



Review Sheet



Business
Impact:



Reason for
this Review:

Scheduled review

Changes
Made:

Yes

Summary:

This Website Privacy and Cookies Policy and Procedure has been reviewed with information about cookie acceptance updated in line with recent guidance, including the requirement to give users the option to 'reject all' cookies. A new form template popup cookie banner wording has been added. The template privacy policy has been updated in relation to recipients of data, transfers of data and data subject rights. Underpinning Knowledge and Further Reading links have also been reviewed and updated where needed.

Relevant
Legislation:

- Data Protection Act 2018
- UK GDPR
- The Privacy and Electronic Communications (EC Directive) Regulations 2003

Underpinning
Knowledge:

- Author: Information Commissioner's Office, (2018), Cookies and similar technologies [Online] Available from: <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/cookies-and-similar-technologies/> [Accessed: 06/06/2024]
- Author: Information Commissioner's Office, (2021), UK GDPR guidance and resources [Online] Available from: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/> [Accessed: 06/06/2024]

Suggested
Action:

- Encourage sharing the policy through the use of the QCS App
- Share 'Key Facts' with relevant staff

Equality
Impact
Assessment:

QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate lawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.



1. Purpose

1.1 To provide a template Website Privacy Policy that Verity Healthcare Limited can adapt to use on their website.

1.2 By using the template Website Privacy Policy provided, Verity Healthcare Limited will ensure that the policy on their website is UK GDPR compliant.

1.3

Key Question

Quality Statements

WELL-LED

QSW5: Governance, management and sustainability

1.4 Relevant Legislation

- Data Protection Act 2018
- UK GDPR
- The Privacy and Electronic Communications (EC Directive) Regulations 2003

2. Scope

2.1 Roles Affected:

- All Staff

2.2 People Affected:

- Service Users
- Website Users

2.3 Stakeholders Affected:

- Family
- Advocates
- Representatives
- Commissioners
- External health professionals
- Local Authority
- NHS

3. Objectives

3.1 To provide assurance that Verity Healthcare Limited has a Website Privacy Policy in place for users of its website that is UK GDPR compliant.

3.2 To establish ways of working in terms of the use, storage, retention and security of personal data.

3.3 To ensure that all data subjects, including Service Users, understand the ways in which their personal data is collected and processed by Verity Healthcare Limited via its website.



Verity Healthcare Limited acknowledges that it may require additional privacy policies in relation to data subjects other than website users, and understands that template external and employee privacy policies have also been provided.

4. Policy

4.1 Verity Healthcare Limited understands that if it operates a website, it needs to ensure its Website Privacy Policy complies with UK GDPR. Verity Healthcare Limited will use the Website Privacy Policy template as a template for its updated version.

Verity Healthcare Limited understands that the Website Privacy Policy only needs to be uploaded to its website if personal data is collected via the website.

Verity Healthcare Limited will consider using the Website Privacy Policy template to inform all website users about how their personal data is processed. Verity Healthcare Limited may wish to consolidate this Website Privacy Policy with the Template Privacy Policy - External that has also been provided.

4.2 Verity Healthcare Limited understands that the Website Privacy Policy template can be found in the UK GDPR suite within QCS Compliance Centre.

Verity Healthcare Limited understands that terms in square brackets are optional (depending on whether or not they apply to Verity Healthcare Limited).

Verity Healthcare Limited must review the Website Privacy Policy in its entirety to determine which elements are applicable to its website, and which are not relevant.

For example:

- If the template Website Privacy Policy refers to personal data that is not collected by Verity Healthcare Limited via its website, Verity Healthcare Limited can remove this
- If the website of Verity Healthcare Limited does not use cookies, they will delete references to cookies and the Cookie Policy
- If Verity Healthcare Limited does not transfer personal data outside of the UK and EEA, they will delete the section entitled "Where we store your personal data"
- If Verity Healthcare Limited is not required to appoint a Data Protection Officer, they will delete references to the Data Protection Officer
- Verity Healthcare Limited may consider replacing Data Protection Officer references with 'Privacy Officer' instead, referencing the person nominated to have day-to-day responsibility for data protection and UK GDPR; or
- If Verity Healthcare Limited uses personal data collected via its website in a way that is not described in the Privacy Policy, it must consider incorporating additional sections

This Website Privacy Policy directs users to a webpage with a contact form or contact details if they wish to contact Verity Healthcare Limited. Verity Healthcare Limited will consider whether to provide an alternative contact method instead, such as an email address and/or phone number.

If Verity Healthcare Limited has any concerns or queries in respect of the template Website Privacy Policy, they must seek legal advice.

