

THE SCHEDULE

This schedule details our data processing requirements, information needs and our data retention

Definitions:

1. **Service Area:** refer to the services we undertake and where personal or sensitive personal data may be used to carry out that service
2. **Purpose of processing:** why we need the data to deliver the service
3. **Type of data:** whether we have a contractual, legitimate reason by law or opt in requirement to your data in providing the service
4. **Type of processing:** whether the data we are using to provide the service is personal or sensitive personal data or both
5. **Transferred data:** who we will transfer data to and why in order we can complete the service. GDPR compliant relationships will be in place with the named organisations.
6. **Retention:** the length of time we hold the data to deliver the service before deleting the data

Please note:

1. **Contact details:** refers to names, email, telephone, social media names and address we use to contact you about the service
2. **Approved panels:** refers to lists of contractors, consultants, suppliers, partners and stakeholders that work with ateb group limited to help provide our services, these panels are reviewed regularly.
3. **B2B:** refers to business to business
4. **Group:** refers to the ateb group www.atebgroup.co.uk

1: The services where data is used

The following service areas will use data to provide the specified service, please also see the related privacy statements;

Customers these are the services we undertake where you data will be used to complete the service	Employees / Boards these are the services where our employee and board data will be used	Job Applicants when applying for a new position, this is where we will use your data	Partners these are the services where we will use your data
SA/01 Letting – applying for, transferring or exchanging a home and entering a tenancy agreement SA/02 Income Collection – paying your rent in accordance with your tenancy SA/03 Customer advice & Support – providing any support and/or advice in relation to your tenancy SA/04 Maintenance – Undertaking	SA/13 Learning & Development – where we undertaking training, learning and development activities SA/14 Wellbeing – activities relating to our employees wellbeing at work SA/15 People Management – the activities the employer undertakes to manage the contract of employment with the employee SA/16 Board Management – the activities	SA/12 Recruitment – the process of recruiting new employees SA/27 Facilities Management – activities and processes undertaken across the groups facilities to protect the facility and their occupants	SA/21 Regulation Management – activities and processes relating to the management of our obligations to our regulating authorities SA/23 Procurement Management – management of our supply chain relationships and contracts SA/30 Treasury Management – management of our investments

<p>maintenance in accordance with our tenancy and statutory obligations</p> <p>SA/05 Service Works – Undertaking the service chargeable works in connection with your tenancy</p> <p>SA/06 Compliance Works – Undertaking the required compliancy works (e.g. gas servicing) in relation to your tenancy</p> <p>SA/07 Planned Improvement - Undertaking planned improvement works in connection with your tenancy</p> <p>SA/08 Engagement – to keep you informed regarding matters relating to your home, community or changes at ateb</p> <p>SA/09 ASB Case Management – Where we engage in a process of resolving an issue of Anti-Social Behaviour (ASB) in accordance with our ASB procedures</p> <p>SA/10 Development – The process of specifying and building a home</p> <p>SA/11 Strategic Asset Management – The process of establishing the long term requirements/issues of your home</p> <p>SA/19 H&S – the duties and obligations the Landlord must undertake and/or abide by to discharge its statutory or contractual obligation to H&S of its tenants</p> <p>SA/20 PR-Marketing-Communications – activities the landlord may undertake to communicate work of the group with its tenants in relation to their tenancy</p> <p>SA/21 Regulation Management – activities and processes relating to the management of our obligations to our regulating authorities</p> <p>SA/25 Supported & Older person – the additional management and support services we undertake for identified older or vulnerable persons</p> <p>SA/27 Facilities Management – activities and processes undertaken across the</p>	<p>ateb undertakes to administer and manage its Boards and Committees</p> <p>SA/19 H&S – the duties and obligations the employer must undertake and/or abide by to discharge its statutory or contractual obligation to H&S of its employees</p> <p>SA/20 PR-Marketing-Communications – activities the employer may undertake to communicate work of the group with its employees in relation to their contract of employment</p> <p>SA/26 ICT Desk – the process of dealing with ICT related issues raised by the employer or employee</p> <p>SA/27 Facilities Management – activities and processes undertaken across the groups facilities to protect the facility and their occupants</p> <p>SA/32 Payroll – The employers requirement to pay its employees in relation to their contract of employment</p> <p>SA/40 ICT Management – ateb’s management and security of its ICT infrastructure systems</p>		<p>SA/31 Exch. & Rev – the management of raising invoices, receiving payments and providing statements of information</p> <p>SA/19 H&S – the duties and obligations the employer must undertake and/or abide by to discharge its statutory or contractual obligation to H&S of its supply chain and general public</p> <p>SA/20 PR-Marketing-Communications – activities the employer may undertake to communicate work of the group with its supply chain</p> <p>SA/27 Facilities Management – activities and processes undertaken across the groups facilities to protect the facility and their occupants</p>
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groups facilities to protect the facility and their occupants SA/31 Exch. & Rev – the management of raising invoices, receiving payments and providing statements of information			
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2: How each service uses the data

