GDPR and Privacy Policy

Riverside Training is committed to a policy of protecting the rights and privacy of individuals, including learners, staff and others, in accordance with the General Data Protection Regulation (GDPR) 2018.

Riverside Training needs to process certain information about its staff, learners, parents and guardians and other individuals with whom it has a relationship with for various purposes such as, but not limited to:

- The recruitment and payment of staff
- The administration of programmes of study and courses
- Learner enrolment
- Examinations and external accreditation
- Recording Learner progress, attendance and conduct
- Collecting fees
- Complying with legal obligations to funding bodies and government including local government

To comply with various legal obligations, including the obligations imposed on it by GDPR, Riverside Training will ensure that all information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

Responsibilities under the GDPR

Riverside Training will be the 'data controller' under the terms of the legislation – this means it is ultimately responsible for controlling the use and processing of the personal data.

The leadership team is responsible for all day-to-day data protection matters and will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the organisation.

Compliance with the legislation is the personal responsibility of all members of the organisation who process personal information.

Individuals who provide personal data to the organisation are responsible for ensuring that the information is accurate and up to date.

Data Protection Principles

The legislation places a responsibility on every data controller to process any personal data in accordance with the eight principles. Riverside Training undertakes to adhere to the eight principles as follows:

1) Process personal data fairly and lawfully

Riverside Training will make all reasonable efforts to ensure that individuals who are the focus of the personal data (data subjects) are informed of the identity of the data controller, the purposes of the processing, any disclosures to third parties that are envisaged; given an indication of the period for which the data will be kept, and any other information which may be relevant.

2) Process the data for the specific and lawful purpose for which it collected that data and not further process the data in a manner incompatible with this purpose

Riverside Training will ensure that the reason for which it collected the data originally is the only reason for which it processes those data, unless the individual is informed of any additional processing before it takes place.

3) Ensure that the data is adequate, relevant and not excessive in relation to the purpose for which it is processed

Riverside Training will not seek to collect any personal data which is not strictly necessary for the purpose for which it was obtained. Forms for collecting data will always be drafted with this mind. If any irrelevant data are given by individuals, they will be destroyed immediately.

4) Keep personal data accurate and, where necessary, up to date

Riverside Training will review and update all data on a regular basis. It is the responsibility of the individuals giving their personal data to ensure that this is accurate, and each individual should notify us if, for example, a change in circumstances means that the data needs to be updated. It is the responsibility of Riverside Training to ensure that any notification regarding the change is noted and acted on.

5) Only keep personal data for as long as is necessary

Riverside Training undertakes not to retain personal data for longer than is necessary to ensure compliance with the legislation, and any other statutory requirements. This means we will undertake a regular review of the information held and implement a weeding process. We will dispose of any personal data in a way that protects the rights and privacy of the individual concerned (e.g. secure electronic deletion, shredding and disposal of hard copy files as confidential waste). A log will be kept of the records destroyed.

6) Process personal data in accordance with the rights of the data subject under the legislation

Individuals have various rights under the legislation, including a right to:

- Be told the nature of the information held and any parties to whom this may be disclosed
- Prevent processing likely to cause damage or distress
- Prevent processing for purposes of direct marketing
- Be informed about the mechanics of any automated decision-making process that will significantly affect them
- Not have significant decisions that will affect them taken solely by automated process
- Sue for compensation if they suffer damage by any contravention of the legislation
- Take action to rectify, block, erase or destroy inaccurate data
- Request that the office of the information commissioner assess whether any provision of the act has been contravened

Riverside Training will only process personal data in accordance with individuals' rights.

7) Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of personal data, and against accidental loss or destruction of data

All members of staff are responsible for ensuring that any personal data which they hold is kept securely and not disclosed to any unauthorised third parties.

Riverside Training will ensure that all personal data is accessible only to those who have a valid reason for using it.

Riverside Training will have in place appropriate security measures e.g. ensuring that hard copy personal data is kept in lockable filing cabinets/cupboards with controlled access:

- Keeping all personal data in a lockable cabinet with key-controlled access
- Password protecting personal data held electronically
- Archiving personal data which is then kept securely
- Ensuring that PC screens are not left unattended without a password protected screen-saver being used.

In addition, Riverside Training will put in place appropriate measures for the deletion of personal data - manual records will be shredded or disposed of as 'confidential waste'. Hard drives of redundant PCs will be wiped clean before disposal or if that is not possible, destroyed physically. A log will be kept of the records destroyed.

This policy also applies to staff and learners who process personal data 'off-site', e.g. when working at home, and in circumstances additional care must be taken regarding the security of the data.

8) Ensure that no personal data is transferred to a country or a territory outside the European Economic Area (EEA) unless that country or territory ensures adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data. Riverside Training will not transfer data to such territories without the explicit consent of the individual

This also applies to publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the EEA - so Riverside Training will always seek the consent of individuals before placing any personal data (including photographs) on its website.

If we collect personal data in any form via our website, it will provide a clear and detailed privacy statement prominently on the website, and wherever else personal data is collected.

Consent as a basis for processing

Although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner.

Consent is especially important when Riverside Training is processing any sensitive data, as defined by the legislation.

Riverside Training understands consent to mean that the individual has been fully informed of the intended processing and has signified their agreement (e.g. via the enrolment form) whilst being of a sound mind and without having any undue influence exerted upon them. Consent obtained on the basis of misleading information will not be a valid basis for processing. Consent cannot be inferred from the non-response to a communication.

Riverside Training will ensure that any forms used to gather data on an individual will contain a statement (fair collection statement) explaining the use of that data, how the data may be disclosed and also indicate whether or not the individual needs to consent to the processing.

Riverside Training will ensure that if the individual does not give his/her consent for the processing, and there is no other lawful basis on which to process the data, then steps will be taken to ensure that processing of that data does not take place.

Subject Access Rights (SARs)

Individuals have a right to access any personal data relating to them which are held by Riverside Training. Any individual wishing to exercise this right should apply in writing to the Managing Director. Any member of staff receiving a SAR should forward this to the Managing Director. Under the terms of the legislation, any such requests must be complied with within 40 days.

Disclosure of Data

Only disclosures which have been notified under our DP notification must be made and therefore staff and learners should exercise caution when asked to disclose personal data held on another individual or third party.

Riverside Training undertakes not to disclose personal data to unauthorised third parties, including family members, friends, and government bodies and in some circumstances, the police.

Legitimate disclosures may occur in the following instances:

- The individual has given their consent to the disclosure
- The disclosure has been notified to the OIC and is in the legitimate interests of Riverside Training
- The disclosure is required for the performance of a contract.

There are other instances when the legislation permits disclosure without the consent of the individual. Riverside Training publishes various items which will include some personal data, for example:

- Internal telephone directory
- Event information
- Photos and information in marketing materials

It may be that in some circumstances an individual wishes their data processed for such reasons to be kept confidential, or restricted Riverside Training access only. Therefore, it is Riverside Training policy to offer an opportunity to opt-out of the publication of such when collecting the information.

It is the policy of Riverside Training to ensure that senders and recipients of email are made aware that under the DPA, and Freedom of Information Legislation, the contents of email may have to be disclosed in response to a request for information. One means by which this will be communicated will be by a disclaimer on our email signature.

Under the Regulation of Investigatory Powers Act 2000, Lawful Business Practice Regulations, any email sent to or from the organisation may be accessed by someone other than the recipient for system management and security purposes.

Monitoring & Review

This policy is reviewed annually

Current Review Date	July 2026
Next Review Date	July 2027

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