

# Privacy Policy for Stellar Starts Paediatric Therapy

January 2025



This privacy policy explains why Stellar Starts Paediatric Therapy collects information about you and your child and how that information may be used.

## How we use your personal information and consent

The Physiotherapist at Stellar Starts Paediatric Therapy who provides your child/young person with treatment maintain records about your child's/young person's health and any treatment or care your child/young person receives. These records help to provide your child/young person with the best possible therapy intervention and is a legal requirement as regulated by the Health and Care Professions Council whom all Physiotherapists at Stellar Starts Paediatric Therapy are registered with.

Stellar Starts Paediatric Therapy takes your privacy seriously and will never disclose, share or sell your data without your consent and in accordance with the terms stated in our Privacy Notice; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. We will obtain your explicit consent through a signature at your/your child's/young person's first consultation. You can modify or withdraw your consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. You are not obligated to provide your personal information to Stellar Starts Paediatric Therapy, however, as this information is required for us to provide you with our clinical services, we will not be able to offer our services without it.

Records held by Stellar Starts Paediatric Therapy about you and your child/young person may include the following personal information:

- Details about you, such as your name, address and contact details
- Gender
- Date of birth
- Emergency contact details
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Other professionals and education settings involved in your child's/young person's care
- Any contact Stellar Starts Paediatric Therapy has had with your child, such as appointments, therapy visits, etc.
- Payment details (including card or bank information for transfers and direct debits)
- Photos and videos of your child/young person as a record of assessment and progress over time.
- Results and investigations such as x-rays, assessments, etc.
- Records of meetings and decisions
- Contact Forms: As part of the "Contact Us" form, we collect personal information. We use that information for a couple of reasons: to tell you about services you have asked us to tell you about or to contact you if we need to obtain or provide additional information. We

do not rent or trade email lists with other organisations and businesses. This may also be the case if you contact us through a third-party clinic search.

## More sensitive information

We process the following more sensitive data (including special category data):

- data concerning physical or mental health (for example, details about your appointments or diagnosis)
- data revealing racial or ethnic origin
- data concerning a person's sexual orientation
- genetic data (for example, details about a DNA sample taken from you as part of a genetic clinical service)
- biometric data (where used for identification purposes)
- data revealing religious or philosophical beliefs
- data relating to criminal or suspected criminal offences

The personal and sensitive information we collect may be used for the following reasons:

- You have provided information to seek care – this is used directly for your child's/young person's care, and also to manage the services we provide, to clinically audit our services, investigate complaints, or to be used as evidence as part of an investigation into care
- Assess, manage and record physiotherapy diagnosis and treatment.
- Communicate information regarding physiotherapy services and costs.
- Arrange, rearrange or remind you about appointments.
- Legal obligation for record keeping of assessments, correspondence and reports related to your child's therapy
- Discuss with you regarding future appointments and/or physiotherapy management.
- Discuss any changes to you or your child's/young person's medical wellbeing or management.
- Liaise with you regarding services, contracts, payments and/or invoicing.
- Communicate changes to our business practices or the services we offer.
- Internal training and Audit purposes (information would be kept anonymous).
- Communicate with other professionals (including GPs, Case managers, Healthcare providers, insurance companies) only when necessary and with your consent.
- Record attendance at classes or groups run by Stellar Starts Paediatric Therapy
- You have applied for a job with us or work for us
- Social Media: We publish information about our services on social media channels such as Facebook and Instagram. We will not publish any personal/sensitive information about you on social media without your consent. We do not collect information about visitors to our social media accounts, but this may be collected by a third party or by the social media channel themselves. For more information, please refer to the Privacy Policy of the social media channel concerned. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

To ensure your child receives the best possible care, their records are used to facilitate the care they receive. Stellar Starts Paediatric Therapy treatment records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Any paper records will be scanned into our electronic record management software Zanda, and paper records then destroyed.

### *Change of Details*

It is important that you tell the person treating your child/young person or Stellar Starts Paediatric Therapy if any of your details such as your name or address have changed or if any of your child's/young person's details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you and your child.

## **Retention of personal and sensitive information**

Information may be used within Stellar Starts Paediatric Therapy for clinical audit to monitor the quality of the service provided. Stellar Starts Paediatric Therapy are committed to protecting your and your child's/young person's privacy and will only be collected when necessary and used lawfully. We have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. We are required by UK Physiotherapy guidelines to keep your child's/young person's clinical records until 25 years of age. Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw consent.

It is important that all data will be accurate, kept up to date and erased, without delay, should your data no longer be required. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Sharing of personal and sensitive information**

Every member of staff who works for Stellar Starts Paediatric Therapy has a legal obligation to keep information about you and your child confidential. We will only ever use or pass on information about you if others involved in your child's/young person's care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances of vital interest to a third party (i.e. life or death situations), where the law requires information to be passed on.

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations:

- NHS health care professionals
- GPs
- Voluntary sector providers
- Local Authorities
- Education Services
- Police and Judicial Services

- Other private sector health care professionals/providers
- Equipment companies
- Debt Collectors
- Other 'data processors' which you will be informed of.

If we need to share your data with external professionals who are involved in, or recommended to be involved in your child's/young person's care, this will always be discussed with you and consent gained before sharing any information. We may share your data with your external referring company or insurer (where applicable) as part of your treatment programme. This will always be discussed with you and consent gained.

