

SPRINGBOARD SPEECH AND LANGUAGE LTD PRIVACY NOTICE (PN 21.1)

First version 2018, last updated March 2021.

This document is part of our obligations under the General Data Protection Regulations 2018 (GDPR) and the Data Protection Act 2018 (DPA 2018). It explains:

- How we obtain personal information about you and / or a child you have parental responsibility for.
- Why we obtain that information and what we use it for.
- Who we share your personal information with.
- How we look after your information and keep it securely.
- How long we keep your information for.
- Your rights in respect to the information that we hold.

We have tried to present the information below in a format that is as clear and easy to read as possible. However if you have any questions or would prefer us to explain it in person please do not hesitate to contact us.

Terms used in this document

“Us” “we” “our” = Springboard Speech and Language Ltd

“you” = a person who contacts us or uses our services

Sections

Section A = General Information

Section B = Specific Circumstances

Section C = For Services/Organisations who engage our services

SECTION A – GENERAL INFORMATION

1. Contact Details

- Springboard Speech and Language Ltd is registered with the Information Commissioner’s Office (ICO). Our registration number is Z1059058.
- Leads for Data Protection within Springboard Speech and Language Ltd are Hilary and Chris Platt (Directors).

Contact details:

EMAIL: office@springboardspeech.org.uk
 hilary@springboardspeech.org.uk
 chris@springboardspeech.org.uk

PHONE: 0780 1239490

POST: 4 Gloucester Close, Petersfield, GU32 3AX

- If you have any concerns about the way that we look after your data please contact us in the first instance. If we are unable to resolve your concern to your satisfaction then the Information Commissioner’s Office can be contacted on 0303 123 1113.

2. Contractors working with Springboard Speech and Language Therapy Ltd

All therapists who work with Springboard Speech and Language Ltd on a Contractor basis must process any personal data arising from this contract as specified in our policies and according to professional standards (all therapists have to be registered with the Health Care Professions Council and abide by their standards). All Contractors are also Data Controllers in their own right and registered independently with the Information Commissioners Office (ICO).

3. How we obtain personal information

Some personal information is provided to us **directly by you** for one of the following reasons:

- When you have contacted us to enquire about our services, for example to enquire about; a training course, working for us, being on placement with us or to discuss our therapy services for your child.
- When you have asked us to provide speech and language therapy services (assessment or therapy) to your child / yourself.
- When you wish to attend, or have attended, a training course that we run / host.
- When you have applied for a job or placement with us, or currently work for us or as a contractor.
- When you contact us on behalf of an organisation (e.g. school, charity, local authority service) to provide services on their behalf.
- When you provide us with your details so that we can invoice you for services provided (e.g. a Grandparent paying for their grandchild’s speech and language therapy sessions).

Some personal information about you / your child is provided to us **indirectly** (i.e. from somebody else) for one or more of the following reasons:

- When professionals working with you / your child within Health, Education, Social Care or the charity/voluntary sector share information with us so that you / your child receive the most appropriate support.
- When they contact us to make an enquiry on your behalf.
- When they provide us with reference information.
- When an organisation has booked a training course on your behalf.
- When we are carrying out a contract on behalf of an Organisation that involves providing support to you / you child.
- When a client or their parent gives us your details to invoice you for services provided to them.

4. Who we share your information with

- (a) We will not share your information with any third parties for the purposes of direct marketing.
- (b) Information is only shared within our organisation on a 'need to know' basis i.e. for administration purposes or to carry out services.
- (c) When providing speech and language therapy services the 'treating therapist' will share information with other people directly involved in that child's education, health or social care unless agreed otherwise between the therapist and parent / carer in advance.
- (d) We share information where there is a safeguarding concern (wherever possible we seek consent before sharing information in these circumstances but if this is not possible and a concern remains that a child may be at risk of significant harm we will contact the appropriate authorities).
- (e) We share information with third parties to provide necessary services for the effective running of our business. For example, IT management and support.

At the present time the third parties are:

- Microsoft – for Office 365.
- Switchnet Services Limited – IT support and administration of Office 365 account.
- Hughes Spencer Ltd – Accountants, compile end of year accounts, run payroll and our company pension scheme.
- National Employment Savings Trust (NEST) Corporation – pension providers.
- Disclosure and Barring Service – when applying for DBS checks for staff, volunteers or students.
- Elklan Training Ltd – when teaching a course on their behalf.
- Thames Web Design – website hosting services.

