

Date: 19 July 2019

For: Employees/volunteers, students, members



Children's Privacy Policy

Ride High is committed to keeping personal information safe and to being clear about how personal information will be collected, looked after and used. Ride High has a general Privacy Policy (available on our website, www.ridehigh.org) that applies in all circumstances but in addition to that, this Children's Privacy Policy deals specifically with any child's personal information that we receive. This Policy sets out how we collect, use and protect a child's personal information. We promise to respect any child's personal information shared with us and to keep it safe; and in all other respects to comply with the GDPR (General Data Protection Regulation) 2018 and all other relevant data protection legislation so that the personal information we hold is:

- adequate, relevant and not excessive;
- accurate and up to date; and
- only kept for as long as is necessary.

What personal information we collect and how and why we collect it

We need to collect certain personal information about the children who are referred to us for our services. When a referral is made to us, a referral form is completed by the referrer and this contains personal information about the child. We require this information to assess whether the service offered by Ride High is suitable for the child and whether he/she qualifies for acceptance on to the Ride High programme (for further information about this, please see our Entrance, Progression and Exit Policies also available on our website), and then to process the referral if appropriate through to membership. Should the child become a member of Ride High, the information will be used for our membership records and to assist in the day to day running and administration of Ride High and our activities.

The consent of the child's parent/carer is required before a referral is made.

Once a child has been accepted on to the Ride High programme, we require his/her parent/carer to complete a Parent/Carer Consent Form. This contains additional personal information about the child. Every child who attends Ride High is also required to complete a Member's Agreement setting out the conditions of Ride High membership.

The information we collect includes:

- Personal information (such as name; contact details including address, email address and phone numbers; date of birth; school/employment information; height/weight; medical and dietary information);
- Characteristics (such as gender, ethnicity, nationality, languages spoken, pupil premium or Strengthening Families eligibility, special educational needs or safeguarding information);
- Background information (such as reasons for referral and other agency involvement).

We also need to collect personal information about our members during their membership of Ride High. This includes attendance information (such as sessions and trips attended, number of absences and absence reasons), wellbeing monitoring information, achievements, volunteering experiences, behavioural issues and any safeguarding information.

We require this information to:

- Monitor and report on the progress and wellbeing of our members;
- Support our members throughout their time at Ride High;
- Provide appropriate pastoral care; and
- Assess the quality of our services.

All long term members are offered a follow up review by Ride High approximately six months after leaving Ride High to assess how they are progressing. We record information shared at this review.

We collect all this information by way of the forms referred to above and other Ride High designated forms, email and postal correspondence, telephone calls, text messages and in person.

Photographs and video

Photographs and videos taken of our members are included within the definition of personal information. Such photographs and videos may only be taken by Ride High employees, volunteers and Trustees or their authorised agents. Such photographs and videos may be used on Ride High's website and its social media channels (such as Facebook, Twitter and YouTube) and/or in Ride High's printed material and/or by the media (including newspapers and broadcast media) for the promotion of Ride High and its activities, but may not be used for any other purpose, and only if we have received specific prior written permission from the young people's parents/carers. Parents/carers are informed that they may withdraw consent at any time.

CCTV is installed in our minibus and people carrier for health and safety reasons. The recordings are also included within the definition of personal information.

Why and how we use personal information

We will only use personal information when the law allows us to. The law permits us to use personal information where we have received specific consent to do so. By providing us with personal information, and by consenting to a referrer doing so, the parent/carer (and where applicable the child) is deemed to give Ride High explicit consent to process that information for the purposes of providing its service. Any parent/carer, child or referrer who does not agree with the terms of this Policy must not provide us with personal information.

How we store personal information

We retain all completed forms in hard copy format and we also input the information contained in the forms to our members' database. We also retain in hard copy format all postal correspondence, notes of telephone calls and notes of meetings or other conversations about the children referred to us. Where appropriate we also input to our members' database the information shared with us in any of these ways.

We also retain emails and text messages (both sent and received), photographs, video and CCTV recordings.

How we keep personal information safe

We take the security of personal information seriously. We ensure that there are appropriate technical, physical and organisational measures in place to protect personal information both online and off-line. Paper documents containing personal information are stored in a locked and secure filing system in our offices. Any scanned copies are stored in a secure password protected cloud-based storage system.

