



Procedure: Privacy Policy

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Issue No: 1

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Introduction

At SHAP Ltd, we are committed to protecting and respecting the privacy of information that we hold. We aim to fulfil our obligations under the General Data Protection Regulation (GDPR) to the fullest extent. This Privacy Policy sets out our commitment to protecting personal data and how that commitment is implemented in respect of the collecting, processing, using, storing and sharing of personal data. This policy should be read in conjunction with our Data Protection Policy and Procedure and our Cookies Policy, which provide details of how we use cookies and similar technologies to browse our website effectively.

We are committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act and GDPR.

This policy tells you what to expect when SHAP Ltd collects personal information from you. It applies to information, we collect about:

- Visitors to our website,
- People who use our services,
- Job applicants and our current and former employees,
- Suppliers who provide services to or on behalf of the organisation,
- Complainants and other individuals in relation to a subject access request, complaint or enquiry
- Students undertaking placements in the organisation

The General Data Protection Regulation (GDPR) is a regulation by which the European Parliament, the European Council and the European Commission intend to strengthen and unify data protection for individuals within the European Union (EU). It also addresses the export of personal data outside the EU. The primary objectives of the GDPR are to give citizens back control of their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

The regulations cover both written and computerised information and the individual's right to see such records. It is important to note that the regulations also cover records relating to staff and volunteers.

This Privacy Policy explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. It sets forth our policy with respect to information that can be associated with or which relates to a person and/or could be used to identify a person ("Personal Data") that is collected from users on or through the services.

Application

This Policy outlines our approach & responsibilities in line with GDPR, which all SHAP Ltd employees are required to follow.

Aims of the Policy

- To comply with Confidentiality, Data Protection & GDPR requirements in relation to processing, using, storing, sharing & protection of personal identifiable information
- To reflect our ongoing commitment for processing, using, storing, sharing & protection of personal identifiable information
- To inform individuals (employees, suppliers, people who use our services & those enquiring about our services or employment opportunities) of the procedures that are followed in the organisation to safeguard their personal information.

Who We Are

SHAP Ltd is a registered charity (no 1075118) & company limited by guarantee (no 1946544). The registered address is SHAP Ltd, 2nd Floor Lakeside Building, Prescott Road, St Helens WA10 3TT. SHAP Ltd and its trading subsidiaries are registered with the Information Commissioners Office (ICO) in order to lawfully control and process personal information.

SHAP Ltd is a data controller (i.e. we are responsible for and control the processing of your personal information) and a data processor (i.e. we obtain, record, hold and transmit your personal information) for the purposes of the Data Protection Act 1998 and GDPR 2016.

We have a number of services which provide accommodation, direct support to individuals to maintain their accommodation, community engagement support, advocacy and subsidiary companies providing nursery care services.

What Type Of Information We Collect From You?

We obtain information about you when you use our website, for example, when you contact us about products and services, employment vacancies or to make a donation. In operating our website we may collect and process the following data about you:

- Details of your visits to our website & the resources that you access including, but not limited to traffic data, location data, web logs & other communication data.

The personal information we collect might include your name, address, email address, IP address & information regarding what pages are accessed on our website & when. If you make a donation online, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture & processing of credit/debit card transactions, as explained below.

We obtain information about you when you apply to use our services or are being supported by our services and may collect and process the following data about you:

- Personal information from the details that are noted in your application form which might include your name, address, date of birth, email address, information about your current accommodation situation and support needs, safeguarding information and details of other services that are or have been provided to you. This information may also be ascertained during discussion with you during meetings that the project staff may have with you when you apply to the services or during day-to-day support sessions that the project staff have with you. We collect this personal data to help us to support you better.

For people who use our services or are supported by our services, additional personal identifiable information obtained includes:

- Tenancy or licence agreement which will include your name and address
- Letters from other organisations sent to us on your behalf or in relation to the care and support you may need or receive
- Bank details for payment of rent & service charges that are payable for a property you rent off us
- Details of welfare benefits that you maybe in receipt of which will include your name & address.
- Support plan & risk assessments which help us to identify particular areas of need that you may require support with so we can personalise & tailor the support to your individual needs. These documents will include your name.

