



# ADULT CONVERSATIONS

speech and language therapy

Speech Therapy for Adults in Staffordshire and the West Midlands

## Privacy Policy

21/08/2023. (Review Date: 21/08/2025).

### Introduction

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This is the Privacy Policy of Adult Conversations; an Independent Speech and Language Therapy practice run by Mark Chalmers. This policy will be reviewed and updated every two years, or sooner if there are any important changes to legislation.

Adult Conversations is committed to protecting your personal data and ensuring that your rights to privacy are protected. Adult Conversations gathers, stores and processes your personal data in accordance with the requirements of the Data Protection Act (2018), the General Data Protection Regulation (GDPR, 2018), the guidelines set out by the Information Commissioner's Office (ICO), the professional guidelines and requirements as set out by the Royal College of Speech and Language Therapists (RCSLT), the Health and Care Professions Council (HCPC) and the Association of Speech and Language Therapists in Independent Practice (ASLTIP).

Mark Chalmers is registered as a data controller with the ICO and can be found on the ICO register <https://ico.org.uk/register> by searching Mark Chalmers. Mark Chalmers is registered with HCPC and RCSLT and completes yearly Information Governance training.

### Why Does Adult Conversations Need My Personal Information?

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Adult Conversations needs to collect comprehensive and accurate personal data from you to provide safe and effective intervention that is tailored to your individual needs. Adult Conversations' lawful basis for processing and storing personal information is one of 'legitimate interest' under article 6 of GDPR.

Adult Conversations cannot adequately deliver a service to you without processing your personal information. Data relating to an individual's health is classified as 'Special Category Data' under section 9 of the GDPR. GDPR specifies 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. This is set out by the Royal College of Speech and Language Therapists and Health Care Professions Council.

### Adult Conversations - Speech and Language Therapy

[mark@adultconversations.co.uk](mailto:mark@adultconversations.co.uk)

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### How Does Adult Conversations Collect My Personal Information?

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Adult Conversations collects the personal information you provide when you make contact to enquire about our services. This includes via the '**Get in Touch**' form at [www.adultconversations.co.uk](http://www.adultconversations.co.uk) and any information provided via email or telephone. Any information collected via these means is stored and used only by Mark Chalmers for the basis of delivering Speech and Language Therapy intervention to you. Please note your privacy when using Adult Conversations website ([www.adultconversations.co.uk](http://www.adultconversations.co.uk)) is governed by a separate Privacy Policy which can be found at [www.adultconversations.co.uk/privacy-policy](http://www.adultconversations.co.uk/privacy-policy).

Additional personal information will be collected when you book Adult Conversations' services. This information is stored on a secure electronic records system, **WriteUpp** (further information regarding this system can be found at [www.writeupp.com](http://www.writeupp.com)).

Information collected during Speech and Language Therapy sessions is also written up electronically and stored on **WriteUpp**. No paper notes are kept.

### What Personal Information Does Adult Conversations Collect?

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The personal data required from you for Adult Conversations to provide you with Speech and Language Therapy intervention may include:

- Personal details such as your age, address, telephone number and general medical practitioner Your past and current medical information, including clinical reports where appropriate.
- Your social situation including employment and support from family members, where this is relevant to your rehabilitation.

Other personal data that may be stored includes:

- Results or comments following your performance on formal and informal assessments.
- Information about the treatment or services that we have provided or propose to provide.
- Notes of conversations that are relevant to Adult Conversations' involvement with you.
- Correspondence with other health care professionals that relates to your care.

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### What Other Information Might Adult Conversations Collect?

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With your consent, videos, or audio recordings of you may be taken as part of your assessment or treatment. These are recorded and temporarily stored on a password-protected tablet or mobile phone. If these need to be kept, i.e., to review at the end of a block of therapy, they are then transferred to Mark Chalmers' password-protected laptop and stored in a password-protected folder. Consent can be refused or withdrawn at any time. If consent is withdrawn, the video or audio recording will be deleted without delay. Stored recordings will not be accompanied by any other personal information about you.

### How Does Adult Conversations Use My Personal Information?

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Adult Conversations uses the collected information in the following ways:

- To arrange, plan and provide Speech and Language Therapy as appropriate to meet your individual needs.
- To communicate with you via email, telephone, or SMS in relation to, for example: arranging and planning for sessions; communication in between sessions; sending you copies of reports and programmes (password-protected where personal data is included); communicating with other professionals involved in your care (your initials rather than full name will be used in emails); sending therapy resources; sending invoices.
- Whenever personal identifiers are not needed for these tasks, if possible, they will be removed from the information use.



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### Will Adult Conversations Share My Personal Information?

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With your written consent, information about your speech, language and swallowing difficulties may be shared with other professionals involved in your care, when it is in your best interests. You will be fully informed about who your data will be shared with and what data is to be shared. A record of your consent is kept within your clinical notes.