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/01 Letting	To assess applicants current housing needs and process general needs and housing transfer applications	Contractual	Contact details; Household Composition & details of other family members/persons wishing to be rehoused, eg children including Date Of Birth & Child Benefit; Supplementary Information eg Notice of Seeking Possession / Court Action; Proof of Overnight Access for children; Medical Information including Maternity B 1 proof of pregnancy; Occupational Therapist Rehousing Reports; Income Information & Savings; Criminal Convictions; Form(s) of Identification eg passport; Details of support agencies eg. Dyfed Drug & Alcohol Service and Community Mental Health Team; Details of interested parties eg Board Member, Council Member, Staff; Proof of Local Connection / Rural Connection eg utility bills.	Personal and Sensitive Personal data	Local Authority; Police; Housing Partners; Community Safety Partnership; Solicitors when legal action is being taken; Social Services; Probation Service; Health Board	Whilst customer remains an applicant, (destroyed when closed after 12 month unless applicant becomes a tenant)
	To ensure level of service maintained with all customers who become a tenant	Contractual	Contact details; Household Composition & details of other family members/persons wishing to be rehoused, eg children including Date Of Birth & Child Benefit; Supplementary Information eg Notice of Seeking Possession / Court Action; Proof of Overnight Access for children; Medical Information including Maternity B 1 proof of pregnancy; Occupational Therapist Rehousing Reports; Income Information & Savings; Criminal Convictions; Form(s) of Identification eg passport; Details of support agencies eg, Dyfed Drug & Alcohol Service and Community Mental Health Team; Details of interested parties eg Board Member, Cllr, Staff; Proof of Local Connection / Rural Connection eg utility bills.	Personal and Sensitive Personal data	Local Authority; Police; Housing Partners; Community Safety Partnership; Solicitors when legal action is being taken; Social Services; Probation Service; Health Board	6 years post tenancy (100 years for information of children (legal))

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Medical information - to inform a tenant's eligibility / banding	Contractual	Consultant / GP letter explaining the reasons why the prospective tenant needs to be rehoused on medical grounds, Social Care assessment for eligibility for extra care schemes, Occupational Therapist Rehousing and Adaptations reports, information form Supporting Agencies	Personal and Sensitive Personal data	Pembrokeshire County Council	Up to 6 years post tenancy (100 years for information of children (legal))
	To ensure equal opportunities when shortlisting for allocations	Contractual	Ethnic group; gender identity; disability / health needs; sexual orientation; religion or belief; if support or care for other with long term mental health or physical disability	Personal and Sensitive Personal data	Local Authority	Whilst customer remains an applicant, (destroyed when closed after 12 months unless applicant becomes a tenant then up to 6 years post tenancy)
	To allow tenant to carry out a mutual exchange of tenancy between social landlords	Legitimate	Contact details, date of birth, national insurance number, household composition & details of other family members/ persons wishing to be rehoused	Personal and Sensitive Personal data	Pembrokeshire County Council and Partnering Landlord	Up to 6 years post tenancy
SA/02 Income Collection	To understand benefit eligibility	Legitimate	proof of benefits, salary, income and expenditure information	Personal data		Until tenancy ends
	To follow up rent payments due of former customers	Legitimate	Forwarding address, contact details, next of kin, details of employer	Personal data	High court enforcement officers, solicitors,	Up to 6 years post tenancy
	Shared Ownership Scheme Option for customers	Legitimate	Contact details	Personal data	Solicitors for each party	For the duration customer is in occupation under shared ownership arrangement or stair-cased to full ownership of property
SA/03 Customer advice & Support	To provide tailored support to older customers	Contractual	Contact details, health information, personal history, date of birth, financial information	Personal and Sensitive Personal data	Other support providers	Until the tenancy ends - to ensure appropriate support is provided

