

Privacy Policy

1. Policy Statement

Compass NZ Housing Services Co (New Zealand) Ltd (Compass NZ) will collect, manage, store, use and disclose personal information about a number of individuals (including tenants, applicants, clients and employees) where it is reasonably necessary for one or more of our functions or activities and to meet the requirements of government contractual agreements or reporting.

When we collect, manage, store, use and disclose personal information Compass NZ is bound by the New Zealand Privacy Act (1993), including the Information Privacy Principles (Part 6) and the Privacy Code of Practice (Part 6) relating to the holding and sharing of personal information in connection with the performance of contracts, service level and support agreements between Compass NZ and the applicable Central and Local government and community based agencies.

This policy outlines the approach by Compass NZ to the collection, management, storage, disclosure and reporting of personal information. It explains when personal information will be collected, the type of personal information that will be collected, how personal information will be used, stored and disclosed and how the quality and security of the personal information will be maintained. In addition it provides information on how individuals can access their personal information, how to opt out of marketing or promotions and how to make a privacy complaint if an individual feels there has been a breach of their privacy relating to Compass NZ use and disclosure of their personal information.

2. Purpose

The purpose of our Privacy Policy is to identify how personal information is collected, stored, managed, disclosed and used to promote the protection of the privacy of individuals, to promote the responsible and transparent handling of personal information and to provide individuals with a means to complain about an alleged interference with their privacy.

3. Scope

The policy applies to all personal information, including sensitive information, collected, used, stored and disclosed by Compass NZ, including information about tenants living in properties

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managed by Compass NZ through contractual or service level agreements on behalf of Central and Local Governments; not-for-profit and for-profit organisations and private landlords or their delegated agents.

It also includes the personal information of applicants for social housing through the Ministry of Social Development (MSD) and other clients participating in the functions and activities of Compass NZ.

4. Risk

Adequate controls and processes support the collection, management, storage, disclosure and use of personal information of our tenants, applicants, other clients and employees and assist to prevent a breach of Compass NZ's compliance with the New Zealand Privacy Act (1993) and/or the Information Privacy Principles (IPP) relating to the holding and sharing of personal information in connection with the performance of contracts and service level agreements between Compass NZ and the applicable government (Central and Local) and community based agencies.

5. Principles

Compass NZ will collect, manage, store and disclose personal information and deal with inquiries about our compliance with the requirements of the New Zealand Privacy Act (1993) and the Information Privacy Principles (IPP) and the Privacy Code of Practice, if applicable that may bind us from time to time.

6. Information Privacy Principles (Part 2, Section 6, Privacy Act 1993)

Principle 1: Purpose of collection of personal information

Compass NZ will only collect personal information about an individual for a proper and lawful purpose and where it is reasonably necessary for us to do so in order for the individual to access or participate in one or more of our functions or activities.

Principle 2: Source of personal information

Compass NZ will collect information directly from the individual concerned for a lawful purpose that's connected with our functions or activities, and that such collection is necessary for that purpose.

Compass NZ may also collect personal information through technology and the online environment. Examples of such collection include CCTV footage recorded by cameras at Compass NZ's offices or located in common areas of complexes under management, the use of Cookies on our website and personal information submitted directly through our website or through social media accounts operated by us.

Compass NZ may also generate personal information from other data which it holds – such as the creation of audit logs, incident reports and other records relating to applicants, tenants and clients.

However, there are occasions or situations in which Compass NZ may collect and/or receive personal information about an individual from a third party or source. Examples may include:

- Referees;
- previous real estate agents and landlords;
- your financial and legal advisers;
- our support service providers;
- information provided to /requested from Compass NZ, from law enforcement agencies;
- information sent to us in emails from third parties;
- publicly available sources such as social media;
- operators of residential tenancy databases;

Principle 3: Collection of information (s6)

Compass NZ may collect personal information from and about a range of individuals, including clients, tenants, applicants, members and potential employees.

At or before the time of collecting personal information, or if that is not practicable, as soon as practicable after, Compass NZ will take reasonable steps to ensure an individual is notified of:

- the information being collected;

- the circumstances of the collection and the purpose for which we have collected the information;
- who is collecting and holding the information (including name and address);
- when and to whom Compass NZ usually discloses personal information to;
- if the information is required or authorised to be collected under a New Zealand law or a court/tribunal order;
- the main consequences (if any) for the individual if all or part of the information is not provided;
- how they can access personal information collected by Compass NZ, and if necessary how they can seek correction if they believe the information is inaccurate; and
- how the individual can lodge a privacy complaint.