Unless required by law, Adult Conversations will not disclose any personal information collected to any person other than as set out above. In the unlikely event that there is a legal requirement to share your personal data with law enforcement and government bodies, this would be in relation to: The prevention or detection of crime and/or fraud; the apprehension or prosecution of offenders; the assessment or collection of tax owed to HMRC; legal proceedings; a requirement to satisfy safeguarding obligations; supporting emergency services or local authorities to respond to an emergency situation that affects you.

If it is necessary as part of your care to transfer personal data to a country or territory outside the European Economic Area, Adult Conversations will do so in accordance with data protection law.

Adult Conversations does not employ agents to process personal data, for example specialist mailing companies to send out communications, and client details are not given or sold to any third parties.

### How Does Adult Conversations Store My Personal Information?

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Documents containing confidential information including clinical notes, assessment record forms, reports and therapy programmes are recorded on an online clinical records programme called **WriteUpp**, which is password-protected and only accessible by Mark Chalmers. **WriteUpp** is used widely within both the NHS and private practices. Further information regarding the security of **WriteUpp** can be found **here**. Emails are accessed on both a password-protected laptop, tablet and a smartphone which is protected with a passcode. In accordance with law, all records will be kept securely for eight years. After this time all your records will be destroyed.

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### What Happens if a Personal Data Breach Occurs?

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Personal data breaches involve personal data becoming accidentally or unlawfully lost, stolen, destroyed, altered, or disclosed where it should not have been. In the extremely unlikely event that a breach occurs at Adult Conversations, all reasonable efforts will be taken to contain and minimise the impact of the breach, and the breach will be reported to the ICO within 72 hours.

Adult Conversations makes all reasonable endeavours to ensure that there are no personal data breaches. For example, all your clinical records relating to your Speech and Language Therapy intervention are stored on the secure online clinical records system, **WriteUpp**. No paper notes are kept, and no information is kept on a USB device. The only personal data saved directly onto a laptop are audio and video recordings which **WriteUpp** currently does not have the facility to upload; these are stored in a password-protected folder with your initials rather than full name. If reports are sent via email, they are sent as password-protected PDF documents and the password is provided separately.

### How Can I Withdraw My Consent to My Personal Data Being Collected or Stored?

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As outlined above, Adult Conversations seeks explicit consent from you where possible, to collect, store and share your personal information.

There are some situations where you may provide consent implicitly; for example, by providing information via Adult Conversations' website form, email, or online case history forms. You may withdraw your consent at any time, however if you do so, it may no longer be possible to provide you with Speech and Language Therapy intervention.



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### How Can I Access My Records?

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You are legally entitled under GDPR to access the information Adult Conversations holds about you. This is a Subject Access Request. According to the Information Commissioner's Office (ICO) and their code of practice for subject access requests, you have the right to a copy of the information we hold about your care in addition to the right to ask for it to be amended if you feel it is incorrect.

A copy of your records is provided free of charge, within 30 days of receipt of all necessary information. Please make your request in writing via email to **mark@adultconversations.co.uk** including the following information: Your name, your correspondence address, your contact number and email address, the details of the information requested.

If you are requesting a copy of the records on the behalf of the individual, this can only be provided if you hold Lasting Power of Attorney for Health and Welfare. Adult Conversations will need to see evidence of this documentation before sharing any records.

When responding to requests, Adult Conversations will need to ask the individual to provide two forms of identification. The individual may be contacted via telephone to confirm the request was made.

Information may not be disclosed if there is a risk of serious harm to the physical or mental health of the subject or another individual.

If the request is complex or numerous, the individual may be informed that Adult Conversations will comply within three months of receipt of the request. Adult Conversations will inform the individual of this within one month and explain why the extension is necessary.

If the request is unfounded or excessive, Adult Conversations may refuse to act on it, or charge a reasonable fee which takes into account administrative costs. A request will be deemed to be unfounded or excessive if it is repetitive or asks for further copies of the same information. If refusing a request, the individual will be informed of the reasons for this, and they will be informed of their right to complain to the ICO.

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### How Can I Make a Comment, Suggestion, Complaint?

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If you have any further questions about how Adult Conversations uses your information, please contact **mark@adultconversations.co.uk**. Further information about data protection legislation and your rights is available from the **Information Commissioner's Office**.

Adult Conversations is interested to hear any comments or suggestions about any improvements that could be made to the collection and storage of personal information. Please email **mark@adultconversations.co.uk**.

You can contact Adult Conversations via email or telephone if you are not happy with this privacy policy or if you have any complaint in respect to how your personal information is processed. In the unlikely event that this cannot be resolved, you have a right to make a formal complaint to the **Information Commissioner's Office**.



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