



## Compass Privacy Notice

Introduction .....2

Who We Are .....2

ICO Registration and Data Protection Officer .....2

Why we collect and use your Personal Data .....2

What Is Our Legal Basis for Processing Your Personal Information? .....3

What Information Do We Collect About You? .....3

Why Do We Collect and Use Your Data?.....4

How Long Do We Keep Your Information? .....4

How Do We Keep Your Information Safe? .....5

Who Can Access Your Information? .....5

Who Might We Share Your Information With? .....5

Your Rights .....5

Concerns or Complaints.....6

## Introduction

Compass provides health and wellbeing services to children, young people and their families and carers across the UK. This privacy notice explains how we collect, use and protect personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to safeguarding personal data and being transparent about how we handle it. If anything is unclear or you would like more information, please speak to a member of staff or contact Compass using the details below.

## Who We Are

**Data Controller:** Compass – Services to Improve Health and Wellbeing

**Registered Address:** 2nd Floor Marlborough House, Westminster Place, York YO26 6RW

**Main Contact for Data Protection Queries:** [information.governance@compass-uk.org](mailto:information.governance@compass-uk.org)

If you have any questions about how we use personal information, we encourage you to speak with the Compass service that you have had involvement with in the first instance. The service will have a good understanding of your situation and is most likely to be able to assist with your query.

However, if you still have concerns or need more detailed information about how we handle your data, you can contact our data protection officer.

## ICO Registration and Data Protection Officer

Compass is registered with the Information Commissioner's Office (ICO), which oversees data protection across the UK.

**ICO Registration Number:** Z6968206

We have an appointed Data Protection Officer (DPO) to support our compliance with data protection law and help ensure your rights are protected.

### Data Protection Officer

**Name:** Laura Palmariello

**Email:** [laura@dataprivacyexpert.co.uk](mailto:laura@dataprivacyexpert.co.uk)

You can contact our DPO if you have any concerns about how your data is being handled or wish to raise a privacy-related issue that cannot be resolved at service level.

## Why we collect and use Personal Data

We collect and use personal information to help us deliver safe, effective and tailored services to the people we support. This might include name, contact details, health information or other relevant background, depending on the service and your relationship with us.

We also hold personal data about other people we work with, such as staff, partner organisations, commissioners, and suppliers. We use this information to manage our operations, meet our legal obligations, and deliver high-quality, joined-up care and support. We always handle personal data lawfully, fairly and securely and only share it when necessary and appropriate.

## What Is Our Legal Basis for Processing Personal Information?

We process data under the following lawful bases:

- Provision of health services: UK GDPR Article 6(1)(e) – task in the public interest
- Statutory services: UK GDPR Article 6(1)(c) – legal obligation
- Special category data (health): UK GDPR Article 9(2)(h) – provision of health or social care

We do not generally rely on consent for processing personal data, but where we do, we will explain this and ask you directly.

We may also process personal information when it is necessary to deliver a contract, or to take steps at your request before entering a contract with us. This is known as a contractual necessity under UK GDPR Article 6(1)(b).

## Understanding Consent – Service Use vs Data Use

When you agree to use our services, you are giving consent to receive support or treatment. This is often called *implied consent* for the delivery of health or wellbeing services. However, this is not the same as giving us consent to process your personal data under data protection law.

In fact, for most of the personal data we use to deliver care, we do not rely on your consent as our legal basis under UK GDPR. This is because:

- We have a legal and professional duty to provide care and keep proper records
- The law allows us to process health information if it's necessary to deliver a service that supports your health or wellbeing

So even though you've agreed to receive support, your personal data is processed under lawful reasons.

## What Information Do We Collect About?

We may collect the following personal information:

- Name, date of birth, address, contact information
- GP and next of kin details
- Health information, referrals and assessments
- Support history and care records
- Information from other professionals

- Notes from meetings and communications with you, schools and other health and care professionals

## Why Do We Collect and Use Data?

We use data to:

- Provide appropriate care and support
- Understand your needs and personalise interventions
- Record care and measure outcomes
- Refer you to other services (for safety and/or with agreement)
- Meet legal obligations
- Evaluate and improve our services

## How Long Do We Keep Information?

We keep your personal information as long as necessary to provide care and meet legal and/or statutory requirements.

We follow the NHS Records Management Code of Practice 2021 to determine how long to keep personal data in relation to your health and care. This ensures your information is only retained for as long as necessary, depending on the type of record and legal requirements.