We obtain information about you when you apply for employment (paid/unpaid/apprenticeship) or apply as a student for a placement in one of the services to support you with your studies at school/college/university.

- The personal information we collect might include your name, address, email address, date of birth, details of your employment history, national insurance number, tax details, bank details, vehicle registration information & vehicle insurance certificate (if using your vehicle for work purposes), next of kin, health/disability information, disclosure and barring service records to support our safer recruitment practice to protect and safeguard the vulnerable children and clients that we work with, right to work documentation, proof of you qualifications/training certificates, proof of your identity - passport and driving licence., Gender, ethnicity and marital or civil partnership status are aspects that we collate for monitoring of equal opportunities and ensuring best practice within our own governance, all of which is optional information which you can choose if you wish to provide or not.

For employees, additional personal identifiable information obtained during your period of employment may include:

- Notes from 1:1 meetings with your line manager (supervision, appraisal meetings)
- Medical information including GP/occupational health reports,
- Disciplinary/grievance letters or information
- Absence information including absence history, informal/formal meeting documentation, sick pay information

If you are a company or individual that does business with us, this will result in us collecting personal data about the company which may include:

- Name, address, email, fax and telephone number of business contacts, bank details and business insurance cover.
- We may obtain business information from companies that provide services to support us to maintain properties or deliver services to Suppliers, which may include company references.

Within our nursery subsidiary and some of our other service provision, the children's information that we collect, hold and share may include:

- Name, address, date of birth, personal characteristics (ethnicity, language, nationality, country of birth, early years pupil premium eligibility), attendance information (sessions attended, number of absences and absence reasons), observations and assessment information and tracking of progress, medical information, information on special education needs and disabilities, referrals to other relevant services, safeguarding information.
- We also collect, hold and share some information on the children's parents/guardians which may include name, address, contact numbers, email address and national insurance numbers.

Whilst the majority of children's information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain children's information to us or if you have a choice with this.

We also collect information if you visit one of our offices (visual images collected via closed circuit television (CCTV)) which we have in some of our accommodation services. Images collected on our CCTV

In the event that you provide us with any sensitive personal data, we will take extra care to ensure your rights are protected.

How we use your information

The information that we collect and store is exclusively used to enable us to provide our services to you. We only ever use your personal data with your consent, or to the extent necessary to:

- Enter into, or perform a contract with you,
- Comply with a legal duty,
- Remember your preferences (if you ask not to receive marketing material, we will keep a record of this) to ensure we comply with your consent request,
- For our own lawful interests (marketing, internal record keeping or to improve our products) provided your rights don't override these.
- To ensure that the information we hold about you is kept up-to-date

We will only use your information for the purpose that it was collected for (or for similar/related purposes). This includes using your personal data to the extent necessary to perform our contractual obligations and in providing services to you.

We do not reveal this information to third parties for marketing.

We may use your information to:

- process a donation that you have made,
- carry out our obligations arising from any contracts entered into by you & us,
- seek your views or comments on the services we provide,
- notify you of changes to our services,
- send you communication(s) which you have requested & that may be of interest to you,
- process a job application
- process an application for support that you have requested from the service(s) we provide
- process payments for work undertaken by you as a supplier or an employee
- protect the vulnerable adults and children that we support

For employees (paid/unpaid) & applicants for jobs with us:

- You will be asked to complete a criminal records declaration to declare any unspent convictions. We will provide your email address to the Government Recruitment Service who will contact you to complete an application for an Enhanced Criminal Record check via the Disclosure Barring Service which will verify your declaration of a clear criminal record check or unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- Both the criminal records check & references are required to enable us to make an offer of employment.
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.
- Emergency contact details, so we know who to contact in case you have an emergency at work
- Our code of conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held on your personnel file.

- To comply with our legal obligations which include HMRC & Pension requirements.

