

Privacy Notice for Service Users

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4	Whole document	September 2023	BLS Review
5	Whole document	September 2024	BLS Review
6	Whole document	September 2025	BLS Review
7	Whole document	September 2026	Annual review. Revised wording to improve clarity and accessibility. Updated sections on commissioner and funder reporting, safeguarding information sharing and call recording. Updated Information Commission Office contact details

Contents

Introduction 4
Our contact details 4
Information we collect about you and where we collect it from 4
Our legal basis for processing your data 5
Special category information 6
How we use your information and how we share it 6
How we store your personal data 8
Is your personal data transferred to other countries? 8
Your rights 8
Changes to this policy ..... **Error! Bookmark not defined.**
Complaints 9

Introduction

N-Compass respects your privacy and is committed to protecting your personal data. This privacy notice explains how we collect and use personal information about you when you are referred to our services, or when you are the next of kin, family member or carer of someone who receives our services. This includes Carer, Advocacy, Counselling, Wellbeing and Volunteering Services. We process personal information in accordance with the UK GDPR, the Data Protection Act 2018 and subsequent amendments, including the Data (Use and Access) Act 2025.

Our contact details

N-Compass is responsible for looking after and using your information when we provide services. For some services, N-Compass decides how and why your information is used and acts as the data controller. For other services, we may process information on behalf of a local authority, integrated care board or another organisation that is responsible for the service. We will explain the arrangements that apply to your service.

Our registered address is Edward VII Quay, Navigation Way, Ashton-on-Ribble, Preston, PR2 2YF. N-Compass is registered with the Information Commission. Our registration number is Z1718763.

We take our duty to protect your personal data and maintain confidentiality very seriously. We are committed to taking all reasonable measures to make sure the personal data we are responsible for is kept securely.

Our Data Protection Champion is Asher Ayres, who can be contacted by writing to Asher Ayres, N-Compass, Edward VII Quay, Navigation Way, Ashton-on-Ribble, Preston, PR2 2YF, by emailing asher.ayres@n-compass.org.uk or by phoning 01772 280030.

Information we collect about you and where we collect it from

The workers supporting you need to keep records about the support and services you receive from N-Compass. These records help us understand your circumstances, provide appropriate support and maintain an accurate record of the work we do with you.

Most of the information we process is provided directly by you, but some information may come from other organisations, for example referrals from GPs, social care agencies or hospitals. We use this information so that we can understand your circumstances and provide the most appropriate support and services for you.

These records help ensure that the people supporting you have accurate and up-to-date information, allowing us to provide effective support and coordinate services where needed. These may be recorded on paper or in electronic form.

They include but are not limited to:

- basic personal details about you such as your name, address, date of birth, next of kin etc.
- contacts and interactions we have had with you, including emails, appointments, visits,
- CCTV images, video doorbell recordings and associated audio recordings where these are used to help manage access to our premises, protect people and property, and support security and safeguarding,
- telephone call recordings and associated call information where calls to N-Compass telephone systems are recorded

We record calls to support quality, training, safeguarding, service delivery, audit and the handling of concerns or complaints. Access to recordings is restricted to authorised staff and, where necessary, authorised service providers who require access for technical support.

- notes and reports about your circumstances, wellbeing, health and the support or services you receive
- relevant information from other people involved in your care and support such as health professionals, relatives and carers
- sometimes we ask people who use our services to let us use images and videos to share the work we undertake with the public. We will always ask for your consent before we do this.

We may also receive information about you from professionals or organisations that refer you to our services.

It is essential that your details are accurate and up to date. Always check that your personal details are correct when you visit us and please inform us of any changes as soon as possible.

Our legal basis for processing your data

N-Compass is a charity and company limited by guarantee. We provide Carers, Advocacy, Wellbeing, Counselling and Volunteering Services to support individuals, families and communities. We use personal information to provide our services, meet our contractual and safeguarding responsibilities, comply with legal obligations and support our charitable purposes.