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	To provide advice on benefit entitlement and apply for appropriate benefits and grants	Consent	Contact details, age of tenant and members of household, personal financial information, details of physical and mental ill health, personal history	Personal and Sensitive Personal data	Other support providers	Until benefit/grant is awarded or outcome of appeal is known
	To give customer advice and support on range of services and to be able to manage the tenancy agreement	Consent	Contact details, age of tenant and members of household, personal financial information, details of physical and mental ill health, personal history	Personal and Sensitive Personal data	Internal sharing of information	Until the tenancy ends - to ensure appropriate support is provided
	To act on behalf of customer in accessing help, advice and support	Consent	Contact details, age of tenant and members of household, personal financial information, details of physical and mental ill health, personal history, current situation	Personal and Sensitive Personal data	Statutory and Voluntary Agencies	Until the tenancy ends - to ensure appropriate support is provided
	To provide requested information sources e.g. Newsletter or information sheet	Consent	Contact details	Personal data		Until tenancy ends
	To provide marketing information about our services and partner organisations	Consent	Contact details	Personal data		Until tenancy ends

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/04 Maintenance	To provide repairs service to customers	Contractual	Contact details: vulnerability (reviewed annually), access information	Personal and Sensitive Personal data	Approved contractor list	Until tenancy ends
SA/05 Service Works	To provide service charge works to the customers internal and external communal areas	Contractual	Contact details, vulnerability (reviewed annually), access information	Personal data	Approved contractor list	Until tenancy ends
SA/06 Compliance Works	To provide customers with property related compliance works e.g. Gas safety	Contractual	Contact details, vulnerability (reviewed annually), access information	Personal and Sensitive Personal data	Approved contractor list	Until tenancy ends
SA/07 Planned Improvement	To Provide customers with improvements to their homes e.g. new kitchen	Contractual	Contact details, vulnerability (reviewed annually), access information	Personal and Sensitive Personal data	Approved contractor list	Until tenancy ends
SA/08 Engagement	To engage with customers to meet our regulatory requirement of customer centred service improvement	Legitimate	Contact details, date of birth, household composition, ethnic group, gender identity, disability, physical and/or mental ill health, sexual orientation, religion or belief, carer responsibilities, parent, or expectant mother	Personal and Sensitive Personal data	Pembrokeshire County Council and approved community partners	Until tenancy ends
	To manage customer interest groups	Consent	Contact details, date of birth, household composition, ethnic group, gender identity, disability, physical and/or mental ill health, sexual orientation, religion or belief, carer responsibilities, parent, or expectant mother	Personal and Sensitive Personal data	Pembrokeshire County Council and approved community partners Lead contacts of group will share their name and contact details publicly	As long as the data subject consents

