



*Last updated: 01/01/2023*

# HR Policy

## Recruitment Policy

RDA take full responsibility for ensuring that the correct steps are taking to ensure a safe and fair recruitment process when recruiting volunteers.

## Applications for Volunteers

All Volunteers wishing to work for RDA must complete the standard volunteer recruitment form. In accordance with the new GDPR guidelines these will be stored safely and securely by the interviewing officer. These forms must be filled out correctly and to the best of the applicant's knowledge as we must have the emergency detail available in the event of an emergency.

## Reference Requirments

RDA volunteer application form for new volunteers makes provision for two refers details to be obtained. Its compulsory that two refences for any new volunteers must be sought and followed up.

Follow up for refences can be followed up in the following ways

- Obtained via a written refenced (hardcopy or email)
- Obtained via telephone (verbally keeping record of time and date of call)
- Use of the generic volunteer refence request form, which is available to download from the RDA website,

These must be stored with the volunteer's application and signed E safety contract.

If volunteer applying for a role within the group has been known to someone already cleared within the group for longer than two years one external refence is sufficient as the second may be the volunteer they are connected with.

## Collection of refences and disclosure

Within RDA all volunteers ages 16 and above who are involved or associated with children or adults are checked for criminal disclosures (DBS). Its also mandatory requirements that all DPS and NI checked are renewed every 3 years and this is the responsibility of the safeguarding officer. There are no exceptions to this.

All applicants will be informed that an enhanced disclosure will be requested from them. This will allow the applicant to decide whether or not to continue with their application. This information will be used only to assess the applicant's suitability for the role as it is relevant and they will not be discriminated against unfairly.

## Volunteers with a criminal record

If an applicant is shown to have a criminal record this does not automatically ban the applicant from working within the RDA group. The RDA will treat each case individually considering the nature of the offence disclosed and the role in which they have applied. A role may be offered with extra provisions depending on the nature of the crime.

### Procedure should an application has a criminal record.

- The applicant shares the information as shown on the original disclosure certificate with the group's safeguarding officer.
- The applicant agrees to the information being shared with the group.
  - If the applicant does not agree they can not be accepted as a volunteer
- If it is agreed between the group and the safeguarding officer that the information is not concerning the applicant may be accepted as a volunteer/employee.
- If it is agreed between the group and the safeguarding officer that the information is a cause for concern the applicant will not be accepted as a volunteer
- If the applicant disputes the information on the disclosure, the process will be put on hold to allow the information to be checked. If as a result of this RDA is not happy with the assurances and new information provided the volunteer will not be accepted.



## Equal opportunities

### **EQUAL OPPORTUNITY POLICY STATEMENT**

RDA is an equal opportunity employer, committed to ensuring that the talents, skills and resources of all employees and volunteers recruited are fully utilised. RDA will not discriminate unfairly against any individual in matters of recruitment or selection for any position, promotion, development or training on the ground of perceived religious or political affiliation, sex, marital status, disability, colour, race, ethnic or national origin.

2. RDA wholeheartedly supports the principle of equal opportunities and opposes all forms of unlawful or unfair discrimination. RDA believes that it is in its best interests to consider the resources available throughout the community when employment and volunteering opportunities arise. Within the framework of the law RDA is committed to this end, wherever practicable, to achieve and maintain a workforce that broadly reflects the local community in which the Association operates.

3. Every possible step will therefore be taken to ensure that individuals are treated equally and fairly and that decisions on recruitment, selection, development, training, promotion and career management are based solely on objective and job-related criteria. Everyone is responsible for playing their part in achieving this policy's objectives.

## Measures to avoid discrimination in specific areas

RDA intends to avoid any form of direct or indirect discrimination in the following:

a. **Recruitment and Selection.** RDA will aim to elicit the widest possible response when advertising vacancies. It will avoid using terminology that suggests that vacancies are open to persons of only one sex, race or particular marital status.

(1) In the selection process RDA will aim to use criteria clearly identified as being directly related to vacancy available.

