

Privacy Policy Statement for Chatterbox

When you use Chatterbox, you trust us with your information. This privacy policy is meant to help you understand what data we collect, why we collect it, and what we do with it. We have tried to make it as simple as possible but if you have any questions please contact us.

Sandra Chappell 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 we protect your data
6. Protecting your rights to data
7. Security of your personal data

1 Information we collect

Chatterbox 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.

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.

Educational records

Relevant Individual Educational Plans (IEPs), progress notes from educational staff and school reports may be held.

Clinical records

Specific data in relation to communication skills may be collected and held, such as assessment forms, reports, case notes, e-mails. Audio and video files may also be collected and stored.

General administrative records

Chatterbox may hold information regarding attendance reports and accident report forms.

Financial records

A financial record pertains to all financial information concerning the practice, e.g. invoices, receipts, information for Revenue. Chatterbox may hold data in relation to 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.

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.

Client Records

Clinical Records

Chatterbox keeps both physical and electronic records of clinical data in order to provide a service.

The preferred format for clinical data is paper.

Clinical data is deleted/confidentially destroyed after the child reaches the age of 25 years (See How we protect your data).

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.

Financial Records

Chatterbox 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.

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.)

4 Information we share

We do not share personal information with companies, organisations and individuals outside Chatterbox unless one of the following circumstances apply:

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. I require opt-in consent for the sharing of any sensitive information.

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

For legal reasons:

We will share personal information with companies or organisations outside of Chatterbox 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 Chatterbox, our service users or the public as required or permitted by law.

To meet financial requirements:

Chatterbox also is required to share Financial data with Kenneth Easby Ltd. in order to comply with local tax laws. Chatterbox is obtaining a copy of the Kenneth Easby Ltd.'s own Data protection policy.

How we protect your data

In accordance with the General Data Protection Regulation (GDPR), we will endeavour to protect your personal data in the following ways:

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 in section 1, 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. 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.

By transmitting the data in certain specified circumstances only

Data will only be shared and transmitted, be it on paper or electronically, only as is required, and as set out in section 3.

By keeping only the data that is required

when it is required and by limiting its accessibility to any other third parties.

By retaining the data for only as long as is required

Data will be kept under accordance to RCSLT (Royal College of Speech and Language Therapists) guidelines, which dictate data should be retained until the child reaches the age of 25 years. This guideline supersedes GDPR guidelines and comes from Health and Social Care Policy 2016.

By destroying the data securely and confidentially after the period of retention has elapsed.

Chatterbox will securely and confidentially shred all physical files, after the retention period has elapsed, unless the return of personal records is requested by the individual. In the case of electronic records, these will be deleted after the retention period has elapsed.

By ensuring that any personal data collected and retained is both accurate and up-to-date.

6 Protecting your Rights to Data

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.

7 Security

Chatterbox, 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 Chatterbox in a professional capacity are briefed on the proper management, storage and safekeeping of data.

All data used by Chatterbox, including personal data may be retained in the following formats:

- Electronic Data
- Physical Files

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

Where applicable, Chatterbox may convert physical files to electronic records to allow us to provide a better service to clients.

Data Security

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

Electronic Data

All electronic data is contained within a private Dropbox cloud storage system. According to Dropbox's security statement, all files stored on Dropbox servers are encrypted and all persons working in Chatterbox require a log on and password in order to access the records. All persons working in Chatterbox have access to records.

Physical Files

All physical data is located at:

21, Parker Dr, Bedale, North Yorkshire DL8 2UD

- This system is physically located at the above address.
- All persons working in Chatterbox have access to these records.
- These records are kept in a container secured with a lock and key.

Security Policy

Chatterbox understands that requirements for electronic and physical storage may change with time and the state of the art. As such, the data controller in Chatterbox reviews the electronic and physical storage options available to Chatterbox annually, on January 1st.

All persons working in Chatterbox are aware and briefed on and refresh the requirements for good data hygiene every 12 months. This briefing compliance is monitored by the Chatterbox data controller and includes, but is not limited to:

Awareness of client conversations in unsecure locations.

Enabling auto-lock on devices when leaving them unattended, even within Chatterbox locations.

Use of non-identifiable note taking options. (initials, not names).

The awareness of Chatterbox procedure should a possible data breach occur, either through malicious (theft) or accident (loss) of devices or physical files.

Date of document: 1/1/19

Review Date: 1/1/20