


Accountable: A Bramley 	Form Ref: RIV/HR/018
Approved By: M Roe <i>Matt</i>	Version: 2
Supersedes Issue/Date: V1/21.02.2018	Issue Date: 11/07/2023



Data Protection & Privacy Policy

PURPOSE AND SCOPE

To outline how we comply with all relevant law(s) in relation to your personal data in line with the General Data Protection Regulation (GDPR) and any subsequent legislation which may replace this.

This policy is designed to give clear guidelines on how the company collects, stores and processes your personal data.

This policy applies to all employees of Riverside Medical, and any other trading names registered by the company, contractors, subcontractors, agency workers, customers and suppliers.

Any individual, as detailed above, will be notified accordingly of any significant changes to the policy. In all cases you must follow the guidelines outlined within this document.

LAWFUL PURPOSE

Any personal data we hold about you will either be due to a statutory obligation to hold and/or report it e.g. to HMRC – under Article 6(1)(c) “*processing is necessary for compliance with a legal obligation to which the controller is subject*” Or because we manage a contract with you for work or services – under Article 6 (1)(b) “*processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract*”.

PRINCIPLES

Any personal data retrieved and stored by the company will be;

- Processed lawfully, fairly and transparently
- Collected for specific, legitimate purposes
- Adequate, relevant and limited only to what is necessary
- As accurate as initially possible and kept up to date
- Processed or transferred in an appropriate manner to maintain security
- Not be transferred to a country or territory outside of the UK, unless adequate protections are in place
- Held or stored inside the UK
- Kept for no longer than is necessary where data subjects (the individual) are identifiable
- Processed securely and protected against accidental loss, destruction or damage

DEFINITIONS:

- Data controller - the person/body/organisation who determines the how and what of data processing. E.g. Riverside Medical Packaging Co Ltd
- Data subject - the individual about whom personal data are processed.
- Personal data - Information about a living individual which is capable of identifying that individual.
- Processing - Anything done with/to personal data, including storing it.
- Data Processor - A company that processes data on behalf of the controller – e.g. payroll provider, benefit consultant.

WHAT WE COLLECT

Riverside may collect, store and process information about you, or people related to you, such as;

- Name, date of birth, marital status
- Contact information, residency and work permit status, nationality and passport information
- Emergency contact names and phone numbers
- Social security or other tax payer information, salary and bank details
- Sick pay, pensions, insurance and any other benefits information
- Date of hire, promotion(s), work history including nominated referees, CV, technical skills & tests, educational background, professional certifications and registrations, language capabilities, training courses attended, or any other information about yourself to determine your suitability for a position

- Health and allergen information, suitability for work or supporting medical diagnoses
- Documents relating to your contract e.g. offer letter, contract of employment, job description
- Clothing sizes, photograph, physical limitations and special needs
- Records of work absences, holiday entitlement, salary history and expectations, probationary and/or performance appraisals, letters of appreciation and commendation, letters of concern, letters related to employee relations and disciplinary and grievance procedures, including monitoring compliance with and enforcing Riverside policies
- Where permitted by law, proportionate to functions to be carried out by an employee or prospective employee, the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, driving licence number, accident history, or unspent convictions under the Rehabilitation of Offenders Act 1974
- Any information required to comply with laws and the requests and directions of law enforcement authorities or court orders e.g. Working Time Regulations, child support and debt payment information
- Acknowledgements regarding acceptance of Riverside policies and training against SOP's with provided signature
- Information captured on security systems, including key card entry systems
- Voicemails, e-mails, correspondence and other work products and communications created, stored or transmitted by an employee using a Riverside computer or other communications equipment
- Health and safety training acknowledgements
- Date of resignation or termination, reason for resignation or termination, information relating to administering termination of employment e.g. references
- Information which we need to hold with regards to future legislation

The above list is not exhaustive, and there may be additional information that the company collects, stores and processes about you for a legitimate purpose.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use personal information concerning you in order to:

- Evaluate applications for employment
- Manage all aspects of an employee's employment relationship, including, but not limited to, payroll, benefits, corporate travel and other reimbursable expenses, development and training, absence monitoring, performance appraisal, disciplinary and grievance processes, and any other general administrative and human resource processes
- Develop labour resource and succession plans
- Maintain sickness records and Occupational Health programmes
- Protect the safety and security of Riverside employees and property, including monitoring, controlling and facilitating access and activity using Riverside's computers, communication devices and other resources
- Conduct employee satisfaction surveys and monitor results for employee engagement initiatives
- Administer termination of employment and provide references
- Maintain emergency contact and beneficiary details, which involves Riverside holding information on the individuals that you nominate
- Comply with applicable laws

We monitor internet use and communications in accordance with the IT and Social Media Policy. Your personal data will be treated as strictly confidential and managed by human resources with the minimum of appropriate data shared with - line managers, consultants, advisors and other appropriate individuals in our offices for the purposes set out above.

There may be times when Riverside outsources some services or functions to a third party. For example, pension contributions and benefit administration.

In these cases, Riverside will stipulate the purpose for which your personal information is to be used and prohibit the disclosure of this information to others, and these third parties will be required to demonstrate that their policies and procedures would also meet the standards above.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

The Company will not keep any personal data for any longer than is deemed necessary and only for the purpose for which it was collected.

Riverside will retain information/data which is required to defend any potential future cases. For example. Health and Safety information and/or legal information or additional information as required by our regulatory body.

All data will be kept in accordance with the guidance outlined in the Document Retention Periods Policy which is available on request from HR.

LEGAL REQUIREMENTS

Riverside reserves the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law, requested to do so by a governmental body, it is determined necessary or desirable to comply with the law, to protect or defend our rights or property.

CONSENT

You will have the ability to consent to how you agree to be contacted by the Company. The consent given can be withdrawn at any time as requested in writing by you. However, this does not include the legal basis for processing of data as listed below;

- Consent (periodically reviewed)
- Necessary for a contract
- Legal obligation – e.g. PAYE/Pension contributions
- Vital interest – e.g. Health information
- Public interest – Criminal justice, Health and Safety
- Legitimate interest

UPDATING OR ACCESSING YOUR PERSONAL INFORMATION

With some limited exceptions, you may enquire about the personal information we maintain about you by sending us a written request by letter or Email to the addresses set out below. This is called a Subject Access Request.

Your request must include your full name, current (or last) job title and department of employment with Riverside so we can confirm your identity and the personal information we maintain about you. We may not disclose data that you are not entitled to receive under applicable laws. For example, data revealing information about another individual.

You may request that we correct or stop processing personal information that we hold about you by sending a letter or email to the addresses set out below. If we agree that the information is incorrect or that the processing should be stopped, we will delete or correct the information. If we do not agree that the information is incorrect, we will record that you consider the information to be incorrect in the relevant file(s).

The Company will respond to a subject access request within 30 days. For complex requests this may be extended. If a request is 'manifestly unfounded or excessive' the Company may charge a reasonable fee or refuse to respond.

Questions or Complaints

If you have any questions about this policy or if you would like to submit a request regarding your personal information as stated above, please contact us in writing or via email to hr@riversidemedical.co.uk.

You also have the right make a complaint to the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/>

CHANGES TO THIS POLICY

Just as our business changes constantly, this Policy may also change. To assist you, this Policy is dated and has an associated version number.