

Pony Partnerships CIC



Privacy Notice 2026-2027

Name of Organisation: Pony Partnerships CIC

Venue/Address: All venues

Date of Review: 1 September 2026

Date of Next Review: 31 August 2027

Author: Danielle Mills

1. Privacy Statement

Pony Partnerships CIC is committed to protecting people's privacy and handling personal information lawfully, fairly, openly and securely.

We will:

- collect only information that we need;
- explain why we need it and how we will use it;
- keep it accurate and appropriately up to date;
- share it only where this is necessary, lawful and proportionate;
- protect it against loss, misuse and unauthorised access;
- keep it only for as long as it is needed; and
- respect people's information rights.

This Privacy Notice explains what people can expect us to do with their personal information.

2. Purpose

This notice explains:

- what personal information we collect;
- where it comes from;
- why and how we use it;
- our legal reasons for using it;
- who we may share it with;
- where and how it is stored;
- how long we keep it;
- the rights people have; and
- how to ask a question or make a complaint.

This notice should be read alongside our Privacy and Data Protection Policy and any relevant referral form, agreement, consent information or commissioning document.

3. Scope

This notice applies to information used in connection with:

- enquiries and referrals;
- suitability assessment and onboarding;
- Equine Facilitated Psychotherapy;
- Equine Facilitated Learning;
- Equine Enrichment;
- neurodivergent groups and community services;
- animal-assisted academic support;
- education-related and alternative provision placements;
- attendance, reports and reviews;
- safeguarding, health, safety and risk management;
- reasonable adjustments;
- contracts, commissioning, invoices and payments;
- accidents, incidents and complaints; and
- communication with participants, families, referrers, commissioners and professionals.

It covers information about:

- participants and prospective participants;
- parents, carers and people with parental responsibility;
- emergency and authorised collection contacts;
- family members and support workers where relevant;
- referrers and commissioners;
- education, health and social-care professionals;
- advocates and authorised representatives; and
- other people involved in a service or placement.

Separate privacy arrangements apply to staff, associates, volunteers, directors, contractors and applicants.

4. Legal and Regulatory Context

This notice has been developed with regard to:

- the UK General Data Protection Regulation;
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025;
- the common-law duty of confidentiality;
- relevant safeguarding and information-sharing requirements; and
- relevant professional, equality, health and safety and record-keeping standards.

Where information is used for safeguarding, we will also have regard to relevant safeguarding law and guidance, including *Working Together to Safeguard Children* and, where relevant to commissioned education-related provision, *Keeping Children Safe in Education 2026*.

Personal information will be:

- used lawfully, fairly and openly;
- collected for clear and legitimate purposes;
- adequate, relevant and limited to what is needed;
- accurate and appropriately updated;
- kept for no longer than necessary; and
- stored and communicated securely.

5. Responsibilities

Pony Partnerships CIC (12448033) c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY
07505951793/info@ponypartnerships.com/www.ponypartnerships.com



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- **Board of Directors:** The Board is responsible for ensuring that appropriate data-protection arrangements are in place and reviewed. This includes oversight of significant incidents, complaints and organisational risks. The Board will keep under review whether Pony Partnerships is legally required to appoint a formal Data Protection Officer.
- **Data Protection Lead:** Danielle Mills, Chief Executive Officer, is the Pony Partnerships Data Protection Lead. The Data Protection Lead is responsible for:
 - coordinating data-protection compliance;
 - maintaining privacy information and internal records;
 - overseeing information-rights requests;
 - managing data-protection complaints and breaches;
 - arranging appropriate staff guidance; and
 - reporting significant matters to the Board.
- **Staff, Associates, Volunteers and Directors:** People working for or on behalf of Pony Partnerships must:
 - maintain confidentiality;
 - access only information needed for their role;
 - use approved accounts and systems;
 - keep information secure;
 - follow organisational policies and procedures;
 - report concerns or suspected breaches immediately; and
 - seek advice where they are unsure whether information can be used or shared.
- **Referrers and Commissioners:** must:
 - have an appropriate lawful basis or authority to share information;
 - provide information that is relevant, accurate and current;
 - avoid sharing unrelated or unnecessary information;
 - notify Pony Partnerships promptly of relevant changes; and
 - make participants, parents or carers aware of this Privacy Notice where appropriate.
- **Participants, Parents and Carers:** are asked to provide accurate information and tell us when relevant information changes.

6. Who We Are

- Organisation: Pony Partnerships CIC
- Company Number: 12448033
- Correspondence Address: c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY
- Telephone: 07505 951793
- Email: info@ponypartnerships.com
- ICO Registration Number: ZA915120

Pony Partnerships is normally the data controller for information it collects and uses for its own:

- referral and suitability decisions;
- service and therapy delivery;
- safeguarding and safety;
- attendance, reports and reviews;
- complaints;
- contractual administration; and
- financial administration.