We use the children's and parents' data to:

- Support their learning and development, to enable staff to plan suitable activities to extend their knowledge and skills
- Ensure that all children are safe within our childcare provision
- Monitor and report on their progress
- Provide appropriate behavioural and emotional support as required
- Assess the quality of our services as a childcare provider
- Comply with the law regarding data sharing
- Meet the requirements of the Early Years Foundation Stage (EYFS)
- Make claims for funding

We collect and use the information under the following lawful basis and ensure that we use one of the following conditions wherever we process personal information, documenting this:

- **Contract:** the processing is necessary for a contract we have with you as an individual or with the parents/guardian of the child to provide childcare and the contract that we have with the local authority to provide funded childcare to eligible families.
- **Legal Obligation:** the processing is necessary for us to comply with the law & in our nursery provision for submitting data for the early year's census.
- **Consent:** we hold recent, clear, explicit and defined consent for the person's data to be processed for a specific purpose.
- **Vital Interests:** processing the data is necessary to protect a person's life or in a medical situation.
- **Public Function:** processing is necessary to carry out a public function, a task of public interest or the function has a clear basis in law.
- **Legitimate Interest:** it is necessary for our legitimate interests. This condition does not apply if there is good reason to protect the person's data which overrides the legitimate interest.

We are required to hold children's data for a reasonable period of time after children have left the provision (e.g. until after the next Ofsted inspection) as a requirement under the EYFS. The Limitation Act 1980 recommends that we retain data until the child reaches the age of 21 — or until the child reaches the age of 24 for child protection records.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations (this includes the collection of Gift Aid or under the early year's foundation stage requirements (EYFS)). We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us. For more information about this, please see our Retention Policy.

It is important that we can communicate with you. We would like to keep you up to date about the work that we are doing and support that we are providing to you. Where donations are given, to tell you about the amazing difference that you are making and how your financial support has helped the adults/children that we work with. We will only do this if you tell us that you are happy for us to contact you (this is 'opting in') by completing a contact consent form, which can be found on the website or provided to you by staff at SHAP. The permission that you give us will only last 2 years. Just before that we will ask you again if you still want to hear from us. We may also use your personal data to detect and reduce fraud and credit risk.

Information in relation to complaints: When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identify of the complainant & any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint & to check on the level of service we provide. We do compile & publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclose, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our Retention Policy. It will be retained in a secure environment & access to it will be restricted according to the 'need to know' principle.

Similarly where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry & any subsequent issues & to check on the level of service we provide.

Who Has Access to Your Information

We will not sell or rent your information to third parties & will not share your information with third parties for marketing purposes. For people that use our services, we may share your personal information internally within Shap to obtain additional support for you, or, to assist you with move on/securing alternative accommodation. We will only share information in this way with your consent.

Third Party Product Providers we work in association with: When you are using our secure online donation pages, your donation is processed by a third party payment processor, who specialises in the secure online capture & processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

If you have made a Gift Aid declaration, we may disclose the information you have provided as part of the declaration to HMRC for the purpose of reclaiming gift aid on your donation(s).

As part of contractual funding requirements in services, when you apply for support from us, we update a third party data monitoring report system. The relevant third party product provider will use your details to monitor service provision, ensuring that we carry out our obligations arising from the contract that we have entered into with them to provide support to people in need. In this case, they will be acting as a data controller of your information & therefore we advise you to read their Privacy Policy (Mainstay & the Local Authority). These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and carry out repairs in properties that you may be one of our tenant's in or rent off us). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business & assets to any third party or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters & customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected. We will communicate with you and obtain your consent before any personal information is transferred to a third party.

Within our nursery subsidiary and some of our other service provision, we routinely share children's information with:

- schools that the child attends after leaving our provision
- other local childcare providers where the child is engaging currently (wrap around or blended childcare)
- the local authority (for funding claims and the early years census)
- the Department for Education (DfE) (annual early years census)
- Special Education Needs Co-ordinators
- NHS services (health visitors and speech and language therapists)

We do not share information about children we support without parent/guardian consent unless the law and our policies allow us to do so.

We share children's data with the DfE on a statutory basis. We are required to submit data to the local authority for them to submit as part of the annual early year's census in January and to access childcare funding.

To be granted access to children's information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data. We ensure that we do this in line with Data Protection and GDPR requirements.

Links to other websites

We may include links on our website to other websites which we do not control or manage. We do not accept any responsibility for how these websites use your information and would encourage you to check their own privacy policies. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

If you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

How you can access and update your information

The accuracy of your information is important to us, ensuring that any personal information that we hold about you is correct & up to date. You may ask us to correct or remove information that you think is inaccurate. If you change your email address, or any of the other information that we hold is inaccurate or out of date, please contact us. You also have a right in certain circumstances, to require us to stop processing your personal information. In relation to any of these rights, please send a written request to us using the contact details at the end of the Privacy Policy.

