

## **Privacy Policy, Data Collection and GDPR**

Traintalk Ltd's Privacy Policy should be read in conjunction with Traintalk Ltd's Terms and Conditions. This document sets out how and why personal information is collected and used and how it is protected.

### **What is Traintalk Ltd?**

Your information is being collected by Traintalk Ltd, an independent speech and language therapy service, with speech and language therapy provision delivered by Jenny Castledine and Beth Shelley. All references to 'we', 'our' and 'therapist' throughout this policy relate to Jenny Castledine and Beth Shelley.

### **Who is responsible for your data?**

The protection and management of personal data is taken very seriously at Traintalk Ltd. We are registered with the Information Commissioners Office (ICO) as Data Controllers. You can review our ICO registrations by visiting [www.ico.co.uk](http://www.ico.co.uk).

### **What kind of personal information will Traintalk Ltd collect and how will it be collected?**

You may use the Traintalk website [www.traintalk.org.uk](http://www.traintalk.org.uk) without providing any personal information. The Traintalk Ltd website contains links to other internet sites which are outside our control and are not covered by this privacy policy. We are not responsible for data which you provide through any such linked websites.

If your enquiry does not result in your child being seen by Traintalk Ltd then this personal information will be deleted once your enquiry has been dealt with. If your child is subsequently seen by Traintalk Ltd these details will be added to their record.

Once we start working with your child only information that is relevant and required to provide speech and language therapy services will be collected. Information is collected from parents, and, with parent permission, information will be collected from professionals and other people known to the child. Personal information will be collected by written and spoken forms of communication (for example, face to face discussions, phone calls, emails, and website enquiries).

The list below provides some examples of personal information that may be collected:

- The child's name, age, gender, date of birth, home address, medical history, education details, speech and language history, milestones, ethnicity.
- Parent or carer names, phone number, email address, home address, details of any speech, language or learning difficulties.
- Family structure details (for example, details about who lives at home with the child).

## **Why and how Traintalk Ltd uses your personal data**

Our lawful basis for processing and storing personal information is one of 'legitimate interest' under section 6 of the General Data Protection Regulations (GDPR). We cannot adequately deliver a service to your child without processing their personal information. As it is both a necessity for our service delivery and of benefit to your child, we have a legitimate interest to process and store their data.

All information about you, your child and their speech and language therapy is stored securely in our systems to ensure that we have a complete record of our service to them.

We use a secure electronic cloud-based system called WriteUpp which is compliant with general data protection regulations (GDPR).

Any paper based confidential information such as assessment record forms are stored securely in accordance with the Information Commissioner's Office (ICO) data protection regulations before being scanned and uploaded to your child's record on WriteUpp. Therapists working for Traintalk Ltd. will have access to your child's clinical notes.

### **Personal information is collected in order to:**

- Provide an individualised speech and language therapy service.
- Communicate with parents regarding therapy services.
- Liaise with other professionals: In order to provide holistic and individualised therapy it will be necessary (in most cases) to liaise and share relevant clinical information with other professionals. You will be asked to indicate that you agree to this by ticking the relevant box when signing the consent form. It is your right as a parent to withdraw your consent at any time, however if consent is withdrawn, Traintalk Ltd will no longer be able to provide a service as this is not in line with the core values of the company.
- Maintain complete records of therapeutic input in the form of session notes, assessment data and reports. The clinical notes database WriteUpp is used to manage and store relevant client information. In order to monitor progress and provide cohesive therapeutic input. Clinical notes are written following each therapy session, and after any discussions and written liaisons (emails etc.)
- Generate and send invoices using accounting software. Our accounting software receives the name of the person paying for services, their home address, email address and details about the service provided. This information will be used to create and send invoices.
- Complete audits.

If necessary, personal data may also be disclosed to the following:

- Traintalk Ltd agents and service providers where necessary (e.g. accounting services).
- Law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by law.
- Others, where you have specifically agreed when we collected your information.

Unless we are required to do so by law, or for child safeguarding purposes, we will not disclose any personal information collected to any person other than as set out above.

We do not give or sell client details to any third parties.

### **Financial Records**

TrainTalk Ltd keep 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.

### **Keeping your data secure**

Appropriate technical and organisational measures will be implemented to protect your personal data. These include:

- Any paper files are stored in lockable filing cabinets. If information is taken out of the cabinet it will be kept with the therapist or in a locked location. At the end of an episode of treatment (when a child has been discharged) all paper-based information will be scanned and kept as electronic documents. Paper based information will then be destroyed by shredding.
- Electronic data may be stored on a password-protected laptop, tablet, or password protected email.
- The minimum amount of confidential information will be taken out of the Speech and Language Therapist's office base. It will be kept with the therapist or will be locked in the boot of the SLT's car (whichever is deemed to be most secure at that time).
- Video and audio recordings will be stored on a password protected tablet/laptop/mobile phone and then deleted after use.

All reasonable efforts are made to safeguard your personal data however you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security of any personal data transferred from you or to you via the internet.

If you enter into communication with your therapist via text message or other messaging services, you consent to data being saved on your therapist's password protected mobile device.

## **Retention of data**

Treatment data (otherwise referred to as case notes or clinical notes) relating to your child will be retained until the child's 25th birthday or in the case of a child who is age 17 at the conclusion of treatment, until the child's 26th birthday. This is in accordance with guidelines set out by the Royal College of Speech and Language Therapists.

Information gathered through telephone or website enquiry will be retained until the enquiry is complete. If you choose to work with Traintalk Ltd then information will be transferred to your child's case notes, otherwise information will be destroyed.

Any email containing sensitive personal data, either in the body of the email or as an unencrypted attachment, will be sent via email or via a HTTPS encrypted email provider through WriteUpp.

Emails are kept for approximately three months. After this time emails will be copied and stored on WriteUpp as part of the child's case notes or they will be destroyed.

## **Your rights**

You have the right to request access to your personal data held by Traintalk Ltd. To do this you are required to put your request in writing specifying the personal data you wish to access. Requests of this type will be responded to within 1 month of receipt of request.

You have the right to request correction of any information you deem inaccurate. To do this you are required to put your request in writing specifying the information that is incorrect and how it should be amended. Requests of this type will be responded to within 1 month of receipt of request.

You have the right to request information is erased if it is no longer relevant. However, if there are legal grounds for information to be kept then we must abide by this. Data contained in treatment notes must be kept in its entirety for the duration of treatment and until the post-treatment retention period is complete. To request erasure of some or all of your data, please put your request in writing. Requests of this nature will be responded to within 1 month of receipt of request.

You have the right to make a complaint if you are concerned about the way in which we process your information. In the first instance please do contact your therapist to discuss your complaint or concerns. If your complaint is not resolved to your satisfaction, you can lodge a complaint with the Information Commissioners Office (ICO). The ICO can be contacted on 0303 123 1113.

If you have any further questions about how we use your information, please contact Beth Shelley (Data Protection Officer) at [beth@traintalk.org.uk](mailto:beth@traintalk.org.uk).

## **Cookies**

Along with most other websites our website uses cookies.

Cookies are very small text files that are stored on your computer when you visit some websites. We use cookies to help identify your computer so we can tailor your user experience.

You can disable any cookies at any time, but this may stop our website from functioning properly. This website will not share any personal information with third parties.

### **Privacy policy updates**

We may make changes to the Traintalk Privacy Policy. The most up to date version will be published on the Traintalk website [www.traintalk.org.uk](http://www.traintalk.org.uk) or please ask your therapist at any time.