The UK GDPR requires organisations to have a lawful basis for using personal information. The main lawful bases we rely on are:

- Article 6(1)(f) – the processing of personal data is necessary for the purposes of the legitimate interests pursued by N-Compass or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. The legitimate interest we rely on are:
    i. To fulfil the charitable purposes of N-Compass through the delivery of support services, wellbeing services, advocacy, counselling, carers services and volunteering services. If we are unable to process your personal data, we will be unable to provide you with the support and services you need, and we will not be able to meet our contractual obligations with our commissioners (local authorities and integrated care boards) or meet our legal obligations with our regulators,
    ii. To fulfil the charitable purposes of N-Compass. For example, if we are unable to fundraise then we will not be able to continue to provide our provision of Carers, Advocacy, Wellbeing, Counselling and Volunteering Services,
    iii. The health and safety of our visitors, service users and sites.

- Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- Article 6(1)(b) – processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract.

Where we have a specific legal obligation that requires the processing of personal data, for example the processing is necessary for compliance with our legal obligations in relation to our regulators, the legal basis is:

- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests), for example in a medical emergency where your information needs to be shared with the ambulance services,
- Where processing is necessary for a task carried out in the public interest or to provide a service on behalf of a public authority.

- Article 6(1)(a) – the individual has given clear consent for us to process their personal data for a specific purpose.

Special category information

Where we process special category data, for example data including health, racial or ethnic origin, or sexual orientation, we need to meet an additional condition in the UK GDPR.

N-Compass only uses your confidential health information (information that identifies you and says something about your health, care and treatment, including your mental health) to provide you with services and support, safeguard individuals, meet legal or contractual requirements, and for the purposes described in this privacy notice.

support, and it is only shared with others for the purposes of providing care and support as set out in this privacy policy.

Where we are processing special category personal data for purposes related to the commissioning and provision of health and social care services the condition is:

- Article 9(2)(h) – processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.

Where we use sensitive personal information for safeguarding, we will identify an appropriate condition under Article 9 of the UK GDPR and, where required, the Data Protection Act 2018. The condition used will depend on the circumstances and the reason the information needs to be used or shared.

We may also share your data with our trusted legal partners to defend our legal rights – for example to resolve a serious complaint.

How we use your information and how we share it

We follow data protection law by making sure that your information is used fairly, securely and only for legitimate purposes. In particular, we will:

- only collect and use information that we need
- make sure the information we hold about you is accurate and up to date
- keep it secure and protect it from loss, misuse, unauthorised access or disclosure
- keep it only for as long as necessary
- only share it when there is a lawful and appropriate reason to do so

We use your personal information to provide services and support, safeguard individuals, meet legal and contractual requirements, improve our services and support our charitable purposes.

Your personal information (including information about your health, wellbeing and the support you receive) is used to direct, manage and deliver services and support to ensure that:

- the people supporting you have accurate and up-to-date information to understand your needs and provide appropriate support and services
- partner organisations involved in supporting you have the information they need to work effectively with us
- appropriate information is available if you are referred to another service or organisation that may be able to support you

Your information will also be used to help manage the services we provide and protect the health of the public by being used to:

- Review the support we provide to ensure it is of the highest standard and quality,
- Protect the health of the general public,
- Manage our services,
- Ensure our services can meet service user needs in the future,
- Investigate service user queries, complaints, and legal claims,
- Prepare statistics on our performance,
- Evaluate and improve our services,
- Help train and educate our health and social care professionals,
- Ask you for feedback about our services,
- Resolve any complaints you may have about services.

To ensure that N-Compass provides you with an efficient and effective service we will sometimes need to share your information with other organisations. Anyone who receives information from us has a legal duty to keep it confidential.

Some of our services are commissioned, funded or overseen by local authorities, integrated care boards or other organisations. We may need to share information with the organisation responsible for commissioning, funding, managing or monitoring your service. This may include information needed to manage the service, check its quality, report on outcomes, meet contractual, regulatory or funding requirements, or confirm that public funds are being used appropriately.

