

Farriers Registration Council



Established under the
Farriers (Registration) Act 1975

Privacy Policy

Approval Date: 26 October 2022

Privacy Statement

The Farriers Registration Council (“the Council”) has created this privacy policy in order to document and communicate its commitment to protecting and respecting your privacy. It also tells you about your privacy rights and how the law protects them. You should read this policy along with our **‘Cookies Policy’** and **‘Retention of Records Policy’**.

This policy is intended to help you understand what information (personal data) the Council collects about you (whether from you, from others or from your use of our website (<https://www.farrier-reg.gov.uk/>) or our internal Intranet (<https://frcintranet.co.uk/>)). The policy also explains why personal data is collected, the legal basis on which we process your personal data and how you can manage your information (data) that we hold.

This privacy policy applies to Registered Farriers, those applying for registration, apprentices, office holders and employees of the Council, website users, members of the public and external contractors.

Who we are

The Farriers Registration Council is located at 14 Swan Court, Forder Way, Cygnet Park, Hampton, Peterborough, PE7 8GX, Tel 01773 319911. The Council is a data controller in respect of the information we hold about you and is registered with the Information Commissioner’s Office (“ICO”) under ICO registration number Z5385430. This means we are responsible for deciding how we hold and use personal information about you.

The Council has a Data Protection Officer (DPO) who is responsible for handling questions in relation to this privacy policy. If you have any questions, including any requests to exercise your legal rights, please contact the DPO via email at dataprotection@farrier-reg.gov.uk or Telephone 01733 319911.

Alternatively if you prefer please write to us at:

Data Protection Officer 14 Swan Court, Forder Way, Cygnet Park, Hampton, Peterborough, PE7 8GX.

The types of information we collect about you

The types of information we collect about you will depend on your relationship with the Council. Further details can be found in our **‘Retention of Records Policy’**.

Purpose and Lawful Basis for holding Data

The FRC processes personal data in line with the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018 (“DPA 2018”).

The Council is a statutory regulator for the profession of farriery within Great Britain (GB). In keeping with this role the Council may collect data for the following purposes:

- Our legal obligations in the administration surrounding our public duties as required under the Farriers (Registration) Act 1975 (“the Act”); including but not limited to the continued maintenance of the Register of Farriers, processing of applications for registration (GB and non-GB), enrolment of apprentices, delivery of statutory duties, approvals and compliance by Registered Farriers with all Council led policies.
- Our contractual obligations, where you are party to that contract, including office holder and employee contracts, and the steps we take to enter into those contracts.
- Our legal obligations and our obligations as an employer to our office holders and employees, such as our health and safety obligations, workplace adjustments for health or disability needs, monitoring and managing sickness absence and administering benefits.
- Our legitimate interests in the day-to-day running and management of our business, including responding to any requests, queries or complaints.

Personal Information usage

The Council will only use personal data for the purposes for which it is collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Where it is required or permitted by law, we may process your personal data without your knowledge or consent, in compliance with the lawful basis set out in the Council’s separate ***‘Retention of Records Policy’***.

How Personal Information is Used

The majority of personal information the Council processes is provided to us directly by you for one of the following reasons:

Registration and Enrolment

Under Sections 3 and 4 of the Act, the Council is required to maintain a ‘Register of Farriers’. In keeping with this requirement all Registered Farriers are asked to initially provide and annually maintain specific details held by the Council throughout their registration. See ***‘Retention of Records Policy’***.

The Council may need to contact referees, college representatives or other persons who are named by an applicant on any application form or provided subsequently, in order to verify information given by the applicant or to obtain further information about the applicant.

The Register of Farriers is securely held at the offices of the Council and is available for public inspection. The Register is not available to the public [published] in full electronically. Specifically, the ‘Find a Farrier’ feature of the Council’s website details the name, qualifications, and abbreviated postcode of all Registered Farriers, and only additionally includes telephone/mobile

numbers, an email address and website link where these have been voluntarily provided to the Council by a farrier with consent for inclusion.

Similar core contact information (name, address, date of birth, telephone numbers, email address etc) is held for Enrolled Apprentices but this is not public information and not published to the public in any format. See **'Retention of Records Policy'**.