This means that we decide why and how that information is used.

A school, local authority, commissioner, healthcare provider or other organisation may separately be the controller for information it collects and uses for its own purposes.

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Data-protection questions, rights requests and complaints should be sent to:

- Data Protection Lead: Danielle Mills
- Email: info@ponypartnerships.com
- Address: Pony Partnerships CIC, c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY

7. Information We May Collect

The information we collect depends on the person, service and placement.

It may include:

- Contact and identity information
 - names, preferred names and dates of birth;
 - addresses, telephone numbers and email addresses;
 - parent, carer and emergency-contact details;
 - authorised collection and handover contacts; and
 - referrer, professional and commissioner details.
- Referral and placement information
 - the reason for referral;
 - the requested service and intended outcomes;
 - participant views and preferences;
 - suitability and onboarding information;
 - session dates, attendance and absence;
 - engagement, progress, reports and reviews; and
 - relevant previous or current support.
- Education and support information
 - school or education setting;
 - attendance and year group;
 - Education, Health and Care Plan information;
 - SEND and support plans;
 - communication, sensory and learning needs;
 - supervision or support arrangements; and
 - reasonable adjustments.
- Health and medical information
 - physical and mental health information;
 - disability;
 - allergies, asthma and anaphylaxis;
 - medication and emergency-medication arrangements;
 - healthcare, Allergy and Asthma Action Plans;
 - dietary requirements;
 - emergency arrangements; and
 - relevant medical incidents or near misses.
- Safeguarding, welfare and risk information
 - current safeguarding concerns and statutory arrangements;
 - social-care involvement;
 - risk assessments and support plans;
 - relevant family or living circumstances;
 - risks relating to self-harm, exploitation, violence, coercion or going missing;
 - relevant substance or alcohol information;
 - accidents, incidents and welfare concerns; and
 - relevant legal, offending, police, bail or court information.

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We ask for current and relevant information only. Unrelated historical information that does not affect the service, current risk or safe delivery should not be provided.

- Therapy and session information
 - assessment and suitability information;
 - therapy or participant agreements;
 - session notes and therapeutic records;
 - attendance and engagement;
 - reviews, reports, endings and transfers; and
 - safeguarding and information-sharing decisions.
- Contractual and financial information
 - commissioning and contract contacts;
 - Service Level Agreements;
 - purchase orders, cost codes and payment references;
 - invoice details;
 - cancellation and session records; and
 - payment and contractual correspondence.
- Other sensitive information
 - Where relevant and voluntarily provided, we may also receive information about:
 - racial or ethnic background;
 - religion or beliefs;
 - disability;
 - sex, gender identity or sexual orientation;
 - culture and communication preferences;
 - important relationships; and
 - other circumstances relevant to the person's experience of the service.

8. Where Information Comes From

We may receive information from:

- the participant;
- a parent or carer;
- a person with parental responsibility;
- a school, local authority or commissioner;
- a referrer;
- a social worker or safeguarding professional;
- a healthcare professional;
- another service involved with the participant;
- an emergency contact;
- an advocate or authorised representative; or
- another person where receiving the information is necessary and lawful.

We may also receive authorised information through commissioner-operated systems, including CPOMS and Arbor.

We create information through our own work, including session notes, attendance records, assessments, reports, incident records, safeguarding records, complaints, emails and financial records.

Where we receive information about someone from another source, we will normally make this notice available:

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- when we first contact them;
- before we disclose their information to someone else, where relevant; and
- no later than one month after receiving the information,

unless they already have the information or a legal exception applies.

9. Why We Use Information and Our Lawful Bases

We use personal information only where we have a lawful reason.

Purpose	Main lawful basis
Responding to enquiries and assessing referrals	Legitimate interests; steps before entering into a contract where the person is a party
Assessing suitability and planning a service	Legitimate interests; contract where applicable
Delivering therapy, learning, enrichment and support	Contract where the participant is a party; otherwise legitimate interests
Maintaining session, attendance, report and review records	Legitimate interests; contract where applicable
Safeguarding, welfare, health and safety	Legal obligation where a specific duty applies; legitimate interests; vital interests in a serious emergency
Making reasonable adjustments	Legal obligation and legitimate interests
Managing contracts, invoices and payments	Contract, legal obligation and legitimate interests
Handling complaints, quality assurance and legal claims	Legal obligation and legitimate interests
Optional contact methods or exceptional recordings	Consent where this offers a genuine choice

We do not normally rely on the public-task basis simply because a service is funded by a public authority.
Special-category information

Health, disability, racial or ethnic background, religion or beliefs and sexual-orientation information receive extra legal protection.

