

Chatterbox Sussex Speech and Language Therapy Ltd: Privacy Notice

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1. Introduction and Who We Are

Chatterbox Sussex Speech and Language Therapy (SLT) Ltd is registered with Companies House (registration number 10859242). We deliver independent speech and language therapy to children in home and educational settings. The company is owned and directed by Rachel Barton, Speech and Language Therapist, who maintains active registration with the Health and Care Professions Council (HCPC).

Our website can be found at <u>www.chatterboxsussex.com</u>, and we are dedicated to protecting the privacy of all information provided by our clients.

You are welcome to browse our website without providing any personal information. However, if you wish to make an enquiry, we will need your contact details. If you decide not to proceed with our services after making an enquiry, we will delete your contact information once we have addressed your query. For clients who proceed with our services, we will add these contact details to their clinical record.

2. Legal Basis for Processing Your Information

We process personal information under four legal bases:

Primary Legal Bases

<u>Under Contract</u> (Article 6(1)(b) of UK GDPR): We process your information to fulfil our contractual obligations through treatment plans, maintaining records, and facilitating communications about your child's care.



<u>Under Legal Obligation</u> (Article 6(1)(c)): We process information to comply with healthcare laws and professional standards, including HCPC requirements for maintaining accurate client records. We are required to retain records until your child reaches 25 years of age.

<u>Under Legitimate Interests</u> (Article 6(1)(f)): We process information to operate our business efficiently and professionally while maintaining high therapy standards.

<u>Under Consent</u> (Article 6(1)(a)): We obtain your explicit consent before sharing information with other professionals, using AI tools to support therapy, or taking and using videos during sessions.

Special Category Data

As healthcare providers, we process health information under specific conditions:

Under Article 9(2)(h) of UK GDPR - <u>provision of healthcare</u>: We process health data to provide therapy services while maintaining our professional confidentiality obligations.

Under Article 9(2)(a) - Explicit consent: We obtain your explicit consent before sharing health information or using it for non-direct healthcare purposes such as training.

3. Information We Collect and How We Use It

Information We Collect

We collect information from several sources to provide the best possible care for your child:

<u>Information Provided by You</u>: We collect information directly from you through our pre-assessment questionnaire. This includes details about your child's development, your contact information, and payment details. We also maintain records of our communications about appointments and your child's progress.

<u>Information from Your Child</u>: During our work with your child, we collect assessment results, detailed therapy session notes, and records of their progress. With your consent, we may take video recordings and collect speech and language samples to support assessment and therapy.

<u>Information from Other Professionals</u>: With your explicit consent, we may receive information from other professionals involved in your child's care. This includes reports from healthcare providers, information from educational settings, and updates from other professionals working with your child.

How We Use Your Information

<u>Core Therapy Services</u>: We use the information we collect to plan and deliver effective therapy for your child. This includes tracking their progress, adjusting treatment plans as needed, creating personalized resources, writing detailed reports and programs, and maintaining communication about their therapy journey.

<u>Administrative Purposes</u>: We use your information to manage appointments, process invoices and payments, and maintain accurate business records.



<u>Service Improvement</u>: We review our services regularly to enhance the quality of care we provide. This includes conducting clinical audits using anonymized data to evaluate and improve our service delivery.

4. Digital Communications and Security

<u>Email Communication</u>: To protect your privacy when communicating via email, we send all sensitive information in password-protected PDF files. We always send passwords in separate communications and use initials rather than full names in professional communications.

<u>WhatsApp Business</u>: Our WhatsApp Business account is used for brief, practical updates about appointments and therapy. We keep messages concise and avoid sharing detailed personal information. All conversations are documented in your child's records, and we regularly delete conversation histories from the app.

<u>Video Sessions (Zoom)</u>: We maintain security during video sessions by using unique meeting IDs and passwords for each session. Our professional Zoom account includes waiting room features for additional security. We conduct all sessions in private spaces and never record sessions without your explicit consent.

<u>Document Sharing</u>: When sharing documents containing personal or clinical information, we use password protection with strong passwords (at least eight characters, including a mix of numbers, letters, and symbols). We always communicate passwords separately from the documents they protect.

5. Use of Artificial Intelligence

<u>Our Approach to AI</u>: We integrate AI tools to enhance our services while maintaining strict privacy standards and professional care. All AI use is carefully overseen by our qualified therapist, and no AI tool is ever used to make clinical decisions.

<u>Our AI Tools</u>: We currently use several AI tools including ChatGPT, Gemini, Claude, Perplexity, Copilot, LMNotebook, and Zoom AI tools to support our work.

