

# POLICY STATEMENTS



## COVID-19 Policy

### **Wilder Ways COVID-19 Policy as of February 2021**

Following our closure over the winter due to the Covid-19 pandemic we will start a phased reopening as soon as Government restrictions allow. This policy outlines the additional precautions necessary for everyone's safety and well-being.

Our reopening will be scheduled according to the terms of the Scottish Government's most recent update of their strategic framework. Once open, the following procedures will be in place to allow us to manage the risk of infection from COVID-19.

Policy: We have carried out a Covid-19 risk-assessment of our premises and working practice and the following protocols are in place.

1. Please satisfy yourselves that these are appropriate:
1. Do not attend if you are showing Covid-19 symptoms or if anyone in your household is self-isolating due to Covid-19 symptoms or has had contact with coronavirus.
2. We will cancel your booking if any Wilder Ways staff or household member shows signs of Covid-19.
3. We reserve the right to require clients to leave our premises at any time, without refund, if they display Covid-19 symptoms.
4. Please be aware of the COVID-19 amendments to our cancellation policy (see website Terms and Conditions) and check how these will affect your booking.
5. Please wash your hands before you arrive and wear gloves on the premises.
6. Please observe physical distancing of 2m and follow any guidance and signage.
7. Please do not touch any hard surfaces or equipment except your tack and helmet and washing facilities.
8. During the ride you should maintain a horse's distance and ride in file, not side-by-side.
9. For incidents requiring assistance or first aid, staff will wear latex gloves and a face-covering.
10. Hand-washing facilities and alcohol gel will be provided on the yard. Outdoor toilet facilities will only be available when this is permitted by the strategic framework.
11. Staff will prepare your horse. All shared hard surfaces including tack, riding hats, door-handles, light switches and hand-washing/bathroom facilities will be disinfected before your ride and between each client.
12. Wilder Ways staff will wear a face-covering for any engagement with guests that requires a proximity of less than 2m.
13. You may use your own hat so long as it is to a current safety standard (see website Terms and Conditions) Holiday guests staying in Glen Kerran Farm will be fully briefed about our COVID-19 policy on arrival. The following additional items will be required as a minimum.
14. Physical distancing of 2m will be required inside the house.
15. Please leave your outdoor clothes & shoes in the tack-room, in your designated area.
16. Guests will never be required to share a bedroom or bathroom with members of another household, but this may mean that, occasionally, some people will have to stay overnight at alternative, local premises.

17. Antibacterial handwash will be provided in every bathroom and alcohol gel available in the bedrooms.
18. In communal spaces, designated seating will be assigned.
19. Wilder Ways will ensure that all communal areas are cleaned and disinfected regularly throughout the day.
20. During pick-ups and transfers within the holiday, you will be required to wear a face-covering which you must provide and use correctly.

How to make CDC approved face coverings: [https://www.wired.com/story/how-to-make-a-cloth-face mask/](https://www.wired.com/story/how-to-make-a-cloth-face-mask/) & CDC guidance on how to wear a face covering: <https://www.cdc.gov/coronavirus/2019-ncov/downloads/cloth-face-covering.pdf> or How to Safely Wear and Take Off a Cloth Face Covering | CDC

***Updated on 16/02/2021***

## **Child Protection Policy**

Wilder Ways is committed to their child protection policy that acknowledges their duty of care to safeguard the welfare of children and young people. It will ensure that the practice of such safeguards reflects statutory responsibilities, Government guidance, best practice and the requirements of the Charities Commission.

The policy applies to all adults working in positions of responsibility within the company including partners, paid staff and volunteers.

Wilder Ways recognises that the welfare of children and young people are paramount in all circumstances. Wilder Ways aims to ensure that children and young people have a positive and enjoyable experience in a safe environment and are protected from abuse whilst participating in Wilder Ways' activities. Wilder Ways acknowledge that particular children and young people of any ability, gender and ethnicity may be particularly vulnerable to abuse and aims to take appropriate steps to ensure their welfare.

