



**Speech & Language Therapy
West Midlands Ltd.**

Privacy Policy

Date of policy:	September 2025
Policy review date:	September 2026
Person/s responsible:	Company Directors

This policy is under regular review. Updates will be made to reflect developments in procedures and best practice



Speech & Language Therapy West Midlands Ltd.

Certifications and Status

Speech and Language Therapy West Midlands Ltd holds:

- Cyber Essentials Certification
- ISO 9001:2015 Registration (Independent Contractor Status)
- NHS Data Security and Protection Toolkit compliance

These certifications verify our commitment to:

- Quality management systems
- Information security and cyber security
- Data protection and privacy
- Secure handling of sensitive and patient-identifiable data
- System and network security
- Staff security awareness and training
- Clinical safety and governance

Independent Contractor Status

As ISO-registered independent contractors operating under NHS standard contract provisions, we:

- Maintain professional indemnity insurance
- Follow NHS information governance standards and frameworks
- Implement quality management systems aligned with NHS requirements
- Maintain professional registration with relevant regulatory bodies
- Ensure continuous professional development
- Comply with NHS contractor requirements and service specifications
- Adhere to NHS standard contract terms for data processing and patient safety

Introduction

Speech and Language Therapy West Midlands Ltd believe that communication is a fundamental human right and we are committed to providing high quality Speech and Language Therapy Services, including autism and ADHD assessments, to enable



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people to reach their potential and achieve functional communication skills. We operate in accordance with NHS values, standards, and contractual obligations.

Our Contact Details

Speech and Language Therapy West Midlands Ltd

Phone Number: 07411765114

E-mail: info@saltwm.co.uk

The Type of Personal Information We Collect

We currently collect and process the following information in accordance with NHS information governance standards:

- Personal identifiers, contacts and characteristics
- Medical and developmental history
- Educational records and reports
- Previous assessments and diagnoses
- Behavioural observations and assessment results
- Family medical history relevant to autism and ADHD assessments
- Reports from other healthcare professionals
- School or workplace observations
- Medication history (if applicable)
- Assessment scores and clinical observations
- Video recordings of assessments (where explicit consent is given)
- Questionnaire responses from parents, teachers, and other professionals
- Clinical notes and transcriptions generated through AI-assisted tools

How We Get Personal Information and Why We Have It

Most of the personal information we process is provided to us directly by the individual or authorised third party for one of the following lawful purposes:

- When a referral is submitted for assessment/therapy
- When we request details about our services
- When an individual enquires about joining Speech and Language Therapy West Midlands Ltd
- When an individual works with a member of our team, such as an assessor
- When an individual completes pre-assessment questionnaires



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- When an individual provides developmental history information
- When we are sent previous medical or educational reports
- When we record assessments for clinical documentation purposes

We also receive personal information indirectly, from the following sources in accordance with NHS information sharing protocols:

- Schools and educational institutions providing academic records
- Healthcare professionals sharing relevant medical history
- Local authorities providing information about previous interventions
- Other clinicians involved in the person's care
- Professional referrers providing background information
- NHS and other healthcare providers as part of integrated care pathways

How We Use Your Personal Information

We use the information that you have given us to:

- Carry out Speech and Language Therapy services in accordance with NHS service specifications
- Conduct autism and ADHD assessments following NICE guidelines
- Provide reports and recommendations to relevant professionals
- Coordinate with other professionals and services
- Plan appropriate support and interventions
- Meet our legal obligations and NHS contractual requirements
- Generate clinical notes through AI-assisted transcription tools
- Maintain clinical records for continuity of care
- Support quality improvement and clinical audit activities
- Comply with safeguarding responsibilities

Technology Systems and Data Processing

AI-Assisted Clinical Documentation - Heidi Health

We may use Heidi Health AI transcription tool to support clinical documentation with patient consent:

- **Purpose:** Generate clinical notes from assessments only
- **No Automated Decision-Making:** AI outputs are always validated by qualified clinicians before use



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- **Data Location:** All data processed is stored within UK/EU jurisdictions in compliance with UK GDPR
- **Clinical Safety:** Tool is subject to ongoing data protection and clinical safety assessment
- **No patient recording:** The system uses AI to transcribe the spoken dictation into text. It does not audio record
- **Clinician Oversight:** All AI-generated content is reviewed, edited, and approved by registered clinicians
- **Quality Assurance:** Regular audits ensure accuracy and compliance with clinical standards
- **NHS Compliance:** Tool is subject to data protection and clinical safety review in accordance with NHS standard contract requirements

Patient Management Portal - Google Firebase

We use Google's Firebase suite for our patient management portal:

- **Data Processing Agreement:** Comprehensive Data Processing Addendum (DPA) automatically forms part of Google Cloud Terms of Service
- **Legal Framework:** Legally-binding document outlining Google's data protection responsibilities
- **Compliance:** Subject access request handling and data protection law compliance
- **Security:** Enterprise-grade security with encryption and access controls
- **Data Location:** UK/EU data processing and storage
- **NHS Standards:** Compliant with NHS Data Security and Protection Toolkit requirements

Google Workspace for Secure Storage

Speech and Language Therapy West Midlands Ltd uses Google Workspace with Google Drive for secure cloud storage:

NHS Data Security Compliance:

- Compliant with NHS Data Security and Protection Toolkit (DSPT) requirements
- Data stored exclusively in UK-based data centres
- Adherence to NHS information governance frameworks
- Regular NHS compliance audits and reviews
- NHS-approved data sharing protocols



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Security Features:

- Multi-factor authentication mandatory for all users
- Advanced encryption for data in transit and at rest
- Regular security audits and updates
- Automatic backup and version history
- Role-based access controls
- Device management and security policies
- Comprehensive audit trails of all data access
- Secure NHS mail integration capabilities (we have secure email accredited to the DCB1596 secure email standard)

Information Sharing and Disclosure

We will not normally share personal data with anyone else without explicit consent, but there are certain circumstances where we may be required to do so in accordance with NHS contractual obligations and legal requirements:

- Safeguarding concerns requiring immediate action
- Legal obligations to law enforcement or government bodies
- Court orders or statutory requirements
- NHS integrated care pathway requirements
- Quality assurance and clinical audit (with appropriate anonymisation)
- Serious incident reporting to relevant authorities
- Professional regulatory body requirements
- Liaison with other agencies with appropriate consent or legal basis

Records Management

We follow the NHS Records Management Code of Practice and NHS standard contract requirements:

- **Adult assessments:** 8 years from last contact
- **Child assessments:** Until 25th birthday or 8 years after last contact (whichever is longer)
- **Video and audio recordings:** Maximum 8 years with explicit consent
- **AI-generated transcripts:** Same retention period as assessments notes
- **Questionnaires and reports:** 8 years from completion
- **Financial records:** 7 years as required by law
- **Clinical audit data:** In accordance with NHS audit requirements

Data Protection Rights



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Under UK GDPR and Data Protection Act 2018, you have the following rights:

- **Right of access** to your personal data
- **Right to rectification** of inaccurate data
- **Right to erasure** (right to be forgotten)
- **Right to restriction** of processing
- **Right to object** to processing
- **Right to data portability**
- **Right not to be subject to automated decision-making**

You are not required to pay any charge for exercising your rights. We have one month to respond to valid requests.

Clinical Safety and AI Governance

In line with NHS AI and digital technology standards:

- All AI tools undergo clinical safety assessment
- Regular monitoring and evaluation of AI system performance
- Clinician oversight and validation of all AI outputs
- Clear escalation procedures for AI system concerns
- Compliance with MHRA software as medical device regulations
- Regular review of AI tool effectiveness and safety
- Adherence to NHS standard contract requirements for AI and digital technologies

Direct Marketing

We may contact you with information regarding our services via email or phone, in compliance with direct marketing regulations and NHS communication standards. You have the right to opt out at any time by emailing info@saltwm.co.uk.

Website and Social Media

- We use cookies to collect standard internet log information and visitor behaviour
- We may collect publicly available information from social media when users interact with our profiles
- All website data collection complies with UK GDPR requirements



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Data Security Incidents

In the event of a data security incident:

- We will assess and contain the incident immediately
- Notify relevant authorities within 72 hours where required
- Inform affected individuals without undue delay where appropriate
- Implement remedial actions to prevent recurrence
- Report to NHS England and relevant commissioners as per contractual obligations

Staff and Candidate Privacy Notice

Scope

This privacy notice applies to all current and former employees, workers, contractors, applicants, and candidates of Speech and Language Therapy West Midlands Ltd.

What Personal Data We Collect

We may collect and process the following categories of information:

- Identification and contact details (e.g. name, address, email, phone)
- Application and recruitment information (CVs, cover letters, interview notes, references)
- Employment records (contracts, pay, performance, training, absence, appraisal data)
- Professional registration, qualification, and right-to-work documentation
- Health and occupational health information (where necessary and lawful)
- Equality and diversity data (optional, for monitoring purposes)
- Criminal record information (where relevant for safeguarding roles)

Why We Process Staff and Candidate Data

We process this information to:

- Manage recruitment and selection processes
- Establish and maintain employment or contractor relationships
- Comply with legal, regulatory, and safeguarding obligations (including NHS and CQC requirements)
- Administer payroll, pensions, and benefits
- Ensure health, safety, and wellbeing at work
- Conduct performance management, training, and professional development



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- Maintain professional registration and compliance with NHS and data security standards

Lawful Bases for Processing

Our lawful bases include:

- Performance of a contract (employment or contractor agreement)
- Compliance with legal obligations (e.g. right-to-work checks, safeguarding)
- Legitimate interests (e.g. business administration, recruitment)
- Consent (where applicable, such as for optional diversity monitoring)

Information Sharing

We may share staff and candidate information with:

- Payroll and pension providers
- HMRC and other government bodies
- NHS organisations (for compliance and verification)
- Professional regulatory bodies (e.g. HCPC, RCSLT)
- DBS (Disclosure and Barring Service) for safeguarding checks
- Occupational health providers
- Training and accreditation providers

Data Retention

- Candidate data: retained for up to 12 months after recruitment outcomes (unless consent is given to retain for longer)
- Employment records: retained for 6 years after employment ends
- Payroll/tax records: retained for 7 years as required by law

Your Rights

Staff and candidates have the same UK GDPR rights as outlined earlier in this policy (access, rectification, erasure, restriction, objection, data portability).

How to Complain

If you have concerns about our use of your personal information:

Primary Contact:

Email: info@saltwm.co.uk



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Data Protection Authority:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Helpline: 0303 123 1113
Website: <https://www.ico.org.uk/>

NHS Complaints:

You may also raise concerns through NHS complaint procedures via your commissioning organisation or NHS England.

This policy complies with NHS standard contract requirements, UK GDPR, Data Protection Act 2018, and relevant NHS information governance frameworks. Regular reviews ensure continued compliance with evolving NHS digital and AI governance standards.