If Compass NZ collects the personal information from someone other than the individual, or the individual may not be aware that Compass NZ has collected the personal information we will take reasonable steps to notify the individual, or otherwise ensure that the individual is aware that Compass NZ collects or has collected the information, and of the circumstances of that collection.

The types of personal information we collect from individuals includes:

- Name;
- Address;
- Date of birth;
- Telephone number/s;
- Email address;

- Fax number/s;
- Family circumstances and household composition;
- Financial situation and income information;
- Rental history.
- Information from enquiries, complaints or appeals the individual has made;
- Communications between Compass NZ and the individual;
- Demographic information relating to a function or activity; and
- Information that we reasonably believe we need to enable individuals to participate in one or more of our functions or activities.

Compass NZ will ordinarily maintain on its tenant files the following information:

- General information about the tenant relating to family composition, employment, income, housing situation and needs, special or support needs etc. including information from housing application received through Ministry Social Development (MSD);
- Signed copy of signed Tenancy Agreement;
- signed copy of initial property condition report;
- signed copy of additional information collected during the lease sign up;
- copies of all property inspection reports;
- copies of all correspondence in relation to the tenancy;
- copies of all complaints made by or about the tenant and the results of the investigation of these complaints;

- copies of all verification of income details;
- copies of any legal documentation in relation to the tenant or tenancy;
- written requests and responses for any change or alteration to the premises;
- copy of any rehousing application;
- details of any support agencies involved;
- copy of risk assessment on tenant and any incident reports;
- copy of risk assessment in relation to the property;
- copies of tenancy plans and/or support plans related to sustaining the tenancy; and
- correspondence notes on conversations with or about the tenant as appropriate.

Compass NZ may also collect sensitive information about an individual:

- if the individual consents to the collection and the information is reasonably necessary for one or more of Compass NZ's functions or activities;
- if required or authorised by or under NZ law or a court/tribunal order;
- if the information relates to Compass NZ's activities and the information relates solely to our members, or to individuals who have regular contact with us in connection with our activities; or
- when a permitted general situation or permitted health situation exists.

Principle 4: Manner of collection of personal information

Personal information will only be collected using lawful and fair means and not in an unreasonably intrusive manner and it will only be collected directly from the individual concerned unless it is unreasonable or impracticable to do so.

This could be done, by way of forms filled out directly by the individual, face-to-face meetings and interviews, emails and telephone calls.

Compass NZ may also collect personal information through technology and the online environment. Examples of such collection include CCTV footage recorded by cameras at Compass NZ offices or located in common areas of complexes under management, the use of Cookies on our website and personal information submitted directly through our website or through social media accounts operated by us.

Compass NZ may also generate personal information from other data which it holds – such as the creation of audit logs, incident reports and other records relating to applicants, tenants and clients.

However, there are occasions or situations in which Compass NZ may collect and/or receive personal information about an individual from a third party or sources via emails, reports, records & forms, meeting notes, references etc.

Principle 5: Storage and security of personal information

Compass NZ will take reasonable steps to protect personal information we collect, store and manage from:

- loss, misuse or disclosure; and
- unauthorised access, use, modification or disclosure.

Where Compass NZ no longer needs an individual's personal information for any purpose for which it was collected we will take all reasonable steps to ensure the information is destroyed or permanently de-identified providing it is not contained in a central or local government record, and we are not required by or under a New Zealand law, or a court/tribunal order, to retain the information.

Compass NZ stores information via several different methods, including paper records, shared electronic files and web-based systems. We maintain tenant and client records databases in electronic form, which are maintained at a secure off site location and accessed by a private network including secured user's login and password.

Other personal information from our internal systems (including financial information) is linked directly to our tenant and client databases. Personal information is also stored in our internally hosted email system.

Each of Compass NZ's offices has in place, steps to protect the personal information the office holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods – including locked storage of paper records and password access rights to computerised records. Generally, access is only authorised to the extent necessary to allow it to be used for the primary or secondary purposes of its collection.

Paper records may be archived and stored at secure off site locations operated by an external party responsible for the secure storage and archiving of paper records on behalf of Compass NZ through a contractual arrangement. Access to these records is controlled by an electronic keypad entry system and all employees of the external provider are required to sign confidentiality agreements and may only enter areas to which they have the correct authorisation. The system also creates an audit trail of their movements and external monitoring and records are further protected by a random storage methodology utilising barcode identification and recognition.

Principle 6: Access to personal information

Compass NZ will hold the personal information of its tenants and clients in a way that it can readily be retrieved, the individual concerned is entitled to:

- obtain confirmation of whether the information is held; and
- have access to information about them.