Where we use this information, we need both:

- a general lawful basis from the table above; and
- an additional condition under data-protection law.

Depending on the purpose, the additional condition may relate to:

- health or social-care provision;
- confidential counselling;
- supporting a person with a disability or medical condition;
- safeguarding children or people at risk;
- protecting life in an emergency;
- legal claims; or
- explicit consent where this is appropriate.

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Where relevant, the Data Protection Act 2018 conditions may include:

- support for people with a disability or medical condition;
- counselling;
- safeguarding children or people at risk; and
- establishing, exercising or defending legal claims.

The exact basis used for each activity is recorded in our internal Record of Processing Activities and Appropriate Policy Document where required.

9.1. Criminal-offence information

Information about allegations, investigations, offences, convictions, court proceedings, bail or legal restrictions will only be used where it is current or otherwise relevant and necessary for:

- safe service delivery;
- safeguarding;
- risk management;
- confidential counselling;
- meeting a legal requirement; or
- establishing, exercising or defending legal rights.

We will identify an Article 6 lawful basis and an appropriate Data Protection Act 2018 Schedule 1 condition. Depending on the purpose, this may include the conditions for counselling, safeguarding or legal claims. Access will be restricted to people who need the information for a lawful purpose.

9.2. What happens if essential information is not provided

A service or placement may be delayed, adapted, paused or unable to begin or continue where essential information is missing, inaccurate, unclear or inconsistent and this creates an unresolved:

- safeguarding concern;
- health or safety concern;
- suitability concern;
- medical concern; or
- contractual concern.

10. Confidentiality and Information Sharing

We keep personal, sensitive, therapeutic and business information confidential.

We may share relevant information where this is necessary and lawful for:

- providing or reviewing the service;
- safeguarding;
- health, safety or emergency response;
- medical care;
- reasonable adjustments;
- attendance or placement arrangements;
- professional supervision or quality assurance;
- meeting a legal or regulatory duty;
- insurance; or
- legal claims.

Information may be shared with:

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- the participant;
- parents, carers or people with parental responsibility;
- authorised advocates or representatives;
- schools, local authorities and commissioners;
- healthcare, social-care and safeguarding professionals;
- emergency services or the police;
- other services involved in the person's care, education or support;
- professional supervisors;
- insurers, accountants and legal advisers;
- regulators and professional bodies;
- approved IT, cloud-storage, forms and accounting providers; and
- a site or venue operator where necessary for safety, safeguarding or an incident.

We share only what is relevant, necessary and proportionate.

10.1. Therapy confidentiality

Detailed therapy-session content is not routinely shared with a commissioner, school, parent, carer or another organisation.

Therapeutic information may be shared where:

- the participant has agreed;
- it is necessary and lawful for delivering or reviewing the service;
- an agreed report requires proportionate information;
- there is a safeguarding, welfare or safety concern;
- the law requires disclosure; or
- another lawful and proportionate reason applies.

Parental responsibility does not automatically give a person access to all detailed therapy-session information.

We take account of:

- the participant's age and understanding;
- consent and assent;
- parental responsibility;
- therapeutic confidentiality;
- safeguarding;
- the reason information has been requested; and
- the rights of other people.

Nothing in this notice prevents necessary action to protect a child, young person or adult at risk.

11. Commissioned Placements, Systems and Security

11.1. Independent controllers

Pony Partnerships and the commissioner normally act as separate independent data controllers.

The commissioner remains responsible for information it uses for its own:

- commissioning and funding;

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- education and attendance;
- safeguarding and statutory duties; and
- contract management.

Pony Partnerships remains responsible for information it uses for its own:

- referral and suitability assessment;
- service and therapy delivery;
- safeguarding and safety;
- attendance, reports and reviews;
- complaints;
- contracts; and
- financial administration.

Any different controller, joint-controller or processor arrangement will be recorded in the relevant agreement.

11.2. Pony Partnerships systems

We use:

- Microsoft Forms for referrals, agreements and structured information collection;
- SharePoint and OneDrive for restricted organisational records;
- Outlook for authorised email communication;
- Xero for invoicing and financial administration;
- approved telephone, text or WhatsApp communication where this has been agreed; and
- locked filing cabinets for authorised paper records.

Material information received through Forms, email or an agreed communication method is transferred to the appropriate secure record where required. Working forms, messages and inboxes are not used as indefinite storage.