You have the right to ask for a copy of the information that SHAP Ltd hold about you. We will provide you, at no charge, with a hard copy of all the personal data that we have regarding you within 40 days; although we shall require proof of your identity.

Consent

By consenting to this Privacy Policy, you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for SHAP Ltd to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data, we will always tell you why & how the information will be used. You may withdraw your consent at any time by writing to us using the contact details shown at the end of the Privacy Policy.

You have a choice whether or not you wish to receive information from us. We will not contact you for marketing purposes by email, post, phone or text message, if you have indicated that you do not wish to be contacted (or unless you have given your prior consent). You can change your marketing preferences at any time, by contacting us by email or post, using our contact details which are noted at the end of the Privacy Policy. Please include your full name, postcode and the subject areas you wish to unsubscribe from. Any choices you make will overwrite any previous preferences you told us. This helps us record the most up-to-date information for you.

Children

We are concerned to protect the privacy of children. In line with Data Protection Act 2018 & GDPR 2016, parental consent will be required to process the data of people under 13. If you are aged 13 or over, then we need your consent to share your personal information, as within the UK under GDPR, age 13 is classed as being an adult for information sharing purposes.

Electronic Access Systems

In some of our services, we use a biometric fingerprint system to enable you to access the building, providing increased security. To hold the information that links the biometric system to records enabling access to the property, we need your consent to hold this electronic information. If you are aged 12 or under, we need your parent/guardian's consent to hold this data. If you are aged 13 or over, then we need your consent to hold the electronic information.

Cookies

Our website uses cookies. Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better personalised service.

We use Google Analytics to analyse the use of our website. It uses cookies to generate statistical and other information to create reports about the use of our website. Google then stores this information.

Cookies do not contain any information that personally identifies you and a cookie in no way gives us access to your computer or any information about you. Most browsers allow you to manage cookies and disable them if you want (visit www.aboutcookies.org or www.allaboutcookies.org).

However in a few cases some of our website features may not function as a result.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us to do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

Personal Information Security (Precautions in place to protect the loss, misuse or alteration of your information)

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as credit or debit card details) is processed by a third party payment processor, who ensure that all such data is protected and dealt with securely.

Non-sensitive details (your email address, etc.) are transmitted normally over the internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

All our employees and data processors that have access to your personal data are under a legal obligation and bound by a contract to fully respect the confidentiality of your information.

We use a third party service to help maintain the security & performance of our website. To deliver this service, it processes the IP addresses of visitors to the Shap website.

The following procedures apply to information we hold about children:

- A child's educational records will be disclosed to their parent/guardian on submission of a written request. Requests will only be refused if it is obvious that the requester does not understand what they are asking for, or if disclosure is likely to cause them or anyone else serious physical or mental harm.
- A child's educational records will be made available without charge within 40 days of receipt of the written request.
- When a child moves to a new school, a completed Common Transfer File together with all educational records relating to the child will be sent to the new school. This includes copies of reports and any

personal education plans. To ensure security, this data will be sent electronically using a secure email system within 15 days of the child ceasing to be registered at the school, where possible. If the new school is not known, every effort will be made to contact the parents/guardians by post, telephone or email.

- Children's records will be stored securely. Paper files are kept securely locked in cabinets in our offices. Electronic files are stored in an account in the cloud. We have checked the company's security information to ensure that it complies fully with our security measures to ensure your personal information is kept securely. Computers within the provision are kept secure with appropriate software to ensure maximum protection against ransom and malware which is regularly updated. All data is securely backed up to our account in the cloud.
- Information that is shared is done securely using a secure email system or password protection of the document.

The following procedures apply to information we hold about staff:

- Members of staff can contact CBU to request access to the personal data that the organisation holds about them. This applies to all data, whether held on computer or as hard copy.
- A time will be agreed for the member of staff to attend CBU to view their personal data.
- Members of staff are required to inform CBU at the earliest opportunity if they believe that anything is inaccurate or untrue or if they are dissatisfied with the information in any way.
- Requests for additional access must be sent to CBU. Each request will be judged in light of the nature of the information in question and the frequency with which it is updated. The member of staff will then be informed whether or not the request is granted. In the event of a disagreement, the matter will be taken up under the formal grievance procedure.
- If a request for additional access is granted, the information will be provided within a month of the date of the request. A fee will not be charged to gain access to the data.

