



Privacy Policy

Who are we?

Key Communication delivers independent Speech and Language Therapy to children in the home and/or educational setting. It is owned and directed by Laura Steere, Speech and Language Therapist, who is registered with the Health and Care Professions Council (HCPC).

Key Communication operates a website at www.keycommunication.co.uk

Key communication is committed to protecting the privacy of information provided by clients.

Collection of personal information

Information about your child may be collected in spoken or written form from parents/carers. With parental consent, information may be collected from other professionals working with your child such as educational staff and health care professionals. We may also collect information about family members where this relates to your child e.g. contact details for parents and any relevant medical/developmental history.

You may use the Key Communication website without providing any personal information. However, if you wish to make an enquiry via the website, you are required to provide contact details, such as your name, location, e-mail address and contact telephone number to enable us to respond to your enquiry. You may add comments or queries which might also contain personal information.

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

The website contains links to other internet sites which are outside of our control and are not covered by this privacy policy. We are not responsible for data you provide through any such linked websites.

Our use of personal information

Personal information collected by us via the Key Communication website, email or face-to-face is stored and used by us for the purpose of delivering your child's speech and language therapy.

Any sensitive personal details are stored in a secure and confidential system and processed in confidence by Key Communication. It shall only be used for the purposes of delivering appropriate speech and language therapy services to your child.

With your consent, information about your child's speech and language needs will be shared with other professionals involved in your child's care, when it is in your child's best interests. A record of your consent is kept with your children's case notes.

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

We do not employ agents to process personal data, for example specialist mailing companies to send out communication.

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



How we use personal information

We use this information:

- To prepare, plan and deliver speech and language therapy services appropriate for your child's needs.
- To communicate with you via post, email, telephone, mobile messages and SMS in relation to:
 - o Confirming and preparing for appointments.
 - o General communication in between appointments.
 - o Sending you reports and programmes for your child (always password protected).
 - o Copying you into communications with other professionals involved with your child (your child's first name only or initials will be used rather than their full name in emails).
 - o Sending you resources.
 - o Sending you invoices and receipts.
- For clinical audit to assess and improve our service. Results from audits are always presented with all client identities removed.
- For management and administration.

Whenever personal identifiers are not needed for these tasks, if possible, we remove them from the information we use.

How we store personal information

All information we store about you, your child and their speech and language therapy is stored in our systems to ensure we have a complete and accurate record of our service to them. We use a secure electronic cloud-based system called "WriteUp" which is compliant with general data protection regulations (GDPR). Documents that contain confidential information such as reports and programmes are individually password protected. Any paper based confidential information, such as assessments, are stored securely in accordance to GDPR.

Videos may be taken of clients with parental consent. These are temporarily stored on an encrypted and password protected tablet. These may then be viewed by the Speech and Language Therapist in order to make notes in a client record within 24 hours of the child's appointment. The video is then deleted.

The minimum amount of confidential information will be taken out of the Speech and Language Therapists' office base. When your child's information is taken out of the office base it will be kept with the Speech and Language Therapist or will be locked in the boot of the Speech and Language Therapists' car (whichever is deemed to be most secure at the time).

In accordance to the law, all records will be kept securely until your child turns 25 years old (26 if therapy was given when they were 17 years old). After this time, all records relating to your child will be destroyed.

Meeting our professional obligations

It is a legal requirement for all Speech and Language Therapists to be registered with the Health and Care Professionals Council (HCPC). The HCPC has clear standards of conduct performance and ethics that all registrants must adhere to.

These standards affect the way in which we process and share information. Specifically:

Standard 2: Communicate appropriately and effectively:



“You must share relevant information, where appropriate with colleagues involved in the care, treatment or other services provided to a service user.”

Standard 10: Keep records of your work:

“You must keep full, clear, and accurate records for everyone you care for, treat, or provide other services to. You must complete all records promptly and as soon as possible after providing care, treatment or other services. You must keep records secure by protecting them from loss, damage or inappropriate access.”

For further information the full document can be found at: <http://www.hcpc-uk.org/assets/documents/10004EDFStandardsofconduct,performanceandethics.pdf>

UK Data Protection Law and EU General Data Protection Regulations

Data Protection Law lays down wide-ranging rules, backed up by criminal sanctions, for the processing of information about identifiable, living individuals. It also gives individuals certain rights in relation to personal data held about them by others.

Laura Steere is registered with the Information Commissioner’s Office (ICO) as a Data Controller. You can view her ICO registration by visiting www.ico.org.uk/ESDWebPages/Entry/ZA331830

Our lawful basis for processing personal information

Our lawful basis for processing and storing personal information is one for ‘legitimate interest’ (under article 6 of GDPR). We cannot adequately deliver a service to your child without processing their personal information. As it is both a necessary for our service delivery and of benefit to your child, we have a legitimate interest to process and store their data.

Data relating to an individual’s health is classified as ‘Special Category Data’ under section 9 of the GDPR. The regulations specify that health professionals who are “legally bound to professional secrecy” may have a lawful basis for processing this data. Speech and Language Therapists are legally bound to keep client information confidential and it is under this condition that we process and store personal information.

Our responsibilities

We are committed to maintaining the security and confidentiality of your child’s record. We actively implement security measures to ensure their information is safe and audit these regularly.

We will not release your personal details to any third party without first seeking your consent, unless this is allowed for or required by law.

We are constantly working to ensure compliance with current data protection regulation.

Your rights

Data protection give you, the parent, various rights. The most important of these are as follows:

- You have the right to a copy of the information we hold about your child.
- You have the right to ask for your record to be amended if you believe that it is wrong.

How to access your child’s records

You can access the information we hold about you in writing. Please apply in writing rather than email, so that we receive an original signature to compare against the records we hold.

A copy of your child’s record is provided free of charge.



We will provide access to your child's records within 30 days of receipt of all necessary information.

If you have any further questions about how we use your information, please feel free to contact me.

Further information about data protection legislation and your rights is available from the Information Commissioner's Office www.ico.org.uk

By employing Speech and Language Therapy services from Key Communication, it is assumed that you have read and are consenting to this Privacy Policy. This will be available on your child's notes for you to read at any time. If you do not consent or have any questions, please contact Laura at laurasteereslt@outlook.com.