



PONY PARTNERSHIPS



Data Protection & Information Security Policy – 2025–2026

Name of Organisation: Pony Partnerships CIC

Venue/Address: All venues

Date of Review: 1 September 2025

Date of Next Review: 31 August 2026

Author: Danielle Mills

1. Introduction

Pony Partnerships CIC is committed to protecting personal data in line with the Data Protection Act 2018 and UK GDPR. This policy sets out how we securely collect, process, store, and share information.

2. Aims

- Protect personal and sensitive data of clients, staff, and partners.
- Ensure compliance with GDPR principles: lawfulness, fairness, transparency, purpose limitation, minimisation, accuracy, storage limitation, integrity, and confidentiality.
- Maintain secure systems to prevent breaches.

3. Roles & Responsibilities

- Data Protection Officer (DPO): Danielle Mills.
- All staff are responsible for handling data securely.
- Volunteers handling personal data must follow this policy.

4. Data Handling Principles

- Only collect data necessary for service delivery.
- Store data securely (password-protected systems, locked cabinets).
- Retain data only for as long as necessary.
- Share data only on a need-to-know basis, with consent where required, unless safeguarding overrides.

5. Information Security

- Strong passwords (minimum 8 characters, mix of symbols/numbers/letters).
- Devices must be encrypted and set to auto-lock.
- No sharing of work devices with family/friends.
- Secure disposal of paper records and digital files.
- All breaches must be reported to the DPO within 24 hours.

6. Monitoring

- Reviewed annually or after a breach.