Wilder Ways will:

- Prioritise the safety and welfare of children and young people.
- Ensure that all partners, staff and volunteers are clear about their responsibilities with respect to the safeguarding of children and young people.
- Ensure all partners and staff complete a 'Child Protection for Equestrians Course'. This is a comprehensive course specifically designed for those in regular contact with children through their work in the equestrian sector. It covers abuse and identifying concerns, legislation and guidance, child protection policies and procedures, working with other agencies, handling allegations and complaints and how and when to make referrals. The course is in line with government guidance and is written in association with the British Equestrian Federation.

- Prevent the involvement of unsuitable individuals in any activity involving young people by the use of Disclosure and the application of best practice in the recruitment of staff and volunteers.
- Keep safe any personal information or records of any safeguarding concerns.
- Immediately address any failure to comply with the terms of this policy.
- Review this policy annually and/or in the light of any changes to relevant legislation or government guidance.

## **Quality Policy**

Wilder Ways will always work in such a way as to ensure the following:

- To ensure high standards of horse health and welfare (and happiness).
- To implement and maintain a Quality System that meets, or exceeds, current legislation.
- To respond to client needs as in a partnership.
- To develop, resource and continually improve our capacity and expertise within our scope of operations.
- To adhere to our environmental, inclusion and data protection policies.
- To ensure sustained profitability.

Wilder Ways are wholly committed to this Quality Statement and shall conduct regular reviews to ensure its continuing relevance, suitability and effectiveness.

## **Environment Policy**

Wilder Ways will always work in such a way as to ensure the following:

- Positive impact on biodiversity by considering the interest of protected species and habitats and minimising our impact on natural habitats and species.
- Minimal impact on the trails and the landscapes we ride in - take only memories (and photos), leave only a few hoof-prints.
- Waste is minimised by low paper use in the office, use of recycled or re-used products including all paper, recycling of all waste where possible.
- Energy efficiency is maximised by high levels of insulation in the office, use of low energy appliances, energy efficiency measures.
- Low carbon emissions are promoted by regular vehicle maintenance, use of public transport and sharing transport wherever possible.
- Use of materials with the minimum environmental impact, e.g. cleaning products, equipment.

# Biosecurity Policy

The following policy note is to ensure that biosecurity is taken into consideration at all levels of Wilder Ways operations. These guidelines are in place to safeguard our staff, clients, animals, third parties and the environment from bio-hazards, i.e. the transmission of harmful organisms including pests and invasive plants.

Biosecurity is important when entering any land, or other premises where there is a risk of spreading organisms, including forestry and agricultural land, the natural environment and buildings.

1. Ensure footwear is clean before entering a new site/premises.
2. Clean footwear between sites. Wash off mud, if necessary, using an appropriate disinfectant.
3. Wash hands between sites.
4. Keep all tools and tack clean.
5. Brush mud and dirt off horses prior to riding out and pick out feet.
6. Ensure that all vehicles are cleaned regularly, especially removing mud from tyres and wheel arches.
7. Keep vehicular access to new sites to a minimum and, wherever possible, keep to established hard tracks.
8. Avoid silt or any disinfectants used from entering watercourses.
9. For sites known to be infested by harmful pests or pathogens special provisions may be required to comply with the National Waste Management Plan for Scotland Regulations (2007) Seek advice from SEPA.
10. Remove and deal appropriately with all rubbish including organic waste such as old hay and feed, hoof trimmings and bandages.
11. Inform all staff and clients about the importance of biosecurity and demonstrate the techniques used to minimise risk. Provide appropriate equipment.

## Inclusion

Wilder Ways work to encourage inclusion throughout the performance of any tasks and will not tolerate discrimination, e.g. on the grounds of race, sex, age or disability.

# Data Protection Policy

Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless
  - a. at least one of the conditions in Schedule 2 is met, and
  - b. in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data 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. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
3. Personal data shall be accurate and, where necessary, kept up to date.
4. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
5. Personal data shall be processed in accordance with the rights of data subjects under this Act. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
6. Personal data shall not be transferred to a country or territory outside the European Economic Area 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.