Where an individual requests access to personal information held by Compass NZ, we will give them access except to the extent that:

- poses a risk to New Zealand's security or defence;
- not be in your interests (but only if you're under 16);
- we reasonably believe that giving access would pose a serious threat to the life or health of any individual;
- giving access would have an unreasonable impact on the privacy of other individuals;
- access should be withheld based on a serious threat to public health or safety;
- the request for access is frivolous or vexatious;

- the information relates to existing or anticipated legal proceedings between Compass NZ and the individual, and would not be accessible by the process of discovery in those proceedings;
- breach legal professional privilege (that is, the information was communicated between a lawyer and client, or the information was obtained for court proceedings);
- giving access would reveal the intentions of Compass NZ in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- denying access is required or authorised by or under New Zealand law or a court/tribunal order;
- giving access would be likely to prejudice an investigation of possible unlawful activity;
- giving access would be likely to prejudice actions by or on behalf of an enforcement body in relation to unlawful activity or seriously improper conduct; or
- giving access would reveal evaluative information generated by Compass NZ in connection with a commercially sensitive decision-making process.

If Compass NZ have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the organisation's functions or activities has been, is being or may be engaged in; and giving access to information would be likely to prejudice the taking of appropriate action in relation to the matter, we are not required to give individuals access to this information.

If Compass NZ refuses access on one of the above specified grounds of refusal, we will take reasonable steps to give access in a way that meets the needs of Compass NZ and the individual. This could include giving access using a mutually agreed intermediary.

If Compass NZ refuses to give access, we will provide a written notice that outlines:

- the reasons for the refusal, unless, having regards to the grounds for the refusal, it would be unreasonable to do so;
- the complaint mechanisms available to the individual; and
- any other matters prescribed by the Privacy Act 1993.

All requests for access for personal information can be made verbally or in writing.

If Compass NZ levies charges for providing access to personal information, those charges:

- will not be excessive; and
- will not apply to lodging a request for access.

Principle 7: Correction of personal information

If Compass NZ is satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete or irrelevant or misleading, or the individual to whom the personal information relates requests us to correct the information we will take reasonable steps to correct the personal information to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading.

If Compass NZ corrects personal information about an individual that it has previously disclosed to another party or another entity, we will take reasonable steps to notify the recipients about the correction.

If Compass NZ refuses to correct the personal information as requested by the individual, we will provide written notice. The written notice will set out:

- the reason for our refusal (unless this would be unreasonable);
- the mechanisms available to complain about the refusal; and
- any other matter prescribed by Privacy Act 1993.

If Compass NZ refuses to make a correction, and an individual requests that a statement be attached to the record stating that the information is inaccurate, out-of-date, incomplete, and irrelevant or misleading, we will associate the statement in such a way that will make the statement apparent to users of the information.

Compass NZ will respond to a request to correct personal information within a reasonable period and will not charge the individual for making the request, for correcting the information or for associating the statement with the personal information.

To make a request to access or update any personal information Compass NZ holds about you, please contact Compass NZ's Privacy Officer (General Manager).

Compass NZ may require you to put your request in writing, verify your identity and specify what information you require.

Principle 8: Accuracy of personal information to be checked before use

Compass NZ will take reasonable steps to ensure that the personal information that we collect is accurate, complete, relevant, up-to-date and not misleading.

Compass NZ will take reasonable steps to ensure that the personal information we use or disclose is accurate, complete, relevant, up-to-date and not misleading, having regard to the purpose of that use or disclosure.

If an individual has any concerns that their information is not accurate, incomplete, not up-to-date and misleading, they should contact Compass NZ to request for a correction.

Principle 9: Personal information not to be kept for longer than necessary

Compass NZ will not keep personal information of an individual for longer than is necessary for the purposes for which it was collected.

Compass NZ will consider any specific New Zealand laws that require information to be kept for certain minimum periods of time, such as tax information and health information.

Principle 10 & 11: Limits on use and disclosure of personal information

Compass NZ will only use or disclose personal information for the primary purpose for which it was collected.