<u>How We Use AI</u>: We use AI tools to assist with creating initial drafts of therapy materials, developing visual supports and worksheets, and generating story-based activities. Our qualified therapist reviews and customizes all AI-generated content. For administrative tasks, AI helps with document formatting, drafting standard communications, and organizing schedules. We also use AI to explore therapy approaches and conduct evidence-based practice research, though all clinical decisions are made solely by our qualified therapist.

<u>AI Data Protection</u>: We maintain strict data protection standards when using AI tools. We never enter personal information such as names, addresses, or identifying details into AI systems. All content is carefully anonymised before being processed by AI tools, and our therapist reviews all AI-generated content for quality and accuracy.



<u>Your AI Rights</u>: You have the right to opt out of any AI-supported aspects of our service. You can request information about how we use AI, ask questions about specific AI applications, and raise any concerns about AI-generated content.

6. Information Storage and Protection

<u>Record Keeping System</u>: We use WriteUpp, a secure healthcare-specific cloud system, for maintaining client records. This system complies with UK data protection laws, uses encryption, receives regular security updates, and requires secure, password-protected access.

<u>Document Storage</u>: We temporarily store documents in a password-protected OneDrive account accessible only to Rachel Barton. These documents are regularly transferred to our secure WriteUpp system. Video recordings are stored on a password-protected iPad and are deleted once relevant notes have been added to your child's record. Any physical records are stored in a locked filing cabinet with restricted access.

<u>Mobile Information Security</u>: When we need to transport your child's information outside our office, we maintain strict security measures. We keep information either in the direct possession of the Speech and Language Therapist or securely locked in the boot of the therapist's car, depending on which option provides the highest security at the time.

<u>Record Retention</u>: In compliance with healthcare regulations, we retain all records until your child reaches 25 years of age. After this period, we ensure secure destruction of all records.

7. Sharing Information with Others

<u>Professional Information Sharing</u>: We share information only when we have your explicit consent, when it is in your child's best interests, when it is necessary for their care, or when we are legally required to do so.

Information Recipients: With your consent, we may share information with:

<u>Educational Professionals</u>: This includes teachers, teaching assistants, SENCOs, and early years practitioners who are involved in your child's education.

<u>Healthcare Professionals</u>: We may share information with NHS Speech and Language Therapists, GPs, specialists, private therapists, and health visitors who are involved in your child's care.

<u>Other Professional Services</u>: When appropriate, we may share information with Educational Psychologists, Occupational Therapists, Social Workers, and other care professionals supporting your child.

Third Party Service Providers: We use WriteUpp as our electronic clinical records system, operating under a strict data processing agreement that ensures UK data protection compliance. We also use secure online services including Zoom, WhatsApp Business, and Gmail for communication purposes.

Emergency Access Arrangements: We have appointed two qualified Speech and Language Therapists, Lynsey Barnard, and Sarah Kelly, as Clinical Executors. They will access records only



in the event of Rachel Barton's death or incapacity to ensure continuity of care. In the unexpected event of Rachel Barton going missing during a working day, her next of kin would be granted access to her diary, including client names and addresses, solely to assist in locating her and ensuring her safety.

8. Your Rights and Choices

Under data protection legislation, you have several important rights regarding your child's information:

<u>Access to Information</u>: You have the right to request a copy of all information we hold about your child. This copy will be provided free of charge within 30 days of receiving your written request.

<u>Record Amendments</u>: You have the right to request amendments to your child's record if you believe any information is incorrect.

<u>Requesting Information</u>: To access your child's information, please submit your request in writing to our postal address rather. This allows us to verify your signature against our records. We will provide access to your child's records within 30 days of receiving all necessary information.

9. Data Breaches

In the event of a data breach, we follow a comprehensive response protocol:

<u>Immediate Response</u>: We will immediately identify and contain the breach, assess the associated risks, notify affected parties, and report to the Information Commissioner's Office (ICO) if required.

<u>Follow-up Actions</u>: We will thoroughly investigate the cause of any breach, implement preventive measures, update our security protocols as needed, and document all learnings to prevent future incidents.

10. How to Contact Us

<u>General Enquiries</u>: For general inquiries, please email <u>rachelbartonslt@gmail.com</u>. We aim to respond by the next working day.

<u>Formal Requests</u>: Please send formal requests in writing to: Subject Access Request, Chatterbox Sussex SLT Ltd, 9 Hamfield Drive, Hassocks, BN6 9ZW

Accessibility: We can provide this privacy notice in large print format upon request.

<u>Document Management</u>: This privacy notice was last updated in October 2024 and will be reviewed in October 2025.

<u>Additional Information</u>: For further information about data protection, you can contact the Information Commissioner's Office: Telephone: 0303 123 1113 Website: www.ico.org.uk

By engaging our services, you acknowledge that you have read and understood this privacy notice. Please contact us if you have any questions about how we protect your information.