

Speaking Space (Romsey) Ltd Privacy Policy

Our contact details

Name: Speaking Space (Romsey) Ltd

Address: Fleming House

Alma Road

Romsey

SO51 8ed

Phone number: 02380 987134

Email: office@speakingsspace.co.uk

Privacy Policy updated: December 2023

The type of personal information we collect:

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (e.g. name, address, email address, telephone number, school or college information)
- invoicing details
- medical history
- other health and social information

How we get the personal information that we collect and why we have it:

Speaking Space (Romsey) Ltd operates a website at www.speakingsspace.co.uk. We may collect data via our website if you make an enquiry. We may also collect data via email, telephone, face to face or via third parties such as other professionals involved in your care. We have CCTV cameras at our base at Fleming House which records our front door and back gate over a 24 hour period.

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To provide a speech and language therapy service
- To provide a day service
- To provide an external supervision service
- To manage training bookings
- To manage financial transactions
- With your consent we may send you information regarding upcoming events

We may also receive personal information indirectly from the following sources in the following scenarios:

- From educational settings where we provide a speech and language therapy service to enable us to provide this service
- From family carers, health or social care professionals to enable us to provide a speech and language therapy or day service

Depending on the service you are receiving from us this might be to:

- keep healthcare records or records for internal use
- to write reports, programmes or targets
- to provide caseload information to an educational setting
- financial transactions such as invoicing or selling products
- booking information for training
- to keep supervision records
- liaising with other professionals involved in your care
- responding to website enquiries

How we share data

We may share data about the individual in relation to the service being provided. We may share this with:

- other professionals involved in the person's care e.g. other therapists, school staff, medical staff, parents
- When we have a service level agreement to provide speech and language therapy to an educational setting

Information sent electronically will be sent via a secure one drive link and password protected with the password sent by another means.

Lawful bases for processing

The new GDPR (General Data Protection Regulations) require data processors to have a lawful basis for processing that data. If sensitive personal data is being processed, further conditions must be met before you start processing this data.

1. Legitimate interest

We will be processing data in relation to the services we provide i.e. speech therapy/day service under this lawful basis. This means we must complete a Legitimate Interest Assessment which performs 3 tests. These are outlined below and the reasons why we have decided to process this type of data under this lawful basis:

a. Purpose test: are you pursuing a legitimate interest?

Yes, our legitimate interest is that we are providing a health/social care service to individuals and processing data is a necessary part of providing this service.

- b. Necessity test: is the processing necessary for that purpose?

Yes, in order to safeguard the children and vulnerable adults we work with, and in order to provide a complete and efficient service we must process this data. With regards to our therapy service, HCPC (Health and Care Professions Council) Standards of Conduct, Performance and Ethics point 2.6 says we must share relevant information with colleagues involved in client care, and point 10.1 obliges us to keep full, clear and accurate records for everyone we care for, treat, or provide other services to.

- c. Balancing test: do the individual's interests override the legitimate interest?

A person entering into a service with us would reasonably expect their data to be processed in this way. Due to the sensitive nature of the data we collect there are measures in place to reduce the likelihood that the data collection will have any impact on the individual.

Special category data: Condition for processing

In order to process special category data we need to meet separate conditions, namely:

"That processing is necessary for the purposes of preventive or occupational medicine, the provision of health or social care or treatment or the management of health or social care systems".

Your rights

Data protection legislation gives you various rights with regards to your data as follows:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to object
5. Rights in relation to automated decision making and profiling

2. Consent

We will be processing some of our data under the lawful basis of consent, namely:

- The use of data for marketing purposes
- The use of audio/video recording of the individual and how this will be used

Please see a separate consent form attached to this privacy notice for more information about this.

Your rights

Your rights in relation to this specific data are as follows:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

3. Contract

We may process information because we have entered into a contract with you. This may include a training booking, external supervision or selling products to you. We will process the information necessary to perform the tasks involved in the contract. This can include prior to a contract being set up if you have asked us to provide you with a quote.