*Personal data is only held on a single mainframe computer and not transferred onto mobile devices. Personal data may be used for the promotion of Wilder Ways products with permission by the owner. If such permission is not given, personal data is destroyed after the purpose for which it was obtained from the owner. Personal data will not be transferred to any other party unless required by law.*

# Privacy Policy

## 1. OUR CONTACT DETAILS

- Name: Wilder Ways LLP
- Address: Glen Kerran Farm, Southend, Campbeltown, Argyll, PA28 6PJ
- Phone Number: 01586 830 682
- E-mail: [adventurew@wilderways.scot](mailto:adventurew@wilderways.scot)
- Website: [www.widlerways.scot](http://www.widlerways.scot)

## 2. THE TYPE OF PERSONAL INFORMATION WE MAY COLLECT ABOUT YOU

We currently collect and process the following information:

- **Contact Data** may include your name, address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of bookings made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include booking details, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use our website and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.
- **Other and Special Category Data** may include height, weight, gender, medical and health records

## 3. HOW WE GET THE PERSONAL INFORMATION

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Making a booking with us
- Through our website
- Requesting information or a newsletter from us
- Through our recruitment process
- Providing feedback or interacting with us, including via social media, email, phone calls
- Making a complaint

We also receive personal information indirectly, from the following sources in the following scenarios:

- Travel Agencies or Tour Operators for the purposes of booking a holiday with us on your behalf.

#### 4. HOW WE WILL USE YOUR PERSONAL DATA

We use the information that you have given us in order to:

- Process your booking
- Contact you for marketing purposes
- To provide you with our newsletter if you have subscribed

We may share this information with insurance companies, accreditation bodies (i.e. TRSS, BHAA, Argyll Council) or emergency or medical personnel in the event of an incident.

This Notice applies to this website only.

This website may include links to other websites. Once you have used these links to leave our website, you should note that we have no control over the other website(s). We cannot, therefore, be responsible for the protection and privacy of any data you supply to other parties whilst visiting their websites. We advise you to familiarise yourself with the individual privacy notices and terms & conditions for each linked website prior to submitting your personal data to that site.

#### 5. LEGAL BASIS FOR USING YOUR PERSONAL DATA

We will only process your personal data where we have legal grounds to do so. The legal grounds will depend on the purpose of the personal data collected and its processing requirements. Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- (a) Your consent. You can withdraw your consent at any time. You can do this by contacting [adventures@wilderways.scot](mailto:adventures@wilderways.scot) and submitting a Subject Access Request Form.**
- (b) We have a contractual obligation.**
- (c) We have a legal obligation.**
- (d) We have a vital interest.**
- (d) We have a legitimate interest.**

#### 6. HOW WE STORE YOUR PERSONAL INFORMATION

Your information is securely stored on our premises and on the cloud and only appointed third parties have access to the data.

We will only transfer your data outside of the European Economic Area ('EEA') if it is necessary in order to comply with a legal obligation or to provide our products and services.

We keep your personal information for up to 5 years. We will then dispose your information by deleting it from all cloud storage and any local storage, including recycling bins. Any hard copy data will be shredded.

#### 7. YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [adventures@wilderways.scot](mailto:adventures@wilderways.scot) if you wish to make a request.

## 8. THE USE OF COOKIES ON OUR WEBSITES AND HOW YOU CAN REJECT THESE COOKIES

Cookies are small files that websites put on your computer hard disk drive or mobile device when you first visit. Think of a cookie as an identification card that is uniquely yours. Its job is to notify the site when you have returned. Many websites use cookies.

Cookies tell us how often you visit our website, which helps us learn what information interests you. In this way, we can give you more of the content you like and less of the content you don't.

Cookies let you store preferences and user names, register products and services, and personalise pages.

Most web browsers automatically accept cookies but you can usually modify your web browser settings to decline or delete cookies if you prefer, this may however prevent you from taking full advantage of our website.

## 9. CHANGES TO THIS PRIVACY NOTICE

From time to time we may change this Notice to accommodate industry practices, new regulatory requirements, or for other purposes. Any changes will be effective when posted and your continued use of this website will indicate your acceptance of these changes. If we make significant changes to our Privacy Notices, we may alert you to these either via a specific 'bulletin' notice on our home page, or by email and/or post.

This Notice was last reviewed and updated on 8<sup>th</sup> March 2021

## 10. HOW TO COMPLAIN

If you have any concerns about our use of your personal information, you can make a complaint to us at [adventures@wilderways.scot](mailto:adventures@wilderways.scot)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>