We will only use or disclose personal information for another (secondary) purpose if:

- the individual has consented;
- the agency got the information from a publicly available publication;
- the individual concerned is not identified;

- the individual would reasonably expect Compass NZ to use or disclose the information for the secondary purpose and the secondary purpose relates to the primary purpose (or directly relates to the primary purpose in the case of sensitive information);
- the use or disclosure of the information is required or authorised by or under a NZ law or a court/tribunal order;
- the use is authorised by the Privacy Commissioner under section 54;
- the use is necessary to prevent or lessen a serious threat to public health or safety, or the life or health of any individual; or
- Compass NZ believes that the use or disclosure of the information is reasonably necessary for one or more of the following by, or on behalf of an enforcement body:
 - the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
 - the enforcement of laws relating to the confiscation of the proceeds of crime;
 - the protection of the public revenue;
 - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

Generally, the primary purpose for which Compass NZ will collect, use and disclose an individual's personal information will be to enable the individual to access or participate in one of Compass NZ's functions or activities:

- tenancy and asset management – including assessment of prospective tenants' applications and management of existing tenancies;
- project management – including the acquisition, construction and upgrade of properties; and
- maintenance management – including the maintenance of existing properties.

Providing access to or participation in Compass NZ functions and activities may include (without limitation and as applicable):

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- communicating with clients, tenants and others about matters relating to the provision of Compass NZ's functions and activities through correspondence, newsletters and magazines;
- administration, including collection of rent and fees;
- providing contact details to our contractors and service providers who provide us with services;
- marketing and promoting our business, products and services;
- seeking donations and contributions to support Compass NZ's activities;
- insurance and governance purposes;
- statistical purposes;
- compliance with our legal obligations such as duty of care;
- assessing potential service providers and employee, including interviewing applicants; and
- administering contracts with service providers – including managing payment of fees and supervision of performance.

In order to engage in its functions and activities Compass NZ may from time to time need to disclose personal information to other entities, including:

- related affiliated entities and bodies corporate;
- entities who fundraise on our behalf;
- service providers and contractors;
- debt recovery agencies;
- Law enforcement agencies; and
- Central and Local government entities pursuant to our reporting obligations under government contracts.

Principle 12: Unique identifiers

Compass NZ will not adopt, use or disclose a government related identifier of an individual unless:

- the use or disclosure of the identifier is reasonably necessary for us to verify the identity of the individual for the purposes of our activities or functions;
- the use or disclosure of the identifier is reasonably necessary for us to fulfil our obligations to an agency or as Central and local government authority;
- the adoption, use or disclosure is required or authorised under a New Zealand law or a court/tribunal order; or
- Compass NZ reasonably believe the use or disclosure is reasonably necessary for an enforcement related activity being conducted by, or on behalf of, an enforcement body.

Direct marketing

Compass NZ will only use or disclose personal information, other than sensitive information, for the purpose of direct marketing if an individual has given us consent to do so, or if one of the following apply:

- Compass NZ may use or disclose personal information (other than sensitive information) about an individual for the purpose of direct marketing if:
 - we have collected it from the individual;
 - the individual would reasonably expect that we would be using or disclosing it in direct marketing;
 - we have provided individuals with a simple means to request they not receive direct marketing; and
 - the individual has not made such a request to Compass NZ.
- Where it would not be reasonable for an individual to expect Compass NZ to use or disclose their personal information (other than sensitive information) for direct marketing purposes or where the information was provided by a third party we may still be able to use or disclose it for direct marketing if:

- the individual to whom it relates has consented for us to use or disclose it for that purpose; or
 - it is impracticable to obtain their consent; and
 - we have provided the individual with notification that we have collected that information and we have given them a simple means to request they not receive direct marketing; and
 - the individual has not made such a request to Compass NZ.
- Compass NZ may only disclose sensitive information about an individual for direct marketing purposes if the individual has consented to the use or disclosure of the information for that purpose.
 - Compass NZ may use or disclose personal information for the purpose of direct marketing where we are a contracted services provider for a Commonwealth contract and it is necessary to meet an obligation under the contract.

If Compass NZ have used or disclosed personal information about an individual for the purpose of direct marketing for themselves or for facilitating direct marketing by a third party the individual has the right to:

- Request not to receive direct marketing communications from Compass NZ;
- Request Compass NZ not to disclose their personal information to third parties for the purposes of direct marketing; and
- Request Compass NZ to provide its source of the individual's personal information.

Compass NZ will comply with these requests within a reasonable period and free of charge. We do not need to comply with requests to disclose the source of information if it is impracticable or unreasonable to do so.

Transfer of Personal Information outside New Zealand

Compass NZ does not ordinarily disclose personal information to overseas recipients. However, in the unlikely event that Compass NZ does need to disclose personal information overseas, it will only do so in accordance with Part 11A (Transfer of personal information outside New Zealand) in the New Zealand Privacy Act 1993.

Making a Privacy Complaint

A person may make a complaint if they feel their personal information has been handled inappropriately by Compass NZ. Privacy complaints may be made in accordance with Compass NZ's External Complaints Handling Policy which is available on the Compass NZ website by contacting Compass NZ's office and requesting a copy of this document. Complaint forms are also available from the Compass NZ website or by contacting Compass NZ by telephone and requesting a form be mailed to you.

