



Client Privacy Notice

At COMMUNICATE we believe in being open and transparent about how we work. This Privacy Notice explains how we manage your information, how it is shared, and why it is important to us. In summary, we will always tell you how we use your data and we'll use it to ensure your treatment is appropriate, bespoke and effective. Plus, we'll make sure we collect and store your data securely.

Who is responsible for your data?

The Data Controller for COMMUNICATE is Emma Ferris, the Clinical Director. COMMUNICATE & CARE LTD are a registered company (number 8196903) at 4 Stable Yard, Middlewood Green, Suffolk IP14 5HG. The Data Controller oversees the policies for the company and ensures the rest of team are aware of their role. You can contact her on: communicate.emma@gmail.com

There are also Data Processors who have access to your information. Your therapist is the main Data Processor who collects and stores the majority of your information. Our Accounts team also use a small amount of your data to manage your account with us.

You are also responsible for keeping your information (like contact details) up-to-date so please do let us know if anything changes.

What Personal Data do we collect about you?

Personal Data means any information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data is likely to include your name, contact details, date of birth and information relating to your treatment.

We collect some personal data from you, for example when we book an initial appointment with you and during the course of treatment. We may also receive some personal data from involved third parties, for example your education/employment setting and other healthcare professionals you are seeing. If you enquire and provide personal information on behalf of someone else, you must have their consent to use their personal information.

We may collect and process the following categories of information about you:

<p>Your details to make an enquiry</p> <ul style="list-style-type: none"> • name • email address • telephone number • postcode • any other information you choose to provide at the time. 	<p>When you make an enquiry via our website contact form.</p> <p>When you email one of us directly to enquire.</p>
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<p>The communications you exchange with us</p> <ul style="list-style-type: none"> • calls & messages • emails • letters • communication on ClassDojo 	<p>When you contact us or are contacted by us</p>
<p>Additional information to organise an appointment</p> <ul style="list-style-type: none"> • DOB • your full address • location of school/work & general working patterns • more detailed information on your SLT needs 	<p>When we contact you to organise an initial appointment</p>
<p>Information for invoicing</p> <ul style="list-style-type: none"> • your full address • your email address 	<p>When you have a first appointment with us</p>
<p>Information to decide how best to offer you SLT support</p> <ul style="list-style-type: none"> • about your health & health history • wellbeing • social circumstances • family history of SLT-related issues • in-depth communication profile 	<p>When you have a first appointment with us and ongoing throughout treatment</p>
<p>Information on the service we provide you</p> <ul style="list-style-type: none"> • assessment data • therapy targets and details • outcome measures • decision making process 	
<p>Information you have from third parties (i.e. other professionals) which you feel is pertinent to your treatment with us and so choose to share it with us.</p> <ul style="list-style-type: none"> • reports from health & social professionals • ECHP • school reports 	
<p>Information we obtain from third parties directly. We only obtain information from third parties if this is permitted by law and you have given them permission to share that data with us. We will let you know what we have received within 1month of obtaining it.</p>	
<p>Your posts and messages on social media directed to us</p>	<p>When you choose to interact with us on social media</p>
<p>Your feedback</p>	<p>When you respond to our requests for feedback or participate in our surveys</p>

In the course of providing services to you, we will collect information that could reveal your racial or ethnic origin, physical or mental health and other very personal information. This information is considered 'sensitive personal data'. We only collect this information where you have given your explicit consent, it is necessary, or you have deliberately made it public. This would be collected solely to inform your treatment plan.

By providing any sensitive personal data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Privacy Notice. If you do not allow us to process this sensitive personal data, this will mean we are unable to provide all or parts of the services you have requested from us.

How and Why do we use your Personal Data?

