Privacy and Cookie Policy

Version	Date Issued	Details	Brief Summary of Change	Author
0.1	21/10/2014	Draft	Adapted from draft PCT Cookie Policy	Web Development Officer
0.2	31/10/2014	Draft	Reformatted	Corporate Business Manager
0.3	11/11/2014	Draft	Communications Manager comments incorporated	Corporate Business Manager
0.4	08/12/2014	Draft	Head of Corporate Business comments incorporated	Head of Corporate Business
1.0	12/12/2014	Final	Approved by Chief of Corporate Affairs	Chief of Corporate Affairs
1.1	15/12/2016	Final	Review and minor amendments	Online Manager

For more information on the status of this policy, please contact:	
Approved by	Chief of Development & Transformation
Approval Date	15/12/2016
Next Review Date	15/12/2018
Responsibility for Review	Corporate Business Team
Contributors	Communications and Engagement Team
Audience	All staff and users of CWS CCG's website

Contents

1. **Introduction and Purpose**

    As an organisation Coastal West Sussex Clinical Commissioning Group (CWS CCG) is committed to sharing its vision and values and for information regarding the services to be easily accessible and readily available. CWS CCG has embraced the web as a way of connecting with its membership and local population.

    The purpose of this policy is to provide users of the CWS CCG website with information regarding cookies as required by the e-Privacy Directive 2012 (aka the "EU Cookie Law").

    The aim of this policy is to provide details of the CCG's cookie function and provide users with information about how these operate within the website, information for users who do not wish to have cookies placed onto their computer and useful links and contact details.

    The policy is aimed at all users of the CWS CCG website and intranet.

2. **Roles and Responsibilities**

    The Corporate Business Team is responsible for ensuring the timely review and ratification of this policy.

    The Communications & Engagement Team will contribute in the writing and reviewing of the policy and provide the requisite specialist information.

    The Chief of Development and Transformation is responsible for approving this policy.

3. **Cookies and the CWS CCG website**

    What are cookies?

    "Cookies" are small text files that are placed on a computer or phone by a web browser at the request of the websites that are visited. Cookies are used to make websites work more efficiently or more conveniently, as well as provide information to the site's operators.

    What cookies do the CCG internal and external sites set?

    This site sets the following cookies:

    PHPSESSID: A temporary cookie used to help maintain settings/ information for users as they move from page to page during a "session" of web browsing on the CWS website. The cookie is removed less than half an hour after the session finishes. It only stores an ID number of the session; no private information is sought or retained.

    siwormian: **For CWS CCG staff members and membership practices only.** A cookie used to automatically log-in return visitors to the internal site without having to repeat log-in credentials. To disable this function the "remember me" option can be unchecked when logging in. The cookie is removed 60 days after it was last used. It

stores an ID number to indicate log-in status and to identify the relevant visitor account.

cookie_ok: A cookie used by website developers to test the CCGs website's cookie use. It stores the value "OK" to help establish that cookies are being correctly written and read during development. The cookie is removed one year after it was last used.

ASP.NET_SessionId: A cookie used in the CCG's "ePanel membership pages" section of the site, identical to PHPSESSID (above).

CMSCurrentTheme: A cookie used in the CCG's "ePanel membership pages" section of the site, enables the content management system used across this section to maintain the active look and feel on all of the section's pages. The cookie is removed one day after it was last used. It stores the name of the website theme to be used on the pages ("NHSCWS").

CMSPreferredCulture: A cookie used in the "ePanel membership pages" section of the site, enables the content management system used across this section to maintain language settings on all of the section's pages. The cookie is removed one year after it was last used. It stores the preferred language for the site ("en-GB").

Google Analytics: Cookies named "_ga" and "_gat" are used by Google Analytics. Google Analytics is software provided by Google to website operators to help them measure the visitor traffic to the site. Information is anonymous and is not used to identify individuals. Find out more about [Google's usage of information](#).

Google Maps: some pages have Google Maps embedded - these use the following cookies: SID, APISID, SSID, HSID, NID and PREF.

Other cookies may occasionally be used on the CWS website as required by any third party facilities embedded in the individual pages. Such cookie use will be detailed in those services privacy and cookie policies.

How do I remove cookies?
Cookies can be removed and/ or blocked. Read more about [cookies and how to manage them](#).

4. Policy dissemination and communication
This policy is available to all directly and indirectly employed members of staff via the shared drive and the intranet. Members of the public can access the policy via the CWS website. The Corporate Business Team will ensure that once ratified, this policy will be uploaded to the external website, staff intranet and disseminated to staff via the CCG's internal communications.

If you have any queries about the cookies used on the CCG's sites, please contact:

- By post: NHS Coastal West Sussex CCG, 1 The Causeway, Goring-by-Sea, West Sussex, BN12 6BT

- By phone: 01903 708400

- By email: contactus.coastal@nhs.net

5. Training and Implementation

No staff training needs have been identified for this policy. Any specific needs should be addressed to the Corporate Business Team or Communications and Engagement Team.

6. Review

A full review of this policy will be conducted every 24 months.

7. Equality Impact Assessment

The CSW CCG recognises the diversity of the local community and those in its employment. The organisation aims to provide a safe environment free from discrimination and a place where all individuals are treated fairly, with dignity and appropriately to their need. This policy is therefore subjected to an Equality Analysis checklist which is appended to this policy (Appendix A)

Appendix A- Completed Equality Analysis Checklist

1	Does the policy /guidance affect one group less or more favourably than another on the basis of:	Yes/No	Comments
	Race	No	
	Ethnic Origin	No	
	Nationality	No	
	Gender	No	
	Culture	No	
	Religion or belief	No	
	Sexual orientation including lesbian gay and bi-sexual people.	No	
	Age	No	
	Disability (e.g. physical, sensory or learning)	No	
	Mental Health	No	
2	**Is there any evidence that some groups are affected differently?**	No	
3	**If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable.**	N/A	
4	**Is the impact of the policy/guidance likely to be negative.**	No	
5	**If so can the impact be avoided?**	N/A	
6	**What alternatives are there to achieving the policy/guidance without the impact?**	N/A	