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/09 ASB Case Management	Evidence to manage Anti-Social Behaviour issues	Legitimate	<u>Victim</u> : Contact details, vulnerability (reviewed annually), details of access <u>Perpetrator</u> : Contact details, CCTV footage, written evidence, photographs, reports to police	Personal and Sensitive Personal data	Police Community Safety Partnership Pembrokeshire County Council	Up to 6 years post tenancy
SA/10 Development	Adapted property design and letting	Contractual	Contact details, DOB, household composition, ethnic and gender group, disability / health issues, support or care provision, mental health or physical disability, Occupational Therapists assessment and design proposals	Personal and Sensitive Personal data	Occupational Therapists Assessment only: Approved consultants and Welsh Government where required for SHG application	12 years to align with the construction contract liability period
	Consultant and contractor appointments	Legitimate	Contact details	Personal data	Approved Consultants and contractors	12 years to align with the construction contract liability period
SA/11 Strategic Asset Management	Stock condition	Contractual	Contact details, vulnerability (reviewed annually), access information.	Personal data	Approved specialist consultants	During the life of the tenancy
SA/12 Recruitment	To monitor equal opportunities data	Contractual	Equal opportunities data	Sensitive Personal data		Should keep for no longer than 6 months to allow for any claims
	To assess applicants' suitability to fulfil the requirements of the post, to defend against any claims	Contractual	Contact details, education and employment history, driving licence, referees, any other supporting information the candidate provides during the application process.	Personal data	Share basic details with referees that candidate provide on application form	Should keep for no longer than 6 months to allow for any claims

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	To review candidates answers to questions to assess best person for the job, to provide feedback to unsuccessful candidates and to defend against any claims	Legitimate	Candidates name and answers to interview questions which may contain personal data	Personal data		6 months
	ID documents to comply with the Home Office's Right to Work legislation	Legitimate	Variety of personal data depending on what documents applicant has that matches the Home Office's approved list – e.g. of docs are: passport, utility bill, birth certificate	Personal data		6 months
	To check DBS status for certain posts as per Disclosure and Barring Service to make safer employment decisions	Contractual	Contact details: any previous addresses and names, marital status, divorce, documents to match requirements on Home Office lists e.g. of documents passport, birth certificate, marriage certificate, decree nisi, utility bills, bank statements/credit card statements	Personal data	Yes - DBS applications are dealt with by CRB Wales on our behalf as we are not a registered body	6 months

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Health - assess fitness to work and under Equality Act whether any reasonable adjustments are required	Contractual	Contact details: doctors details and medical information	Personal data	Yes - candidate shares information directly with PCC Occupational Health department	6 years from end of employment
	Need to be able to pay and tax new starter	Contractual	bank/building society details, P45 with NI and tax information	Personal data	share with organisations required to process the payroll and/or regulatory bodies e.g. tax office	6 years from end of employment
	References to check details provided by successful candidate on application from and assess suitability for post	Contractual	Confirmation of employment, suitability for post, disciplinary history, absence details	Sensitive Personal data	Can be asked to share with candidate but they would have to follow Subject Access Request process	6 months for unsuccessful applicants and 6 years from end of employment for employees
	Certificates to check candidates hold required qualifications	Legitimate	Name, possibly address and qualifications	Personal data	No	6 months for unsuccessful applicants and 6 years from end of employment for employees
	Photo for their ID badge	Consent	Photo	Personal data	No	No need to keep data once leave

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Various documents confirming appointment, setting out terms and conditions etc.	Contractual	Contact details, salary, any adaptations etc.	Sensitive Personal data	No	6 months for unsuccessful applicants and 6 years from end of employment for employees
SA/13 Learning & Development	Certificates to confirm employee has successfully completed courses/training	Legitimate	Name, possibly address and qualifications	Personal data	Approved training organisations	6 years from end of employment
	Photo- sometimes on certificate cards	Contractual	Copy of certificate card eg Gas Safe and CSCS cards	Personal data	Approved training organisations and trade bodies	No need to keep data once left
	Correspondence relating to L&D to ensure employees have relevant qualifications, they are kept up to date, we have accurate L&D records, we evaluate L&D activities	Legitimate	Name, possibly address, qualifications, opinions on L&D, evidence of L&D activities	Personal data	Approved training organisations	6 years from end of employment

