

Privacy Policy

Date of policy:	May 2024
Policy review date:	May 2025
Person/s responsible:	Company Directors

This policy is under regular review. Updates will be made to reflect developments in procedures and best practice



Certifications and Status

Speech and Language Therapy West Midlands Ltd holds:

- Cyber Essentials Certification
- ISO 9001:2015 Registration (Independent Contractor Status)
- NHS Data Security and Protection Toolkit compliance

These certifications verify our commitment to:

- Quality management systems
- Information security
- Data protection
- Secure handling of sensitive data
- System and network security
- Staff security awareness

Independent Contractor Status

As ISO-registered independent contractors, we:

- Maintain professional indemnity insurance
- Follow NHS information governance standards
- Implement quality management systems
- Maintain professional registration
- Ensure continuous professional development
- Comply with NHS contractor requirements

Introduction

Speech and Language Therapy West Midlands Ltd believe that communication is a fundamental human right and we are committed to providing high quality speech and language therapy services, including autism and ADHD assessments, to enable people to reach their potential and achieve functional communication skills.

Our contact details

Speech and Language Therapy West Midlands Ltd



Phone Number: 07411765114

E-mail: info@saltwm.co.uk

The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics
- Medical and developmental history
- Educational records and reports
- Previous assessments and diagnoses
- Behavioural observations and assessment results
- Family medical history relevant to autism and ADHD assessments
- Reports from other healthcare professionals
- School or workplace observations
- Medication history (if applicable)
- Assessment scores and clinical observations
- Video recordings of assessments (where consent is given)
- Questionnaire responses from parents, teachers, and other professionals

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by the individual or a third party for one of the following reasons:

- When a referral is submitted for assessment / therapy
- When we request details about our services
- When an individual enquires about joining Speech and Language Therapy West Midlands Ltd
- When an individual works with a member of our team, such as an assessor
- When an individual completes pre-assessment questionnaires
- When an individual provides developmental history information
- When we are sent previous medical or educational reports

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

- Schools and educational institutions providing academic records
- Healthcare professionals sharing relevant medical history
- Local authorities providing information about previous interventions



- Other clinicians involved in the person's care
- Professional referrers providing background information

How we use your personal information

We use the information that you have given us to:

- Carry out speech and language therapy services
- Conduct autism and ADHD assessments
- Provide reports and recommendations
- Coordinate with other professionals
- Plan appropriate support
- Meet our legal obligations

Information Sharing

We will not normally share personal data with anyone else without consent, but there are certain circumstances where we may be required to do so. These include, but are not limited to, situations where:

- There is an issue with a client or vulnerable person that puts the safety of our organisation or staff at risk
- We need to liaise with other agencies -- we will seek consent as necessary
- Our suppliers or contractors need data to enable us to provide services
- We are required by law enforcement or government bodies
- There is a safeguarding concern

Practice Management System and Data Storage

We use Halaxy as our secure practice management system for storing and processing information.

Security Features

Halaxy provides:

- Bank-grade security
- End-to-end encryption
- UK data centre hosting
- GDPR compliance
- Regular security audits
- Two-factor authentication



- Role-based access control
- Audit logging
- Encrypted backup
- Secure file sharing
- Regular penetration testing

Clinical Integration

Halaxy supports our clinical processes through:

- Secure assessment documentation
- Clinical note templates
- Standardised outcome measures
- Integrated appointment scheduling
- Secure document storage
- Treatment plan tracking
- Clinical correspondence management

NHS Compliance

Halaxy meets NHS requirements through:

- NHS Data Security Standards compliance
- UK data sovereignty
- Information governance framework
- Clinical safety standards
- Secure NHS mail integration
- Audit trail maintenance

Data Management

Our data handling in Halaxy includes:

- Regular automated backups
- Data recovery protocols
- Archiving procedures
- Secure data disposal
- Access monitoring
- Version control



Personal data that is no longer needed will be disposed of securely through Halaxy's secure disposal protocols. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

Google Workspace

Speech and Language Therapy West Midlands Ltd uses Google Workspace (formerly G Suite) with Google Drive for secure cloud storage, operating under NHS data protection standards and compliance requirements:

Compliance

- · GDPR compliant data processing
- ISO 27001 certified infrastructure
- · Regular compliance audits
- Data processing agreements in place
- · Built-in data loss prevention

NHS Data Security Compliance

- Compliant with NHS Data Security and Protection Toolkit (DSPT) requirements
- · Data stored exclusively in UK-based data centres
- Adherence to NHS information governance frameworks
- Regular NHS compliance audits and reviews
- NHS-approved data sharing protocols

Security Features

- Two-factor authentication
- Advanced encryption for data in transit and at rest
- Regular security audits and updates
- Automatic backup and version history
- Role-based access controls
- Device management and security policies
- Audit logging and tracking
- Multi-factor authentication mandatory for all users
- Regular security updates and patch management
- Comprehensive audit trails of all data access
- Secure NHS mail integration capabilities

Data Management

- Files are stored in UK/EU-compliant data centres
- · Regular automated backups



- Access permissions are strictly controlled
- Secure file sharing with authorized personnel only
- Automated file retention policies
- Secure deletion protocols

Information Governance

- Alignment with NHS Information Governance requirements
- Regular staff training on NHS data handling procedures
- Clear protocols for handling patient-identifiable data
- · Documented access control procedures
- Regular information governance audits

Access Management

- · Role-based access control following NHS principles
- · Regular access reviews and updates
- Strict protocols for external sharing
- Documented user access management
- · Regular access monitoring and reporting

Data Protection Measures

- Regular data protection impact assessments
- Incident reporting procedures
- · Clear data retention and disposal policies
- Business continuity and disaster recovery plans
- Regular backup verification

All data handling within Google Drive follows NHS information governance principles and is subject to regular review to ensure continued compliance with NHS digital security standards.

Records Management

We follow the NHS Records Management Code of Practice:

- Adult assessments: 8 years from last contact
- Child assessments: Until 25th birthday or 8 years after last contact
- Video recordings: Maximum 8 years with consent
- Questionnaires and reports: 8 years from completion
- Financial records: 7 years as required by law

Direct Marketing



We may contact you with information regarding our services via email, or phone, and in compliance with the direct marketing regulations. You have a right at any time to stop us from contacting you for marketing purposes by emailing info@saltwm.co.uk

Social Media

We may collect publicly available information from social media profiles when users mention our social media profiles handles, comment on or retweet/share our posts.

Website

We use cookies to collect standard internet log information and visitor behaviour information.

Data Protection Rights of the Individual

Under data protection law, you have rights including:

- Your right of access
- Your right to rectification
- Your right to erasure
- Your right to restriction of processing
- Your right to object to processing
- Your right to data portability

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.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at info@saltwm.co.uk

You can also complain to the ICO: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>