



Review Sheet

Summary:	This policy will support the collection and processing of personal data collected via an organization's website. It has been reviewed and updated. References have been checked and updated.
Relevant legislation:	• The Privacy and Electronic Communications (EC Directive) Regulations 2003 • Data Protection Act 2018 • UK GDPR
Underpinning knowledge - What have we used to ensure that the policy is current:	• Author: Information Commissioner's Office, (2021), <i>Guide to the UK General Data Protection Regulation (UK GDPR)</i>. [Online] Available from: https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/ [Accessed: 19/6/2023] • Author: Information Commissioner's Office, (2018), <i>Cookies and similar technologies</i>. [Online] Available from: https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/ [Accessed: 19/6/2023]
Equality Impact Assessment:	We 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 unlawful 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 St. Leonards Place can adapt to use on their website.
- 1.2** By using the template Website Privacy Policy provided, St. Leonards Place will ensure that the policy on their website is UK GDPR compliant.
- 1.3** To support St. Leonards Place in meeting the following Key Lines of Enquiry/Quality Statements (New):

Key Question	Key Lines of Enquiry	Quality Statements (New)
WELL-LED	W2: Does the governance framework ensure that responsibilities are clear and that quality performance, risks and regulatory requirements are understood and managed?	QSW5: Governance, management and sustainability

- 1.4** To meet the legal requirements of the regulated activities that {St. Leonards Place} is registered to provide:

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



2. Scope

- 2.1** The following roles may be affected by this policy:
- All staff
- 2.2** The following Clients may be affected by this policy:
- Clients
 - Website Users
- 2.3** The following stakeholders may be affected by this policy:
- Family
 - Advocates
 - Representatives
 - Commissioners
 - External health professionals
 - Local Authority
 - NHS



3. Objectives

- 3.1** To provide assurance that St. Leonards Place 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 Clients, understand the ways in which their personal data is collected and processed by St. Leonards Place via their website.



4. Policy

4.1 St. Leonards Place understands that if they operate a website, they need to ensure their Website Privacy Policy complies with UK GDPR. St. Leonards Place will use the Website Privacy Policy template as a template for its updated version.

St. Leonards Place understands that the Website Privacy Policy only needs to be uploaded to their website if personal data is collected via the website.

St. Leonards Place will use the Website Privacy Policy template to inform all data subjects, including Clients, how their personal data is processed.

4.2. St. Leonards Place understands that terms in square brackets are optional (depending on whether or not they apply to St. Leonards Place).

St. Leonards Place 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 St. Leonards Place via its website, St. Leonards Place can remove this
- If the website of St. Leonards Place does not use cookies, they will delete references to cookies and the Cookie Policy
- If St. Leonards Place does not transfer personal data outside of the UK and EEA, they will delete the section entitled "Where we store your personal data"
- If St. Leonards Place is not required to appoint a Data Protection Officer, they will delete references to the Data Protection Officer
- St. Leonards Place 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 St. Leonards Place 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 St. Leonards Place. St. Leonards Place will consider whether to provide an alternative contact method instead, such as an email address and/or phone number.

If St. Leonards Place has any concerns or queries in respect of the template Website Privacy Policy, they must seek legal advice.

4.2 UK GDPR has changed the way cookies should be incorporated into websites and what information about the cookies should be provided. This means that St. Leonards Place must explain what cookies will be set and what the cookies will do to the users of its website.

St. Leonards Place must obtain consent from individuals to store or use certain cookies on devices and consent must be to the UK GDPR standard. Cookies that are not strictly necessary, or are used for a secondary purpose, need consent which is UK GDPR compliant, this means that St. Leonards Place cannot rely on implied consent.

St. Leonards Place 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.

4.3 St. Leonards Place 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 St. Leonards Place 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
- The users at St. Leonards Place must have control over any non-essential cookies
- Non-essential cookies must not be set on landing pages before you gain the user's consent



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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 St. Leonards Place, will still require consent. The communication exemption is about the transmission of a communication over an electronic communications network. For the exemption to apply, the transmission of the communication must be impossible without the use of the cookie. Simply using a cookie to assist the communication is insufficient for the exemption to apply.

St. Leonards Place 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.

St. Leonards Place must read the ICO's cookie guidance available at: <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/> for further information on the types of cookie that require consent.



5. Procedure

5.1 St. Leonards Place 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. St. Leonards Place acknowledges that the use of cookies constitutes processing of personal data via the website.

