



General Privacy Policy

Scope of Policy: This policy details the steps which must be taken when handling confidential personal data.

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ORGANISATION: Let's Communicate LTD

DATA PROTECTION OFFICER: Francesca Beard

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INTRODUCTION

Let's Communicate are committed to respecting the privacy and protecting the data of our clients and employees. We protect the privacy of all who share personal data with us via email, post, text, phone or our websites: www.letscommunicateltd.com.

We will only collect and use personal data in ways that are described in this policy. We have strict policies and procedures in place to protect your data when you send it to us, and when we process it to provide you with the services you have requested.

The data you provide us will be used only for the efficient provision of agreed upon services and it will not be shared with anyone else unless explicitly stated in this document.

You have the right to see what data we hold on you and request that any data held is amended or deleted. Please contact the relevant Data Protection Officer, (listed above), if you have any concerns or queries.

We are registered with the Information Commissioner's Office, the regulator of the Data Protection Act 1998 and abide by its requirements.



DEFINITIONS

Personal data relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, or online identifier. It can also include pseudonymised data.

Special categories of personal data relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

Criminal offence data relates to an individual's criminal convictions and offences.

Data processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Data controller is the person who determines the purpose for which and the way any personal data is processed. They have a responsibility to establish practices and policies in line with GDPR legislation. Francesca Beard is the data controller of all personal data used in Let's Communicate Ltd.

Data users includes employees and other workers whose work involves using personal data. Data users have a duty to protect the information they handle, by following Let's Communicate Ltd data protection and security policies at all times.

DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- I. Processing will be fair, lawful and transparent
- II. Data will be collected for specific, explicit, and legitimate purposes



- III. Data collected will be adequate, relevant and limited to what is necessary for the purposes of processing.
- IV. Data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- V. Data is not kept for longer than is necessary for its given purpose.
- VI. Data will be processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures
- VII. We will comply with the relevant GDPR procedures for the international transferring of personal data.

WHAT INFORMATION DO OUR WEBSITES COLLECT?

On our websites we receive, collect and store any information you enter in. This information is stored and processed by the web hosting companies listed below but is controlled by us. Please read their privacy policies, (links below), if you would like more information on the data collected, how it is stored and any third-party services used.

Squarespace: <https://www.squarespace.com/privacy>

In addition to any data that you provide, these sites may collect, (automatically through monitoring tools), the Internet protocol, (IP), address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information and purchase history.

All payments on our websites are processed through Stripe which prevents us from seeing your payment information. Please see Stripe's Privacy Policy to find out how they process and store your data.

COLLECTION OF PERSONAL DATA



HOW DO WE COLLECT YOUR DATA?

Parents or clients will receive a referral form which gives us consent to work with your data. An episode of care can only begin when the form has been signed and returned with the consent box ticked. Duty of care begins with an initial contact with the client.

Information about the client will be collected via spoken or written information from parents/carers. With your consent we may request to gather information from other professionals such as educational provision staff, childminders, or other professionals such as paediatricians, dyslexia specialists and occupational therapists.

We may collect information about family members where this relates to your child, e.g., contact details or medical/developmental history.

Our waiting list collects your name and contact details and some details about your child. All data remains on the waiting list for 12 months. After this period this data is destroyed. If contacted and we do not hear back from you within 6 months data is destroyed.

Any student seen by Let's Communicate LTD has a personal record stored as per HCPC (<https://www.hcpc-uk.org>) guidance.

Client data may include but is not limited to:

- Biographical information, e.g., name, address
- Assessment information, e.g., assessment results
- Therapy information, e.g., session notes, targets
- Liaison information, e.g., record of telephone conversations, letters.
- Information from other professions (with prior permission)
- Video and/or audio recordings of therapy or assessment sessions
- Observation information e.g., case notes, observation notes

All the above information is required for our processing activities. We are collecting the above information under the lawful basis of legitimate interest.



HOW DO WE STORE YOUR DATA:

When you engage our services, we store the information we collect about you electronically and/or on paper. Electronic data is kept in a secure google account or on the WriteUpp website. (Writeup is notes management software that allows us to manage clients' personal information, contact details, session schedules, session notes)

In addition, files containing sensitive information, such as diagnostic assessment reports, are password protected. Hard copies of documents are stored securely in a fireproof, locked cupboard. We use email or file sharing to transfer data, using password protection if it contains sensitive or highly confidential information.