4.3 UK GDPR has changed the way cookies should be incorporated into websites and what information about the cookies should be provided. This means that Verity Healthcare



Limited must explain what cookies will be set and what the cookies achieve.

Verity Healthcare Limited must obtain consent from individuals to store or use cookies that are not strictly necessary for the website to function properly. Such consent must comply with UK GDPR, which means that Verity Healthcare Limited cannot rely on implied consent to the use of cookies.

Verity Healthcare Limited will ensure that it uses a cookie banner or other appropriate consent process on its website to obtain consent to the use of cookies in line with this policy and that if no consent is obtained, no cookies will be set other than strictly necessary cookies.

Verity Healthcare Limited understands that strictly necessary cookies may be enabled by default and the user should not be able to disable strictly necessary cookies, but information should still be provided about strictly necessary cookies within the cookie policy of Verity Healthcare Limited.

4.4 Verity Healthcare Limited must, therefore, update its processes for collecting consent for cookies. In practice, this means:

- Users must take a clear and positive action to consent to non-essential cookies
- The websites and apps of Verity Healthcare Limited must tell users clearly what cookies will be set and what they do, including any third-party cookies
- Pre-ticked boxes or any equivalents, such as sliders defaulted to 'on', cannot be used for non-essential cookies
- Non-essential cookies must not be set on landing pages before the user's consent is gained
- Users must be given the option to 'reject all' cookies within a popup cookie banner (with the exception of strictly necessary cookies)

Consent is not required for cookies that are defined as 'strictly necessary' or that fall within the communication exemption. 'Strictly necessary' cookies are those that are essential to providing the service requested by the user. Such cookies must be essential to fulfil their request. Those that are simply helpful or convenient, but not essential, or that are essential for the purposes of Verity Healthcare Limited, will still require consent.

Verity Healthcare Limited must note, in particular, that cookies used for analytical purposes or those used for marketing and advertising will always need consent as they are considered to be non-essential.

Verity Healthcare Limited should read the ICO's cookie guidance for further information on the types of cookie that require consent.

5. Procedure

5.1 Verity Healthcare Limited will consider whether or not it collects personal data via its website (for example, via enquiry forms, requests to be sent newsletters, requests for provision of services) and whether it needs a Website Privacy Policy. Verity Healthcare Limited acknowledges that the use of cookies may constitute processing of personal data via the website.

5.2 Verity Healthcare Limited will adapt the Website Privacy Policy before uploading it to its website to ensure that all aspects of the Website Privacy Policy are relevant and reflect the ways in which Verity Healthcare Limited processes personal data collected via its website.



5.3 Verity Healthcare Limited will use Template Privacy Policy - External and Template Privacy Policy - Employees to inform all other data subjects, including Service Users, about how Verity Healthcare Limited processes personal data other than personal data collected via the website.

6. Definitions

6.1 Data Subject

- The identified or identifiable individual about whom {Client_Name_Official} has collected personal data

6.2 Data Protection Act 2018

- The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It sits alongside the UK General Data Protection Regulation and implements the EU's Law Enforcement Directive

6.3 UK GDPR

- The UK GDPR is the retained EU law version of GDPR that forms part of English law
- **General Data Protection Regulation (GDPR)** (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union

6.4 Personal Data

- Any information about a living person from which that person can be identified directly or indirectly including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV, online identifiers and special categories of data as defined in section 6.7

6.5 Process or Processing

- Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. {Client_Name_Official} does not need to be doing anything actively with personal data - at the point {Client_Name_Official} collects it, it is processing it

6.6 Special Categories of Data

- A term for personal data that is sensitive and personal in nature. Special categories of data include but are not limited to medical and health records (including information collected as a result of providing health care services), {Care_plan_name}s, generic and biometric data and information about a person's religious beliefs, ethnic origin and race, sexual orientation, trade union membership and political views

6.7 Cookies

- Cookies are small text files sent from a website and stored on a user's computer, either temporarily or permanently. They are designed to hold a modest amount of data specific to a particular client so that a website can identify the user and can be used in a number of ways such as to analyse traffic to a website, support users logging in or track users' browser activity

6.8 ICO

- The Information Commissioner's Office



7. Key Facts - Professionals

Professionals providing this service should be aware of the following:

- The Website Privacy Policy applies to personal data collected via the website of Verity Healthcare Limited

8. Key Facts - People Affected by The Service

People affected by this service should be aware of the following:

- Personal data provided to Verity Healthcare Limited via its website will be processed in accordance with the Website Privacy Policy at Verity Healthcare Limited

Further Reading

Please find the forms below in the Forms section of the GDPR suite of policies within QCS Compliance Centre:

- Cookie Example Policy Statement
- Website Privacy Statement
- Template Privacy Policy - External
- Template Privacy Policy - Employees

BBC - What do I need to know about cookies?

