

# Legitimate Interest Assessment

## To Process personal data on Assemble and Peakon

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This legitimate interest assessment (LIA) form outlines how the legitimate interest condition applies to the processing of personal data by Vale food bank for the purpose of volunteer management and administration. It has been created using the Information Commissioner's template, and consists of three tests:

1. Identify a legitimate interest – Purpose Test
2. Show that the processing is necessary to achieve it – Necessity Test
3. Balance it against the individual's interests, rights and freedoms – Balancing Test

### Part 1: Purpose test

An assessment of whether there is a legitimate interest behind the processing.

#### Part 1: Purpose Test

Our people are our most valuable asset. To enable sustainable, expert support and to invest in volunteers and the opportunities available to them, it is crucial that our infrastructure is robust, and user-friendly.

Assemble and Peakon are cloud hosted software applications that have been subject to appropriate due diligence and have the appropriate technical and organisational measures in place to protect personal data from breach.

What's more, Assemble empowers volunteers giving them direct access to their own data to ensure it remains up to date and relevant supporting the principles of accuracy, fairness and transparency. Finally, the systems will allow a more volunteer-centred, consistent, recognition-focused volunteering programme, supporting best practice at all levels.

The Trussell Trust has a contract in place with the developers of Assemble and Peakon to process relevant data relating to volunteers. The Trussell Trust grants a sublicense to food banks to access Peakon and Assemble. Trussell Trust has a Data Sharing Agreement with Network food banks, allowing Trussell Trust access to a food bank's personal data to provide; training and guidance to our volunteer managers and individual volunteers, troubleshooting technical problems with either system or statistical monitoring purposes.

By being part of the Trussell Trust system, we are also strengthening the top level reporting at the national and local level to provide a more comprehensive understanding of the value and impact food banks have.

Not going ahead would limit our ability to provide a consistent, robust and user-focused volunteering programme.

Data being processed is in line with current volunteering best practice.

## Part 2: Necessity test

An assessment of whether the processing is necessary for the purpose we have identified.

The processing of data in Assemble ensures volunteering data from across the food bank is stored in a centralised location, with access only available to those with appropriate permissions. It ensures consistency from recruitment through to inductions, support, rota management and exiting volunteers. The system also allows us to clearly identify volunteers' milestones, allowing for a more dynamic recognition programme.

Peakon provides an anonymised engagement platform for volunteers, giving them a safe environment in which to provide their voice on the food bank's operations. This is important to ensure the food bank's volunteer management processes remain fit for purpose and relevant to the people who are critical to supporting our work.

The data held includes the volunteer's:

- name and contact details
- address
- Note on health issues (if applicable)
- Notes on unspent charges or convictions (where relevant)
- The name and contact details of emergency contacts (data not provided directly by the subject)
- Previous experience and qualifications
- Date of birth / age (optional)
- Driving information (if applicable)
- Disclosure and Barring Service record number and date of issue (if applicable)
- role, location and length of volunteering service

. This information is required to ensure we can manage volunteers in line with best practice, meet our duty of care to these volunteers, and recognise individual's milestones and achievements.

Without Assemble and Peakon, data would be spread across various locations making the possibility of errors and inconsistencies much greater. What's more they wouldn't benefit from the same dynamic permission settings or anonymisation making it harder to control and meet our compliance with UK GDPR requirements.

The only data requested is that directly relevant to the management of volunteers. On Assemble, volunteers have access to their data further empowering them. This way they will be able to update their details directly, ensuring the system is as unobtrusive as possible.

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## Part 3: Balancing test

Consideration of the impact on individuals' interests and rights and freedoms and assess whether this overrides our legitimate interests.

### **Nature of the personal data**

Volunteers names, contact information, date of birth, location and role are all held on the system. The Assemble volunteer application forms ask people to disclose any medical information that will be relevant to the role (e.g. those with back problems not being asked to do heavy lifting) as well as information on any unspent criminal convictions or charges, to ensure appropriate support is put in place.

Where volunteers provide contact information about third parties, their emergency contacts, the data processed only contains basic identifiers, it is only ever used for the purpose for which it was provided by the volunteer, and we consider this processing to be necessary and proportionate.

The data relates to their role as a food bank volunteer.

Food bank volunteers are required to be aged 16 and over for insurance purposes, as such data is not processed for anybody under that age.

### **Reasonable expectations**

Volunteers are directly recruited or via referral through the Assemble system and managed by the food bank.

Data has traditionally been gathered and stored through paper forms, Word Documents, Excel spreadsheets, sign-up sheets etc. As before, the data is only being used to support strong best practice in volunteer management by the food bank. The advantage of Assemble and Peakon is that it provides a more consistent and streamlined volunteering journey.

Privacy statements are included in our volunteer Application form to ensure volunteers understood how their data would be collected and stored. The data was collected directly from the volunteer at the time they started volunteering, being updated as relevant when volunteers contact information changed or new policies were brought into place.

Assemble and Peakon provide us with new technology to hold and process data in a smarter, more secure, and more accessible way. We maintain that volunteers would reasonably expect us to adopt new technologies to support our volunteer recruitment, management and administration processes.

**Likely impact**

The main impact is that we will be able to process data in a more secure, transparent and accurate way. Support and guidance will be provided by the Trussell Trust to ensure volunteers and managers understand the systems and to ensure individuals can access and benefit from these processes.

Volunteers are being provided with an updated Privacy Statement to ensure they understand and are comfortable with the changes being made and know who to go to if they have any questions. We operate from a position of openness and transparency, seeking to ensure volunteers are confident with what is being processed and how.

The type of data being stored isn't changing, just the location of the data. The data is required to ensure a safe, supported volunteering opportunity for all.

Volunteers will not lose control over their data, on the contrary the system has been chosen to maximize volunteers' ability to access and control their own data. Those not happy with the use of these systems can object as is their right by raising their concerns with Project Manager.

Providing an opt-out option would inhibit our ability to manage volunteers in line with best practice and prevent us from being able to provide a comprehensive understanding of volunteering at the food bank, inhibiting opportunities for development. It would likely demand duplication of data and processes exposing the food bank to unnecessary risk.

Can we offer individuals an opt-out?

No

|  |                |
|--|----------------|
| Can we rely on legitimate interests for this processing? | Yes            |
| Additional comments to justify our answer? (optional)    |                |
| LIA completed by   | Charles Cooper |
| Date   | 27/07/2021     |