Depending on the service you receive, we may routinely share identifiable personal information and client-level data with the organisation responsible for the service. In some services, that organisation may be responsible for deciding how your information is used and shared. We will only share information that is relevant, necessary and proportionate for the purpose it is being shared, and we will do so securely. Where appropriate, we will use anonymous or summary information instead.

We may also need to share your information with other health and social care providers, for example to make a referral on your behalf. If you tell us something that indicates that you or someone else has experienced harm, abuse or neglect, is currently being harmed, or may be at risk of harm, we may need to share relevant information with safeguarding professionals, social services, the police or another organisation that can help. We will usually discuss this with you first and seek your consent where appropriate. However, we may share information without your consent, and in exceptional circumstances without telling you first, where this is necessary to protect you or someone else, meet a legal duty or avoid increasing the risk of harm. We will only share information that is relevant and necessary.

We will never share your information with any external organisation for marketing purposes.

How we store your personal data

Your information is securely stored on our IT servers or on our premises. We have appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised manner, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our written instruction, and they are subject to a duty of confidentiality.

We have procedures in place 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.

We only keep personal information for as long as it is needed. The retention period depends on the service, the type of record, legal and regulatory requirements, and any applicable commissioning or funding agreement. At the end of the retention period, records will be securely destroyed, anonymised or returned to the commissioning organisation where required. You can ask us for more information about the retention period that applies to your records.

Is your personal data transferred to other countries?

We use a number of systems and trusted service providers to help us deliver our services. Where personal information is transferred outside the United Kingdom, we will ensure that appropriate safeguards are in place in accordance with UK data protection law.

Your rights

Under data protection law, you have rights including:

- Right to be informed

You have a right to be informed if your personal data is being used. Most of this right to be informed is met in this privacy notice, and similar information when we communicate with you directly – at the point of contact.

- Right of access

You have the right to obtain a copy of personal data that we hold about you and other information specified in the UK GDPR (commonly known as a Subject Access Request or SAR), although there are exceptions to what we are obliged to disclose.

For example, we may not provide all the information, where in the opinion of an appropriate health or social care professional disclosure would be likely to cause serious harm to your, or somebody else's physical or mental health, or it refers to other individuals.

You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

To make a subject access request, speak to the worker supporting you or contact our Data Protection Champion using the contact details above.asher.ayres@n-compass.org.uk

- Right to rectification

You have the right to ask us to rectify any inaccurate data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Right to erasure ('right to be forgotten')

You have the right to request that we erase personal data about you that we hold. This is not an absolute right, and depending on the legal basis that applies, we may have overriding legitimate grounds to continue to process and store your data.

- Right to object

You have the right to object to the processing of personal data about you on grounds relating to your particular situation. The right is not absolute, and we may continue to use the data if we can demonstrate compelling legitimate grounds.

- Right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

- Right in relation to automated individual decision-making

You have the right to object to being subject to a decision based solely on automated processing, including profiling.

- Right to notification

You have the right to be notified if there has been a breach with regards to your personal data that we hold. This right is enforced if the breach is likely to result in a high risk of adversely affecting your rights and freedom.

- Right to data portability

You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes.

Complaints

If you are concerned about how N-Compass has used your personal information or believe that we have not kept it secure, we would like the opportunity to address your concerns. Please contact our Data Protection Champion in the first instance at asher.ayres@n-compass.org.uk.

We will consider your concerns, make appropriate enquiries and explain the outcome to you.

You also have the right to complain to the Information Commission if you are unhappy with how we have used your personal information or believe that data protection requirements have not been met.

Information Commission
4th Floor, No. 3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline: 0303 123 1113
Website: Contact us | ICO
Make a complaint: Make a complaint | ICO

Changes to this notice

We may update this privacy notice from time to time to reflect changes in how we use personal information, our procedures or data protection requirements. The date of the most recent review or revision will be shown on this notice.

Any significant changes will be brought to your attention where appropriate. The latest version of our privacy notice will also be available on the N-Compass website.

Last reviewed September 2026