<https://www.bbc.co.uk/usingthebbc/cookies/what-do-i-need-to-know-about-cookies/#:~:text=Cookies%20are%20small%20text%20files,We%20use%20them%20to%3A&text=To%20deliver%20advertising%20to%20websites,remembering%20your%20preferences%20and%20settings.>

Outstanding Practice

To be "outstanding" in this policy area you could provide evidence that:

- Verity Healthcare Limited ensures it uses an appropriate popup cookie banner to seek consent to the use of cookies in line with legislative requirements
- Verity Healthcare Limited ensures that the Website Privacy Policy is supplemented by additional privacy policies on the basis of the Template Privacy Policy - External and the Template Privacy Policy - Employees
- Verity Healthcare Limited ensures that clear links are available to the privacy policy on its website and that, if a person inputs personal data into the website, they are directed to the policy and required to accept its terms
- Verity Healthcare Limited has modified the template Website Privacy Policy to ensure that it includes all information relevant to the collection of personal data via its website and has uploaded a copy to its website



- The wide understanding of the policy is enabled by proactive use of the QCS App

Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Cookies Example Policy Statement - GDPR08	When Verity Healthcare Limited has no information on the use of cookies on its website (a "Cookie Policy"). It can be used with the Website Privacy Statement.	QCS
Website Privacy Policy Statement - GDPR08	To be used on a website if the website processes personal data.	QCS
Pop Up Cookie Banner	To seek consent to the use of cookies where cookies other than strictly necessary cookies are used on a website	QCS



Cookies Example Policy Statement - GDPR08

COOKIES WEBSITE STATEMENT

Cookies are small text files which a website may put on your computer or mobile device when you first visit the website. The cookies will help the website recognise your device the next time you visit. Web beacons or other similar files can also do the same thing. We use the term 'cookies' in this policy to refer to all files that collect information in this way.

We use cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you use the website and also allows us to improve the services we provide to you.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Disabling them may mean you are not able to access parts of our website
- Analytical or performance cookies. We use these cookies to collect information about how visitors use the website, for instance, which pages visitors go to most. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. Some of these cookies are known as analytic cookies which allow us to monitor website traffic using industry accepted third parties. **[If you do not use analytical or performance cookies, you can delete this policy entry]**
- Functionality cookies. These cookies are used to recognise you when you return to our website and to remember changes you have made to things such as text size, fonts and other parts of the website you can change so we can personalise our content for you. [If you do not use functionality cookies, you can delete this policy entry]
- Targeting cookies. We use these cookies to record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may share this information with third parties for this purpose. **[If you do not use targeting cookies, you can delete this policy entry]**

For more details on the specific cookies we use, why we use them and when they will expire, please see Part 1 of Appendix 1 of this Cookie Policy.

[Please note that third parties (such as advertising networks and providers of external services) may also use cookies on the website, over which we have no control. These cookies are likely to be analytical cookies, performance cookies or targeting cookies. Part 2 of Appendix 1 of this Cookie Policy provides a list of the third parties who may use these cookies and the reasons for which they use them.] **[If you do not use third parties for these services, you can delete this policy entry.]**

Most browsers accept cookies automatically, but you can change your cookie preferences by adjusting your browser settings to refuse the setting of all or some cookies if you prefer. You can usually do this by visiting the 'options' or 'preferences' menu on your browser. Please note, however, that if you do this and choose to block all cookies (including essential cookies), we cannot guarantee that your experience will be as fulfilling as it would otherwise be, and you may not be able to access all or parts of our website.

Where we collect personal data as part of our use of cookies on the website, we will do so in accordance with our Privacy Policy [\[insert hyperlink to Privacy Policy\]](#).



Appendix 1

Part 1 - Cookies used

Cookie Title Cookie Name	Purpose	More Information	Expiry
[Cookie Title] [Cookie Name]	[Insert description of the purpose for which the cookie is used]	[Insert link to external information where appropriate]	[Insert length of time cookie is available for, e.g. This cookie will expire after 2 years]

Part 2 - Third-party cookies [If you do not use third parties, you can delete this policy entry]

Third-Party Name	Purpose
[Insert third party name, e.g. Google Analytics]	[Insert description of what the third party does with the information. This information will usually be found in the contractual documentation entered into with the third party (if any)]



Website Privacy Policy Statement - GDPR08

We are Verity Healthcare Limited, a *private limited company* incorporated in *[England and Wales]*. Our company number is *07462140* and our registered address is
20 -22 Wenlock Road
Islington
London
E10 7JQ
England.

