

# I CAN Privacy Notice for the Family Support Service

I CAN is committed to protecting the privacy and security of your personal data.

The information that we collect about you will only be used lawfully in accordance with the Data Protection Act 2018. All data is retained exclusively within the United Kingdom. This information will not be disclosed to anyone outside I CAN or its associated companies, partners, and other companies with which I CAN has arranged services for your benefit.

We expect the information we hold to be accurate and up to date. You have the right to find out what information we hold about you and make changes, if necessary. You also have the right to ask us to stop using the information. To have your information removed, please contact us.

The purpose of this privacy notice is to let you know clearly how I CAN collects and uses personal data about you for the purposes of the Family Support Service (incorporating our advice line operating over telephone and email, our TALK Webinar series delivered online via video conferencing and our Teletherapy service, also delivered online via video conferencing).

I CAN is a data controller. This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the information contained in this privacy notice. In this Privacy Notice, references to “I CAN”, “we”, “us”, “our” and “the organisation” mean the I CAN charity, including our schools. The registered address of I CAN is 2 Angel Gate, Hall Street, London EC1V 2PT. Your main point of contact for data protection queries is our Data Protection Officer, Satswana Limited, Pembroke House, St. Christopher’s Place, Farnborough, Hampshire, GU14 0NH, Tel 01252 516898 or email [info@satswana.com](mailto:info@satswana.com)

It is important that you read and understand this notice so that you are aware of how and why we are using your personal data.

## How is your personal data collected and stored?

In connection with your contact with us, we will collect, store, and use personal data about you that you have provided to us directly as part of the Family Support Service. This may include, for example, your name and contact information, and written information about your child that you provide to us as part of accessing our Family Support Service. Your personal data will be stored in our IT systems (including email) but will have access restricted to specific people only. We make every effort to ensure that information we collect and store about children is anonymised.

If participating in our Teletherapy service, we will also record clinical notes which will be stored in the *MyTherapyTracker*, a secure web-based electronic patient record system. We may also request that you share short video clips of you and your child interacting through play as part of therapy, which will also be stored in the *MyTherapyTracker*. The only people who have access to this are you and the I CAN speech and language therapists who work on the Teletherapy service. We will delete all videos that you share with us through the *MyTherapyTracker* within 2 weeks of your child’s 3-month online review appointment. You can



find the Privacy Policy for *MyTherapyTracker* here: <https://mytherapytracker.com/privacy-policy/>

Occasionally, families give us permission to use the videos of them and their children in future therapy sessions with other families. This would always be discussed with you and written consent obtained. Only if you have given us written consent would your videos be retained for longer than the time period specified above and shared with other families. If your child is over 13 years of age, we will require their consent to use their videos for this purpose (in line with new legislation that came in with the GDPR 2016 and later adopted by DPA 18).

### **Why do we collect and use personal data about you?**

I CAN has a legitimate interest in processing your personal data as part of the Family Support Service and for keeping records of the process. We make every effort to keep information anonymised, but some processing of personal data is essential for I CAN to be able to provide advice / information via email following contact with one of our Speech and Language Advisors. We will seek your permission before using your personal data to collect feedback about the service.

The condition for processing personal data under the DPA can be found in Chapter 2, section 8 of the Data Protection Act 2018. All personal data is stored in the UK and is not transferred outside the European Economic Area (EEA) without prior written consent.

*MyTherapyTracker* stores all information provided to and collected by the service in accordance with industry standard security measures in secure servers located within the UK and back-ups within the EU managed by their hosting partners with 24/7 manned security and only accessible with pre-approved access via the authorisation security gate.

### **Who has access to the Family Support Service data?**

If you are accessing our Enquiry Service or attending one of our parent webinars, your personal data may be shared internally for the purposes of managing the Family Support Service. This includes Speech and Language Advisors who operate the Enquiry Service, and other staff members (including senior management staff) as necessary who have responsibility for ensuring the quality of the service. The organisation will not share your personal data with third parties. I CAN will not transfer your personal data outside the organisation for any processing.

If you are participating in our Teletherapy service, your personal data is shared with and stored in the *MyTherapyTracker* (as stipulated above). *MyTherapyTracker* uses third-party suppliers to support the running of the service including their hosting partners and secure back-up services. Such use will be in accordance with the contracts *MyTherapyTracker* has with these suppliers as outlined by their terms of service, privacy policy and data processing agreements. You can find the Privacy Policy for *MyTherapyTracker* here: <https://mytherapytracker.com/privacy-policy/>

### **How does I CAN protect your personal data?**

I CAN takes the security of your personal data seriously. We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, destroyed, used, or accessed in an unauthorised way, altered or disclosed. In addition,

we limit access to your personal data to those employees who need to access it in the proper performance of their roles for I CAN. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. These measures are in accordance with applicable laws and regulations.

If participating in our Teletherapy service, *MyTherapyTracker* provides you with a password which enables you to access your account, and you are responsible for keeping this password confidential and secure. According to the *MyTherapyTracker* terms of service and acceptable use policy, you are asked not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although *MyTherapyTracker* will do its best to protect your personal data, we cannot guarantee the security of your data transmitted via the site. Any transmission is at your own risk. I CAN and *MyTherapyTracker* will use strict procedures and security measures to try to prevent unauthorised access.

### How long will I CAN retain your personal data for?

I CAN will keep your personal written data up to your child's 25<sup>th</sup> birthday after which it will be destroyed, in line with Statutory/NHS guidelines.

### Your rights

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please make contact by emailing Data Protection Officer, Satswana Limited, Pembroke House, St. Christopher's Place, Farnborough, Hampshire, GU14 0NH, Tel 01252 516898 or email [info@satswana.com](mailto:info@satswana.com)

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of incomplete or inaccurate personal data we hold about you.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are processing it for our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal data to another party** where processing is carried out by automated means.

To find out more about your rights, to exercise any of your rights, or if you have any questions or concerns about data protection at I CAN, please contact our Data Protection Officer, Satswana Limited, Pembroke House, St. Christopher's Place, Farnborough, Hampshire, GU14 0NH, Tel 01252 516898 or email [info@satswana.com](mailto:info@satswana.com)



If you have any concerns or comments about how we use information, we would like to hear from you. Alternatively, you may contact the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues for guidance and advice, or to lodge a complaint. The ICO may be contacted at:

Online: [www.ico.org.uk](http://www.ico.org.uk)

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545745 (national rate).