(2) When filling a vacancy application will be accepted from all groups, irrespective of sex, marital status, disability, colour, creed, race, ethnic or national origin. The agencies used will also be made aware of RDA's commitment to provide equal opportunities for all groups in the community.

b. **Appraisal and Counselling.** RDA's appraisal and counselling processes are considered important and essential mechanisms in encouraging employee performance and development. Any employee or volunteer involved in carrying out appraisal and counselling should do so on a non-discriminatory basis.

c. **Training and Development.** Training and development are important in RDA's performance. All training and development programmes are designed on a non-discriminatory basis, as is the selection for those attending any training and development programme.

d. **Promotion.** RDA aims to promote an individual on the basis of their specific aptitude skills, knowledge and ability to perform a role effectively. Those involved in the selection process for promotion will ensure that it is based on criteria clearly identified as being directly related to both job and person specifications.

## Equal Opportunities Training

RDA realises the importance of training in ensuring that the policy is implemented effectively on a day-to-day basis. This is identified in three areas.

- a. To educate those involved in decision-making on selection for recruitment, promotion, training and development, disciplinary offences, and for those who appraise or counsel employees. RDA will ensure that those people involved in such decisions are informed of the importance of being objective and of pursuing an equal opportunities approach. Those involved in selection will receive training that includes information on equal opportunity in those areas.
- b. To educate everyone in the importance of equality in all matters.
- c. To provide adequate induction training for all employees and volunteers to assist them in settling into the organisational culture and procedures as quickly as possible, RDA will aim to identify and provide for any special needs of an individual during this period.

## **Mechanism for resolving grievances**

Any internal grievance relating to this policy may be addressed through RDA's complaints procedure. Anyone who believes that the spirit of this policy is not being implemented properly in any area may raise it, in the first instance, with the Group Chair.

Any external complaint relating to RDA's procedures will be directed to the Group Chair in the first instance. If the applicant is not satisfied with the outcome, they can escalate the issue per the RDA Complaints Policy.

## **Responsibility and accountability**

Everyone is responsible for ensuring that the equal opportunity policy is implemented, and the spirit of the policy is adopted throughout the organisation. The Group Chair is responsible for monitoring and evaluating the effectiveness of the equal opportunity policy and for making recommendations and investigations where appropriate.

## **Equality and Diversity**

RDA is committed to promoting equality of opportunity for all staff, volunteers and participants. We aim to create a safe and welcoming atmosphere for everyone. We want to challenge all forms discrimination and will ensure that we do not discriminate against anyone on the basis of their protected characteristics, i.e. age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic and national origin), religion or belief, sex or sexual orientation, or on any other basis. We aim to design and deliver our activities and services in a way which will encourage support participation from everyone. Furthermore, RDA recognises the value that diversity can bring to our organisation and strives to reflect this among our trustees, employees, volunteers and participants. We believe that greater diversity provides diversity

of perspective, leading to a broader range of opinions being involved in decision making and this creates a better and more open environment for achieving our objectives.

Policy Statement RDAUK endorses the principle of equality and will strive to ensure that everyone who wishes to be involved in riding, carriage driving and horse care whether as participants, volunteers, coaches, or those within the rdauk :

- has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to their age, sex, gender identity, disability, marital or civil partnership status, pregnancy or maternity, religion, race, ethnic origin, nationality or sexual orientation (Referred to as 'Protected Characteristics' under the Equality Act 2010); and
- can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular that they are able to enjoy their sport without the threat of intimidation, victimisation, harassment or abuse.

Legal obligations RDAUK is committed to avoid and eliminate unfair discrimination of any kind in RDA and will under no circumstances condone unlawful discriminatory practices. The organisation takes a zero-tolerance approach to harassment. Examples of the relevant legislation and the behaviours in question are given in the Appendix

Positive action the principle of Equality goes further than simply complying with legislation. It entails taking positive steps to counteract the effects of physical or cultural barriers – whether real or perceived – that restrict the opportunity for all sections of the community to participate equally and fully. RDAUK will therefore seek to institute, support or contribute to appropriate measures or initiatives that enable access to RDA and participation in associated activities by people from any group that is underrepresented in the sport or has difficulty accessing it.

Implementation The following steps will be taken to publicise this policy and promote equality in RDA: -

- A copy of this document will be published on the RDAUK website and also on the "MyRDA" website.
- The RDAUK Chair will take overall responsibility for ensuring that the policy is observed.
- The Board will take full account of the policy in arriving at all decisions in relation to activities of the RDAUK.
- RDAUK will collaborate fully with any surveys or other initiatives designed to assess the level of participation of different sections of the community in RDA and will take account of the findings in developing measures to promote and enhance equality in RDA.

