

# Pony Partnerships CIC



## Privacy and Data Protection Policy 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

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### 1. Policy Statement

Pony Partnerships CIC is committed to protecting the privacy, confidentiality and personal information of all individuals who engage with our services.

We recognise the importance of handling personal information lawfully, fairly, transparently, and securely.

This policy explains how Pony Partnerships CIC manages personal information and fulfils its responsibilities under data protection legislation.

### 2. Purpose

This policy aims to:

- protect personal information;
- ensure compliance with data protection legislation;
- promote confidentiality and information security;
- explain individual rights relating to personal information;
- provide a framework for responding to data protection concerns and breaches;
- support safe and lawful information sharing.

### 3. Scope

This policy applies to personal information relating to:

- participants;
- parents and carers;
- staff;
- associates;
- volunteers;
- directors;
- contractors;
- commissioners;
- partner organisations.

It applies to all personal information held by Pony Partnerships CIC, whether stored electronically, in paper records or through approved cloud-based systems.

This policy also explains how CCTV or other surveillance operated by a third-party site owner may affect people attending Pony Partnerships services, and how Pony Partnerships will manage any footage that is subsequently shared with us.

#### 4. Legal Framework

This policy has been developed with regard to relevant UK data protection legislation, statutory guidance and recognised good practice.

This includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025, together with relevant safeguarding and information-sharing guidance.

Where information is shared for safeguarding purposes, Pony Partnerships CIC will also have regard to Keeping Children Safe in Education 2026, Working Together to Safeguard Children and statutory information-sharing guidance.

Pony Partnerships CIC will process personal information lawfully, fairly, transparently, and securely.

This policy will be reviewed to reflect changes in legislation, regulatory guidance, and organisational practice.

#### 5. Data Protection Principles

Pony Partnerships CIC will ensure that personal information is:

- processed lawfully, fairly, and transparently;
- collected for specified and legitimate purposes;
- adequate, relevant, and limited to what is necessary;
- accurate and kept up to date;
- retained only for as long as necessary;
- stored securely;
- protected against unauthorised access, loss, misuse, or disclosure.

These principles apply to all personal information processed by the organisation.

#### 6. Information We May Hold

Depending on the nature of our services, Pony Partnerships CIC may process information including:

- contact details;
- emergency contacts;
- referral information;
- attendance and engagement records;
- safeguarding information;
- risk assessments;
- health and medical information;
- allergy information, Allergy Action Plans, Asthma Action Plans, Individual Healthcare Plans, medication consent forms, medication administration records, emergency medication information, and allergy incident or near miss reports;
- therapy and support records;
- educational or placement information;
- employment and recruitment records;
- financial information where necessary.

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Only information that is necessary for the provision of services or organisational functions will be collected.

## 7. Lawful Processing

Pony Partnerships CIC will identify an appropriate lawful basis for processing personal information. Depending on the circumstances, this may include:

- consent;
- contractual obligations;
- legal obligations;
- vital interests;
- public task;
- legitimate interests.

Where special category information is processed, an appropriate additional condition will also be identified.

## 8. Confidentiality

All staff, associates, volunteers, and directors have a responsibility to maintain confidentiality.

Information will only be shared where:

- there is a lawful basis to do so;
- consent has been obtained where required;
- safeguarding concerns make sharing necessary;
- a legal obligation exists;
- disclosure is otherwise justified and proportionate.

Confidential information must not be discussed inappropriately or shared with unauthorised individuals.

## 9. Information Sharing

Pony Partnerships CIC may share information with:

- parents and carers;
- schools and educational settings;
- local authorities;
- health professionals;
- safeguarding agencies;
- commissioners;
- regulatory bodies.

Relevant allergy, medical and emergency medication information may be shared with staff, schools, commissioners, emergency services, or health professionals where necessary to support safety, medical care, safeguarding, or emergency response.

Information sharing decisions will be made lawfully, proportionately and in the best interests of the individual.

Where safeguarding concerns arise, information may be shared without consent where this is necessary to protect a child, young person, or adult at risk.

When sharing safeguarding information, Pony Partnerships CIC will consider what information is relevant to

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the current risk, what is necessary for the receiving person or organisation to know, and whether the information is clearly presented and appropriately contextualised.

## 10. CCTV and Third-Party Surveillance

CCTV operates in some areas of the wider site used by Pony Partnerships CIC. The CCTV system is operated independently by the site operator and is not operated or routinely accessed by Pony Partnerships.

The site operator is responsible for:

- determining the purpose and lawful basis for the CCTV system;
- ensuring appropriate signage and privacy information are provided;
- controlling access to recordings;
- securing and retaining footage appropriately;
- responding to requests concerning CCTV footage.

Pony Partnerships will make reasonable efforts to ensure that participants, families, staff and visitors are aware where CCTV operates at a venue used for Pony Partnerships activities.