("Verity Healthcare Limited" / "we" / "our" / "us"). We are committed to ensuring that your privacy is protected. We comply with the Data Protection Act 2018 and the UK GDPR together with any other relevant data protection and privacy legislation (together "Data Protection Legislation"). We are the data controller of data you pass to us pursuant to this policy. Our Data Protection Officer can be contacted at *[insert email address for DPO. If there is no DPO, delete reference to them]*.

This Privacy Policy [together with our website terms and conditions and cookie policy] sets out how we collect personal information from you and how the personal information you provide will be processed by us. By visiting the website at <https://www.verityhealthcare.co.uk> (the "Website") you are accepting and consenting to the practices described in this Privacy Policy. If you do not consent, please do not submit any personal data to us.

What information does Verity Healthcare Limited hold and how will we use it?

Information you give Verity Healthcare Limited: You may give us information about you by completing enquiry forms on the website or by requesting via the website that we send you marketing information, or *[insert any other reason for which a person may upload their personal data to the website]*. The information you give us may include your name, email address, address/location and phone number *[if there are any other types of personal data that Verity Healthcare Limited collects via the website, add them to this list. This does not include all personal data processed by Verity Healthcare Limited but only personal data it collects through its website]*.

We will retain this information while we are corresponding with you or providing services to you or to the Service User you represent. We will retain this information for *[insert the relevant retention period for the types of personal data listed above. If it is not possible to insert the retention period, explain the criteria Verity Healthcare Limited uses for determining how long it will retain the personal data. Refer to the Records Management Code of Practice for Health and Social Care if required]*.

Information Verity Healthcare Limited collects about you: Verity Healthcare Limited may collect the following information from you when you visit the website:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), products you viewed or searched for, page response times, website errors, length of visits to certain pages, page interaction information, methods used to browse away from the page and any phone number used to call our helpline

We retain this information for *[insert the relevant retention period for the types of personal data listed above. If it is not possible to insert the retention period, explain*



the criteria Verity Healthcare Limited uses for determining how long it will retain the personal data].

Information we receive from other sources: This includes information we receive about you when you use other websites operated by us or other services we provide. This information may include your name, email address, postal address and phone number. We will retain this information for **[insert the relevant retention period for the types of personal data listed above. If it is not possible to insert the retention period, explain the criteria Verity Healthcare Limited uses for determining how long it will retain the personal data].**

Cookies

The website uses cookies to distinguish you from other users of the website. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy [\[insert hyperlink to Cookie Policy\]](#).

Use Made of the Information

We may use the information we receive and/or collect about you via the website to:

- Fulfil our obligations under any contract that we have entered into with you or with the Service User that you represent, and to provide you or the relevant Service User with information or services that you or the Service User has requested
- Send you newsletters and marketing information if you have consented to us doing so
- Notify you of products and services that we feel may interest you, or permit third parties to do so if you have provided the appropriate consent
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website

Verity Healthcare Limited processes personal information for certain legitimate business purposes, which include some or all the following:

- Where the processing enables Verity Healthcare Limited to enhance, modify, personalise or otherwise improve the website, its services or communications
- To identify and prevent fraud
- To enhance the security of the network and information systems of Verity Healthcare Limited
- To better understand how people interact with the websites of Verity Healthcare Limited
- To administer the website and carry out data analysis, troubleshooting and testing; and
- To determine the effectiveness of promotional campaigns and advertising

If we obtain consent from you to do so, we may provide your personal details to third parties so that they can contact you directly in respect of services in which you may be interested.

Where we are processing personal data that we have obtained via the website on the basis of having obtained consent from you, you have the right to withdraw your consent to the processing of your personal data at any time. If you would like to withdraw your consent or prefer not to receive any of the above-mentioned information (or if you only want to receive certain information from us), please let us know by contacting us via the following webpage [\[insert link to webpage\]](#). Please bear in mind that if you object, this may affect our ability to carry out the tasks above for your benefit.



If you wish to have your information removed from our database or if you do not want us to contact you for marketing purposes, please let us know by clicking the 'Unsubscribe' option in any email we send to you and providing the details requested or by contacting us via the following webpage [insert webpage link] and we will take steps to ensure that this information is deleted as soon as reasonably practicable.

We will not share, sell or distribute any of the information you provide to us (other than as set out in this policy) without your prior consent, unless required to do so by law.

We may carry out automated decision-making using the personal data you provide to us. We do so to [insert an explanation about the automated decision-making (including profiling) that you carry out. You should explain the logic involved and the significance and potential consequences for the Data Subject. For example, if you track their behaviour on your website to send targeted advertising, explain this process. If you do not carry out any automated decision making, you can delete this policy entry].