For the purposes of communications such as (but not limited to) issue of the Farriers Bulletin and the annual production of registration/apprentice cards, data held by the Council on registrants or Enrolled Apprentices may be shared with third parties. In such circumstances data is securely transferred and any third parties involved are required to have signed a Data Handling Agreement issued by the Council (see section below on *'Third Party disclosure'*)

We may use your personal data in the Farriers Bulletin (which is sent to Registered Farriers by post and is publicly available on the website) or on our website (including photographs), but will only do so with your consent.

See also: *'The Register of Farriers and Registration Policy and Procedures'*, *'Guide to Registration for Farriers Qualifying in GB and the British Army'*, *'Guide to Entering Farriery Training as an Apprentice in GB'*, *'Guide to Applications for Registration by Overseas Farriers'* and *'Guide to Fixed Term Temporary Licence Applications by Overseas Farriers'*, *'ATF Policy'* and *'Annual Return Policy'*

Approvals of courses, qualifications and institutions

Sections 11 and 12 of the Act require the Council to approve for the purposes of the Act (or of the rules of the Council thereunder): (a) any course of training or qualification which the Council considers is designed to confer on persons completing it sufficient knowledge and skill for carrying out the shoeing of horses; and (b) any institution the Council considers able to provide such courses and training. As part of this statutory requirement, the Council is required to monitor any institutions it approves, including by collecting information about who is attending the relevant courses and the passing of any examinations being conducted. All data provided to the Council in such circumstances is required in the supervision of such institutions and in the preparation of monitoring visits completed by the Council. Such data is handled by the Council securely and for the purposes it was provided and is either destroyed once it is no longer required or held as appropriate under the terms of the Council's **'Retention of Records Policy'**. See also **'Policy for Approvals'**.

Professional Conduct (Investigations and Disciplinary)

Sections 13 and 14 of the Act require the Council to set up an Investigating Committee (IC) for the preliminary investigation of cases in which it is alleged that a person is liable to have his name erased from the Register and a Disciplinary Committee (DC) for the consideration and determination of disciplinary cases referred to it by the IC or under Section 9 of the Act concerning Appeals in relation to Registration.

The Council may receive data from the public by way of either verbal or written communication (such as letter/email) about the conduct or workmanship of any Registered Farrier. Records of initial enquiries are not kept on a registrant's registered file. In the event that an enquiry is not followed up and no further communication is received from a complainant any data relating to an initial enquiry is securely destroyed. Once a complainant has completed a complaint form and a matter has been formally submitted in writing all matters are handled in accordance with Council policy and the retention of any data is processed in accordance with the Council's **'Retention of Records Policy'**. See also **'Publication Policy for statutory functions delivered by the independently-operated Investigating and Disciplinary Committees'**, the **'Investigating Committee Manual'** and **'Disciplinary Committee Manual'** and **'Making a Complaint'**.

The Council may need to contact witnesses, referees, college representatives or other persons who are named by a complainant within any complaint, or provided subsequently in connection with the complaint, in order to verify information given by the complainant or to obtain further information about a complaint submitted. Additionally data may be shared with the Council's solicitors when legal advice is sought and when cases are referred to the Disciplinary Committee.

Office Holders and Employees

The Council holds personal data in keeping with its obligations as an employer and in the management of its business in relation to its Office Holders and Employees. Most data is held as part of individuals' personnel files. See '**Office Holders Code of Conduct**' and '**Staff Handbook**'.

The FRC may need to contact referees or other persons who are named by a prospective Office Holder or Employee on any application form or provided subsequently, in order to verify information given by the Office Holder/Employee or to obtain further information.

Members of the Public

On a regular basis the Council receives enquiries from members of the public by way of telephone, email, letter, web enquiry etc. All data provided in such circumstances is given freely to assist the Council with the handling of their enquiry. Such data is handled by the Council securely and for the purposes it was provided and is either destroyed once it is no longer required or held as appropriate under the terms of the Council's '**Retention of Records Policy**'.

