

Pony Partnerships CIC



Digital Safety and Device Use Policy 2026-2027

Name of Organisation: Pony Partnerships CIC

Venue/Address: All venues

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Date of Next Review: 31 August 2027

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1. Policy Statement

Pony Partnerships CIC is committed to promoting the safe, responsible, and appropriate use of digital technology.

Digital devices can support communication, learning, accessibility, and service delivery. However, they can also create safeguarding, confidentiality, privacy, and professional boundary risks if not used appropriately.

This policy sets out expectations for the safe use of devices, photography, video recording, and social media across all Pony Partnerships CIC activities. It supports safeguarding, protects personal information, and promotes respectful and ethical use of technology.

2. Purpose

This policy aims to:

- promote safe and responsible use of technology;
- protect children, young people, and adults from harm;
- maintain confidentiality and professional boundaries;
- support compliance with safeguarding and data protection requirements;
- provide clear expectations regarding device use;
- protect the privacy and dignity of participants, staff, volunteers, and animals.

3. Scope

This policy applies to:

- directors;
- employees;
- associates;
- volunteers;
- students and trainees;
- participants;
- parents and carers;
- visitors and contractors.

It applies to:

- organisation-owned devices;
- personal devices used for work purposes;
- mobile phones;
- tablets;
- laptops;
- smart watches;
- cameras;
- social media platforms;
- photography and video recording.

For this policy, a personally owned device includes a device owned by a staff member, associate, volunteer, or other authorised worker, even where that device is used mainly or solely for their own professional or business purposes.

4. Key Principles

Pony Partnerships CIC expects all digital technology to be used in a way that:

- promotes safeguarding;
- protects confidentiality;
- maintains professional boundaries;
- respects privacy and consent;
- supports learning, wellbeing, and participation;
- does not compromise animal welfare or safety;
- recognises risks linked to artificial intelligence, image manipulation, deepfakes, online grooming, harmful content, and digital harassment.

Safeguarding considerations will always take precedence over convenience or personal preference.

5. Organisation-Owned and Personal Device Use

Pony Partnerships CIC provides shared organisation-owned equipment where appropriate, including office computers and an office telephone. Staff, associates, volunteers, and other authorised workers may also use personally owned phones, computers, or tablets for legitimate work purposes.

Personal devices may be used for Pony Partnerships work where:

- their use has been authorised;
- a BYOD Declaration has been completed before the device is used to access Pony Partnerships systems or information;
- the device is protected by an appropriate password, PIN, or biometric security;
- the device and operating system are kept reasonably up to date and secure;
- multi-factor authentication is used on organisational accounts where available or required;
- Pony Partnerships information is accessed through approved systems, such as Office 365, SharePoint, Teams, or other authorised applications;
- confidentiality and professional boundaries are maintained;
- the device is not shared in a way that could allow another person to access Pony Partnerships information.

A personally owned device may be used for work-related calls, messages, or email where the communication method, account or number has been authorised for work use and professional boundaries are maintained.

Participant records and other confidential Pony Partnerships information must not normally be stored

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directly on a personally owned device or in personal email, messaging, cloud-storage, or backup accounts.

Where information is temporarily downloaded or accessed for an authorised purpose, it must be protected and removed when it is no longer required.

Individuals using their own devices remain responsible for complying with Pony Partnerships' safeguarding, confidentiality, data protection, digital safety, and information security requirements.

Any loss, theft, compromise or suspected unauthorised access involving Pony Partnerships information must be reported immediately.

Pony Partnerships may withdraw authorisation to use a personal device where security, safeguarding or confidentiality requirements are not being met.

6. Participant Device Use

Pony Partnerships CIC aims to provide a calm, safe, and engaging environment.

Personal devices are not normally used during sessions unless agreed for a specific purpose, such as:

- a reasonable adjustment;
- communication or accessibility needs;
- medical or allergy-related reasons;
- emergency communication;
- an individual support plan;
- an agreed learning activity;
- another purpose authorised by a member of staff.

Pony Partnerships does not operate a blanket ban on participant devices. Device use during sessions is managed according to individual need, purpose, safeguarding, and safety.

Where commissioned provision has additional agreed device requirements, these will be communicated to the participant and relevant staff.

Any permitted use must be supervised where appropriate and must not compromise safety, privacy, participation, confidentiality, safeguarding, or animal welfare.

Where device use creates a significant safety, safeguarding, privacy or professional-boundary concern, staff may ask the participant to stop using the device and may request that it is handed over temporarily in accordance with the Search, Prohibited Items and Confiscation Procedure.

