



**St Marylebone CE Bridge School**  
**Speech and Language Therapy Service**

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**St Marylebone CE Bridge School Speech and Language Therapy Service (SMBS SaLT Service)**

**Information regarding processing of personal data**

In the course of our professional activities the SMBS SaLT Service collects a variety of personal data (see table below for more details). Personal data is information related to an individual that enables them to be directly or indirectly identified. The table below details the different types of data, where the data is stored, how long data is stored and who the SaLT service might want to share the information during the execution of therapeutic work (see “information regarding consent” for more details about data sharing).

Type of Data	Storage Information	Required storage duration	Who might we wish to share this information with
Assessment Data	<i>School Server</i> <i>Back up – Encrypted External Hard Drive</i>	35 years	Teaching staff
SaLT Assessment Report	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	Allied Health Professionals (AHP) / Social Services / Local Authority / Teaching staff / Educational Psychology
Clinical Intervention Notes	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	
Clinical Intervention Reports	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	Teaching staff
Clinical Intervention Resources With Personal Data	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	Teaching staff
Education Health & Care Plan (EHCP)	<i>Writeupp</i> <i>Back up – School Server</i>	<i>Until aged 30</i>	Allied Health Professionals (AHP) / Additional Therapies / Social Services / Educational Psychology / Joint Council for Qualifications
Statement of Special Educational Needs	<i>Writeupp</i> <i>Back up – School Server</i>	<i>Until aged 30</i>	Allied Health Professionals (AHP) / Additional Therapies / Social Services / Educational Psychology
Referrals	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	Allied Health Professionals (AHP)
Reports from other health professionals	<i>Writeupp</i> <i>Back up – School Server</i>	35 years	Teaching staff

Communication Plans	Writeupp <i>Back up – School Server</i>	3 years	Teaching staff
Individual Education Plans from previous settings	School Server	<i>Until aged 35</i>	Teaching staff
Individual Education Plans from current settings	School Server	<i>Until aged 35</i>	Teaching staff
Work diary with personal data	Electronic – Writeupp Physical – Locked Draw	2 years	
Clinical Photo & Video Records	School Server / Writeupp	35 years	Teaching staff
Discharge Letters	Writeupp <i>Back up – School Server</i>	35 years	Other speech and language therapy services / GP / New SENCo
Parent/Carer Correspondence including advice and information	Writeupp <i>Back up – School Server</i>	12 years	Teaching staff
Complaints	Writeupp <i>Back up – School Server</i>	8 years from completion of action	Senior Leadership Team / School Governors
Speaking & Listening Assessment Levels	Classroom Monitor	Current year +1 year	Teaching Staff School Governors
Student's work in communication lessons	Locked filing cabinet	Current year +1 year	Teaching Staff

### **Writeupp**

Writeupp is a cloud based electronic patient record system that is widely used by the NHS and a variety of allied-healthcare professionals. It enables us to maintain fully compliant clinical records in a secure way. Writeupp complies with ISO27001:2013. It has Two-Factor Authentication (2FA) and 256-bit SSL encryption. Data is protected by 24/7 manned security, CCTV, real-time encrypted backup and geographically separate replication.

### **Data protection principles**

The SMBS SaLT Service follows the data protection principles under the General Data Protection Regulation (GDPR) (EU) 2016/679 (Art. 5):

- Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

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- Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **Requests for information**

Formal requests for personal information falls under the GDPR.

This includes:

- Right of access by the data subject (GDPR Art. 15)
- The right to data portability (GDPR Art. 20)
- The right to transparent information and communication (GDPR Art. 12)

Organisational information falls under the Freedom of Information Act (2000)

### **The St Marylebone CE Bridge School Speech & Language Therapy Service commits to:**

- Supporting service users to access to own care records, in accordance with legislation and local policy
- Keeping records that are fit for purpose and offer clear reasoning and decision making
- Having a protocol for secure information sharing with other organisations
- Having a protocol for the secure erasure of information
- Managing records according to all relevant legislation, guidance or policies, national and local
- Recording evidence for consent or authorisation before identifiable service user information is shared
- Following local policy or protocol where mental incapacity does not allow the gaining of consent to share service users' information.

### **How to make a request for information**

- Requests for information should be made in writing (paper or electronic).

### **Who can make a request?**

- Individuals for whom the record relates
- Parents may request access to records if the service user is under the age of 16.
- Pupils under the age of 16 can request to see their own school records.
- Police under a Section 29 order can request information for the detection, prevention of crime and apprehension/protection of criminals and the public.
- Criminal Case Review Commission may request materials relevant to a case they are investigating.
- Researchers/auditors may extract data if:

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- the individual the data concerned has explicit consent
- the individual will not be identifiable within the whole.
- Anyone can request information about an organisation.

### **Response times**

- One month response time for information requested under the GDPR
- 20 days for requests under the Freedom of Information Act.

### **Data Breaches**

If personal data is lost or shared incorrectly the following people will be informed:

- The person affected
- The student's parents/legal guardian
- The school's data protection officer
- The information commissioner's office

### **Data Processing**

Under the Data Protection Act 2018, SaLTs fall under the definition of "health professionals" under 195(1)(g): "a person registered as a member of a profession to which the Health and Social Work Professions Order 2001 (S.I. 2002/254) for the time being extends, other than the social work profession in England"

The SMBS SaLT Service therefore has the required bases for processing student's personal data. Namely:

1. Explicit consent for the processing of data has been given by the data subject (or if under 16 their parent/legal guardian)
2. Under Article 9(2) of the GDPR: Processing of data is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in 9(3) of the GDPR.

### **Data Security**

Article 5 (1)(f) of the GDPR states: "Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

The SMBS SaLT Service maintains the following security measures:

- Only members of the therapy team have access to Writeupp
- Only members of the therapy team have access to data stored on the SaLT data stored on the school server
- Files are kept in a locked drawer or locked filing cabinet
- The therapy room is locked when there is no one inside it

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- The school has a motion activated security alarm, CCTV and security shutters
- The school operates a signing in / out system for visitors
- Visitors, parents and students are not allowed to be unattended in the therapy room where data is stored
- Paper waste with personal data is cross-shredded
- The computer system is secured with anti-virus software
- Use of USB keys/external hard-drives to store personal data is prohibited
- Passwords are changed every 3 months
- Computers are locked when left unattended
- Electronic files are wiped from the school server and Writeupp after the required time the information needs to be held
- Information is only shared with other professionals using a secure method such as encrypted email or secure post.

If you have any questions about this information please contact the clinical lead.