

# **Data Protection & Privacy Policy**

Name of Organisation: Pony Partnerships Venue Address for which policy applies: All venues. Date of last review: 1<sup>st</sup> September 2024 Date of next review: 31<sup>st</sup> August 2025 Name of Author: Danielle Mills

Any personal data provided by you to Pony Partnerships CIC Limited through any means (verbal, written, in electronic form, or by your use of our website) will be held and processed in accordance with the data protection principles set out in the Data Protection Act 2018 and the <u>EU GDPR guidance</u> for the purposes of providing the services you have requested from us, and to meet the legitimate interests of the business.

#### Introduction

Pony Partnerships CIC Limited (the 'data controller', referred to below as "PP", "us" or "we") is committed to protecting your privacy. Please read the following in order to learn more about PP's privacy policy and our information collection and use practices.

This policy only applies to data collected by PP staff and via our own forms and website. Third party agents, and websites which are linked to ours, are not covered by this policy, please read individual privacy policies detailed below.

If you have any queries concerning your personal information or any questions on our use of the information, please contact us at info@ponypartnerships.com or send us mail to Pony Partnerships CIC, c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY.

When you request services with PP or otherwise provide your personal details to us, you will be asked to consent to our processing of your data under the terms of this policy.

#### What information do we collect?

- Psychotherapy & Counselling Requests Registering with us to request access to our counselling service can be done online, on paper or in person. Our request process involves providing us with your name, address, telephone numbers and email address. We may also request information on your availability, therapeutic issues, and other details which we deem relevant to processing your request.
- Initial Assessment Appointments At an initial appointment we ask about your current personal, social, medical, and financial circumstances. We may also ask about your background and family history, as well as the issues which are affecting you now. We require this information so that we can decide about our offer of counselling to you, to assign you to a counsellor, and to manage the service we provide to you.
  - Job opportunities In order to apply for job opportunities advertised on our website and

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elsewhere, you may be required to provide your contact details and other personal information contained in your CV (such as employment history and qualifications). This information is only processed for the purpose of considering your job application and making any offer of employment.

- Website We use Google Analytics to collect anonymous data relating to user behaviour and 'web traffic' statistics. The collection and use of this data by Google Inc. is subject to their own Privacy Policies.
- Other Forms The information you give us on our forms (including all enquiry and application forms) may include your name, postal address, email address, phone number and other messages to us.

#### What do we use your information for?

We use information held about you in the following ways:

- To provide clients with the professional psychotherapy & counselling service requested from us.
- To enable us to offer appropriate opportunities and support to our counsellors & psychotherapists.
- To offer suitable psychotherapy & counselling appointments, and to allocate clients and counsellors for counselling & psychotherapy.
- To notify you about changes to your appointments and other changes to our services.
- To seek feedback from you on your experience of counselling & psychotherapy services with us.
- To improve our service to ensure that it is provided in the most effective manner for you and for us.
- To administer our service, including the arrangement of appointments and for financial control, data analysis, research, statistical and survey purposes.
- To keep in touch with those who ask us to, for the purposes of organisational, service, and professional development.

#### What information do we share?

We will not share any information about you with other organisations or people, except in the following situations:

- Consent PP may share your information with professional carers or others whom you have requested or agreed we should contact.
- Serious harm PP may share your information with the relevant authorities if we have reason to believe that this may prevent serious harm being caused to you or another person.
- Compliance with law PP may share your information where we are required to by law or by the regulations and other rules to which we are subject.

## How do we keep your information safe?

All information you provide to us is stored as securely as possible. All paper forms and correspondence are kept in locked filing cabinets on our premises. All electronic records are stored on an encrypted computer, all access to which requires password-protected authentication, or by reputable service providers using secure internet 'cloud' technology.

Unfortunately, the transmission of information via the internet is never completely secure. Although we will do our best to protect your information using industry-standard protocols and encryption, we cannot guarantee the security of your data transmitted to us via email, including forms completed on our website which are transmitted by email; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your identifiable personal information is kept separately from any session notes and other descriptive material. Client notes and other documentation are destroyed 3 years after the end of counselling, and personal contact details are destroyed/deleted after 7 years of no contact or updates.

We are registered with the Information Commissioners Office (ICO) and will keep this registration up to date.

# Your rights

You have the right to ask us to provide a copy of the information held by us in our records, for which we may charge a small fee. You also have the right to require us to correct any inaccuracies in your information. If you would like to do this, please contact us at info@ponypartnerships.com or send us mail to Pony Partnerships CIC, c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY.

You may withdraw your consent for us to hold and process your data at any time. However, if you do this while actively receiving counselling at PP, your counselling will have to end. You can withdraw your consent by contacting us at info@ponypartnerships.com or send us mail to Pony Partnerships CIC, c/o 84 Cheal Close, Shardlow, Derby, DE72 2DY.

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This section sets out the use and management of CCTV equipment and images to ensure compliance with the Information Commissioners Office (ICO), the Data Protection Acts of 1998 and 2018. There will also be compliance with the guiding principles of the Surveillance Camera Code of Practice as updated in 2021. The existence of CCTV cameras is to monitor animal welfare and safety. The CCTV cameras do no record audio.

Location and Signage: There are currently two places on the wider site with CCTV surveillance. The cameras are positioned in:

- The entrance to the alpaca barn
- A tree near the entrance to the rabbit enclosure opposite Highfields Education

There is clear signage at both locations informing people that they may be recorded. The cameras are owned by Etwall Alpacas and their directors are the only people with access to the recordings. They will periodically check the equipment and ensure that any images are deleted within 30 days. They will only view the recorded images to monitor animal welfare and safety. Under no circumstances will they disclose or retain copies of the recorded images unless required to do so for an official investigation. Images will be stored on recording equipment that will be securely protected. Footage is password protected and only the authorised users stated above will be able to access the data.

There will be a review annually or sooner if the need arises to review the systems in place. This will ensure that legal requirements, policies and standards are complied with alongside any developments or changes to the existing legislation

## Changes to this policy

We may edit this policy from time to time. If we make any substantial changes, we will notify you by posting a prominent announcement on our website.

## **Resources and Further Reading**

Data Protection Data Protection Act 2018 Privacy of Electronic Communications Regulations 2003 Facebook Privacy Policy Google Privacy Policy LinkedIn Privacy Policy Xero Privacy Policy Microsoft Privacy Policy Instagram Privacy Policy Surveillance Camera Code of Practice Canva Privacy Policy Information Commissioners Office (ICO)