.co.uk website without providing any personal information. However, if you wish to make an enquiry via email or over the phone, you are requested to provide relevant contact details, such as your name, email address, and contact telephone number to enable us to respond to your enquiry. You may add comments or queries which might also contain personal information.

If your enquiry does not result in your child being seen by us, then this personal information will be deleted once your enquiry has been dealt with. We will allow a three-month time period (from time of initial contact) before deleting information supplied by you if we do not hear back from you. If your child is subsequently seen by us these details may be added to their personal record.

The website ([www.communic8kids.co.uk](http://www.communic8kids.co.uk)) contains 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 website.

### **Use of personal information:**

Personal information collected by us through; email, telephone or face to face, is stored and used by us to deliver your child's speech and language therapy.

We use your sensitive personal data for the purposes of providing a service to you or if we need to comply with a legal obligation. Any sensitive personal details are stored in a secure and confidential system and processed in confidence by us and shall only be used for the purposes of delivering appropriate speech and language therapy services to your child.

Your Speech and Language Therapist has a legal and professional obligation to keep accurate records (e.g. case notes, reports and assessments) relating to any treatment they provide.

With your consent, information about your child's speech and language needs will be shared with other professionals involved in your child's care, when it is in your child's best interests. A record of your consent is kept within your child's case notes.

Unless we are required to do so by law, we will not disclose any personal information collected to any person other than as set out above.

We use your non-sensitive personal data to (a) register you as a new client, (b) manage payment, (c) collect and recover monies owed to us, (d) to manage our relationship with you and (e) send you details of our good and services.

We do not employ agents to process personal data, for example specialist mailing companies to send out communications.

We do not give or sell client details to any third parties except with your express consent.

**Information/ Data includes:**

- The initial case history form that you completed when you arranged your child's first appointment or at your child's first appointment
- Any reports/ letters/ programmes and session feedback we have written about your child
- The case notes that we write at the end of each therapy session
- Any reports or information regarding your child that you have shared with us or other professionals have shared with us
- Any emails sent or received regarding your child
- Any photographs you have provided for us to make individualised resources for your child
- Your telephone number which is stored on our mobile phone under your initials and your child's initials

**How we use personal data:**

We use this information:

- To prepare, plan and provide speech and language therapy services appropriate for your child's needs
- To communicate with you via post, email, telephone, mobile messages, SMS and MMS in relation to:
  - confirming and preparing for appointments
  - general communication in between appointments
  - sending your reports and programmes for your child (always password protected)
  - copying you in to communication with other professionals involved with your child (your child's initials rather than full name will be used in emails)
  - sending you resources
  - sending you invoices and receipts
- For clinical audit to assess and improve our service. Results of audits are always presented with all clients' identities removed.
- For management and administration
- For preparing our accounts

**Disclosure of your personal data:**

We may have to share your personal data with (a) service providers who provide IT support and system administration support, (b) professional advisors including lawyers, accountants, auditors and insurers, (c) HMRC and other regulatory authorities, (d) and to other professionals for the purposes of discussing your child's treatment. Whenever personal identifiers are not needed for these tasks, if possible we remove them from the information we use. We may also anonymise your personal data (so that you can no longer be identified from such data).

We require all these third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on our instructions.

### **Data Security:**

All information about you, your child and their speech and language therapy are stored securely in our systems to ensure that we have a complete record of our service to them. We use secure electronic cloud-based systems (only accessible via a password held by us) which are compliant with general data protection regulations. Documents which contain confidential information such as reports, and programmes are individually password protected from the outset. Any paper based confidential information such as case notes and assessments are stored securely in accordance with Data Protection Regulations.

We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

Videos and audio recordings may be taken of clients with parental consent. These are temporarily stored on an encrypted and password/code protected device. These may then be viewed by the SLT to make notes in a client record. The video and audio recordings are then deleted when no longer required.

The minimum amount of confidential information will be taken out of the Speech and Language Therapist's office base. When your child's information is taken out of the office base it will be kept with the Speech and Language Therapist or will be locked in the boot of the Speech and Language Therapist's car (whichever is deemed to be the most secure at the time).

In accordance with law, all records will be kept securely until your child is 25 years old or until their 26<sup>th</sup> birthday if 17 years old at conclusion of treatment. After this time all records relating to your child will be destroyed.

### **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:

*Standards 2: Communicate appropriately 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 the full document can be found at:

<http://www.hcpc-uk.org/aboutregistration/standards/standardsofconductperformanceandethics/>

**UK Data Protection Law and EU General Data Protection Regulations:**

The 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.

Zara Humphry is registered with the Information Commissioner’s Office (ICO) as a Data Controller. You can view her ICO registration (Azahara Humphry) details by visiting:  
[www.ico.org.uk/ESDWebPages/Entry/ZA106805](http://www.ico.org.uk/ESDWebPages/Entry/ZA106805)

**Our lawful basis for processing personal information:**

Our lawful basis for processing and storing personal information is one of ‘legitimate interest’ (under article 6 of GDPR). We cannot adequately deliver a service to your child without processing their personal information. As it is both a necessity of our service delivery and of benefit to your child, we have a legitimate interest to process and store their data.

Data relating to an individual’s health is classified as ‘Special Category Data’ under article 9 of GDPR. The regulations specify that health professionals who are “legally bound to professional secrecy” may have a lawful basis for processing this data. Speech and Language Therapists are legally bound to keep client information confidential and it is under this condition that we process and store personal information.

**Our responsibilities:**

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

We will not release your personal details to any third party without first seeking your consent, unless this is allowed for or required by law.

We are constantly working to ensure compliance with current data regulation.

### **Your rights:**

Data protection legislation gives you, the parent, various rights. The most important of these are as follows:

- You have the right to request that we inform you of the data we hold about you and how we process it (Subject Access Right)
- You have the right to ask for your records to be amended if you believe that it is wrong

In relation to a Subject Access Right request, you may request we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to a request unless your request is excessive or unfounded in which case we may charge a reasonable fee.

You can access the information we hold about you by writing to the address we supply. Please apply formally in writing rather than by email, so that we receive an original signature to compare against the record we hold. Initially you will need to make your request in writing by email to Zara Humphry, marked for the attention of the Data Compliance Officer. We will, in most cases, respond within one month of the date of the request providing all the necessary information is supplied. Should the request be complex we will notify you of any delay and will in any event reply within 3 months.

If you have any further questions about how we use your information, please contact [zarahumphryslt@gmail.com](mailto:zarahumphryslt@gmail.com)

Further information about data protection legislation and your rights is available from the Information Commissioner's Office or by calling 0303 123 1113.

### **Complaints**

If for some reason you are unhappy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

Please do contact us first if you do have any complaint so that we can resolve it for you.

We may change this Privacy Notice from time to time and shall notify you of any changes.

If you have any changes to your personal data (such as a change of contact details) please let us know as soon as possible.