If you are not using our services and we hold your data for another reason, for example, if you're a partner, supplier, or supporter, please contact us to request a full list relevant to your circumstances.

If you are a member of staff, please refer to our separate Employee Privacy Notice. We can send you a copy — just email us at [information.governance@compass-uk.org](mailto:information.governance@compass-uk.org)

Record Type	Retention Period	Notes
Adult health records	8 years after last treatment or last seen	Unless mental health (see below)
Children and young people	Until the patient's 25th birthday, or 26th if the patient was 17 at the conclusion of treatment	
Mental health records	20 years after last contact or 8 years after death	Whichever is longer
Complaints records	10 years from closure	Applies to formal complaints
Safeguarding records	100 years or 8 years after death	Whichever is longer
Incident reports (serious)	20 years	Especially if linked to safeguarding or serious harm
Research records	25 years or as per ethics guidance	Anonymised data may be retained longer

## How Do We Keep Information Safe?

Measures include:

- Encrypted systems and secure networks
- Limited access
- Passwords and locked storage
- Staff induction and training
- Policy and procedures

## Who Can Access Information?

Only Compass staff involved in your care can access your information routinely. Access is limited to what's necessary and is monitored.

We may have to share information with our commissioners and NHS England.

## Who Might We Share Information With?

We may share your personal data in the following ways:

**With your consent** - This includes sharing information with other care professionals or services directly involved in supporting you. If you are a child or young person, we may share relevant information with your parent(s) or carer(s), if it's in your best interests and you agree, or if you are not considered able to make that decision yourself (for example, due to your age or circumstances).

**Without your consent** - In some situations, we are legally required or permitted to share information. This may include:

- When there is a serious risk of harm to you or someone else
- When we need to seek specialist advice or support to provide safe and appropriate care
- **When there is a formal information sharing agreement in place** with another organisation, and we have a lawful basis to share under data protection law

**Anonymised or de-identified data** - We may use or share information that does not identify you for purposes such as monitoring service quality, evaluating outcomes, research, or improving public services.

## Your Rights

You have rights over your data, including:

Under UK data protection law, you have rights over your personal information. These rights aren't always absolute, this means sometimes they may not apply or may be limited depending on the reason we are using your data (for example, if there's a legal obligation or a safeguarding concern).

### 1. Access

You can ask us to send you a copy of some or all of the personal information we hold about

you. This is sometimes called a **Subject Access Request (SAR)** You can also ask why we're using it, where it came from, and who we've shared it with.

## 2. Correction (or 'Rectification')

If you think the information we have about you is wrong or out of date, you can ask us to correct it. For example, this might include a new address or fixing a spelling mistake in your name.

## 3. Erasure (or 'Right to be Forgotten')

In some cases, you can ask us to delete the personal information we hold about you. This isn't always possible, for example, we may need to keep records for legal reasons or to protect others – but we'll always explain why if we cannot erase something.

## 4. Restriction

You can ask us to pause how we're using your data. This does not mean we delete it, but we will stop using it in certain ways until we have looked into your request. This is helpful if you think something is wrong with your data or how we're using it.

## 5. Objection

You can say no to us using your information in certain situations. For example, if we are using it for research or because it is in our 'legitimate interests', you can object. If there's a strong reason for us to keep using it, we will explain that.

## 6. Portability

You can ask us to give you your data in a format that can be easily shared with another service or organisation. This only applies to information you gave us yourself and which we are using with your consent or to provide a service under a contract.

### Want to use one of your rights?

Just contact us at [information.governance@compass-uk.org](mailto:information.governance@compass-uk.org) and we will guide you through the process. Most requests are free, and we will respond within one month.

## Concerns or Complaints

If you have any questions or concerns about how we use your information, please speak to your Compass worker or Service Manager in the first instance. We are always here to listen, and we are committed to improving wherever we can.

If you are still unhappy, you can also raise a complaint through our formal process, just contact us at [information.governance@compass-uk.org](mailto:information.governance@compass-uk.org) and we'll guide you through it.

You also have the right to raise your concerns with the Information Commissioner's Office (ICO), the UK's independent regulator for data protection:

- Website: [www.ico.org.uk](http://www.ico.org.uk)
- Phone: 0303 123 1113

## Reviews

We regularly review this privacy notice to make sure it stays accurate, up to date, and clear. We update it if there are any significant changes in the law, in how we work, or in the services we provide.

**Last reviewed:** May 2025

**Next scheduled review:** May 2026

**Reviewed by:** Compass' Information Governance Working Group