External Contractors

The Council works with external contractors and businesses to assist with delivery of its statutory functions. In doing so, the Council maintains data on the employees/representatives of the businesses it works with predominantly for the purposes of contract management and the settlement of fees. When it is necessary to share data with external partners (such as printers) they are required to have signed a Data Handling Agreement issued by the Council (see section below on '**Third Party disclosure**').

Internet-based information we may collect

When you interact with us through either the Council website (Registered Farriers and the public) or Council's internal Intranet (Office Holders and Employees only), we collect Personal Data from you for the purpose of legitimate business interests

Similar to many other websites and internet-based intranets, we also gather certain additional information automatically when you access or download content from our sites. This may include but is not limited to, Internet Protocol (IP) addresses, browser type, Internet Service Provider (IIP), referring/exit pages, the files viewed on our sites, date/time stamps and/or clickstream data to analyse trends and monitor usage. Cookies are collected from the Council's website and this information would be collated for statistical purposes only (no identifiable detail collected and stored). For more information please refer directly to the '**Cookie Policy**'.

Use of CCTV at the Council's offices

The Council operates a Closed Circuit Television (CCTV) system at its offices to ensure the security of its staff, visitors and property. See '**FRC Closed Circuit Television (CCTV) Policy**'.

Third Party disclosure

The Council may disclose personal data (and, where strictly necessary, sensitive personal data/special category data) to external agencies where it is necessary for its legal obligations, its public functions, the running of the Council's business or for safeguarding or duty of care purposes. The types of third parties we may share your information with include:

- the Police, other law enforcement agencies or security agencies,
- HMRC,
- other regulatory authorities,
- the RSPCA,
- medical practitioners,
- competent authorities in other nations,
- training institutions,
- examining bodies,
- legal representatives and investigators,
- IT providers,
- Payment providers and services (such as BACS and Sagepay),
- courts and other parties in court proceedings, and
- printing companies,

We require third parties with whom we share personal data, other than the Police or security agencies, HMRC and other regulatory authorities, to:

- process your personal information only on our instructions
- treat the information confidentially and keep it secure
- take appropriate and stringent security measures to protect your personal data in line with our policies
- not use your personal data for their own purposes (other than the relevant purpose for which the information has been shared and in compliance with their own legal and regulatory obligations)
- only process your personal data for specified purposes.

We will never share or sell your personal data for the purposes of external marketing.

Access to Personal Information and your Individual legal rights

Depending on why we are processing your personal information, you may have the following rights under data protection laws regarding your personal information:

- a. The right to request access to your personal data held by the Council.
Response times to access requests will usually be within one month. If the request is more complex, or there are multiple requests by you, this one month time line may be extended. When this occurs we will update you of progress as necessary.
- b. The right to request that inaccurate or incomplete personal data is rectified.
- c. The right to request erasure of personal data – this will only apply where there is no legitimate reason for the Council to continue to process the personal information.
- d. The right to restrict the processing of your personal data – individuals have the right to restrict the processing of their personal data by the Council in specific situations*.
- e. The right to data portability – individuals have the right to request provision of some elements of their information (for example academic progress details) in digital form in order to provide it to other organisations.

- f. The right to object to the processing of your personal data – individuals can object to the processing of their personal data by the Council in certain circumstances*.

** See Data Protection Act 2018 and UK General Data Protections Regulations for further information.
<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>*

No fee will be required to exercise any of these rights. However, the Council reserves the right to charge a reasonable fee or decline any requests that we consider to be excessive or a misuse of the rights set out above. We may also ask you to assist us by taking reasonable steps in order to confirm your identity or help us to identify the information your request relates to.

If you want to exercise any of the above rights, please contact us at dataprotection@farrier-reg.gov.uk or telephone 01733 319911.

If for any reason you are unhappy with the Council's handling of your personal data, or believe that the requirements of the UK GDPR or DPA 2018 may not have been fully complied with, you can contact the Council's DPO at dataprotection@farrier-reg.gov.uk or Telephone 01733 319911. We want to try and resolve any concerns you may have as quickly and simply as possible but the Council's formal complaint procedure can be invoked if appropriate.

You can also seek independent advice from, or submit a complaint to, the ICO. Further details can be found at <https://ico.org.uk/>

You can contact the ICO at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This privacy policy was last updated on the date set out at the top of it.