



September 2021

Connect Therapy Services Ireland

Privacy Statement

This privacy statement explains how Connect Therapy Services Ireland (CTSI) stores and uses the information we collect about you when you utilise our services to receive independent speech and language therapy.

At CTSI we take the protection of client data very seriously, and conform with guidelines from both our professional bodies ([The Irish Association of Speech & Language Therapists \(IASLT\)](#)) and CORU and also the independent authority the Data Protection Commission.

The information contained within this privacy policy is a requirement of the new General Data Protection Regulation (GDPR) legislation which replaces the Data Protection Act with effect from 25th May 2018.

Your Rights

You have the right to:

1. Know what data has been collected about you (and your child) and how this data has been processed
2. Erasure i.e. to withdraw consent and ask for your personal data and that of your child to be deleted
3. Make changes to inaccurate data
4. Provide or withhold your explicit consent (written and verbal) following explanations given in clear and plain language

What is the lawful basis for processing personal information?

CTSI processes your personal data under the lawful basis of 'legitimate interests' (GDPR Article 6-1-f). As with any healthcare provider, when you employ the services of CTSI, there is an implied understanding that we will not be able to assess and treat you safely and appropriately unless you or others give us the relevant information to do so. We will always discuss it with you prior to us gaining information from other sources. We will request your verbal consent to us gaining this information.

CTSI processes your healthcare data under the lawful basis of the provision of health or social care or treatment (GDPR Article 9-2-h). We are legally permitted to store and use your health data and communicate this with other professionals involved in your care for health-related purposes (assessment, diagnosis, and treatment), because we are bound by the confidentiality rules of our own professional bodies.

What data do you collect about me and why?

CTSI will collect a variety of data which helps us to assess, diagnose and provide treatment to you. Data may be given to us by you or other people and can include the following:

- Personal information e.g. name, address, date of birth
- Health information e.g. medical history
- Email addresses
- Telephone numbers
- Correspondence e.g. clinical letters and reports, print outs of emails
- Assessment forms/results
- Clinical observations
- Audio / video recordings
- Photographs e.g. for use in communication apps and naming practice
- Financial information e.g. bank sort code and account number
- Private insurance policy details
- Contact details for family members (*)

() Please note that the names and contact details about any family member forms part of the data we hold about you so is treated the same in terms of confidentiality and security.*

Information may be given to us verbally (e.g. over the telephone) or in writing by you, your family/carer, another healthcare professional involved in your care, your private health insurer amongst others.

We have a professional and legal duty to ensure that the information we record about you is relevant to your treatment/care, accurate and up to date, and only used for the purposes for which it was collected. Please help us to keep our records up to date by informing us of any changes e.g. you move to a new house, change your telephone number or change your GP.

Where is my data kept?

Most of your data will be kept in your main electronic clinical 'file'. This file is electronic and stored in our online database, Writeupp, a Microsoft Cloud-based data handling server. Additional data about you may also be kept in the following places:

Clinical diaries

Work mobile phones

Electronic devices e.g. work i-Pads, laptop computers

Removable media e.g. memory cards, memory sticks

Invoices

CTSI bank statements

Google drive

Back up hard drives

Paper files (this information is minimal and usually relates only to assessment forms, correspondence from other professionals and any hard copies of reports)

** Please refer to the privacy policies of Google and Microsoft, companies with whom we have contractual agreements.

How is my data secured?

CTSI takes the security of your data very seriously and employs a series of measures to prevent theft, loss, damage or unauthorised access. These measures are checked regularly by the company directors. Writeupp is a password access database. It uses Microsoft Cloud infrastructure. All data is stored securely in locked filing cabinets when not in use. When it is necessary to transport data about you (e.g. bringing any paperwork to your clinic appointments), this will be kept with the therapist at all times. Wherever possible, we anonymise data using a writeupp reference number only to identify you. Phones are pin/password protected. Laptops are password protected, the hard drive is encrypted as an additional security measure, and we use anti-virus software to protect data from cyber-attack.

Who has access to my data?

Your named therapist, as an employee of CTSI, has direct access to your clinical records. The Directors of CTSI also have access. This enables us to have clinical discussions about your care should this be required, respond to queries you may have and run the business in terms of invoicing, accounting and fulfilling Revenue requirements.

Who do you share my data with?

When providing healthcare, it is considered good practice to keep other people involved in your care updated. We may share your information with any of the following: another SLT or healthcare professional involved in your care, your private health insurer. We will ask for your permission/consent before sharing your information with other people. The exceptions to

this are if we are required to share the information by law, or of there is a safeguarding concern.

CTSI will never sell or loan information about you to 3rd party service providers and your data will not be exported outside of Ireland.

For how long will you store information about me?

Professional guidelines require all Speech & Language Therapists (Independent or within the HSE) to retain clinical records relating to children until the child's 25th birthday (or 26th if young person was 17 at the conclusion of treatment).

Financial records and items such as CTSI bank statements (which may contain your name and bank details if you have made online payments) are also required to be kept for a full 7-year period by Revenue for tax purposes.

Accounts are shredded and destroyed by CTSI annually in the January of each year.

Duplicate data (which also appears in your SLT file) such as your telephone number and email address will be deleted from electronic devices wherever possible when you are discharged to reduce the possibility of a data breach if such devices are lost or stolen.

The above requirements mean that your 'right to be forgotten' under GDPR law does not apply until we no longer have a need to keep your data for the reasons explained above.

If you make an enquiry about our service but for whatever reason do not get back to us, any written notes of our telephone conversations with you, email correspondence and contact details will be deleted/shredded after a period of 3 months.

If you make an enquiry about our service and request that we maintain your details on our waiting list, we will do so until such time that a suitable appointment becomes available.

How can I access my information?

CTSI will keep you fully informed of every aspect of your care. You will routinely be given copies of any letters or reports which are written about you unless there is a legal reason for us not to do so (e.g. adult safeguarding issues, police investigation, court evidence). You have the right to access your SLT file, but any request to do so must be made in writing to us. CTSI reserves the right to charge a fee to cover the administrative cost of providing this information where it is requested more than once.

What happens if there is a data breach?

CTSI is required to inform you if the data breached about you could negatively affect your personal or professional life and is considered 'a threat to your rights or freedoms'. We must also inform the Data Protection Commission (DPC) within 72 hours of discovering such a breach.

If you feel that your data protection rights have been breached by CTSI you should raise your concerns with us in the first instance and we have 28 days in which to respond to your concerns. If you still feel that your concerns have not been satisfactorily addressed by us, you have the right to lodge an official complaint to the DPC. Details of how to do this can be found on www.dataprotection.ie.

Changes to our privacy statement: We keep our privacy notice under regular review and will email clients any changes to our statement.