If the participant does not cooperate, staff must manage the resulting risk through the appropriate safety or safeguarding arrangements. Force must not be used solely to obtain a device.

7. Photography and Video Recording

Photography and video recording are not permitted during sessions unless authorised by Pony Partnerships CIC.

Where permission is granted:

- appropriate consent must be in place;
- privacy and dignity must be respected;
- images must not compromise safeguarding;

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- participants must not photograph or record others without permission;
- staff may stop photography or filming where concerns arise.

Where staff or associates are authorised to take photographs or recordings using a personally owned device, the method of capture and storage must be authorised in advance. Images or recordings must be transferred to approved organisational storage as soon as reasonably practicable and must not remain in personal photo libraries, cloud backups, or other personal accounts.

Images, videos, or recordings must not be altered, manipulated, or used to create AI-generated content without explicit organisational approval and appropriate consent.

Additional requirements may apply where photographs are used for organisational, promotional, or professional purposes.

This section relates to photography and recording undertaken by participants or by people working for or on behalf of Pony Partnerships. It does not apply to fixed CCTV operated independently by a site owner or venue. Information about third-party CCTV is provided in the Privacy and Data Protection Policy.

8. Social Media

Staff, associates, volunteers, and participants must use social media responsibly.

Individuals must not:

- share confidential information;
- identify participants without appropriate consent;
- publish photographs taken during sessions without permission;
- make posts that could compromise safeguarding, confidentiality, or professional boundaries;
- imply organisational endorsement without authorisation.

Staff, associates, and volunteers must not use personal social media accounts to communicate privately with participants, unless an exceptional arrangement has been formally authorised. This does not prevent an authorised worker from using a personally owned device to access an approved work email account, communication application, or authorised work contact method.

9. Safeguarding and Online Safety

Digital safeguarding risks may include:

- inappropriate contact, grooming, or exploitation;
- cyberbullying, harassment, or abuse;
- harmful, sexual, discriminatory, or extremist content;
- sharing or creation of nudes or semi-nudes;
- AI-generated or manipulated images, including deepfakes or sexual imagery;
- sexual extortion;
- privacy or confidentiality breaches;
- harmful online challenges or coercion;
- unsafe or harmful use of generative AI;
- cyber-dependent behaviour such as hacking or unauthorised access.

Any digital or online activity that creates a safeguarding concern must be reported immediately to the DSL or DDSL. Staff must not investigate safeguarding concerns themselves.

Staff must not search or browse a participant's device for safeguarding evidence or intentionally view

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suspected nudes, semi-nudes or other indecent images. Where a device is voluntarily handed over because of a safeguarding concern, it should be secured without examining its contents and referred to the DSL or DDSL for advice.

10. Loss, Theft or Security Concerns

Any lost, stolen, compromised device, or suspected unauthorised access involving Pony Partnerships systems or information must be reported immediately to the CEO/Manager or designated lead.

The person identifying the concern must:

1. report it immediately;
2. preserve relevant information or evidence;
3. not delete messages, emails, or other evidence;
4. not attempt technical action beyond their competence;
5. follow instructions given by the CEO/Manager or authorised technical support.

Appropriate action may include:

- changing passwords;
- restricting account or system access;
- signing out active sessions;
- securing organisational information;
- assessing whether personal data has been affected;
- considering safeguarding risk;
- recording the incident;
- notifying affected individuals or external authorities where required.

11. Breaches of this Policy

Failure to follow this policy may result in:

- advice, supervision, or additional training;
- withdrawal of permission to use a device or system;
- restriction or removal of system access;
- review of placement or working arrangements;
- disciplinary, contractual or volunteer-management action, as applicable;
- safeguarding action;
- reporting to an external authority where required.

Responses will be proportionate to the nature and seriousness of the breach.

12. Responsibilities

- Board of Directors: Responsible for ensuring proportionate digital-safety and device arrangements are in place and reviewed.
- CEO/Manager: Responsible for implementing this policy, approving device and system arrangements, responding to significant digital or security concerns and ensuring appropriate action is taken.
- DSL/DDSL: Responsible for overseeing safeguarding concerns arising from digital technology, devices, or online activity.
- Session Lead: Responsible for managing device use during sessions, including participant devices, authorised photography or recording and immediate concerns affecting safety, privacy, or animal welfare.

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- Staff, Associates and Volunteers: Responsible for following this policy, maintaining professional boundaries, protecting information, and reporting concerns promptly.
- Participants: Responsible, with appropriate support, for using devices safely and respectfully and following agreed session expectations.

13. Review

This policy will be reviewed annually or sooner if:

- legislation changes;
- safeguarding guidance changes;
- a significant incident occurs;
- organisational arrangements change.

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