In some circumstances we are legally obliged to share information. This includes:

- when required by NHS Wales to develop national IT and data services
- when reporting some infectious diseases
- when a court orders us to do so
- where a public inquiry requires the information

We will also share information if the public good outweighs your right to confidentiality. This could include:

- where a serious crime has been committed
- where there are serious risks to the public or staff
- to protect children or vulnerable adults

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Stellar Starts Paediatric Therapy uses third-parties to provide the services detailed in this Privacy Policy and business functions; however, all processors acting on our behalf, only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

## **Rights of the client- legal basis for processing data**

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

The points below clearly set out the rights each client is entitled to. Please ask us for an explanation of each, should you wish to have more information. Under data protection law, you have rights including:

- **The right to be informed**

- **The right of access:** You have the right under the Data Protection Act 2018 to request access to view or to obtain copies of what information Stellar Starts Paediatric Therapy holds about you and your child/young person and to have it amended should it be inaccurate. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. You will need to give adequate information (for example full name, address, date of birth and details you request) so that your identity can be verified and your records located.

Please contact us at [stellarstarts.therapy@outlook.com](mailto:stellarstarts.therapy@outlook.com), or in writing to 6 Pilgrim Close, Radyr, Cardiff, CF158GD if you wish to make a request.

- **The right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **The right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **The right to restrict processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances. If at any time, should you wish to withdraw consent, to processing your personal data or sensitive personal data, please contact Stellar Starts Paediatric Therapy Data Protection Officer on [stellarstarts.therapy@outlook.com](mailto:stellarstarts.therapy@outlook.com) or in writing to: Stellar Starts Paediatric Therapy, 6 Pilgrim Close, Radyr, Cardiff, CF158GD.
- **The right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **The right to object to processing:** You have the right to object to the processing of your personal information.
- **Your right to withdraw consent:** When we use consent as our lawful basis you have the right to withdraw your consent at any time.
- **The right to complain/object & ICO Information**

The Data Protection Act 2018 requires organisations to register a notification with the Information Commissioner to describe the purposes for which they process personal and sensitive information. This information is publicly available on the Information Commissioners Office website [www.ico.org.uk](http://www.ico.org.uk), [casework@ico.org.uk](mailto:casework@ico.org.uk) or telephone 03031231113 (local rate) or 01625545745. Stellar Starts Paediatric Therapy is registered with the Information Commissioners Office (ICO).

The Data Controller, responsible for keeping your information secure and confidential is: Stellar Starts Paediatric Therapy. Should you have any concerns about how your information is managed at Stellar Starts Paediatric Therapy, please contact the Owner of Stellar Starts Paediatric Therapy, Suzie Shanahan, in writing: 6 Pilgrim Close, Radyr, Cardiff, CF158GD, or at [stellarstarts.therapy@outlook.com](mailto:stellarstarts.therapy@outlook.com). If you are still unhappy following a review by the Owner of Stellar Starts Paediatric Therapy, you have the right to raise a concern with the Information Commissioner's Office (ICO). Details on how to do this can be found here: <https://ico.org.uk/for-the-public/raising-concerns/>

## **Is information transferred outside the UK?**

Stellar Starts Paediatric Therapy uses the electronic practice management software, Zanda, which is certified with ISO 27001. Being ISO 27001 certified means that Zanda has implemented strict security measures to prevent unauthorised access, theft, and corruption of sensitive information. Zanda is also GDPR UK and Europe compliant. Zanda's data is hosted in the UK.

## **Common law duty of confidentiality**

In our use of health and care information, we satisfy the common law duty of confidentiality because:

- you have provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses)
- we have support from the Secretary of State for Health and Care following an application to the [Confidentiality Advisory Group \(CAG\)](#) who are satisfied that it isn't possible or practical to seek consent
- we have a legal requirement to collect, share and use the data
- for specific individual cases, we have assessed that the public interest to share the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime). This will always be considered on a case by case basis, with careful assessment of whether it is appropriate to share the particular information, balanced against the public interest in maintaining a confidential health service

## **Security and Breaches**

Should your personal data that we control be lost, stolen or otherwise breached, where this constitutes a high risk to your rights and freedoms, we will contact you without delay. We will give you the contact details of the person who is dealing with the breach and the steps we are taking to deal with it.

## **Cookie Notice**

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages, or logging in options. Cookies are widely used in order to make websites work, or to work more efficiently, and our site relies on cookies to optimise user experience and for features and services to function properly. Cookies do not personally identify users but they do identify a user's computer. Most browsers are initially set to accept Cookies. Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>

## **How do I complain?**

Stellar Starts Paediatric Therapy only processes your personal information in compliance with this privacy notice and in accordance with data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you can make a complaint by contacting us at [stellarstarts.therapy@outlook.com](mailto:stellarstarts.therapy@outlook.com), or writing to us at 6 Pilgrim Close, Radyr, Cardiff, CF158GD.

Following this, if you are still unhappy with how we have used your data, you can then complain to the supervising authority, the Information Commissioner's Office (ICO).

The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Helpline number: 0303 123 1113, ICO website: <https://www.ico.org.uk/global/contact-us/email/>

## **Contact**

Suzie Shanahan- Owner and Highly Specialist Paediatric Physiotherapist

Telephone: 07443658018

Email: [stellarstarts.therapy@outlook.com](mailto:stellarstarts.therapy@outlook.com)

## **Review of Policy**

Privacy Notice Reviewed: January 2025

Next Review Date: January 2026

Signed: Suzie Shanahan— Owner of Stellar Starts Paediatric Therapy.