



Metis Therapy Limited

Independent Speech and Language Therapy Provider

204 Abbots Way
North Shields
NE29 8LR

07984 693 493 / 07850 186 141

www.metistherapy.co.uk

rightpath@metistherapy.co.uk

Metis Therapy Limited

Privacy Policy

Post Holder Responsible for Policy:	Information Governance Manager
Contact Details:	Christina Howe christina@metistherapy.co.uk
Date Written:	May 2018
Next Due for Revision:	May 2019

Who is Metis Therapy Ltd?

Metis Therapy Ltd provide Independent Speech and Language Therapy to children and adults (under the age of 25) in their own home or educational setting.

Metis Therapy Ltd is registered with Companies House, registration number: 09032540.

The two Company Directors are Rachael Howitt and Christina Howe. They are both Speech and Language Therapists registered with the Health and Care Professions Council and the Royal College of Speech and Language Therapists.

Our Data Controller is Christina Howe. She is registered with the Information Commissioners Office. Her registration Number is: Z8574211.

We operate the website www.metistherapy.co.uk

What Information Do We Collect About You?

We collect spoken or written information about you and your child from telephone, email or messenger enquiries about the suitability and availability of our services.

Once therapy is agreed to be provided written consent is obtained from your child's parent or guardian (or the individual if over 18 years of age) to collect relevant information from other professionals working with your child (e.g. teachers, NHS employees, social services staff). Information may relate to things such as names, addresses, contact details, date of birth, details of professionals involved in your child's care and copies of letters and reports written by them, medical investigations and diagnoses, written consent to treatment and sharing of information, formal and informal assessments and observations, records of therapy sessions, emails, telephone calls and discussions about your child.

We will collect information about family members where this relates to the child's care. For example, telephone numbers and e-mails to contact about appointments and therapy, history of health conditions relevant to your child's presenting needs.

Testimonials relating to our service are printed on our website and may contain the name of the person who wrote it. Verbal or written consent for this publishing has been sought.

What About Cookies?

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. For further information visit www.aboutcookies.org or www.allaboutcookies.org. Our website does not set any cookies on your computer and we do not gather any data about visitors' browsing behaviour, location or identity whatsoever.

How Do We Use Your Personal Information?

Personal information collected by Metis Therapy Ltd will be used to:

- Plan, prepare and carry out Speech and Language Therapy appropriate for your child.
- To arrange and confirm appointments.
- Send reports, programmes and resources.
- Provide invoices and receipts.
- Administer and manage the service.
- Audit our services.

Wherever possible personal identifiers are removed from these tasks.

We do not employ agents to process personal data.

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

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

What is Our Lawful Purpose for Processing Personal Information?

Our lawful basis for processing and storing personal information comes under section 6 of the General Data Protection Regulations (GDPR) and is defined as a “legitimate interest”. We need to process and store your/your child’s information in order to provide Speech and Language Therapy to your child.

Section 9 of the GDPR sets out regulations for processing health information which is considered “special category data”. In this case health professionals that are “legally bound to professional secrecy” can have a lawful basis for processing data. Speech and Language Therapists are legally required to be registered with the Health and Care Professions Council (HCPC). The HCPC outlines clear standard of conduct, performance and ethics that all registrants must adhere to. The standards relating to processing and sharing information are:

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 Long Do We Keep Personal Information?

Any personal information gathered from enquiries about therapy (e.g. contact numbers from voicemails, emails from our website contact form) are deleted once the enquiry has been dealt with.

In accordance with the law all records will be kept securely until your child reaches 25 years of age. For those aged over 18 years the information will be kept for 7 years after the date of discharge. After this time all records relating to you/your child will be destroyed.

How Do We Store Personal Information?

Data from those currently receiving therapy from Metis Therapy Ltd (or on a waiting list to do so) have data stored in paper format. These are kept in files marked with “Strictly confidential/restricted data”. We regularly need to move data between work locations and all reasonable measures are taken to ensure the minimum amount of data is transferred at any one time and all reasonable measures are taken to ensure data is consistently placed in areas not accessible to the public or left in an unattended vehicle. Within our therapy bases all paper records are stored in a locked filing cabinet. Some data can also be stored on a General Data Protection Regulations compliant cloud platform.

Emails from parents/guardians or other professionals are transferred to an encrypted, password protected memory stick.

Data from those discharged (i.e. no longer receiving therapy) from Metis Therapy Ltd will have their paper data transferred to an electronic record. This will be combined with any data currently in an electronic form (e.g. emails) and transferred to an encrypted, password protected memory stick that is kept in a locked filing cabinet at one of our therapy bases.

How Do We Transmit Data?

When transmitting data electronically Metis Therapy Ltd uses web hosting and email systems that are compliant with the General Data Protection Regulations (GDPR) so information shared in this way is secure. Reports are sent password protected and this password will not be contained within the communication in which it is being transmitted. Reports and messages containing personal data are sent to identified, individual email addresses not generic ones and contain the words “strictly confidential/restricted data”.

Paper data sent by post will be clearly marked confidential, only if strictly necessary and with the minimum required amount of personal data to meet the purpose for which it is being sent.

Your Rights and How To Access Your Record

Data protection legislation gives you, the parent, many rights with regards to your own and your child's personal data. You have the right to ask for a copy of the information we hold about you and your child and ask for the record to be amended if you believe it is wrong.

You can access the information we hold about you and your child by writing to us at the following address:

Metis Therapy Ltd,
204, Abbots Way,
North Shields,
NE29 8LR.

Compliance with UK Data Protection Law and EU General Data Protection Regulations

Metis Therapy Ltd is committed to maintaining the security and confidentiality of our service users and process and store their data in compliance with the law. Our policies and procedures state that regular audits and risk assessments are carried out and information on changes to legislation is shared by our Data Controller with our Data Processors.

Any breach to these policies or procedures where there is likely to be a "risk to the rights and freedom of an individual" will result in the Information Commissioners Office (ICO) being informed within 72 hours of the Data Controller becoming aware. In the case of a serious, high risk breach then you (the "Data Subject") will also be informed.

When will This Policy Be Reviewed

This policy will be reviewed and updated in May 2019, unless any necessary changes are identified when it will be updated sooner.