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/14 Wellbeing	To monitor equal opportunities data	Legitimate	Anonymised equal opportunities data to include, but not limited to religion, marital status, sexual orientation, ethnicity, trades union membership.	Personal data	Welsh Government Regulator	6 months for unsuccessful applicants and 6 years from end of employment for employees
	Health - assess fitness to work and under Equality Act whether any reasonable adjustments are required; sickness and attendance data as have a duty of care for employees under H&S legislation, counselling information	Contractual	Contact details: doctors details and medical information, medical certificates, self-certificates, hospital letters, occupational health referral forms and reports – anonymised data sent to WG.	Sensitive Personal data Consent	Welsh Government Regulator PCC Occupational Health	6 years from end of employment
SA/15 People Management	To monitor equal opportunities data	Legitimate	Contact details: Equal opportunities data	Sensitive Personal data		6 years from end of employment

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	To check DBS status for certain posts as per Disclosure and Barring Service to make safer employment decisions and ongoing employment	Contractual	Contact details: any previous addresses and names, marital status, divorce, documents to match requirements on Home Office lists e.g. of documents passport, birth certificate, marriage certificate, decree nisi, utility bills, bank statements/credit card statements	Personal and Sensitive Personal data	CRB Wales	6 months
	Health - assess fitness to work and under Equality Act whether any reasonable adjustments are required; sickness and attendance data as have a duty of care for employees under H&S legislation, counselling information	Contractual	Contact details: doctors details and medical information, medical certificates, self certificates, hospital letters, occupational health referral forms and reports	Personal and Sensitive Personal data	PCC Occupational Health Counsellors	6 years from end of employment

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Need to be able to pay and tax employees	Contractual	bank/building society details, P45 with NI and tax information	Personal	Potential sharing with mortgage lenders/landlords	6 years from end of employment- Taxes Management Act 1970
	References provided to third parties	Consent	Contact details: job title, performance summary	Personal	Third parties who request references	6 years from end of employment
	Disciplinary, grievance and performance	Contractual	Depends on issue could be complaints, CCTV, e-mails, clocking records etc. Statements, disciplinary reports, disciplinary records, correspondence, outcomes	Personal and Sensitive Personal data	May be asked for disciplinary record on references by third party	Investigation documents to be retained until end of sanction, records of sanctions to be kept for 6 years from end of employment
	Working times - to monitor attendance and if employees work their contracted hours	Contractual	Name, job title, clocking times	Personal data		6 years from end of employment
	General correspondence, letters etc.	Legitimate	Depends on correspondence	Personal and Sensitive Personal data		6 years from end of employment

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/16 Board Management	To maintain board communications and governance	Contractual	Contact details: education and employment history, equal opportunities, referees, any other supporting information the board member provides to support the position	Personal and Sensitive Personal data	Biographs on website and with regulator and key partners e.g. Lenders	Unsuccessful candidate's data will be destroyed following successful interview stage. Successful candidate's information will be destroyed once they resign from the Board.
SA/19 H&S	Health and Safety Policy, in line with the Health and Safety at Work Act 1974	Contractual	Name of person responsible for H&S recorded in policy	Personal data	Anyone who reads out notice boards	1 year
	Accident/Incident reports in line with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)	Contractual	Contact details	Personal data	Managers, HSE and/or council, environmental authorities if reportable under RIDDOR. Insurance company	3 years after the date of the accident/incident

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Fire information Personal emergency evacuations plan (PEEP) in line with the Regulatory Reform (Fire Safety) Order 2005	Contractual	Contact details: medical information	Personal and Sensitive Personal data	Fire & emergency services	Length of tenancy
	Risk Assessments - Management of Health and Safety Regulations, Display Screen Equipment Regulation and The Workplace Health, Safety and Welfare Regulations	Contractual	Name: job title: medical information	Personal data and sensitive personal data	Occupational Health Provider	3 years after leaving employment
SA/20 PR-Marketing-Communications	Key Partner Schedule	Consent	Contact details	Personal data		Remove on request from data subject
SA/21 Regulation Management	Shareholder Management	Contractual	Contact details: Date of Birth, Occupation, equality & diversity data, whether or not they are a tenant	Personal and Sensitive Personal data		Permanently

