Inner Compass
THERAPEUTIC SERVICES LTD

DATA PROTECTION POLICY (DPP)

SEPTEMBER 2026

SAM LEWIS, MA
INNER COMPASS THERAPEUTIC SERVICES LTD

Commitment to Data Protection and Privacy

At Inner Compass Therapeutic Services Ltd, our Therapists and Associate Therapists are dedicated to safeguarding the privacy of all individuals, and ensuring the protection of personal data entrusted to their care. This Data Protection Policy outlines the procedures for collecting, using, storing, and securing your information, in full compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and established professional standards.

We value the trust you place in us and work to ensure your rights are upheld throughout your engagment with us. Our commitment is to maintain the highest standards of confidentiality and to ensure that your data is handled responsibly and securely at every stage of your engagement with our services.

1. Personal Data We Collect

To provide safe, effective, and personalised therapeutic services, Therapists and Associate Therapists may collect and process the following categories of personal data:

- **Personal Identification Information** Names, dates of birth, gender, and contact details (phone number, email address, home address).
- **Health and Therapy Records** Session notes, assessments, reports, mental health information, medical history, and any other data relevant to therapeutic care.
- **Family or Guardian Information** Names, relationships, contact details, and legal documentation such as consent forms or guardianship information.
- **Sensitive Personal Data** Information relating to emotional wellbeing, mental health, behavioural concerns, and other sensitive details necessary for therapeutic support.

2. Legal Basis for Processing Personal Data

Therapists and Associate Therapists process personal data under the following lawful bases:

- **Consent** Explicit consent is obtained from clients or their legal guardians (for minors) before processing personal data.
- **Contractual Necessity** Processing is required to deliver therapeutic services or take steps to enter into a therapeutic agreement.
- **Legal Obligations** In certain circumstances, we may need to process or share data to comply with safeguarding, child protection, or other legal requirements.

3. How We Use Personal Data

Personal data is used solely for purposes directly related to therapeutic work, including:

- Providing tailored therapeutic support
- Maintaining accurate and up-to-date therapy records
- Communicating with clients, families, or relevant professionals
- Meeting legal, regulatory, or contractual obligations
- Reviewing and improving the quality of services

We do not use personal data for marketing or unrelated purposes.

4. How We Store and Protect Personal Data
Therapists and Associate Therapists take data security seriously and use appropriate technical and organisational measures to protect your information.

- **Electronic Records** Stored on secure, password-protected systems with encrypted backups.
- **Paper Records** Kept in locked, secure storage accessible only to authorised personnel.
- **Data Retention** Personal data is retained only for as long as necessary for therapeutic, legal, or regulatory purposes. After the retention period ends, all data is securely destroyed.

5. Sharing of Personal Data
We treat all personal data as confidential and only share it when necessary, with your explicit consent, or when legally required.

Data may be shared with:

- **Healthcare Professionals** With consent, relevant information may be shared with GPs, psychiatrists, or other professionals involved in care.
- **Educational Settings** With consent, we may share insights or recommendations with schools to support a child's wellbeing.
- **Regulatory or Legal Authorities** If required by law, we may disclose information to comply with safeguarding or statutory duties.
- **Person of Trust** In the event of incapacity or emergency, a designated person of trust may access client contact details to inform you of the situation. This is outlined in our GDPR and incapacity procedures.

Important: We do **not** sell, rent, or trade personal data under any circumstances.

6. Your Rights Under UK GDPR
You have the following rights regarding your personal data:

- **Right to Access** – Request a copy of the data we hold about you.
- **Right to Rectification** – Request corrections to inaccurate or incomplete data.
- **Right to Erasure** – Request deletion of data when it is no longer required.
- **Right to Restrict Processing** – Ask us to limit how your data is used.
- **Right to Data Portability** – Request your data in a structured, commonly used format.
- **Right to Object** – Object to certain types of processing.
- **Right to Withdraw Consent** – Withdraw consent at any time where processing is based on consent.

To exercise any of these rights, please contact: Inner Compass Therapeutic Services
Email: sam@innercompasstherapeuticservices.co.uk
Phone: 07759424652

7. Data Security Measures

Therapists and Associate Therapists take proactive steps to maintain data security, including:

- Encryption and secure digital storage
- Regular security reviews and updates
- Confidentiality practices aligned with professional standards
- Limiting access to authorised personnel only

8. Data Breaches

If a data breach occurs that may pose a risk to your rights or freedoms:

- You will be notified without undue delay
- The Information Commissioner's Office (ICO) will be informed within required timeframes
- Associate Therapists are individually registered with the Information Commissioner's Office (ICO).
- Inner Compass Therapeutic Services Ltd ICO registration: ZC227670

9. Updates to This Policy

This policy may be updated periodically to reflect changes in legislation, professional standards, or service practices. Significant updates will be communicated directly or posted on the Inner Compass Therapeutic Services website.

Sam Lewis, MA
Director - Inner Compass Therapeutic Services Ltd

Last updated: September 2026
Review: February 2027