Additionally, we use QuickBooks for invoicing and bookkeeping and to store your name, email address and postal address within their system.

On occasion we may reach out asking you to provide feedback on our services using google reviews. These surveys are optional and any information you provide will stored as mentioned above and on the google servers.

Where clients book access to training via Eventbrite, their data is held securely on Eventbrite servers and is only accessible us.

Additionally, your child's name may be stored by the educational websites we use (WordShark, TTRS and Units of Sound) in order to allow us to create accounts for their use. No other identifying or personal information is used to set up these accounts. You will be provided with your child's login details.

Google Drive, QuickBooks, SurveyMonkey, Eventbrite and Writeupp are GDPR compliant and do not have access to any of your data.

Google Drive: <https://cloud.google.com/privacy/gdpr>

Quickbooks: <https://quickbooks.intuit.com/uk/gdpr/>



Eventbrite: <https://www.eventbrite.com/help/en-us/articles/460838/eventbrite-privacy-policy/>

Writeupp: <https://www.writeupp.com/security>

WHY DO WE COLLECT YOUR DATA?

To communicate with you as a response to an email, web enquiry, text or telephone call;

- To supply you with the services and products you request;
- To provide you with ongoing support and services;
- To collect payment for our services;
- To comply with statutory requirements for bookkeeping, auditing and accounting.

HOW DO WE SHARE YOUR DATA?

We will not share data with 3rd parties for marketing purposes.

We will only share your personal data with the Let's Communicate LTD speech and language therapists who work with your child.

Data is only shared to allow us to carry out contracted services. You will be asked to sign a privacy agreement as part of the therapy or prior to the assessment.

In order for online sessions to take place, your child may be signed up for a number of online educational services including: Word Shark online, TTRS online and other, similar sites. Only your child's name is shared with these sites.

HOW LONG DO WE KEEP YOUR DATA?

This will vary depending on the services provided. Please see your contract for specific details or contact the relevant Data Protection Officer listed at the beginning of this document.

- If you have subscribed to our website, we keep your data until you no longer want to remain on the list. You can request removal at any time.



- We keep the names and email addresses of people who have asked us not to send them communications for an indefinite time to ensure that we do not contact you. You may request to be removed from this list at any time.
- We will keep a list of people interested in our courses or requiring tuition for a period of two years.
- We keep copies of assessment reports (stored electronically) and test papers for the time required by law and as advised by our professional bodies. This may vary over time.
- We keep the details of those who have received intervention, lesson notes and copies of work completed in tuition sessions for a year after sessions have ceased.

ALL CLIENTS

WHAT ARE YOUR RIGHTS?

You have a number of rights under the GDPR including data correction, data erasure, data restriction, data objection etc.

For full details see <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You have the right to request your data, or withdraw your consent, as described below. Please contact us for information on any other rights mentioned above.

HOW CAN YOU WITHDRAW YOUR CONSENT?

You have the right to have your personal data erased, "right to be forgotten". You can withdraw your consent by contacting the relevant Data Protection Officer, (listed at the beginning of this document), verbally or in writing. If emailing, please ensure you put the subject as 'withdrawal of consent.' We will email you back to confirm your request. If you do not receive a response to your email, please contact us again. We will act upon your request without undue delay and within one month of receipt.



Please note that this right is not absolute – we are required to hold certain data for legal and accounting reasons.

You may also unsubscribe from our website as described in the marketing section of this document.

HOW CAN YOU ACCESS YOUR PERSONAL DATA?

If you want to know what personal data we have about you or your child, you can ask us for details of that personal data and for a copy of it. This is known as a “subject access request”. Please email the relevant Data Protection Officer, (listed at the beginning of this document), for a copy of the form to fill in. There is no charge for a subject access request if it is reasonable. We will aim to reply to your request within one month, but in some cases this can take up to three months.

COMPLAINTS AND QUESTIONS

Please contact us in the first instance with any questions or complaints you may have.

07946577634

admin@letscommunicateltd.com

INTERNATIONAL DATA TRANSFERS

Let’s Communicate LTD does not transfer personal data to any recipients outside of the EEA.

DATA PROTECTION COMPLIANCE

Francesca Beard

Contact Details

admin@letscommunicateltd.com

07946577634