5. How we keep information secure

We take data protection very seriously and put in numerous safeguards to protect against data breaches as detailed below. However, no system – whether managing physical or electronic data – can guarantee to be 100% secure. By working with us you acknowledge that there is some degree of risk inherent in managing data.

(a) Organisational Measures

These consist of policies and procedures for staff and contractors and include guidance on identifying and reporting any data breaches. We also have a schedule of audits and risk assessments to ensure we continue to review implementation and to identify any new risks that arise.

(b) Physical Measures

Physical data can take different forms e.g. hand-written notes, assessment forms, letters, reports and photographs. When not in use all such data will be stored in locked metal filing cabinets to which only employees and / or independent contractors (i.e. self-employed Speech and Language Therapists) working on our behalf will have keys.

Additional safeguards apply to the use and transit of physical data. If a client's file needs to be taken off the premises (e.g. if a therapist were taking it to a meeting) this should be recorded with a note made of who took the file, when, and where. Similarly, if files are transferred, e.g. to be archived or passed on to a different therapist within Springboard Speech and Language Ltd. then this should also be recorded. All therapists working for, or on behalf of, Springboard Speech and Language Ltd. need to be aware of their data protection obligations and must take care to meet these particularly when clinical records are being moved from one setting to another.

(c) Electronic Measures

Electronic data takes many forms such as emails, electronic health records (casenotes), typed reports, photographs, video and audio recordings. Electronic data is stored locally on our computers and may also be stored in the 'cloud' through our Microsoft Office 365 accounts. Microsoft are committed to data security and GDPR compliance and our decision to use them as our cloud provider was made after careful consideration and after taking advice from a Data Protection specialist, an IT professional, and a solicitor. All data in our Office 365 accounts is stored within UK data centres. For more information regarding Microsoft Office 365 and data security please see:

<https://www.microsoft.com/en-us/trustcenter/privacy/gdpr> or search for 'office 365 gdpr compliance'.

Additionally, given the recognition within GDPR of the need to keep electronic data not only secure but also backed-up to prevent inadvertent loss (e.g. due to a computer failure, user error, ransomware attacks etc) our main Office 365 account is also backed up through Acronis Cyber Protect at UK Data Centres.

To support us in administering these accounts we use Switchnet Limited as our IT partner. Switchnet Limited are independently registered with the ICO (Information Commissioner's Office) and have signed a Third Partner Confidentiality Agreement with us.

In addition to this we also use a range of safeguards to secure electronic data including:

- Full disc encryption via Bitlocker.
- Pre-boot PIN to access hard drives.
- Secure Windows Passwords.
- 2-Factor authentication for account logins.
- Business Grade internet security and virus protection.
- Additional password protection for written client documents e.g. casenotes and reports.

Inevitably both technology and data threats will continue to evolve over time. Consequently, we will keep our current system under review and make changes as and when these seem necessary or expedient. We will be happy to explain any future changes regarding how we process electronic data on request. At all times we will remain committed to data security and to meeting our obligations under the GDPR.

Please note the details above apply to Directors and Employees of Springboard Speech and Language Ltd. Independent contractors carrying out work on our behalf may use different safeguards and systems - but they do have to commit to standards we provide regarding data management and they too need to adhere to the obligations of the GDPR. Additionally, contractors undertaking work on our behalf must also be independently registered with the ICO.

6. Your data protection rights

Under data protection law you have rights that we are required to tell you about.

The right to be informed about the personal data we hold and process.

This privacy notice provides details of the information we collect, process and archive. If you would like more information please contact us using the details provided above.

The right of access.

You have the right to request access the data we hold about you (or a child you have parental responsibility for). You can make this request verbally or in writing and we have to respond within one month.

The right to rectification.

If you believe we hold inaccurate data then you have the right to ask for it to be amended. We will carefully consider all requests as soon as possible after they are made and respond within the given timeframe of one month.

Please help us to keep records accurate by informing us of any changes to personal details as soon as possible. For example, change of address, change of family circumstances or change of school.

The right to erasure.

You have the right to ask us to erase your personal information, and in some circumstances we will be able to agree to this. Please note that this is not an 'absolute' right and it will not apply in some circumstances, for example, for clinical records until the retention periods are completed.

The right to restrict processing.

You have the right to request that the use of the personal data we hold about you / your child is limited and we must respond within one month.

The right to object

You have the right to ask us to stop processing your personal data. This right only applies in certain circumstances.

The Information Commissioner's Office (ICO) website <http://ico.org.uk> contains more information on these rights – the circumstances when they may / may not apply.

7. Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

SECTION B – SPECIFIC CIRCUMSTANCES

The following tables explain the data that we obtain, process and store in the following situations.

Please refer to the section or sections that relate to your circumstances.

- (a) When you enquire about our services.
- (b) When you engage us to provide speech and language therapy for your child / yourself.
- (c) When you apply for, or are appointed to, a job or placement with us.
- (d) When you attend a training course that we run or host.
- (e) When you use our website.

- (a) **ENQUIRIES** We are contacted via email, phone and in person to enquire about one or more of our services.

What personal data do we have and 'process'?	Why it is needed? What is the lawful basis for processing?	How long is the data kept? (retention period)
Personal data provided to us at this stage may include, name, age, address, school attended, medical/health information, personal/family circumstances.	You provide us with this information so that we can determine if we are suitable (and have the availability) to meet your requirements. The lawful basis = contract.	If we are able to fulfil your enquiry then the information gathered from your initial enquiry (and a record of our response) forms part of the clinical record, employment /placement record (and are kept as below). If we are unable to fulfil your enquiry we retain your information for up to 24 months as we often receive re-enquiries and need to refer back to previous correspondence. Please note we will not make unsolicited contact with you in this time.

- (b) **CLIENTS** When you receive speech and language therapy services from us for yourself / your child.

What personal data do we have and 'process'?	Why it is needed? What is the lawful basis for processing?	How long is the data kept? (retention period)
Clinical records which may include: Name /date of birth / address /school / family members' details such as ages, health needs, occupation and contact details, written/typed	When we provide speech and language therapy services we have a professional requirement to keep clinical records. Lawful basis – legitimate interests (article 6) and Special Category Data – Article 9(h) provision of health care.	As Speech and Language Therapists we have a requirement to archive clinical records once treatment is completed until:

records of all therapy sessions and liaison discussions, assessment results, reports we have written or been given by other people working with the client, and photos / audio or video recordings.		<p>A child who has been seen reaches 25 years old (or 26 years old if they were aged 17 when started contact).</p> <p>For an adult client – 7 years from last contact.</p>
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(c) EMPLOYMENT / PLACEMENTS When you apply to work or have a placement with us, or when you work as an employee or contractor.

What personal data do we have and 'process'?	Why it is needed? What is the lawful basis for processing?	How long is the data kept? (retention period)
Personal information such as name, date of birth, address, qualifications, and relevant health information, DBS information, bank details, evidence of right to work in the country.	<p>To consider all applications, assess an applicant's suitability and carry out a recruitment process.</p> <p>To arrange and issue a contract of work and ensure workers are adequately qualified and registered.</p> <p>To administer payment for work completed.</p> <p>To meet our requirements as employers e.g. checking the right to work in the UK.</p> <p>Lawful basis = contract</p>	<p>If under contract / employed / on placement – for the duration of the relationship and for 6 years afterwards (in case of queries) and longer if there is a need for ongoing contact.</p> <p>If the application is not successful then for the duration of the application process and up to 6 months afterwards unless agreed by both parties to extend this (e.g. because we have been asked to let the applicant know when another opportunity may occur).</p>

(d) TRAINING When you apply for or attend a training course hosted or run by us.

What personal data do we have and 'process'?	Why it is needed? What is the lawful basis for processing?	How long is the data kept? (retention period)
Personal information such as name, address, qualifications, and relevant health information, bank details, place of work, medical / dietary information (where relevant e.g. if food is	<p>To administer payment for work completed.</p> <p>Lawful basis = consent plus any medical / dietary / access requirement information is processed under article 9(2) (a) as special category data.</p>	6 months after the end of the course unless participants request to be informed of future events.

being provided or in case of an allergy).		
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(e) VISITING OUR WEBSITE

Our website is <https://www.springboardspeech.org.uk> and has a specific policy for users of the site. It can be accessed via the website or through this link: <https://www.springboardspeech.org.uk/privacy-policy/>

SECTION 3 – FOR SERVICES OR ORGANISATIONS WHO ENGAGE OUR SERVICES

We have contracts / service level agreements with a number of organisations to provide services. These include schools, charities and training organisations.

As part of these contracts our agreements outline the nature of the data we will receive, process, and generate in the course of fulfilling the agreement and the measures we take to fulfil our obligations under GDPR and DPA 2018.

Parents / carers of children receiving speech and language therapy services under these arrangements should refer to section 2 (b) for the information we obtain and process when providing speech and language therapy to their child.