

PRIVACY NOTICE

1. Introduction

The UCL Communication Clinic respects your privacy and is committed to protecting your personal data.

Please read this Privacy Notice carefully – it describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by individuals themselves or by third parties.

People who participate in research projects should also refer to the following:

[Research participants for health and care purposes privacy notice](#) (link)

We keep this Privacy Notice under regular review. It was last updated on 6th February 2019.

2. About us

The UCL Communication Clinic is part of the Department of Language and Cognition, in the Division of Psychology and Language Sciences, at University College London (UCL).

UCL, a company incorporated by Royal Charter (number RC 000631), is the entity that determines how and why your personal data is processed. This means that UCL is the 'controller' of your personal data for the purposes of data protection law.

3. Personal data that we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. This may include:

- Your name and contact details;
- 'Special category' data about you (information about your medical and social history, the results of assessments of speech, language and cognition and associated analyses, and your response to therapeutic interventions);

- The names and other details about third parties who are involved in the issues we are helping you with, and their reports (family members and other carers, other professionals such as speech and language therapists and GPs).

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To register you as a service user and to manage our relationship with you;
- To provide speech and language therapy. This necessarily includes special categories of personal data. A professional requirement for speech and language therapists is to maintain appropriate clinical records.

Processing is based on your consent which is implicit in accepting an invitation to attending speech and language therapy sessions. You have the right to withdraw your consent at any time by contacting us using the details set out below. Please note that this will not affect the lawfulness of processing based on consent before its withdrawal. Withdrawing consent will terminate the provision of speech and language therapy sessions in the clinic. There is also an implied withdrawal of consent if you cease to attend sessions that you are offered in the clinic.

We may also use anonymised data, meaning data from which you cannot be identified, for the purposes of service evaluation and promotion (such as published reports, journals and at conferences).

You may be asked, or you can ask, to join the Research Volunteer Register. Explicit consent to this will allow us to share your personal data with UCL researchers, allowing them to contact you directly with information about suitable projects. These projects are the responsibility of their principal researchers and each will have its own consent and information governance procedures which you will be told about. The Research Volunteer Register also stores and shares between projects special categories of personal data relating to your acquired communication difficulties and the outcomes of assessments of speech, language and cognition.

5. Who we share your personal data with

Your personal data will be collected and processed by staff and students at UCL. Access to your personal information is limited to people who have a legitimate need to see it for the purpose of carrying out their work and research at UCL. We may have to share your personal data with the parties set out below for the purposes outlined in section 4. Referral to third party organisations will be made with your consent and will be processed according to their information governance policies

- Other speech and language therapy services
- Other health and social care services

- Voluntary or community-based organisations that provide services relevant to your acquired communication difficulties

6. Lawful basis for processing

Data Protection Legislation requires that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "lawful basis" for the processing. The basis for processing will be as follows:

- Consent. You have given clear consent for us to process your personal data. Processing is necessary for the provision of healthcare or treatment, in the form of speech and language therapy interventions, or the management of health care systems and services
- Public task. The data processing is necessary for us to carry out UCL's core purposes of education and research. As a university we use personal data to conduct research to improve health, care and services.

These bases also meet the requirements of the Data Protection Act 2018 Schedule 1 Part 1 for health or social care purposes (2-2d,f) and research (4), and Part 2 for the provision of support for individuals with a particular disability or medical condition (16-1, 2, 3, 4, 5, 6).

7. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

8. Information security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

We will retain your personal data in the form of paper and electronic casenotes for 8 years following discharge from the UCL Communication Clinic.

10. Your rights

Under certain circumstances, you may have the following rights under data protection legislation in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction of your personal data;
- Right to request erasure of your personal data;
- Right to object to processing of your personal data;

- Right to request restriction of the processing your personal data;
- Right to request the transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact the Data Protection Officer.

Contacting us

You can contact UCL by telephoning +44 (0)20 7679 2000 or by writing to: University College London, Gower Street, London WC1E 6BT.

Please note that UCL has appointed a Data Protection Officer. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our Data Protection Officer:

data-protection@ucl.ac.uk

11. Complaints

If you wish to complain about our use of personal data, please send an email with the details of your complaint to the Data Protection Officer so that we can look into the issue and respond to you.

You also have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the ICO website.