- RDAUK will provide access to training for all of its Board Members to raise awareness of both collective and individual responsibilities. All RDAUK volunteers will receive training in equality and diversity.
- It will be a condition of membership of RDAUK that all Member Groups:
  - formally adopt this policy, or produce their own equality and diversity policy in terms that are consistent with it; and
  - take steps to ensure that their Trustees, members, volunteers and participants behave in accordance with the policy, including where appropriate taking disciplinary action under the Group’s constitution; and
  - ensure that access to membership is open and inclusive
  - support such measures and initiatives that RDAUK may institute or take part in to advance the aims of this policy

Responsibility, Monitoring and Evaluation - The Board will be responsible for ensuring the implementation of this policy.

The Board will review all RDAUK activities and initiatives against the aims of the policy on an annual basis, and the Chair will report formally on this issue in the annual report.

The Board, or where appropriate a designated project leader, will review any measures or initiatives that RDAUK may institute or take part in to promote and enhance equality and will report findings in the annual report.

The Board will review the policy itself at intervals of no more than three years (or when necessary due to changes in legislation) and update as necessary.

Complaints and compliance- RDAUK regards all of the forms of discriminatory behaviour, including (but not limited to) behaviour described in the Appendix as unacceptable, and is concerned to ensure that individuals feel able to raise any bona fide grievance or complaint related to such behaviour without fear of being penalised for doing so.

Appropriate disciplinary action will be taken against any employee, member or volunteer who violates the RDAUK Equality Policy.

Any person who believes that he or she has been treated in a way that they consider to be in breach of this policy, should follow the process set out in RDA UK’s complaints process, which can be found on the MyRDA website, under “Policies.



# GDPR PROTECTION POLICY

## Purpose and Background

The RDA Group holds information about riders, volunteers and other people involved with our activities. The Group has a responsibility to look after this information properly, and to comply with the EU General Data Protection Regulation (GDPR). It is likely that the GDPR will continue to form the basis of our Data Protection legislation, even once the UK has left the EU, so it is fully taken into account in this policy.

Good Data Protection practice is not just a matter of legal compliance and ticking the boxes. Data Protection is about taking care of people and respecting their privacy. Poor practice or a serious breach could not only harm individuals but would also have a serious effect on the reputation of our group and RDA as a whole.

## Our legal basis for using people's data

Everything we do with records about individuals – obtaining the information, storing it, using it, sharing it, even deleting it – will have an acceptable legal basis. There are six of these:

- Consent from the individual (or someone authorised to consent on their behalf).
- Where it is *necessary* in connection with a contract between our group and the individual.
- Where it is *necessary* because of a legal obligation – if the law says you must, you must.
- Where it is *necessary* in an emergency, to protect an individual's 'vital interests'.
- Where it involves the exercise of a public function – i.e. most activities of most government, local government and other public bodies.
- Where it is *necessary* in our legitimate interests, as long as these are not outweighed by the interests of the individual.

Where we are basing our processing on consent we will be able to 'demonstrate' that we hold consent. This means having a record of who gave consent, when they gave it, how they gave it (e.g. on the website, on a form, verbally) and what they actually consented to.

In the case of legitimate interests we will do a balancing test, and be confident that our legitimate interests in using the data in a particular way – for example in providing our services or raising funds to support them – are not over-ridden by the interests of the individual.

There are additional considerations where we are holding information about people's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and also genetic data or biometric data, health data or data concerning their sex life or sexual orientation. We will legitimise the use of any of these categories of data by having the individual's *explicit* consent.

## Data Protection Principles

Data Protection compliance is based largely on a set of Principles.

The six GDPR Principles say that:

- Whatever you do with people's information has to be fair and legal. This includes making sure that they know what you are doing with the information about them.
- When you obtain information you must be clear why you are obtaining it, and must then use it only for the original purpose(s).
- You must hold the right information for your purposes: it must be adequate, relevant and limited to what is necessary.
- Your information must be accurate and, where necessary, up to date.
- You must not hold information longer than necessary.
- You must have appropriate security to prevent your information being lost, damaged, or getting into the wrong hands.

Our policy sections below reflect each of these principles in a bit more detail.

