



## INFORMATION GOVERNANCE POLICY & PROCEDURES

### PURPOSE OF OUR SERVICE

- Interactions Speech and Language Therapy provides speech and language therapy services to children, including:
  - Assessment
  - Diagnosis of speech, language and communication needs
  - Intervention
  - Advice and recommendations to parents/education staff/other professionals
  - Liaison with other professionals to aid decision making and joint planning in the best interests of the child
  - Attendance at meetings to represent the speech, language and communication needs of the child
  - Support to obtain additional funding available to those with speech, language and communication needs
  - Responsibility to act on safeguarding concerns and protect the well-being of children in our care
  - Written documentation of all of the above

### CONSENT

- No child will be seen directly by an Interactions SLT representative until a signed parental consent form has been received.
- The school will provide the potential client's parent/guardian email address to their SLT who will then send the parent/guardian a copy of the electronic consent form.
- Once the parent/guardian returns the electronic consent form, the SLT will create a client record (on 'WriteUpp') and gather information relating to the child's SLCN.
- A record of this consent must be uploaded to every child's electronic record.

#### *Contracts with education settings:*

- Children will be referred by the education setting. Before any child is seen in an education setting, the setting must gain consent from the parent/guardian to pass the parent/guardian email onto the SLT.
- No personable, identifiable information about the child should be shared from the education setting to the SLT before the parental consent form has been received by the SLT.
- In the child's first casenote entry, the therapist must include the phrase "Signed parental consent form received", and upload the consent form to the 'Files' section of the child's electronic record.
- If the parent/guardian has not ticked any of the consent boxes, this must be recorded in the child's electronic record.
- If there is no consent for email correspondence, then under 'email address' on the child's home page, write "noconsent@noconsent.co.uk".
- If there is no consent to share information with other professionals, then under 'other info' on the child's home page, write "No consent to share information with other professionals".



- The original electronic copy of the consent form is stored on Interactions' secure online system

*Withdrawal or change of consent:*

- A parent/guardian may withdraw their consent to any part of our service at any time
- If a parent/guardian contacts a therapist to amend their consent, the parent/guardian must complete a new Parental Consent Form (e-form) and the SLT must upload this to the child's record. For example, if the parent wishes to remove their consent for emailing information, they will return the new consent form to reflect this change.
- Make a note in the child's electronic record to reflect the change e.g. "Parent has withdrawn consent to email information" and update the relevant section on the child's home page as above.
- Upload the new consent form as per all electronic consent.
- If consent to treatment is withdrawn completely, the parent should complete a 'Withdrawal of consent' form. The therapist should complete the above steps then discharge the child with a discharge letter stating the reason for discharge as "Parental consent was withdrawn" .

*Consent to access previous records:*

- If a client has previously been known to Interactions SLT and is re-referred, their existing electronic record will be re-opened in order to maintain a complete and contemporaneous record.
- In the event of a previously known child being re-referred, new consent must be obtained by the above consent processes.

**CASENOTES**

- Any contact relating to a child on the caseload must be documented in the child's electronic record in the 'Notes' section.
- This must be completed within 24 hours of the contact.
- If for any reason access to the system is not available within 24 hours, a paper record of the contact must be taken and copied into the electronic record at the earliest possible opportunity, preceded by the statement "Session carried out on DD.MM.YY. Notes copied from paper as access to the electronic system was not available at the time."
- Information in casenotes must be complete, relevant, accurate, up-to-date, and necessary for the purpose of our services.
- Interactions SLT representatives should only view or edit a record when it is clinically relevant, appropriate and necessary (in line with standards outlined in General Data Protection Regulation (2016)).



## **PAPER-BASED CLIENT INFORMATION**

- When working in education settings it will be necessary to carry certain personal information with you in paper form from your office base to the setting and back. All such information should be kept to a minimum.
- This information must be kept with you at all times, or locked in the boot of your car.
- No personal information should be left in your car overnight.
- For education settings, all paper based information relating to the children in that school should be kept together in one file ('Location File') to minimise any risk of loss, theft or damage.
- Any general caseload information that is held in paper form (e.g. referral lists, caseload lists) should be uploaded to the setting's folder in the therapists secure Interactions SLT GDrive at least annually to maintain an accurate and complete record. The paper copies should be returned to the setting to be kept in their own records or to be disposed of according to their own information governance policies.
- When taking written notes during a session, avoid including unnecessary personal information e.g. write the child's initials instead of their full name, write chronological age rather than date of birth.
- *Assessment forms:* Type all relevant assessment information into the notes section of the child's electronic record. Upload a copy of any paper assessment forms into the 'Files' in the child's record (front cover containing results summary is adequate). Return the original assessment form to the education setting, or shred it.
- Once any paper-based written information is handed over to the education setting, that information becomes the responsibility of the setting's Data Protection Officer (DPO). The setting has signed a 'GDPR responsibility agreement' with Interactions SLT to that effect.
- Any miscellaneous paper-based client sensitive information not covered by the procedures above should be shredded, or returned to the education setting, when no longer required.

## **SAFEGUARDING INFORMATION**

- All Interactions SLT representatives have a responsibility to safeguard the well being of the clients on their caseload.
- Information regarding safeguarding will be recorded and stored in line with our 'Safeguarding Policy and Procedures'.