We use your data for the following purposes:

- To manage your enquiries and provide our services to you
- When you are receiving treatment from us, we use your information to maintain our professional standards, for example, to provide up-to-date paperwork, to liaise with the NHS Speech and Language Therapy team where relevant, to ensure those supporting our work are aware of the programme.
- To communicate with you and manage our relationship with you
- Occasionally we may need to contact you by email and/or SMS for administrative and operative reasons, for example to send you confirmation of appointment booking, to advise you of disruption or changes to your planned appointments. If you are using ClassDojo we may also send you app notifications for these purposes. Please be aware that these communications are not made for marketing purposes
- We will use your personal data if we contact you after you have sent us a request, filled in a web-form through our website, or contacted us on social media.
- Your opinion is very important to us, so we may send you an email to seek your feedback. We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our client and to improve our services and experiences for customers.
- Please note that we do not share your contact details and other personal data with other companies for marketing purposes.
- We do not use direct marketing.
- To fulfil our administrative purposes and protect our business interests.
- The business purposes for which we will use your information include accounting, billing and audit, safety, security and legal purposes, statistical analysis and development.
- Legally we may have to use and share your personal data where there is a safeguarding concern, concern of suicide or criminal concerns. Otherwise the data you provide is used only by us, unless you give consent for any other processing or sharing.
- We use cloud-based services for our email, document storage and accounts. This means that your data may be on a cloud server outside of the EEA. We have checked and verified the security of this and are satisfied about their safety measures.
- We keep your data in line with our retention policy. Our retention period is set according to legal, statutory and regulatory obligations. Once this retention period is complete all personal data is safely disposed of.

What are our Security Measures?

We are committed to taking appropriate technical and organisational measures to protect your personal data against unlawful or unauthorised processing and against accidental loss, destruction or damage to personal data.

When you provide your personal data through our website, this information is transmitted across the internet securely using encryption. When you communicate with us through ClassDojo, you register for an account and agree to their terms & conditions and data protection procedures. Email can be used but it must be acknowledged that GMail does not provide data encryption. However, personal data will be produced in a document which will be password protected before attaching to the email.

The information that you provide to us will be held in our email, filing cabinets and cloud-based systems, which are located on our Premises or those of an appointed third party (for example cloud-based systems for file storage and accounting). We limit the access to these files with only those needing the information having access to it. All of our systems require a key or password log-in which only those needing it will have access to.

As described within this Notice, we may in some instances disclose your personal data to third parties. Where this happens, we ensure the data we are sending is as secure as possible through password-protection.

We do not use your data for marketing purposes unless you have provided explicit consent for this to happen. In this instance, you still have the rights as below to that data.

What are Your Rights over your Data?

Request Access

You have the right to request access to the personal data that we hold about you. This could include treatment notes we have created. We would have to redact information that involves other people's personal data before we give it to you. We would provide you with this information within 1-2 months depending on the extent of the request. To request a copy of some or all of your personal data, please contact us at: communicate.emma@gmail.com

Request Rectification

If you feel that our information is incomplete or erroneous, you should inform your therapist who will update your records accordingly. This may be because you have moved house, or a professional is no longer involved. We would also endeavour, where reasonable, to notify anyone whom we had shared the rectified information with that it had been updated.

Request Erasure

If information is no longer relevant it can be erased. However, if there are legal grounds for us to keep it we must abide by this. Typically, anything in medical 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 contact us at: communicate.emma@gmail.com

Request to Restrict Processing

A restriction on processing would mean that we are able to keep your data but you wanted to restrict who could access and use it unless legally we had to. We would provide you with evidence of this happening within 1-2 months depending on the extent of the request. To request a restriction on your personal data, please contact us at: communicate.emma@gmail.com

Request Data Portability

You may request for your data to be transferred to another therapist. As with Access Requests, due to legal reasons we will need to redact certain parts and retain a copy for ourselves. To request your data to be transferred to a third party, please contact us at: communicate.emma@gmail.com

Lodge a Complaint

If you were unhappy with the way we were processing your data then please contact us by post or email communicate.emma@gmail.com.

If your complaint is not resolved to your satisfaction, you can lodge a complaint to the Information Commissioner's Office. Our number is ZA068217. The ICO can be contacted on 0303 123 1113.

Updates to Our Privacy Notice

We may make changes to this Privacy Notice from time to time. We will update the Privacy Policy and we will publish on our website any new version of this Notice.