Your rights in relation to this specific data are as follows:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability

How we store personal data:

We take the following measures to ensure personal data is stored securely:

- Any paper based confidential information such as assessments are locked in the building of Speaking Space (Romsey) Ltd, or in the school in which we have a contract, within a locked filing cabinet.
- All electronic case notes will be written directly into and kept within a system called Writeupp which is GDPR compliant. This will only be accessible to the therapy team and administrators of the system.
- If therapists don't have access to the internet they will write case notes offline on their secure one drive until they are uploaded to Writeupp. Case notes will



then be deleted from their one drive. This process will be the same for other information which is relevant to the individual's case file e.g. electronic copies of emails, reports, target forms.

- Paper documents such as assessment forms and previous paper files will be uploaded to a folder on our secure Sharepoint system as soon as possible which is only accessible to the administrators of the system and our therapists. Paper files will then be securely shredded if appropriate. If assessment forms need to be kept for future assessments these will be securely locked in the building of Speaking Space (Romsey) Ltd, or in the school in which we have a contract, within a locked filing cabinet.
- We use office 365 to store electronic data on personal one drives and on SharePoint due to the high level of security and encryption offered by this platform. Documents produced by individual therapists are stored on their personal one drive. This means the information is stored securely in the cloud and is accessed by that individual via office.com or via one drive on their personal password protected laptop.
- Shared information is stored securely on SharePoint and can be accessed via individual accounts via office.com. Folders within SharePoint have restricted access so each individual can only access folders which are necessary for their role. This includes supervision notes for external supervision or training booking information
- Two factor authentication is enabled on all office 365 accounts
- No documents are stored on laptop hard drives
- Videos or photos may be taken with consent. If taken on a mobile device, they will be transferred onto one drive or SharePoint at the earliest opportunity and immediately deleted from the mobile device.
- The minimum amount of confidential information will be taken out of the office base. When information is taken out of the office base it will be kept in a locked portable storage container, either with the staff member or be locked in the boot of the staff member's car (whichever is deemed to be the most secure at that time).
- Archived files are either kept in locked filing cabinets at our base in Romsey, or if they have been transferred to electronic archiving they are stored currently on SharePoint in a restricted folder which is only accessible to the administrators of the system. Our aim is for all of our archived files to be stored electronically. Once stored electronically, paper files are destroyed securely (shredded).
- CCTV footage is stored on a secure, encrypted system at our base in Fleming House.

We will keep your personal data for:

- Speech and language therapy records are classed as healthcare records and therefore must be kept securely until a child is 25 years old or 8 years from discharge from the service (whichever is appropriate). For people with a mental health condition this will be 20 years.
- All day service records will be kept for 3 years, this will be from the date they last attended the day service. There is no statutory guidance for how long day services have to retain records, we have chosen 3 years as this is the same good practice period advised to care providers under the Care Standards Act 2000.
- Photos and videos will be kept only for the time they are required. For example, photos used on social media will be immediately deleted from our internal systems or mobile devices once uploaded. Recordings which form part of the client's records will be kept in accordance with these retention dates. If consent is given for use in training, consent will be refreshed regularly. You can withdraw your consent at any time.
- Financial information and external supervision notes will be kept for 7 years.
- If you make an enquiry via our website, we will use this personal information to respond to your enquiry. If you buy any products from us we will only keep your information for as long as is necessary to fulfil the contract. If this does not result in you engaging with our services this information will not be retained longer than necessary to follow up the enquiry.
- CCTV footage is retained for 30 days.

After the stated retention periods all records relating to the individual will be destroyed securely i.e. shredding, incineration or permanently deleted electronically.

Your data protection rights

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at:

Email: office@speakingsspace.co.uk

Telephone number: 02380 987134

We will need to verify your identity prior to sharing any information in order to safeguard your personal data.

Speaking Space (Romsey) Ltd is registered with the Information Commissioner's Office (ICO) as a Data Controller. You can view this ICO registration at:

<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

We regularly review, and where necessary, update our privacy information. These will be kept up to date on our website using the link below.

[Speaking Space \(Romsey\) Ltd – A Centre of Excellence in Communication](#)

If you have any further questions about how we use your information, please contact us at:

Email: office@speakingsspace.co.uk

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Email: office@speakingsspace.co.uk

Telephone number: 02380 987134

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>