## **STORAGE**

- All sensitive information should be stored on WriteUpp, the electronic record management system used by Interactions SLT, or within the Interactions SLT secure business Google Drive. No sensitive information should be stored on a long term basis in paper form, or on the hard drive of an electronic device.
- Once a document or note has been uploaded to WriteUpp, any local copy must be deleted from the hard drive of your electronic device (paper documents to be disposed of as outlined above).
- Working documents must be held on the Interactions SLT secure business Google Drive and not on the hard drive of your electronic device.



- If for any reason a working document has to be held on the hard drive of your electronic device, it should not contain patient identifiable information (e.g. Date of Birth, Full name, School name). Complete the full details prior to uploading the document then delete the document from your device immediately.
- File names should only contain the child's initials and the date of the report e.g. MH report July 19.

### **ELECTRONIC DEVICES**

- Any electronic devices containing any information relating to your work with Interactions SLT must be password/pin/biometric protected.
- Personal mobile devices may be used for the purpose of communicating with parents and professionals via telephone and text. No client identifiable information should be stored on a personal mobile device. Personal mobile devices may not be used for the purposes of taking photographic, video or audio content of clients, or for accessing work emails.
- **Visual** images/recordings of clients may only be taken on electronic devices if expressly consented to by parents and the education setting's SENCo in writing. Visual images/recordings should only be taken on an Interactions SLT issued device, or a device provided by the education setting/parent (never on a personal mobile device)
- **Audio** recordings may be taken on Interactions SLT issued electronic devices (not personal devices) by verbal agreement with the education setting's SENCo.
- Images/recordings should only be stored for as long as is clinically required (i.e. to be analysed and information recorded into the client's electronic record). They should then be deleted.
- Images/recordings should only be taken if necessary and used only for the purpose which consent was given.
- Images/recordings must be saved with no personal identifiable information in the file name – initials and date of recording only.
- Images/recordings must not be played to any third parties outside of the parents and professionals directly involved with the client.
- Photographs of sensitive information such as professional reports or consent forms should never be taken via the camera function of an electronic device. Photographs of such documents can be taken with an electronic device via our secure electronic records database - 'Writeupp' - as this immediately uploads to the secure database and does not store a copy of the image.

### **EMAILING**

- You must have written consent from parents to share information via email.
- Frequently used email addresses (e.g. the setting SENCO) should be recorded in the 'Next of Kin' section of the child's record. This is to prevent the child's details appearing in the subject headline of the email.
- Emails pertaining to specific children should contain the child's initials only in the subject and body of the email or in any file names that will be attached to the email.
- All reports and documents pertaining to a child will be emailed via 'Writeupp', our secure electronic records database.
- Emails from 'Writeupp' should be sent using company templates where provided.



- Documents emailed via Writeupp should be in PDF format to guard against alteration.
- Only if it is not possible to email from 'Writeupp', you may send a password protected PDF via your work email address and send the password in a separate new email message.
- If you are emailing a person outside of the education setting, you must have express parental consent to share information with other professionals.

### **SHARING INFORMATION**

- Information regarding any child on the caseload will only be shared with other professionals by Interactions SLT representatives with the express signed consent of parents.
- All information that is shared must be done on the basis that it is relevant, accurate, and necessary for the care of the client.
- Once information has been shared with an education setting or other professional, that setting's Data Protection Officer (DPO) takes responsibility for how that information is stored, processed and shared with others.

### **DATA AUDIT and TRAINING**

- In order to ensure the safety and security of the information collection, storage and processing procedures outlined in this document, the Interactions SLT Data Protection Officer (DPO) will conduct a twice yearly Information Governance audit which will include:
  - Ensuring that all Interactions SLT representatives are up to date with Information Governance training (must be completed at least every 3 years)
  - Spot checking client electronic records to ensure they meet the standards outlined in this document, and the standards of practice outlined by the Health and Care Professions Council (HCPC)
  - Conducting an Information Governance audit questionnaire with Interactions SLT representatives to monitor everyday practices
- Interactions SLT 'Information Governance Procedures' and 'Privacy Policy' documents will be updated annually, and will take into account the audit results.

### **DATA REQUESTS**

- Any individual for whom we hold data, or their legal parent/guardian, has the right to request a copy of that information, and to request for information about them to be amended if they believe it to be inaccurate.
- If you receive a data request from the parent/guardian of a client in your care, please direct them to submit their request in writing to:

*FAO Data Protection Officer  
Interactions Speech and Language Therapy  
54 Gledhow Wood Grove  
Leeds  
LS8 1PA*



- **NB:** Copies of reports, assessment forms, target sheets etc can and should be shared freely with clients and parents/guardians. 'Data requests' pertain to more complex requests, for example for a complete copy of the entire record, or for an aspect of the record to be amended. If you have any doubts about a request for information, please contact the DPO.

### **DATA BREACH**

- In the unlikely event that client identifiable information regarding a child is lost, stolen or communicated to an unintended or unauthorised person, you must notify the Interactions SLT Data Protection Officer (DPO).
- The DPO will arrange for the child's parent/guardian to be notified as soon as possible.
- If the Interactions DPO and/or the parent/guardian considers that the data breach presents a significant risk to the rights or freedoms of the child then the Information Commissioner's Office (ICO) will be notified of the breach.
- You and the parent/guardian will be kept fully informed by the DPO of the advice from the ICO.

### **CONTACTS**

*Interactions Data Protection Officer (DPO):* Anna Lees  
Tel: 07513 234 257  
Email: [anna@interactionspeechtherapy.co.uk](mailto:anna@interactionspeechtherapy.co.uk)

A copy of our 'Privacy Policy' is available for parents/education settings to read at their convenience.