5.2 St. Leonards Place 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 St. Leonards Place processes personal data collected via its website.

Where St. Leonards Place has any concerns or queries in relation to its own Privacy Statement, St. Leonards Place will seek legal advice.

5.3 St. Leonards Place will use the Privacy Policy template to inform all other data subjects, including Clients, about how St. Leonards Place processes personal data other than personal data collected via the website.



6. Definitions

6.1 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 Plans, generic and biometric data and information about a person's religious beliefs, ethnic origin and race, sexual orientation, trade union membership and political views.

6.2 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.

6.3 Process or Processing

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

6.4 ICO

- The Information Commissioner's Office

6.5 UK GDPR

- **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
- The UK GDPR is the retained EU law version of GDPR that forms part of English law

6.6 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

6.7 Data Subject

- The identified or identifiable individual about whom St. Leonards Place has collected personal data.

6.8 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



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 St. Leonards Place



Key Facts - People affected by the service

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

- Personal data provided to St. Leonards Place via its website will be processed in accordance with the Website Privacy Policy at St. Leonards Place



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Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

BBC - What do I need to know about cookies?

[What do I need to know about cookies? - Using the BBC](#)

ICO cookie guidance:

<https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>

St. Leonards Place 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.

St. Leonards Place 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.

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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 recognize 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 you. On revisiting the website, we will be able to obtain information about your previous visits and about your computer including where available, your IP address, operating system and browser type, for system. This is statistical data about your browsing actions and patterns and does not identify you. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer.

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.*
- **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.
- **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].***

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.

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We are St. Leonards Place Ltd, a *company* incorporated in *England*. Our company number is 03047178 and our registered address is 96 Maidstone Road, Chatham, Kent, ME4 6DG, United Kingdom.

("St. Leonards Place" / "we" / "our" / "us"). We are committed to ensuring that your privacy is protected. We comply with the UK General Data Protection Regulation ("UK GDPR") unless and until the UK GDPR is no longer directly applicable in the UK. We also follow all national implementing laws, regulations and secondary legislation as amended or updated from time to time in the UK, and any successor legislation to the UK GDPR and the DPA (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 st.leonardsplaceltd@gmail.com

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 www.stleonardsplace.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 St. Leonards Place hold and how will we use it?

Information you give St. Leonards Place: 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 *applying for jobs*. *This does not include all personal data processed by St. Leonards Place 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 a Client you represent.

Information St. Leonards Place collects about you: St. Leonards Place 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 *30 days period for the types of personal data listed above*.

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 *30 days*.

Cookies

The Website uses cookies to distinguish you from other users of the website. For detailed information on the

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cookies we use and the purposes for which we use them, please see our Cookie Policy.

Use Made of the Information

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

- Fulfil our obligations under any contract that we have entered into with you or with a Client that you represent, and to provide you or the relevant Client with information or services that you or the Client 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.

St. Leonards Place processes personal information for certain legitimate business purposes, which include some or all the following:

- Where the processing enables St. Leonards Place 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 St. Leonards Place
- To better understand how people interact with the websites of St. Leonards Place
- 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 www.stleonardsplace.uk. 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

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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

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 optimization 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, organizations and/or governmental bodies for the purposes of fraud protection and credit risk reduction.

Where we Store your Personal Data

Although we have left the EU, UK GDPR still requires the following:

St. Leonards Place does not transfer personal data outside the EEA, however if we do need to transfer information outside of EU, appropriate safeguards will be in place, including the use of EU standard contractual clauses or an intragroup agreement.

Your Rights in Respect of your Data

If any of the information you provide to us via the website changes, please let us know as soon as possible so that we can make the necessary changes to the information we hold for you on our database. If you wish to make any changes to your information, please contact us via the following webpage www.stleonardsplace.uk.

If you wish to access or rectify the information we hold about you, or request that such information be transmitted directly to another data controller, please contact us via the following webpage www.stleonardsplace.uk.

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We shall process your request to access your information within one month of receipt, or we will let you know within that timeframe if we need more information from you. We will process your request free of charge. To request that your information is deleted or if you wish to restrict or object to the processing of your information, please contact us via the following webpage www.stleonardsplace.uk

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 www.stleonardsplace.uk or you can contact us by emailing st.leonardsplaceltd@gmail.com . We also welcome your views about our website and our Privacy Polic

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