



Privacy Policy (short form) for Pathways Speech Therapy

Pathways Speech Therapy is a small, independent speech and language therapy practice, operating as a sole trader. The therapist is **Kirsten Howells**.

Pathways Speech Therapy is registered at: 19 Heatherfield Court, Wilmslow, Cheshire, SK9 2QE. The website is www.pathwaysspeechtherapy.co.uk, the email address is pathwaysspeechtherapy@gmail.com, and the telephone number is 07450 067 233.

This Privacy Policy outlines how Pathways Speech Therapy processes personal data in line with the requirements of the General Data Protection Regulation (GDPR). The aim of the document is to explain what data Pathways Speech Therapy collects, why we collect it and what we do with it. The terms 'data' and 'information' are used interchangeably throughout the document. For more information or explanations regarding the topics outlined in this document, please contact Kirsten with questions or to request a copy of our more detailed Privacy Policy Statement.

Personal data is information that relates to an identifiable individual. *Processing* refers to any operation which is carried out using personal data, for example, the collection, recording, organisation, storage, adaptation, retrieval, disclosure, dissemination, destruction and/or erasure of such data.

1 What personal data does Pathways Speech Therapy collect?

Pathways Speech Therapy holds personal information or data as part of conducting a professional service for service users. The following types of information may be collected (the exact details vary dependent on the concerns, needs and situation of the service user):

- Your general contact details and basic personal information, such as name, address, date of birth, email addresses and telephone numbers
- Parent/guardian/carer details for children under the age of 16 or adults who typically receive support with activities of daily living
- An outline of your concerns
- healthcare records such as the contact details for your GP and other relevant healthcare professionals, medical and mental health history, pre- and post-natal history, developmental information
- Employment and/or vocational history
- Educational records
- Hobbies and interests
- Case notes of assessment and therapy sessions and associated discussions
- Assessments forms, reports, case notes, emails, text messages, transcripts and audiovisual files related to assessment or therapy activities
- Attendance information and accident report forms
- Financial records related to invoicing and payment for speech therapy provision

2 What is Pathways Speech Therapy's lawful basis for processing personal information?

Under the General Data Protection Regulation, Pathways Speech Therapy must identify a lawful basis for processing your information. The lawful basis related to initial referral, enquiries or registration of interest is *'contracts'* under the General Data Protection Regulation (GDPR Article 6(1)(b)). This means that information is collected and stored when you first approach Pathways Speech Therapy with a query of to seek advice or find out more about the services offered. We store this information, so that we can contact you and respond to your enquiry.

The lawful basis for processing data if you have entered into an agreement or contract regarding services with Pathways Speech Therapy is *'legal obligation'* under the General Data Protection Regulation (GDPR Article 6(1)(c)). As a Speech & Language Therapist, there is a statutory requirement for Kirsten to collect information and keep and process records in particular ways to facilitate clinical decision-making, plan and deliver therapy and keep a record of this process.

For more information, please see our more detailed Privacy Policy Statement and the following website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/>.

3 How does Pathways Speech Therapy collect the information?

Personal data will be provided by the or, where the client is a child (under 16 years) or an adult who receives regular assistance with activities of daily living, may also be collected from their parent(s), guardian(s) or carer(s). Information may be collected during face-to-face, telephone or email communications, during therapy sessions, and through formal or informal observation and assessments. Where appropriate and usually following discussion with yourself, information may also be collected from friends, family members and employers.

Information may also be provided directly by relevant third parties such as schools, medical professionals and allied health professionals.

4 How does Pathways Speech Therapy use the information collected?

The information collected is primarily used to provide you with speech and language therapy services, to facilitate clinical decision-making and therapy planning, and to facilitate communication between yourself and the therapist. Information may also be used for research or training purposes, but only with written consent from yourself. Financial information related to invoicing is used to report Pathways Speech Therapy's annual accounts to HM Revenue and Customs.

5 How does Pathways Speech Therapy store personal information?

Pathways Speech Therapy keeps both electronic records and physical records of information in order to provide a service. The majority of information, including casenotes, is stored electronically using *MyTherapyTracker*, a web-based tool, which is GDPR compliant and utilizes end-to-end encryption when sharing information between yourself and the therapist.

