



Privacy Policy

This policy was last updated by Milly Clarke in August 2023

About Milly Clarke

I am an Independent Speech and Language Therapist (SLT) providing speech and language therapy support for children across East and West Sussex. I am registered with the Association of Independent Speech and Language Therapists (ASLTIP) and the Health and Care Professions Council (HCPC).

My website can be found at www.millyclarke.com and you can contact me on millyclarke.slt@gmail.com, 07773040068.

As an Independent SLT, I am 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/Guardians. With written consent from Parents/ Guardians, information may also be collected from other professionals working with your child e.g. NHS Speech and Language Therapist or other Healthcare Professionals, Teaching/ Nursery Staff. We may also collect information about family members where this relates to your child e.g. contact details for parents and relevant medical or developmental history.

You can access my website without providing any personal information about yourself or your child. Should you choose to contact me via my website, you will be asked to provide contact details, including your name, phone number, address and email address to enable me to respond to your enquiry. You may add comments or questions which might also contain personal information.

If I do not meet with you and your child following an enquiry, personal information will be deleted once the enquiry has been dealt with. If an enquiry results in me working with your child, these details may be added to your child's personal record.

The website contains links to other Internet sites which are outside of my control and are not covered by this privacy policy. I am not responsible for data which you provide through any such linked websites.

How Personal Information is Collected

Personal information collected by me via my website, email, telephone or face to face, is stored and used by me for the purpose of delivering speech and language therapy for your child.

Any sensitive personal details are stored in a secure and confidential way and processed in confidence by myself and shall only be used for the purposes of delivering appropriate speech and language therapy services to your child.

With your written 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 clinical notes.

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



I do not employ agents to process personal data, for example specialist mailing companies to send out communications and I do not give or sell client details to any third parties.

How Personal Information is Used

I use the collected information in the following ways:

- To arrange, plan and provide speech and language therapy as appropriate to meet the needs of your child
- To communicate with you via post, email, telephone, mobile messages and SMS in relation to:
 - arranging and planning for sessions
 - communication in between sessions
 - sending you copies of reports and programmes for your child (always password protected)
 - communicating with other professionals involved with your child (your child's initials rather than full name will be used in emails)
 - sending you/ your child's education setting resources
 - sending you invoices via post, email or face to face

Whenever personal identifiers are not needed for these tasks, if possible we remove them from the information we use.

How Personal Information is Stored

All information about you, your child and their speech and language therapy is stored securely in accordance with Data Protection Regulations.

Paper based documents containing confidential information including assessment record forms are stored in a locked filing cabinet which only I have access to. If I am working with your child in a school for children with Special Educational Needs, paper-based documents may be stored in a secure location in the school or on a school computer system e.g. Google Drive.

Documents which contain confidential information such as reports and programmes are stored on a personal laptop with password protection, only accessible by myself or on a secure school system if I am working with your child in school.

From September 2020, clinical notes will either be stored on the online clinical notes platform, Writeupp or in a secure Word Document saved on a secure school system.

My Writeupp account is secured by password and is only accessible by myself.

Clinical notes saved in a secure Word Document will be password protected and only accessed by myself other professionals working in the school your child attends.

I will access clinical notes on both my password protected laptop and a smartphone which is protected with a passcode. Clinical notes may be accessed on a school computer.

I access emails on both my password protected laptop and a smartphone which is protected with a passcode. Emails may also be accessed online from a secure school computer, if I am working with your child in their school. I will sign out of my email account when finished.



Videos may be taken of clients with parental consent. These are temporarily stored on a password protected phone. These may then be viewed by the SLT in order to make notes in a client record within 24 hours of the child's appointment. The video is then deleted.

Audio recordings may be made with parental consent. These are temporarily stored on a password protected smartphone. These may then be listened to by the SLT in order to make notes in a client record within 24 hours of the child's appointment. The recordings will then be deleted. Audio and video recordings may be saved in the child's confidential file on a password protected laptop for the purposes of outcome measures.

The minimum amount of confidential information will be taken out of my base. When your child's information is taken out of the base it will be kept on my person or it will be locked in the boot of my car (whichever is deemed to be the most secure at that time).

In accordance with law, all records will be kept securely until your child is 25 years old. After this time all records relating to your child will be destroyed. Any records stored at a school for special educational needs will continue to be stored securely at the school. It is the responsibility of school staff to keep these records until your child is 25 years old. The school may share these records with future professionals.

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 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/assets/documents/10004EDFStandardsofconduct,performanceandethics.pdf>

Personal Data Breaches

In the unlikely event that a personal data breach should occur, this would be reported within 72 hours to the local authority. In cases where data was not encrypted, the breach would also be reported to the Parent/ Guardian.

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.



I am registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view my ICO registration by visiting: <https://ico.org.uk/ESDWebPages/Entry/ZA258304>

Lawful Basis for Processing Personal Information

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

Data relating to an individual's health is classified as 'Special Category Data' under section 9 of the 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.

My Responsibilities

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

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

I am constantly working to ensure compliance with current data protection 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 a copy of information we hold about your child.
- You have the right to ask for your record to be amended if you believe that it is wrong.

How to access your child's records

You can access the information I hold about you and your child by writing to us. Please apply in writing rather than by email, so that we receive an original signature to compare against the records we hold. A postal address will be provided should you wish to request access to your information.

A copy of your child's records is provided free of charge.

We will provide access to your child's records within 30 days of receipt of all necessary information.

If you have any further questions about how I use your information, please contact millyclarke.slt@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, 9am to 5pm, Monday to Friday.

Signed

Designation

Milly Clarke, Specialist Speech and Language Therapist

Date:

30th August 2023