11.3. Commissioner-operated systems

For some placements, we are given authorised access to systems operated by a school, commissioner or partner organisation. These may include:

- CPOMS; and
- Arbor, including access provided through Junction 16.

We use these systems only for the agreed purpose and through authorised individual accounts.

The system owner remains responsible for:

- operating and securing the system;
- granting and removing access;
- its own privacy information; and
- retention within its system.

Pony Partnerships remains responsible for:

- how its authorised workers use the system;
- any information downloaded, exported or copied; and
- any separate Pony Partnerships record.

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Any separate copy follows our own retention arrangements.

11.4. Security

We use reasonable and proportionate security measures, including:

- authorised organisational accounts;
- role-based access;
- strong passwords and multi-factor authentication where available;
- approved devices and communication routes;
- secure storage and disposal;
- confidentiality requirements;
- staff guidance and training; and
- prompt reporting of loss, disclosure or unauthorised access.

Personal information must not normally be stored in personal email accounts, personal cloud storage, personal messaging accounts or directly on personal devices.

Paper records are kept in locked filing cabinets and accessed only by authorised people.

11.5. International transfers

Some technology and cloud-service providers operate internationally.

Where personal information is transferred outside the United Kingdom, we will ensure that an appropriate lawful safeguard applies, such as:

- UK adequacy regulations;
- approved contractual safeguards; or
- another lawful transfer arrangement.

Further information about a transfer safeguard may be requested from the Data Protection Lead.

11.6. Third-party CCTV

CCTV operates in some areas of the wider site used by Pony Partnerships. It is operated by the site owner, not by Pony Partnerships.

The site owner is responsible for its operation, signs, access, security and retention.

Pony Partnerships does not routinely operate, view or store this footage. The current site system does not record audio.

Where footage is lawfully supplied to us for safeguarding, health and safety, insurance, investigation or another necessary purpose, we will treat it as personal information and keep it securely.

12. How Long We Keep Information

The UK GDPR does not set one retention period for every record. We set periods according to the purpose, type of service, age of the person, safeguarding considerations, professional requirements, insurance requirements and possible legal claims.

Our standard periods are:

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Record	Standard retention period
Enquiry that does not lead to a service	12 months after closure
Referral that does not lead to a placement	12 months after closure
Referral and onboarding information where a placement begins	Included in the participant record and kept for the applicable service-record period
Adult EFP and psychotherapy records	Eight years after the final session or closure
EFP and psychotherapy records for a child or young person	Until the person's 25th birthday; where the service ends when they are aged 17, until their 26th birthday
EFL, Equine Enrichment, animal-assisted academic support and group-service records	Six years after the service or placement ends
Safeguarding record concerning a child or young person	Until the person's 25th birthday; where the case closes when they are aged 17, until their 26th birthday
Safeguarding record concerning an adult	Eight years after closure
Health, allergy, medication and emergency-plan information	Kept with the relevant participant record; replaced plans are kept only where needed to evidence earlier arrangements, decisions or incidents
Accident or incident record concerning an adult	Six years after closure
Accident or incident record concerning a child	Six years after closure or until the person's 21st birthday, whichever is later
Commissioning agreement, SLA and material contract correspondence	Six years after the agreement ends and all sums are settled
Invoice and financial records	Six years from the end of the relevant company financial year
Formal complaint	Six years after closure, or the longer period applying to any linked safeguarding, therapy, incident or legal record
Data-protection complaint or rights request	Three years after closure; six years where disputed, referred to the ICO or connected with a legal claim
Personal-data breach record	Six years after closure
Exceptionally authorised photograph, video or audio recording	Normally no more than 12 months, unless it forms part of a safeguarding, incident, complaint, insurance or legal record
Working Microsoft Forms response	Normally removed within 90 days after the verified record has been transferred securely

A record may be kept longer where:

- a safeguarding matter remains open;
- a complaint, investigation or legal claim is ongoing or reasonably expected;
- an insurer, court, regulator or professional body requires it; or
- another documented lawful reason applies.

Information will be securely deleted, destroyed or anonymised when it is no longer needed.

Records held solely within commissioner-operated CPOMS or Arbor systems follow the system owner's retention arrangements. Any separate Pony Partnerships copy follows this schedule.

13. Children and Young People

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Children and young people need particular care in relation to their personal information.

We take account of:

- their age and understanding;
- their communication needs;
- their views and wishes;
- parental responsibility;
- consent and assent;
- safeguarding; and
- therapeutic confidentiality.

Where appropriate, we explain directly to the child or young person:

- what information we hold;
- why we need it;
- how it may be used;
- who it may be shared with;
- the limits of confidentiality;
- how long it may be kept; and
- how they can ask a question or raise a concern.

