

Data Protection Policy

1. Introduction

At Acorn Autism Specialists, we are committed to ensuring that the personal data of our clients, staff, and other individuals we interact with is protected and handled in compliance with the highest standards of data protection law. As a private autistic diagnostic service in the UK, we recognise the importance of maintaining confidentiality and privacy for all individuals and are fully committed to complying with the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**.

This Data Protection Policy sets out how we collect, store, manage, and protect personal data to ensure its security, accuracy, and compliance with relevant laws and regulations.

2. Purpose

The purpose of this policy is to:

- Ensure that personal data is processed lawfully, fairly, and transparently.
- Set out the legal rights of individuals regarding their personal data.
- Provide clear guidelines on how we manage and protect personal data throughout its lifecycle.
- Comply with our legal obligations under the GDPR and related legislation.

3. Scope

This policy applies to all employees, contractors, volunteers, and anyone else who processes personal data on behalf of Acorn Autism Specialists. It covers all personal data that we collect, store, use, or share in relation to:

- Clients (children and adults) undergoing private autism assessments.
- Staff and contractors.
- Suppliers and other third parties with whom we have a relationship.

This policy applies to all forms of personal data, including paper records, digital files, and any other data stored in physical or electronic formats.



4. Data Protection Principles

In accordance with the GDPR, Acorn Autism Specialists will adhere to the following principles when processing personal data:

- **Lawfulness, fairness, and transparency:** We will process personal data in a lawful, fair, and transparent manner. Data subjects will be informed about how their data is being used and the lawful basis for processing it.
- **Purpose limitation:** We will collect personal data only for specified, legitimate purposes and will not use it for any purpose that is incompatible with those purposes.
- **Data minimisation:** We will collect and process only the personal data that is necessary to fulfil the specified purposes.
- **Accuracy:** We will ensure that personal data is accurate, complete, and up to date.
- **Storage limitation:** We will retain personal data only for as long as necessary to fulfil its purpose, in line with data retention guidelines.
- **Integrity and confidentiality:** We will implement appropriate security measures to protect personal data from unauthorised access, disclosure, alteration, or destruction.
- **Accountability:** We will demonstrate our compliance with these principles by maintaining appropriate records, conducting regular audits, and fostering a culture of accountability.

5. Types of Personal Data We Process

In the course of providing private autism assessments, we may collect and process the following types of personal data:

- **Identification and contact information:** Name, address, telephone number, email address, and date of birth.
- **Health and medical data:** Information about the individual's medical history, including details of professional assessments, diagnoses, treatments, and healthcare services.
- **Sensitive data:** As part of the autism assessment process, we may process sensitive personal data such as disabilities, mental health conditions, or other special needs information.
- **Family or caregiver information:** Contact details and relevant health or care information of family members or caregivers who are involved in the individual's care.

6. Legal Basis for Processing Personal Data

We will ensure that all processing of personal data is based on one of the following lawful bases, as outlined in the GDPR:

- **Consent:** Obtaining explicit consent from the data subject for specific purposes (e.g., for conducting an autism assessment).
- **Contractual necessity:** Processing personal data when it is necessary to fulfil a contract or agreement (e.g., providing healthcare services as part of an autism assessment).
- **Legal obligation:** Processing personal data to comply with legal obligations (e.g., compliance with healthcare regulations).
- **Legitimate interests:** Processing personal data to fulfil legitimate interests, where these interests do not override the rights and freedoms of the data subject.
- **Vital interests:** Processing personal data to protect the vital interests of the data subject or another individual (e.g., in cases of medical emergencies).

7. Rights of Data Subjects

Individuals whose data we process have the following rights under the GDPR:

- **Right to access:** Individuals have the right to request access to the personal data we hold about them.
- **Right to rectification:** Individuals can request that inaccurate or incomplete personal data be corrected.
- **Right to erasure (right to be forgotten):** Individuals can request that their personal data be deleted, subject to certain conditions.
- **Right to restrict processing:** Individuals can request that we restrict the processing of their personal data in certain circumstances.
- **Right to data portability:** Individuals can request that their personal data be transferred to another organisation in a structured, commonly used, and machine-readable format.
- **Right to object:** Individuals can object to the processing of their personal data in certain situations, including for direct marketing purposes.
- **Rights related to automated decision-making and profiling:** Individuals can request that decisions based solely on automated processing, including profiling, be reviewed by a human.

To exercise any of these rights, individuals can contact our **Data Protection Officers** (DPO), Dr. Sarah Clayton, Clinical Psychologist, and/or Mrs. Kate Wright, Highly Specialist Speech and Language Therapist, via phone on 01376 402284 or email info@acorn-autism.co.uk.

8. Data Retention and Deletion

We will retain personal data for as long as necessary to fulfil the purpose for which it was collected and in accordance with our data retention schedule. After the retention period has expired, we will securely delete or anonymise personal data, ensuring that it is no longer accessible or identifiable.

9. Data Security and Protection

We are committed to ensuring that personal data is protected from unauthorised access, disclosure, alteration, or destruction. To achieve this, we implement appropriate technical and organisational measures, including:

- **Encryption:** We will use encryption to protect sensitive personal data during transmission and storage.
- **Access control:** We will limit access to personal data to those staff members who need it to perform their job duties.
- **Regular audits:** We will conduct regular security audits to identify and address potential vulnerabilities.
- **Data breach management:** In the event of a data breach, we will assess, mitigate, and report the breach in accordance with legal requirements.

10. Sharing Personal Data

We will not share personal data with third parties unless necessary to provide the services required or as permitted by law. In some cases, we may share personal data with:

- Experienced subcontracted **associate health care professionals** as part of the autism assessment.
- **External Healthcare professionals or other organisations** involved in the individual's care (with the individual's consent).
- **Third-party service providers** who help us deliver services, such as IT providers or administrative support.
- **Regulatory bodies** or law enforcement agencies, when required to comply with legal obligations.

Where personal data is shared with third parties, we will ensure that appropriate safeguards are in place to protect the data.

11. Data Protection Officer (DPO)

We have appointed a **Data Protection Officer (DPO)** who is responsible for overseeing our data protection practices and ensuring compliance with data protection laws. The DPO are Dr. Sarah Clayton, Clinical Psychologist, and/or Mrs. Kate Wright, Highly Specialist Speech and Language Therapist, who can be contacted via phone on 01376 402284 or email info@acorn-autism.co.uk.

12. Monitoring and Compliance

We will regularly monitor our data processing activities to ensure compliance with this policy and the requirements of the GDPR. This will include conducting periodic

audits and reviewing our data protection practices to identify and address any areas for improvement.

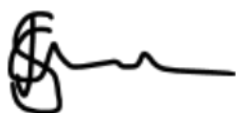
13. Policy Review

This Data Protection Policy will be reviewed regularly and updated as necessary to ensure that it remains compliant with relevant laws and regulations. Any changes to this policy will be communicated to staff and stakeholders.

14. Conclusion

At Acorn Autism Specialists, we take the protection of personal data seriously and are committed to maintaining the privacy and security of the individuals we serve. By following the principles outlined in this policy, we ensure that all personal data is handled responsibly, ethically, and in compliance with the law.

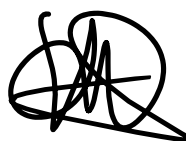
Signed:



Dr. Sarah Clayton

BSc. MSc. DClinPsych. DipCAT. CPsychol
Chartered Clinical Psychologist

HCPC: PYL26149



Mrs. Katherine Wright

BA. Hons. MSc. MRCSLT
*Highly Specialist Speech and
Language Therapist*

HCPC: SL30142

Date: 09/01/2024