If a complainant is not satisfied with Compass NZ's response or the way Compass NZ has dealt with the complaint, the individual may make a formal written complaint to the New Zealand Privacy Commission.

If a person is not satisfied with a determination by the New Zealand Privacy Commissioner, they could seek other alternative appeal venues; for example, New Zealand Ombudsman's Office, the New Zealand Human Rights Review Tribunal.

7. Legislation and Compliance

- NZ Privacy Act (1993)
- NZ Information Privacy Principles (Part 2, Section 6- Privacy Act 1993)

8. Related documents and resources

- Compass NZ Tenancy Management Policy Procedure
- Compass Complaints Handling Policy and Procedures
- Information & Records Management Procedures
- Authority to Share Personal Information (sign up)
- Fact Sheet on Information Privacy Principles (NZ Office of the Privacy Commissioner)
- Resources on Privacy Act 1993 (Community Law, NZ)

9. Responsibilities

All Compass NZ workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass NZ policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass NZ customers,

- inform Compass NZ clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass NZ Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved Compass NZ Policy and Procedures to be reported and managed.

10. Document Control

This policy is part of Compass Group approved policies and procedures register. Policies and procedures on the register are reviewed regularly and revised where warranted. The Compass Group Chief Governance officer is ultimately responsible for the control and review of policy and procedure documents in accordance with Compass' Group Documentation Structure and Quality Assurance ("QA") Management Guidelines (GUI-035). Refer to Compass Policy and Procedure Development Approval and Review (PROC-011) for information on the document review process.

11. Records

All records relevant to these procedures are to be maintained in a recognised Compass NZ recordkeeping system in accordance with the requirements of the New Zealand Privacy Act (1993) and the New Zealand Information Privacy Principles and any code of practice issued by the New Zealand Privacy Commissioner that may bind us.

12. Definitions

Term	Definition
Appeals	<p>A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’</p> <p>An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;</p>
Compass	Compass Housing Services Co. Ltd
Compass Group	The corporate structure that includes Compass (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Compass NZ	Compass Housing Services Co (New Zealand) Ltd, a wholly owned subsidiary of Compass registered in New Zealand under the Companies Act 1993 (NZ)
Complaints	<p>An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service.</p> <p>Types of Complaint include:</p> <ul style="list-style-type: none"> • Where Compass NZ have failed to provide or there’s been a delay or problem in providing a service; • Where Compass NZ have failed to follow or have been unfair or inconsistent in applying our policies or procedures. • Where Compass NZ have failed to keep Tenants informed, through lack of or insufficient information • Where there has been inappropriate behaviour or attitude from a Compass Employee or contractor.
Complainant	Person with a Complaint ongoing with Compass NZ.
Employee	A person engaged under an employment agreement or award by any company in the Compass Group.

Term	Definition
Executive Manager	Many positions within Compass include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document Compass Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.
Independent contractor	means a party engaged directly by Compass pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies or partnerships with whom Compass enters into an agreement for the provision of specified individuals to supply specific skills, services or consultancy arrangements. It does not include individuals engaged through labour hire agencies. Independent contractors are not employees of Compass.
Subsidiary Company	A company in which Compass owns all or at least most of the shares.
Worker	Compass NZ have adopted the New Zealand Health and Safety Act (2015) Section 19’s definition of a ‘worker’ where the term is used in policy. The definition of a ‘worker’ includes an individual who carries out work in any capacity for a PCBU, including work as : (a) an employee; or (b) a contractor or subcontractor; or (c) an employee of a contractor or subcontractor; or (d) an employee of a labour hire company who has been assigned to work in the business or undertaking; or (e) an outworker (including a homemaker); or (f) an apprentice or a trainee; or (g) a person gaining work experience or undertaking a work trial; or (h) a volunteer worker; or (i) a person of a prescribed class.

13. Document Information

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14. Version History

Amendment History			
Version	Date	Status and Changes	Reviewer
V1.0	2015-09-18 2015-11-13 2015-11-20	Submit to Compass NZ Board for approval Approved NZ Board Approved Compass Board	Ben Wong, Compass Quality Administrator / Bernadette Pinnell General Manager Compass NZ
V2.0	13/02/2020	Review of policy document	Julie Barnett, Group Chief Governance Officer
	26/02/2020	Circulated to Compass NZ Board for feedback	Compass NZ Board
		Update for feedback	Julie Barnett, GCGO
	27/02/2020	Approved by circulating resolution	Compass NZ Board

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