We will provide privacy information in a form suited to the person's age, understanding and communication needs.

14. Your Information Rights

Depending on the circumstances and lawful basis, a person may have the right to:

- be told how their information is used;
- ask for a copy of their information;
- ask for inaccurate information to be corrected;
- ask for information to be deleted in certain circumstances;
- ask us to restrict how information is used;
- object to certain uses;
- receive certain information in a portable format;
- withdraw consent where consent is the lawful basis; and
- challenge certain decisions made solely by automated means.

These rights are not absolute. Safeguarding, confidentiality, legal exemptions and the rights of other people may affect what can be provided, changed or deleted.

Requests should be sent to:

- Data Protection Lead: Danielle Mills
- Email: info@ponypartnerships.com

We may ask for reasonable evidence of identity or authority before responding.

We will respond within the applicable legal timescale and explain if:

- more information is needed;

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- a permitted extension applies;
- only part of a request can be met; or
- a legal exemption applies.

14.1. Your right to object

A person may have the right to object where we rely on legitimate interests.

The person should tell us:

- which use of their information they object to;
- why they object; and
- any circumstances they would like us to consider.

We will consider the objection and explain our decision.

14.2. Automated decision-making

Pony Partnerships does not use solely automated decision-making or profiling to decide:

- whether someone can access a service;
- whether a placement is suitable;
- what support is needed;
- whether there is a safeguarding concern; or
- another matter producing legal or similarly significant effects.

These decisions involve human consideration and professional judgement.

15. Photography, Marketing and Website Use

Pony Partnerships does not use identifiable photographs, video or audio recordings of clients for:

- publicity;
- advertising;
- social-media promotion; or
- online marketing.

15.1. Photography and recording during sessions are not normally permitted.

Where an image or recording is exceptionally needed for an agreed operational, safeguarding, evidence or participant-specific purpose:

- the purpose and legal basis will be identified;
- access will be restricted;
- it will be stored securely;
- it will not remain in personal photo libraries or cloud accounts; and
- it will be deleted when its purpose ends.

Pony Partnerships does not maintain a client marketing mailing list and does not use client information for online advertising or marketing.

Client service records are not stored on the public Pony Partnerships website. Technical website information, such as cookies or security logs, is covered by the website's separate privacy and cookie information where applicable.

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16. Data-Protection Concerns, Complaints and Breaches

16.1. Questions and complaints

Anyone concerned about how we have collected, used, stored, shared or retained personal information may contact:

- Email: info@ponypartnerships.com
- Telephone: 07505 951793
- Post: Pony Partnerships CIC, c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY

A complaint should include, where possible:

- the person's name and contact details;
- what has happened;
- which information or activity is concerned;
- what they would like us to consider; and
- any relevant supporting information.

We will:

- normally acknowledge a data-protection complaint within five working days;
- always acknowledge it within the statutory 30-day period;
- make appropriate enquiries without undue delay;
- investigate fairly and proportionately;
- keep the complainant informed where necessary; and
- explain the outcome and any action taken without undue delay.

Where a complaint concerns Danielle Mills personally or her own handling of information, it will be allocated to an uninvolved Director or another suitably independent person.

A person may also complain to the Information Commissioner's Office.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113

Information about making a complaint is available from the ICO.

16.2. Personal-data breaches

Any actual or suspected personal-data breach must be reported immediately to the Data Protection Lead.

Examples include:

- information sent to the wrong person;
- loss of a device or paper record;
- unauthorised access to an account;
- inappropriate access to CPOMS or Arbor;

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- accidental disclosure of therapy, health or safeguarding information; or
- a cyber incident.

Pony Partnerships will:

- contain and assess the incident;
- protect affected people;
- record what happened and the action taken;
- notify affected people where legally required;
- report the breach to the ICO where legally required; and
- take action to reduce the risk of recurrence.

Where a breach is reportable to the ICO, it will be reported without undue delay and, where feasible, within 72 hours of Pony Partnerships becoming aware of it.

17. Monitoring and Review

Pony Partnerships will monitor:

- information-rights requests;
- complaints and data breaches;
- system and supplier arrangements;
- commissioner-system access;
- security and staff awareness;
- retention and deletion; and
- actions arising from reviews, incidents or complaints.

This notice will be reviewed annually, or sooner where:

- legislation or guidance changes;
- a service, system or supplier changes;
- information-sharing arrangements change;
- an incident or complaint identifies learning;
- insurer or professional requirements change; or
- the Board requests a review.

The current approved version will be published through the Pony Partnerships policy arrangements and made available through relevant forms, referrals, agreements and onboarding processes.

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