



Data Protection Policy

For

Wenlo

Riding for the disabled Group

Address: Meadow School of Riding, Deans Lane, Nr
Woodhouse Eaves, Loughborough, Leicestershire,
LE12 8TE

Registered Charity No: 1073408

A. Purpose & Background

In the course of carrying out its normal activity, RDA needs to collect and use certain types of information about participants, their families and/or carers, volunteers, supporters and other individuals who come into contact with the Group.

The purpose of this policy is to enable RDA to:

- Comply with the law in respect of the data it holds about individuals;
- Follow good practice;
- Protect RDA's participants, volunteers, supporters, staff and other individuals;
- Protect the organisation from the consequences of a breach of its responsibilities.

B. Scope

This policy applies to information relating to identifiable individuals, which is held by RDA Wenlo Group and does not apply to information gathered and held by RDA National.

C. Policy Statement

RDA will:

- Comply with both the law and good practice;
- Respect individuals' rights;
- Be open and honest with individuals whose data is held;
- Provide training and support for staff and volunteers who handle personal data, so that they can act confidently and consistently.

RDA recognizes, that its first priority under the Data Protection Act is to avoid causing harm to individuals. In the main this means:

- Keeping information securely in the right hands;
- Holding good quality information.

D. Data Protection Principles

RDA regards the lawful and correct treatment of personal information as very important and therefore works to ensure that personal information is treated lawfully and correctly. To this end RDA fully endorses and adheres to the Principles of Data Protection, as detailed in the Data Protection Act 1998.

Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, RDA will seek to give individuals as much choice as is possible and reasonable, over what data is held and how it is used.

Specifically, the Principles require that personal information:

1. Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met where stipulated;
2. Shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
3. Shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed;
4. Shall be accurate and, where necessary, kept up to date;
5. Shall not be kept for longer than is necessary for that purpose or those purposes;
6. Shall be processed in accordance with the rights of data subjects under the Act;
7. Appropriate technical and organisational measures shall be taken against unauthorized, or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data;
8. Shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

In order to meet the conditions set out above, RDA will, through appropriate management, application of criteria and controls:

1. Observe fully conditions regarding the fair collection and use of information;
2. Meet its legal obligations to specify the purposes for which information is used;
3. Collect and process appropriate information, and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
4. Ensure the quality of information used;
5. Apply checks to determine the length of time information is held;
6. Ensure that the rights of people about whom information is held, can be fully exercised under the Act. (These include: the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as wrong information);
7. Take appropriate technical and organisational security measures to safeguard personal information (all personal information will either be stored in locked cabinets or on a secured and a suitably protected database);
8. Ensure that personal information is not transferred abroad without suitable safeguards;
9. Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information & set out clear procedures for responding to requests for information.

In addition, RDA will ensure that:

1. There is someone with specific responsibility for Data Protection. The Group's Data Protection Officer is as listed in Annex 1;
2. Everyone managing and handling personal information understands that they are responsible for following good data protection practice;
3. Everyone managing and handling personal information is appropriately supervised;

4. Queries about handling personal information are promptly and courteously dealt with;
5. Methods of handling personal information are clearly described;
6. A regular review and audit is made of the way personal information is held, managed and used;
7. Methods of handling personal information are regularly assessed and evaluated;
8. A breach of the rules and procedures identified in this policy by a member of staff or volunteer may lead to disciplinary action being taken.

More specific information about key areas is listed below.

E. Accuracy of data

RDA Wenlo Group may hold separate registers of their participants, volunteers and supporters.

RDA will, from time to time, review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- IT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.
- Data on any individual will be held in as few places as necessary, and all staff and volunteers will be discouraged from establishing unnecessary additional data sets.
- Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.
- Staff or volunteers who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.

F. Retention of data

RDA will establish retention periods for at least the following categories of data:

- Participants
- Volunteers
- Supporters
- Suppliers
- Staff

G. Consent

Consent will normally not be sought for most processing of information about staff or volunteers, with the following exception:

- Staff details will only be disclosed for purposes unrelated to their work for RDA (e.g. financial references) with their consent.

