



MANAGING INFORMATION POLICY

At The Pony Club we use personal data and information every day. We couldn't operate without it. So, all our Pony Club staff and volunteers must make sure that they collect and use information appropriately, and store it safely. This is a legal requirement, which protects the privacy of our members, volunteers, customers and staff.

This *Managing Information* policy comes into effect on 25 May 2018. It may also be referred to as a *Data Protection* policy.

What do we use personal data and information for?

The Pony Club needs to keep personal data about its employees, members and volunteers, in order to:

- Deliver Pony Club services to its membership
- Safely recruit and develop volunteers and staff
- Monitor health and safety
- Deliver Pony Club services to our members.
- Ensure that the Pony Club complies with its statutory obligations.

Does this policy apply to everyone at Pony Club?

Yes. This public-facing policy sets out how the Pony Club ensures that all our information is managed appropriately. It must be followed by all volunteers and staff who handle Pony Club information and personal data. It applies to the entire Pony Club organisation, including Areas and Branches. References in this policy to 'Pony Club' should be read as referring to Pony Club, Areas and Branches collectively.

How do I use this policy?

You must refer to the related statements, procedures and guidance and comply with them.

Some specialist terms (such as 'data controller', 'personal data') are defined in the appendix.

What does this Managing Information Policy cover?

This policy covers governance and compliance, data protection, records management and information security. Explore these concepts in more detail below.



Governance and compliance

This means the actions The Pony Club will take to make sure this policy is followed.

Who is accountable for this policy in The Pony Club, and responsible for it being followed across the organisation?

- **Board of Trustees (level 1)**

The Board of Trustees will approve this policy and related policies, and is ultimately accountable for compliance across The Pony Club.

- **Executive Team (level2)**

The Executive Team allocates a person to be ultimately responsible for compliance across The Pony Club. This person will be the Finance and Operations Director.

- This person must have understanding of the relevant information governance legislation.
- This person will be the point of contact with the Information Commissioner's Office (ICO) and for any queries about the policy for staff, members, volunteers and the public.

- **The Information Commissioner's Office**

The Pony Club as a body corporate is registered as a Data Controller with the Information Commissioner's Office (ICO).

The registration number is: Z6167202 Annual renewal date: 9th December 2018

The Pony Club is obliged to notify the ICO of any significant data protection incident. Any such notifications, and the terms of The Pony Club's registration, shall be reviewed annually by the Executive Team.



Data protection

Data protection means how we make sure personal data is kept confidential and used appropriately.

Data protection principles

The Pony Club is committed to ensuring the appropriate use and management of personal information. We follow the data protection principles and requirements to make sure that personal data is:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. For example, if collecting data to allow a child to join The Pony Club, it is unnecessary to collect any personal data about their parents other than contact details.
- Accurate and, where necessary, kept up to date.
- Not kept for longer than is necessary.
- Processed in accordance with the rights of the data subject.
- Compliant with the data security principles set out in the GDPR legislation.

Legal basis for processing personal data

The Pony Club must have a legal basis to collect and use personal data, within data protection law there are six legal bases. The Pony Club makes use of the most appropriate legal basis when processing different categories of personal data for different purposes. The Pony Club privacy notice states what basis is used and when.

Data protection law - an individual's rights

The Pony Club respects the following legal rights of individuals whose personal data it holds:

- The right of access
- The right of rectification
- The right of erasure
- The right to restrict processing
- The right to object
- The right of portability



Records management

The Pony Club has a duty to keep some employee, member and volunteer personal data for a period of time after they have left The Pony Club. This is mainly for legal reasons, but also for other purposes, for example so we can provide references and for historical and statistical research. Different categories of data may be kept for different periods of time.

The Pony Club will not keep personal data for longer than is necessary for the purpose it was originally collected for. This means that data will be destroyed or erased from our systems when it is no longer required, as set out in a data retention schedule.

Information security

As Pony Club staff and volunteers, if you process information on behalf of The Pony Club you are responsible for making sure that data security is maintained, in line with the managing information policy and any related The Pony Club procedures.

The Pony Club will ensure that appropriate technical and organisational measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

What are The Pony Club's corporate responsibilities?

The Pony Club commits to:

- Implement this policy and make sure it remains compliant with data protection legislation.
- Co-operate with the relevant regulatory bodies and name a contact point.
- Give appropriate guidance and training to The Pony Club employees and volunteers to help you to comply with this policy.
- Make sure that personal data is destroyed safely (in line with Pony Club's data retention schedule).
- Systematically identify and respond to any data protection queries which may arise.
- Handle all requests and complaints from data subjects relating to Pony Club's use of their personal data.
- Use a risk-based approach to its processing activities. This will include the use of data protection impact assessments (DPIA) for high-risk processing activities where necessary.
- Maintain and be able to give the relevant regulatory bodies, organisational records and evidence of the following practices:
 - Name and details of the organisation
 - Purposes of the data processing
 - Description of the categories of individuals and categories of personal data being processed
 - Categories of recipients of personal data when disclosed
 - Details of transfers to parties outside the European Union including documentation of the transfer mechanism safeguards in place
 - Data retention schedules
 - Description of technical and organisational security measures



What are The Pony Club volunteer or staff responsibilities?

As a volunteer or member of Pony Club staff, if you process personal data you must:

- Follow this policy and relevant procedures whenever personal data is being used for planning and delivering Pony Club activities.
- Follow Pony Club procedures, guidance and codes of practice about the collection and use of personal data.
- Think about why you need to handle personal data and make sure you use as little data as you need to carry out your task.
- Reduce as much as possible the likelihood of data breach (i.e. personal data being lost, inappropriately shared or disclosed, altered, destroyed, or published without permission), by maintaining good data handling practices with adequate control measures in place.
- Report any data breaches to the Chief Executive immediately on discovery.
- Establish, maintain and follow guidance around effective systems for reporting, monitoring and responding to any emergencies that could arise in relation to data protection.
- Make sure that personal data is destroyed safely at the appropriate time (in line with Pony Club's data retention schedule).
- Inform your line manager or Area Representative and the Chief Executive immediately if you receive a request from a data subject for information held or used about them.

Appendix: Definitions

See the section below for definitions of key terms referred to in this policy.

- **Data controller**

Definition: A person or an organisation who alone, or with others, decides how and why collected data will be used.

- **Data breach**

Definition: An act or occurrence which causes the loss, destruction, erasure, alteration of personal data; or the unauthorised disclosure, sharing use or publication of personal data.

Examples:

- Emailing personal data (information) to the wrong person
- Leaving personal data unsupervised or in a public place where others can access it

- **Data subject**

Definition: A data subject is a living individual who is the subject of the personal data.

Example:

- A member
- A young member
- A parent/guardian
- A member of staff
- A volunteer

- **Personal data**

Definition: Any information relating to an identifiable person (a 'data subject'). Personal data also includes special category personal data: any permanent characteristics of a person's physical, physiological, genetic, mental, cultural or social identity.

Examples:

- Name, address etc.
- Telephone number
- Email address
- IP address
- Photograph
- Disability or health data
- Gender



- **Data processing**

Definition: The use, collection, storage and disposal of personal data.

Examples:

- Storing data
- Sharing member information by email
- Destroying information when no longer required

- **GDPR**

Definition: General data protection regulation. The UK embodiment of EU data protection legislation, enforceable from 25 May 2018.