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	Declaration of interests	Contractual	Name, business interests in connection with ateb	Personal data		2 years
	Complaint Management	Legitimate	Contact details, any personal or sensitive data relevant to the complaint	Personal and Sensitive Personal data		6 years
SA/23 Procurement Management	Tendering and approved panels	Contractual	Contact details: key contact details: business interests in connection with ateb	Personal data	Procurement portals, approved consultants panel	For the period of procurement and/or period of retention on approved consultant, suppliers and contractor lists
	Card holder personal detail	Legitimate	Contact details: date of birth	Personal data	Banks and card providers	As long as account is active
	Supplying any services in relation to our service areas e.g. maintenance works	Contractual	Contact details and DBS checks for all staff directly undertaking work for ateb	Personal and Sensitive Personal data		For the period contract
SA/25 Supported & Older person	To ensure that we have next of kin details for those living in extra care / sheltered	Contractual	Next of kin contact details: relationship to tenant	Personal data		For the duration of the tenancy

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
	We need to understand the care requirements of our tenants in extra care schemes	Contractual	Medical information, details of personal care needs	Sensitive Personal data	Pembrokeshire County Council	For the duration of the tenancy
SA/26 ICT Desk	Supplier Information - Support for systems	Contractual	Contact Details: contracts info, Service Level Agreements	Personal data	Approved ICT panel	For the duration of the contract
SA/27 Facilities Management	CCTV	Legitimate	We record CCTV images at our offices and all of our schemes	Personal and sensitive personal data	Law enforcement, legal consultants or other parties required to use the data to deliver an enforcement	Video: 6 months Images required for an enforcement action: as long as required to complete the action
	Telephones	Legitimate	We record external telephone calls, incoming and outgoing	Personal and sensitive personal data	Law enforcement, legal consultants or other parties required to use the data to deliver an enforcement	6 months
	Card access systems	Contractual	We record movements and access of identity cards across our facilities	Personal data		6 months after employment ends
SA/30 Treasury Management	Financial lending or investment services	Contractual	Contact details: key contact details, business interests in connection with ateb	Personal data		For length of financial arrangement

Service Area	Purpose of processing	Type of data	Type of data subject	Type of processing	Type of recipient to whom personal data is transferred	Retention period
SA/31 Exch. & Rev	Tenancy set up & maintenance	Contractual	Contact details: NI. Number, Date of Birth, Ethnic Origin, Language, Flags - e.g. vulnerability (reviewed annually), Bank details	Personal and Sensitive Personal data	Housing Benefit	For the length of the tenancy
	Tenant Bank Mandate	Contractual	Contact details: NI number: Date of Birth: Bank details	Personal data		For the length of the tenancy
	Supplier bank details	Contractual	Contact details, Bank details	Personal data		For the length of the supplier relationship
SA/32 Payroll	To process pay	Contractual	Contact details: NI Number, Date of Birth: Business Bank details	Personal data	Inland Revenue	For the length of employment
	Pension	Contractual	Contact details: NI Number, Date of Birth: Pay details	Personal data	Pension provider	For the length of the employment
SA/40 ICT Management	Supplier Information - Support for systems	Contractual	Contact Details, Contracts info, SLAs	Personal data	Approved ICT panel	For the length of the SLA

3: Generally in relation to all our services

All Service Areas	Data subjects freely sending personal data to ateb as part of a B2B enquiry, marketing campaign or potential future service or business transaction	Legitimate	Contact details	Personal data		up to 1 year unless the data subsequently becomes part of a service area that has a longer retention policy or the B2B enquiry or transaction remains open. e.g. a supplier offering services or materials that may be needed in the future
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