The following is also stored in a secure password-protected cloud-based storage system:

- personal information provided online;
 - our members' database;
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- letters, notes, minutes and reports written by Ride High staff or Trustees.

Text messages are stored on password-protected Ride High phones. CCTV recordings from our vehicles are stored on a password-protected hard drive.

How long we store personal information for

We will only retain personal information for as long as is necessary to fulfil the purposes for which it is collected and processed. Unless otherwise stated below, we will keep personal information for the duration of a child's membership of Ride High and for a period of seven years after the child leaves Ride High. This retention period enables us to:

- have records in place should the child return to Ride High;
- conduct follow up reviews for long term members approximately six months after leaving Ride High;
- assist with any safeguarding issues or questions that arise after a child has left Ride High;
- provide volunteering opportunities for former members;
- defend any legal claim made in respect of the child's membership of Ride High;
- provide references or other information about the child, at the request of the child, including to future education establishments, work experience providers, employers or those offering volunteering opportunities.

Photographs and video of a child will be destroyed to the extent that this is practically possible three years after he/she leaves Ride High. This retention period enables us to continue to use pre-existing marketing material bearing images (the requisite consent having been obtained from the child and/or their parent/carer) for a reasonable period of time.

CCTV recordings from the Ride High vehicles will be destroyed after six months. For the avoidance of doubt, associate members are not deemed to have left Ride High during their period of associate membership, but only if and when it has been agreed that they will not return. An associate member is a long-term member who, for whatever reason (health or otherwise), is no longer able to fulfil his or her commitment to regular and sustained long-term attendance rates, but who would benefit from remaining a member of Ride High and who it is hoped would be able to return to full membership in due course.

Personal information which is no longer retained will be securely and effectively destroyed or permanently erased from our IT systems to the extent that this is practically possible. In some circumstances we may anonymise personal information so that it no longer permits identification. In this case, we may retain such information for a longer period.

Why we share personal information and with whom

We do not share information about a child referred to us with anyone without consent unless the law and our policies allow us to do so. A child's personal information may be shared internally within Ride High for the purposes of providing our service to that child.

We will routinely share information with the child's referrer, parent/carer, school and any other professional listed in the referral (or who succeeds anyone named in the referral).

Where we engage a third party to deliver a service on our behalf, only required personal information will be shared (and in accordance with data protection legislation). Such third parties include:

- Ride High Equestrian Centre, a company wholly owned by Ride High, which runs the riding lessons attended by our members;
- any organisation managing the residential visits attended by our members;
- any organisation offering work experience or volunteering opportunities to our members.

Where a child and/or their parent/carer has chosen to share their story to help further our work and explicit consent has been given, we may share personal information in materials promoting our campaigning, services or fundraising work or in specific documents. Where we undertake this activity the personal information is usually anonymised unless and except where we have received explicit consent to do otherwise.

Ride High will comply and co-operate with regulatory authorities when we are legally required to do so; in such cases personal information would be passed on in accordance with data protection legislation.

Where there is a perceived threat to life due to suicidal intent or serious concern regarding a child, Ride High may be required, in line with its duty of care, to report these concerns to the police or social services.

In circumstances other than those noted above, Ride High will not share personal information with any other organisation for marketing, market research, fundraising or commercial purposes.

Requesting access to personal information

Under data protection legislation, the children referred to us and their parents/carers have the right to:

- request access to personal information about them that we hold;
- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal information rectified, blocked, erased or destroyed.

How to contact us

Any questions about this Children's Privacy Policy or any other data protection queries, or any requests to receive a copy of personal information held by Ride High, should be emailed to: a.oddie@btinternet.com, or sent to:

Alan Oddie
Secretary
Ride High
Ride High Equestrian Centre
Redland Drive
Loughton
Milton Keynes
MK5 8HD

Changes to this Children’s Privacy Policy

This Children’s Privacy Policy was approved at a Board Meeting of the Trustees. It will be reviewed each year thereafter, or more frequently if appropriate. Any changes will be incorporated into an updated version of this document and if the changes are significant we will provide a more prominent notice.

Signed.....

Date.....