## Transparency & purposes (first and second Principles)

We will make key information available to people at the time we collect information from them. This includes:

- the identity and contact details of our group and the person who is responsible for Data Protection;
- the purposes we intend to use the data for and our 'legal basis' for this (see above);
- what we regard as our 'legitimate interests', if this is our basis for processing;
- any specific recipients of the data (e.g. RDAUK) or categories of recipients.

Other information will be made available where relevant. This includes:

- the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- details of the individual's rights, such as to request a copy of all the data held;
- the right to withdraw consent if that is the legal basis for processing (but not retrospectively);
- whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

In both cases, we will only tell people things they won't already know. When a rider joins our group they know that we will keep a record about them and their activities with us. When a volunteer comes along it's the same. We will therefore tell them anything that may not be entirely obvious to them. This could include things like:

- The fact that RDA nationally is a separate organisation and that limited data may be passed to RDA. We will reassure people that their data is anonymous when analysed on Tracker by RDA.



- Any **direct marketing** that we may want to carry out (see below), or any additional purpose(s) that we might use the data for – publicity, perhaps. ('Data' can include photos, videos, CCTV, audio recordings, etc, not just written records.)

## Direct marketing

One explicit right that people have is to stop us sending them marketing material (by post, phone, email or text) if they don't want it.

When we collect information from people that might be used for marketing we will say so at the time and ask them if they are happy to hear from us. The wording will be along the lines of: "We would like to keep you up to date with information about opportunities and events within RDA, and how you can support us. Please tick here to indicate which method(s) you are happy for us to use: Mail , Phone , Email , Text

These rules are only for marketing. They do not stop us from contacting people in whatever is the most convenient way to give them information about things they have already signed up to, or for other administrative purposes.

## Data quality, record keeping and retention (third, fourth and fifth principles)

Our activities will be more effective and appropriate if we have good quality records about the people we are working for and with. GDPR insists on this. We will ensure we have the information we need, but no more (it must be adequate, relevant and limited to what is necessary) and it will be as accurate as we can make it and – where necessary – kept as up to date as possible. We will not keep it longer than necessary.

We will remind our staff and volunteers that the individual concerned has the right to see all the information recorded about them by the group. While Data Protection concerns should never prevent us from recording the information we believe we need (especially in cases relating to safeguarding or other serious misbehaviour), being over-casual, rude or injudicious in an email could easily cause a major crisis for the group, and even the wider RDA. This can be a useful discipline in deciding what to record and how to record it.

Our group will also have a clear policy on how long to keep information. We will draw up a retention schedule, taking each type of record we hold and specifying how long we normally keep it, and our justification for this. We will set up a process for ensuring that data is deleted or destroyed routinely at the appropriate time.

## Security (sixth principle)

We will take good care of the information we hold, whether on computer or on paper, and make sure that we have provided guidance and training to our staff and volunteers so that they treat the information appropriately.

In particular we will think about the risks when data is 'in transit' – either on portable devices or when it is being sent out. For example:

- If people are using their personal phone, laptop, camera or other device for our group's purposes there will be clear expectations of how they should be secured.
- When sending information, particularly by email, we will take steps to prevent confidential information being sent to the wrong person. For example, by using password-protected documents and sending the password in a separate email.
- We will also take care not to disclose people's email addresses or other information inappropriately by carelessly copying in a large number of people or forwarding an email that has been copied widely.
- Information on paper will not be left lying around, and will only be taken out of a secure location when this is really necessary.
- Where information is processed for us externally (for example by RDA) we will expect the external organisation to be able to give us satisfactory guarantees about the security measures they take.

## Responsibilities

Responsibility for compliance with Data Protection lies with the organisation, not with any specific individual. The Trustees as a whole body will be responsible to keep up to date with any developments, to check that we are complying and have the evidence to prove it, to give advice to staff and volunteers and to handle any issues such as a data breach or a Subject Access Request. The Trustees may designate someone to be the lead person. See Appendix

We will notify RDA National Office in the event of a serious issue eg a data breach.

When we work in collaboration with other organisations, we will sort out clearly (and in writing) who is responsible for what, in order that there are no Data Protection gaps.

If we engage external suppliers to handle data for us in any way, our contract will set out their responsibilities to handle data in a way that will not cause us to be in breach.