



PONY PARTNERSHIPS



Privacy Policy

Name of Organisation: Pony Partnerships

Venue Address for which policy applies: All sites.

Date of last review: 1st September 2025

Date of next review: 31st August 2026

Name of Risk Assessor: Danielle Mills

1. Introduction

Pony Partnerships CIC ("PP", "we", "our", "us") is committed to protecting the privacy and rights of all individuals we work with. This policy explains how we collect, use, store, share, and protect personal data in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant UK law and guidance.

This policy applies to data collected by PP staff and via our own systems and website. It does not cover data collected by third-party organisations or websites linked to us.

For any queries about your personal data or this policy, please contact us:

- info@ponypartnerships.com

2. What Information We Collect

We may collect and process the following categories of personal data:

- Counselling & Therapy Requests – name, address, phone number, email, availability, presenting issues, and relevant background details.
- Assessment Appointments – personal, social, medical, financial, and family history details to support service provision.
- Employment & Volunteering Applications – contact details, employment history, qualifications, references, and DBS status.
- Website & Digital Platforms – usage statistics collected via Google Analytics (anonymised).
- Other Forms – details provided on enquiry forms, consent forms, and communications.
- Special category (sensitive) data such as health information will only be processed where necessary and with your explicit consent, or as permitted by law.

3. Why We Collect and Use Your Data

We use your personal data for the following purposes:

- To provide therapy, counselling, and support services.
- To allocate staff, therapists, and appointments appropriately.
- To notify you of changes to services or appointments.
- To seek feedback and improve our services.
- To manage staff, volunteer, and recruitment processes.
- To comply with safeguarding, health & safety, and legal requirements.
- To maintain records for insurance, accountability, and audit purposes.

We process your data under the following lawful bases:

- Contract – providing services you have requested.
- Consent – where explicit consent is given (e.g. for special category data).
- Legal obligation – to comply with safeguarding, employment, and regulatory duties.
- Legitimate interests – to manage and improve services, ensure security, and protect our clients and staff.

4. Data Sharing

We will not sell your data or share it unnecessarily. Data may be shared where:

- With consent – where you ask us to share information with a professional, carer, or third party.
- Safeguarding / serious harm – where there is risk of harm to yourself or others.
- Legal requirement – where required by law, regulators, or courts.
- Where we use third-party providers (e.g. IT services, cloud storage), they are bound by confidentiality and data processing agreements.

5. How We Keep Your Data Safe

- Paper records are stored in locked cabinets.
- Electronic records are encrypted and password-protected.
- Session notes are stored separately from personal identifiers.
- Access to data is restricted to authorised staff only.
- We regularly review security practices in line with ICO guidance.

Retention:

- Client notes and documentation: kept for 3 years after counselling ends.
- Contact details: retained for 7 years after last contact (unless required longer for safeguarding or legal obligations).
- Recruitment & HR data: retained as per safer recruitment and employment law requirements.

6. Your Rights

You have the right to:

- Access the data we hold about you.
- Request correction of inaccurate data.
- Request erasure of your data (where lawful).
- Restrict or object to processing.
- Data portability (to obtain and reuse your data for your own purposes).
- Withdraw consent at any time (although this may affect service delivery).

If you are unhappy with how we handle your data, you can complain to the Information Commissioner's Office (ICO): www.ico.org.uk/03031231113.

7. CCTV

CCTV on the wider site is owned and managed by Etwall Alpacas, not Pony Partnerships CIC.

- Purpose: To monitor animal welfare and site safety.
- Locations: Entrance to alpaca barn; tree near rabbit enclosure (opposite Highfields Education).
- Access: Only Etwall Alpacas directors can view recordings.

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- Retention: Images deleted within 30 days unless required for an investigation.
- Signage: Clear notices are in place.
- Compliance: ICO rules, Data Protection Act 2018, and the Surveillance Camera Code of Practice (2021).

No audio is recorded. Pony Partnerships CIC does not access, manage, or store these recordings.

8. Changes to This Policy

This policy will be reviewed annually or sooner if legislation, guidance, or practice changes. Significant updates will be communicated via our website.

Further Resources

- Data Protection Act 2018
- UK GDPR
- Privacy and Electronic Communications Regulations (PECR) 2003
- ICO Guidance: www.ico.org.uk
- Surveillance Camera Code of Practice (2021)

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