



Privacy Policy

Who we are

Rose Therapy Centre is a partnership of two speech and language therapists, Gillian Buckingham & Karen Scrivener-Fearn. Rose Therapy Centre delivers independent communication and dysphagia assessment and therapy to adults typically in the home or clinic setting. Gillian and Karen are both registered with the Health and Care Professions Council (HCPC), members of the Royal College of Speech and Language Therapists (RCSLT) and members of the Association of Speech and Language Therapists in Independent Practice (ASLTIP). Rose Therapy Centre operates a website at www.rosetherapycentre.co.uk. Rose Therapy Centre is committed to protecting the privacy of information provided by its clients.

Our lawful purpose for processing personal information

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 you without processing your personal information. As it is both a necessity for our service delivery and of benefit to you, we have a legitimate interest to process and store your 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.

It is a legal requirement for all Speech and Language Therapists to be registered with the Health and Care Professions 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."

How we collect personal information

Information about you may be collected in spoken or written form from you. With your consent, information may also be collected from other people or professionals working with you (such as your partner/carer,



medical team, other members of your 'treating team' /case managers and NHS Speech and Language Therapists).

You may use the Rose Therapy website without providing any personal information. However, if you wish to make an enquiry via the website's online submission form, you are requested to provide your name, 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 you being seen by Rose Therapy then this personal information will be deleted once your enquiry has been dealt with.

The Rose Therapy 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.

How we use personal information

Personal information collected by us via the Rose Therapy website, email, telephone or face to face, is stored and used by us for the purpose of delivering your speech and language intervention.

We use this information:

- To prepare, plan and provide speech and language therapy services appropriate for your needs



- To communicate with you via post, email, telephone or text message in relation to:
 - arranging / confirming and planning for appointments
 - general communication in between appointments
 - sending you reports and programmes
 - copying you in to communications with other professionals involved with your care
 - sending you resources necessary for your speech and language intervention
 - sending you invoices
- For management and administration, for example names and addresses of clients are included in our secure clinical database

Any sensitive personal details are stored in a secure and confidential system, processed in confidence by Rose Therapy Centre and shall only be used for the purposes of delivering appropriate speech and language therapy services to you.

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

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

With your consent we may share information such as appointment dates and times and reports via email. Any email containing sensitive personal



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

We do not employ agents to process personal data.

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

How we store personal information

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

We use a secure electronic cloud-based system called WriteUpp which is compliant with general data protection regulations - WriteUpp is ISO27001:2013 compliant. Prior to being uploaded to this system documents may be temporarily stored on an encrypted memory stick, which is only accessible via a password held by the speech and language therapist involved in your care.

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 record on WriteUpp.

Once a paper document has been uploaded the original copy is shredded and disposed of. Voice recordings and videos may be taken of clients with your consent. These are temporarily stored on a password protected tablet.



These may then be viewed by the SLT in order to make notes in a client record within 48 hours of the appointment. The video is then permanently deleted.

Should any recordings be held as necessary for your treatment (either video, voice or photographic) you will be asked to sign a consent form outlining your consent for how these will be used, how these will be stored and at what point they will be destroyed.

The minimum amount of confidential information will be taken out of the Speech and Language Therapist's office base. When your 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 Therapist's car (whichever is deemed to be the most secure at that time).

In accordance with law, all records will be kept securely until 8 years after the final entry. After this time all records relating to your treatment will be destroyed.

Data Protection Regulations 2018

The General Data Protection Regulations (GDPR) 2018 govern protection, processing and movement of data and the legal rights of individuals to control information about themselves.

GDPR seeks to give people more control over how organisations use their data. It enforces significant penalties for organisations that fail to comply. All speech and language therapists working for Rose Therapy Centre are registered with the Information Commissioner's Office (ICO) as



Data Controllers. You can view their ICO registrations by visiting:

<https://ico.org.uk/esdwebpages/search>.

Our responsibilities

We are committed to maintaining the security and confidentiality of your personal information. We actively implement security measures to ensure your information is safe, and review these measures annually.

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

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

Your rights

GDPR gives you the following rights:

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

How to access your records

You can access the information we hold about you by writing to us at the address below.

We will provide access to your records within 30 days of receipt of all necessary information. Please make your request in writing to:



FAO Data Protection Officer

Rose Therapy Centre

8 Tailor Close

Scholes

Cleckheaton

BD19 6AT

If you have any further questions about how we use your information, please contact Gillian Buckingham (Data Protection Officer)
gill@rosetherapycentre.co.uk / 07881 652 766

Further information about data protection legislation is available through the Information Commissioner's Office www.ico.org.uk.