Pony Partnerships does not routinely view, manage or store CCTV recordings.

Where CCTV footage is provided to Pony Partnerships for a lawful and necessary purpose, such as:

- safeguarding;
- investigating a serious incident;
- health and safety;
- insurance;
- responding to police or another lawful authority;

the footage will be treated as personal information and handled securely in accordance with this policy.

Pony Partnerships will only request or retain CCTV footage where this is necessary and proportionate.

No audio is recorded by the current site CCTV system.

Current site-specific CCTV arrangements, including the operator and monitored areas, are maintained within the relevant Site Operations File.

## 11. Children's Information

Pony Partnerships CIC recognises that children and young people require particular protection regarding their personal information.

Information relating to children will be managed with additional consideration for:

- safeguarding;
- confidentiality;
- parental responsibility;
- the child's age and understanding;
- legal requirements.

Allergy and medical information relating to children will be treated as sensitive health information and shared only where necessary to support safety, care, safeguarding, emergency response, or legal

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obligations.

Where appropriate, children and young people will be supported to understand how their information is used.

## 12. Records Management and Retention

Records will be:

- stored securely;
- accessible only to authorised individuals;
- retained in accordance with organisational retention schedules;
- disposed of securely when no longer required.

Retention periods will take account of legal, safeguarding, clinical and operational requirements.

Medical, allergy, and medication records will be retained and disposed of in line with organisational retention arrangements, safeguarding requirements and any relevant legal or clinical considerations.

Where safeguarding information is transferred or shared with another setting, Pony Partnerships will aim to provide a clear structured summary of current concerns, relevant context, and ongoing support needs, distinguishing current risk from historic information where appropriate.

## 13. Individual Rights

Individuals have rights under data protection legislation, including:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure in certain circumstances;
- the right to restrict processing;
- the right to object;
- the right to data portability where applicable;
- rights relating to automated decision-making.

Pony Partnerships CIC will respond to requests in accordance with legal requirements.

## 14. Subject Access Requests

Individuals may request access to personal information held about them.

Requests should be submitted in writing wherever possible.

Pony Partnerships CIC will:

- verify identity where required;
- respond within the applicable legal timescale;
- provide information unless an exemption applies.

Further guidance regarding Subject Access Requests is available from the organisation upon request.

## 15. Data Protection Concerns and Complaints

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Individuals who have concerns about how their personal information has been collected, used, stored, or shared are encouraged to raise those concerns with Pony Partnerships CIC in the first instance.

Concerns may relate to:

- confidentiality;
- information sharing;
- record accuracy;
- retention of information;
- access to records;
- data security.

Where appropriate, concerns will be investigated under the organisation's data protection procedures.

Complaints about services, staff conduct or organisational decisions should normally be managed through the Complaints and Feedback Policy.

Where a concern relates solely to CCTV operated by an independent site owner or venue, Pony Partnerships will explain this and, where appropriate, provide or signpost to the relevant operator's contact details. Where Pony Partnerships has received or used CCTV footage itself, concerns about our handling of that footage will be managed under this policy.

## 16. Data Breaches

Any actual or suspected data breach must be reported immediately.

Examples include:

- lost devices;
- unauthorised disclosure of information;
- cyber incidents;
- accidental sharing of records;
- unauthorised access to information;
- accidental or unauthorised disclosure of allergy, medical, medication, Individual Healthcare Plan, Allergy Action Plan, or emergency contact information.

Pony Partnerships CIC will investigate data breaches promptly and take appropriate action to reduce risk and prevent recurrence.

Where required by law, breaches will be reported to the Information Commissioner's Office (ICO) and affected individuals. Where a personal data 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. Information Commissioner's Office

If an individual remains dissatisfied after Pony Partnerships CIC has considered a data protection concern, they may contact the Information Commissioner's Office (ICO).

The ICO is the UK's independent authority responsible for upholding information rights and data protection legislation.

## 18. Responsibilities

- Board of Directors: Responsible for ensuring appropriate data protection arrangements are in place and reviewed regularly.

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- CEO: Responsible for overseeing implementation of this policy and responding to significant data protection concerns.
- Staff, Associates, Volunteers and Directors: Responsible for handling information appropriately, maintaining confidentiality, following organisational procedures, and reporting concerns or breaches promptly.
- Participants, Families and Service Users: Responsible for providing accurate information and informing Pony Partnerships CIC when personal information changes.

## 19. Monitoring and Review

Pony Partnerships CIC will review:

- data protection arrangements;
- information security incidents;
- complaints and concerns;
- retention arrangements;
- staff training needs.

Learning from incidents and feedback will be used to improve practice.

## 20. Review

This policy will be reviewed annually, or sooner if:

- legislation changes;
- regulatory guidance changes;
- organisational arrangements change;
- a significant incident identifies a need for review.

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