RIVERWAY CARE

Recruitment Employee and Worker Privacy Notice

This notice explains how Riverway Care collects and uses personal information throughout recruitment, employment and other work-related engagements, and the choices and rights available to the people concerned.

Document control	Details
Document reference	RW PN 001
Version and issue date	Version 1.0 | 9 October 2026
Approval status	Approved for issue
Approved by	Riverway Care Directors
Next review date	9 October 2027
Applies to	Job applicants, employees, workers, agency staff, contractors, volunteers, students and former workers

1 Who we are and how to contact us

Riverway Care is the data controller for the workforce information described in this notice unless another organisation clearly tells you that it is the controller. Contact hello@riverwaycare.co.uk with privacy questions or rights requests. Current contact information is maintained at riverwaycare.co.uk.

2 Who this notice covers

This notice covers applicants, prospective and current employees, casual and bank workers, agency workers, contractors, consultants, volunteers, trainees, students and former workers. Some people may also receive additional information about a particular system, benefit, monitoring activity or occupational-health process.

3 Information we may collect

- Identity, contact, address, date of birth, emergency-contact and next-of-kin information.
- Applications, employment history, qualifications, professional registrations, references, interview notes and recruitment decisions.
- Right-to-work, identity checking, DBS and other safer-recruitment information.
- Contract, role, pay, tax, National Insurance, pension, expenses, bank and benefit information.
- Rota, attendance, leave, working time, location and timekeeping information where relevant.
- Training, supervision, appraisal, competency, performance, disciplinary, grievance and whistleblowing records.
- Health, disability, sickness, occupational-health, reasonable-adjustment and wellbeing information.
- Equality monitoring information, trade-union membership where relevant and information connected with family leave.
- Use of Riverway systems, devices, accounts, premises and access controls where monitoring is lawful, necessary and explained.
- Images or recordings from identification, events, CCTV or communications where applicable.

4 Where information comes from

Information may come from you, referees, recruitment agencies, previous employers, professional bodies, the Disclosure and Barring Service, right-to-work services, occupational-health providers, training providers, payroll and pension providers, government bodies, managers, colleagues, Riverway systems and publicly available professional sources where checks are lawful and proportionate.

5 Why we use information and our lawful bases

Purpose	Likely lawful basis
Recruit, assess suitability and make an offer	Steps before entering a contract; legitimate interests; legal obligations including safer recruitment.
Manage contracts, pay, benefits, rotas and attendance	Contract and legal obligation.
Protect young people and maintain safe services	Legal obligation; legitimate interests; substantial public interest and safeguarding conditions where special category data is involved.
Support health, adjustments, absence and wellbeing	Legal obligations in employment; occupational health; employment and social-protection conditions.
Provide training, supervision and performance management	Contract; legal obligation; legitimate interests in quality and safe care.

Purpose	Likely lawful basis
Investigate concerns, complaints, conduct or legal claims	Legal obligation; legitimate interests; establishment, exercise or defence of legal claims.
Plan the workforce and monitor equality	Legal obligation and legitimate interests; substantial public interest where permitted safeguards apply.

Consent will only be used where it is genuinely optional and can be withdrawn without disadvantage. It is generally not the main basis for routine employment processing because of the imbalance in the working relationship.

6 Special category and criminal offence information

Riverway may process health, disability, ethnicity, religion, sexual orientation, trade-union and other special category information where necessary and where an Article 9 condition applies. Criminal-offence and DBS information will only be processed with legal authority and safeguards, primarily for suitability and safer recruitment. Access will be restricted and the information will not be retained for longer than necessary.

7 Who we may share information with

- Payroll, pension, benefits, occupational-health, training, recruitment, IT, legal and professional advisers acting under appropriate arrangements.
- HM Revenue and Customs, pension bodies, courts, law-enforcement, regulators and other authorities where required or permitted.
- Ofsted, placing authorities and safeguarding partners where information is relevant to safe care, suitability or a regulatory matter.
- Prospective employers or professional bodies when an authorised or legally required reference or disclosure is made.
- Another organisation involved in a business transfer or restructure, subject to confidentiality and data protection safeguards.

8 Retention

Riverway will keep workforce information in line with its retention schedule. The period depends on the record’s purpose, legal and regulatory requirements, safeguarding relevance and limitation periods. Recruitment information for an unsuccessful applicant will normally be kept for six months after the process ends unless a longer period is justified or the applicant agrees to a talent-pool period. Core employment records will generally be kept for the engagement and an appropriate period afterwards. DBS certificate information will be retained only as long as necessary and handled in line with the DBS code of practice.

9 Security international transfers and automated decisions

Access is limited according to role and need. Riverway uses organisational and technical safeguards and requires processors to protect information under contract. If information is transferred outside the UK, Riverway will use an approved legal safeguard and assess the transfer where required.

Riverway does not intend to make recruitment or employment decisions based solely on automated processing that produces legal or similarly significant effects. If this changes, the affected person will receive specific information and available safeguards.

10 Your rights

Depending on the circumstances, you may ask to access, correct, erase, restrict or object to processing, or receive portable information. You may withdraw consent where consent is used. Rights are not absolute, and Riverway may need to retain or withhold information where law, safeguarding, legal privilege or another person's rights require it.

11 Questions and complaints

Contact hello@riverwaycare.co.uk if you have a question or want to exercise a right. You may also complain to the Information Commissioner's Office at https://ico.org.uk or 0303 123 1113. This notice will be reviewed when Riverway's systems, suppliers or employment arrangements change and at least annually.

References and guidance

This document was developed for Riverway Care using the following legislation and official guidance. The sources should be checked when the document is reviewed.

- ICO employment practices and data protection: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/employment/
- ICO right to be informed: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/the-right-to-be-informed/
- DBS code of practice: https://www.gov.uk/government/publications/dbs-code-of-practice