Third Party Sites

Our website may contain links to third party websites, including websites via which you are able to purchase products and services. They are provided for your convenience only and we do not check, endorse, approve or agree with such third-party websites nor the products and/or services offered and sold on them. We have no responsibility for the content, product and/or services of the linked websites. Please ensure that you review all terms and conditions of website use and the Privacy Policy of any such third-party websites before use and before you submit any personal data to those websites.

How Safe is your Information?

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Protecting your security and privacy is important to us and we make every effort to secure your information and maintain your confidentiality in accordance with the terms of the data protection legislation. The website is protected by various levels of security technology, which are designed to protect your information from any unauthorised or unlawful access, processing, accidental loss, destruction and damage.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is, therefore, at your own risk.

Disclosure of your Information

[Verity Healthcare Limited should update this section to accurately reflect any disclosures of personal data]

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006. We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter with them or you
- Third parties who may wish to contact you in respect of services or products they offer or sell which may be of interest to you, provided we receive your consent to such disclosure, and/or advertisers and advertising networks that require the data to select



and serve relevant adverts to you and analytics and search engine providers that assist us in the improvement and optimisation of the website

Please note, we may need to disclose your personal information where we:

- Sell any or all of our business or assets or we buy another business or assets in which case we may disclose your personal data to the prospective buyer or seller
- Are under a legal duty to comply with any legal obligation or to enforce or apply our terms and conditions; or
- Need to disclose it to protect our rights, property or the safety of our customers or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction

Where we Store your Personal Data

[If Verity Healthcare Limited processes all personal data within the UK or the EEA, it should leave in the following sentence and delete the rest of this section]

All your personal data is stored within the UK or the EEA.

[If Verity Healthcare Limited processes personal data outside of the UK or EEA, it should delete the sentence above and update the sections below accordingly]

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") ***[insert the reasons why personal data is transferred outside the EEA, for example, because it is hosted on a server outside the EEA]***. By submitting your personal data, you agree to this transfer, storing or processing. Verity Healthcare Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this applicable data protection and privacy legislation. If a finding of adequacy has not been made in respect of the country to which the data is transferred, we will only transfer it where there are appropriate safeguards in place.

Your Rights in Respect of your Data

You benefit from a number of rights in respect of the personal data we process about you. We have summarised your rights below and more information is available from the Information Commissioner's Office website. Your rights apply for the period in which we process your data. There are certain caveats and exemptions to those rights which mean that in some circumstances you may not be entitled to exercise them. If we believe that is the case upon receipt of a request from you, we will let you know.

1. Access to your data
2. Rectification of your data
3. Right to be forgotten
4. Right to restrict processing
5. Data portability
6. Right to object

Automated decision making



Automated decision making means making a decision solely by automated means without any human involvement. We do not carry out any automated decision making using your personal data. ***[It is unlikely that Verity Healthcare Limited carries out automated decision making where there is no human involvement in a decision made that impacts on an individual, such as an automatic clocking in/out process that deducts salary. If Verity Healthcare Limited is unsure, it should seek legal advice.]***

Your right to complain about our processing

If you have any complaints about our use of your personal data, please contact us. You also have the right to complain to the relevant supervisory authority in your jurisdiction. In the UK, the supervisory authority is the Information Commissioner's Office. Contact details for the ICO can be found at <https://ico.org.uk/>.

If you have any further queries or comments on our Privacy Policy, please contact us via the following webpage *[insert webpage link]* or you can contact us by emailing *[insert email address]*.



Pop Up Cookie Banner

[Verity Healthcare Limited will need to, or ask its website developers to, upload the wording below as a pop up banner that appears on its website the first time a user visits the website. The user should be required to accept or reject cookies. If no action is taken and the user is able to continue using the website, no cookies except strictly necessary cookies should be set on the website].

If you are happy for us to use cookies (as detailed in our cookie policy, which is available [here] **[Verity Healthcare Limited should insert a hyperlink to its cookie policy]**, please click "Accept" below to enable them. If you would prefer to choose which cookies we use, please click [here] **[Verity Healthcare Limited??????? (or its website developers) to provide a pop-up to a slider bar or similar which enables website users to turn some cookies off and keep others enabled]**. You may reject our use of all cookies except strictly necessary cookies by clicking "Reject" below.

"Accept" **[Verity Healthcare Limited??????? or its website developers to ensure that by clicking "Accept" all cookies are accepted and used]**.

"Reject" **[Verity Healthcare Limited or its website developers to ensure that by clicking "Reject" no cookies are enabled, except strictly necessary cookies]**.