Type of information	Where is it stored?	How long is it stored for?
Telephone enquiry	Handwritten notes, kept in locked filing cabinet.	Notes destroyed 1 month after initial contact or transferred to your electronic casenotes* if enquiry leads to a referral.
Email enquiry/initial contact	Password protected email account.	Email deleted 2 months after initial contact or transferred to your electronic casenotes* if enquiry leads to a referral.
Other email information	Deleted or transferred to your electronic casenotes.	*See electronic casenotes below.
Documents from third parties (e.g. medical documents, school reports)	Scanned and saved to your electronic casenotes.	*See electronic casenotes below.
Paper working documents, such as re-useable rating scales, and written or pictorial works-in-progress.	Locked filing cabinet.	Scanned and saved to your electronic casenotes* on completion or discharge.
Video and audio recordings and photos	Deleted immediately post-use, or saved to your electronic casenotes or password protected on an external harddrive stored in a locked filing cabinet.	Where such video or audio recordings or photographs form part of the ongoing record of assessment/therapy and are used to document progress or to inform clinical decision-making, they are kept for the retention period of the electronic casenotes*. If they are a tool within a particular therapy activity or session, they are deleted as soon as their purpose is served.
Therapist's handwritten notes made during or immediately following	Kept in locked therapy bag or filing cabinet, prior to transfer to electronic	Destroyed within 48 hours, following transfer to your electronic casenotes*.

sessions or conversations	notes system within a maximum of 48 hours.	
*Electronic casenotes	MyTherapyTracker	Casenotes, including contact data, for adults are retained for 8 years post-discharge. Casenotes for children are retained until their 25 th birthday, or 26 th birthday if they were 17 at the time of discharge.
Invoices	MyTherapyTracker	Where invoices and financial information can be separated from the clinical record, they will be deleted 6 years following the financial year to which they pertain.

6 How does Pathways Speech Therapy share information?

Pathways Speech Therapy does not share personal information with external companies, organisations and individuals unless one of the following circumstances apply. In these circumstances, information will be shared verbally or in writing, whichever seems most appropriate.

- When you ask us to.
- Sharing information with relevant professionals , for example, with your GP if an issue requires referral to a medical specialist, or with a child’s teacher if working on classroom strategies (NB Such sharing of information will usually occur in collaboration and following discussion with yourself).
- For legal reasons, for example related to issues regarding safeguarding of children and vulnerable adults.
- To meet financial reporting requirements.
- For electronic storage of electronic casenotes and sharing of electronic information between yourself and the therapist in *MyTherapyTracker* (NB *MyTherapyTracker* is a web- and cloud-based system which meets the requirements of GDPR and uses end-to-end encryption for the sharing of data between client and therapist).

7 Your rights with regard to your data

You have the following rights with regard to the processing of your personal information:

- The right to be informed about the ways in which Pathways Speech Therapy processes your personal data
- The right to access your data
- The right to correction of factually incorrect data
- The right to restrict processing of your data to some extent applies in certain circumstances

Please note that the right to **erasure**, **data portability**, or to **object** to the processing of personal data is not included in this list as these do not apply to clients who have entered into an agreement

or contract with Pathways Speech and Language Therapy for the provision of services. This is because the therapist is under a legal obligation to collect, keep and hold the data for specified periods of time.

8 How your data is protected

In accordance with the General Data Protection Regulation (GDPR), Pathways Speech Therapy endeavours to protect your data in a number of ways:

- By collecting only data that is relevant to provide you with speech & language therapy services (see Section 1).
- By storing data securely, for example, password-protected and encrypted electronic systems and locked filing cabinets for paper records (see (Section 5).
- By deleting or destroying information that does not form part of the longer-term record (see Section 5 above).
- By transmitting or sharing data only in specified circumstances, and as set out in Section 6 above.

If you have any questions or require more information, please contact Kirsten. You are welcome to ask her questions about this policy, and to request more detailed verbal explanations or a copy of our more detailed Privacy Policy Statement.