The following procedures apply to information we hold about people that use our services:

- A person that uses our services can contact the individual scheme in SHAP who is supporting them, to request access to the personal data that the organisation holds about them. This applies to all data, whether held on computer or as hard copy.
- People who use our services are required to inform the Scheme Manager at the earliest opportunity if they believe that anything is inaccurate or untrue or if they are dissatisfied with the information in any way. They can also request that any inaccuracies are rectified.
- Requests for additional access must be sent to the Scheme Manager for current clients or the CBU for people not currently using our

services. Each request will be judged in light of the nature of the information in question and the frequency with which it is updated. You will then be informed whether or not the request is granted. In the event of a disagreement, the matter will be taken up under the formal grievance procedure.

- If a request for additional access is granted, the information will be provided within 40 days of the date of the request. A fee will not be charged to gain access to the data.

The following procedures apply to information that we hold about suppliers. It also outlines the procedures in place with them to protect the personal information of people whom are supported by SHAP when the supplier is acting as a third party service provider working on our behalf:

- We have documents from each contractor confirming their compliance with GDPR,
- We have agreed safe sharing of information & confidentiality agreements in place.
- If a supplier requests to be removed from our approved supplier list, then your details will be removed & any personal data that we hold for you will be removed in line with our Retention Policy.

Please refer to our Retention Policy for details of timescales which information is held for.

Transferring your information outside of Europe

As part of the services offered to you through our website, the information which you provide to us is not transferred to countries outside the European Union (EU).

If you wish to change how we contact you

You can stop receiving information from us at any time. To do this, you can write to us or email us, using the contact details shown at the end of this Privacy Policy.

We aim to fulfil all requests to stop sending information to you within 5 working days of receiving it.

Changes to our Privacy Policy

We keep our Privacy Notice & Privacy Policy under regular review and we will place any updates on our web-page, so please return and review it regularly. Our Privacy Notice and Privacy Policy were last updated in April 2018.

If you want to complain about how we collect, store or use your data

SHAP tries to meet the highest standards when collecting & using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

You can contact us if you have any concerns or complaints about how we have collected, used or stored your personal information. You can write to us at: SHAP Ltd, 2nd Floor Lakeside Building, Prescott Road, St Helens WA10 3TT, or sending an email to us: cbu@shap.org.uk

Alternatively you can contact our Data Protection Supervisory Authority at: Information Governance Department, Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or telephone: 0303 1231113, or by email: www.ico.org.uk

How to contact us

Please contact us if you have any questions about our Privacy Policy or information we hold about you:

- By email: cbu@shap.org.uk
- Or write to us at: SHAP Ltd, 2nd Floor Lakeside Building, Prescott Road, St Helens WA10 3TT
- SHAP Ltd Data Protection officer is: Theresa MacDermott, who can be contacted at the address above or by sending an email to: TMacDermott@shap.org.uk
- Alternatively you can telephone us on 01744 454056

Information Circulation Checklist:

Line Managers, who needs to know about this process and how will you tell them?

Managers Meeting	<input type="checkbox"/>
Team email	<input type="checkbox"/>
Supervision / Catch Up meetings	<input type="checkbox"/>
Group training	<input type="checkbox"/>
Staff Noticeboard	<input type="checkbox"/>
Service User Meeting / update	<input type="checkbox"/>
Partners	<input type="checkbox"/>

General public, who need to know about this process and how the organisation will tell them

Organisation Website	<input type="checkbox"/>
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Related documents

- Data Protection Policy & Procedure
- Privacy Notice
- Cookies Policy
- Retention Policy

Policy review record and version control

Policy/procedure: **Privacy Policy**

Version Number 1

Date of last review: n/a

Next review due: May 2021 or as necessary

Persons conducting review

Theresa MacDermott, Janine Iyanda

Details of Revisions

Circulated to managers and administrators and placed on company drive

Approved for circulation