Information about volunteers will be made public according to their role, and consent will be sought for:

- a) The means of contact they prefer to be made public, and
- b) Any publication of information which is not essential for their role.

Information about participants and supporters will only be made public with their consent. (This includes photographs.)

‘Sensitive’ data about participants and supporters (including health information) will be held only with the knowledge and consent of the individual.

H. Marketing

RDA will treat the following unsolicited direct communication with individuals as marketing:

- Seeking donations and other financial support;
- Promoting any services;
- Promoting events;
- Promoting forms of “membership” to supporters;

- Promoting sponsored events and other fundraising exercises;
- Marketing on behalf of any other external company or voluntary organisation.

Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opt out. If it is not possible to give a range of options, any opt-out, which is exercised will apply to all RDA marketing.

RDA has the policy of not sharing lists, with the exception of carrying out occasional joint mailings, where there is a clear affinity between the parties, such joint mailing will only be carried out on a tightly-controlled basis.

RDA undertakes to obtain external lists only where it can be guaranteed that the list is up to date and those on the list have been given an opportunity to opt out.

Appendix 1 - RDA Specific Information

Data Controller for Wenlo Group is:

Appendix 2 - Privacy Statement

When you request information from RDA, sign up to any of our services or buy things from us, RDA obtains information about you. This statement explains how we look after that information and what we do with it. We have a legal duty under the Data Protection Act to prevent your information falling into the wrong hands. We must also ensure that the data we hold is accurate, adequate, relevant and not excessive. Normally the only information we hold comes directly from you. Whenever we collect information from you, we will make it clear which information is required in order to provide you with the information, service or goods you need. You do not have to provide us with any additional information unless you choose to. We store your information securely on our computer system, we restrict access to those who have a need to know, and we train our staff in handling the information securely. We would also like to contact you in future to tell you about other services we provide, and other ways in which you might like to support RDA. You have the right to ask us not to contact you in this way. We will always aim to provide a clear method for you to opt out. You can also contact us directly at any time to tell us not to send you any future marketing material. Very occasionally we carry out a joint mailing with carefully selected other organisations, in order to tell you about products and services we think you might be interested in. Again, you have the right to opt out of this. You have the right to a copy of all the information we hold about you (apart from a very few things which we may be obliged to withhold because they concern other people as well as you). To obtain a copy, either ask for an application form to be sent to you, or write to the Data Protection Officer at the Group.

Appendix 3 - Confidentiality Statement for Staff and Volunteers

When working for RDA, you will often need to have access to confidential information which may include, for example:

- Personal information about individuals who are participants, volunteers, supporters or otherwise involved in the activities organised by RDA.
- Information about the internal business of RDA.
- Personal information about colleagues working or volunteering for RDA.

RDA is committed to keeping this information confidential, in order to protect people and RDA itself. 'Confidential' means that all access to information must be on a need to know and properly authorised basis. You must use only the information you have been authorised to use and for purposes that have been authorised. You should also be aware that under the Data Protection Act, unauthorised access to data about individuals is a criminal offence. You must assume that information is confidential unless you know that it is intended by RDA to be made public. Passing information between a Group and the National Office, or between RDA and a mailing house, or vice versa does not count as making it public, but passing information to another organisation does count. You must also be particularly careful not to disclose confidential information to unauthorised people or cause a breach of security.

In particular you must:

- Not compromise or seek to evade security measures (including computer passwords);
- Be particularly careful when sending information between the National Office and Groups;
- Not gossip about confidential information, either with colleagues or people outside RDA;
- Not disclose information — especially over the telephone — unless you are sure that you know who you are disclosing it to, and that they are authorised to have it.

If you are in doubt about whether to disclose information or not, do not guess. Withhold the information while you check with an appropriate person whether the disclosure is appropriate. Your confidentiality obligations continue to apply indefinitely after you have stopped working or volunteering for RDA.



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I have read and understand the above statement. I accept my responsibilities regarding confidentiality.

Signed:

Print Name:

Date:

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