

Legitimate Interests Assessment

1. What are the legitimate interest(s).

- Why we want to process the data
 - To be able to contact carers as a group or individually
 - To hold some historical details of their experience as a carer or other responsibilities so that ongoing support is relevant and appropriate.
- Who benefits from the processing?
 - Carers and indirectly the people they care for. They receive relevant information that is appropriate for their needs.
- Are there any wider public benefits to the processing?
 - The collective knowledge allows our organisation to campaign for improvements in services and benefits for carers.
 - We are able to share best practice
- How important are those benefits?
 - Feedback from carers shows that actual examples of specific support have been helpful in practical and emotional ways.
 - Carers who have used our service report that knowing we are available makes them feel they have someone to turn to.
- What would the impact be if you couldn't go ahead?
 - Our service would be altered dramatically. We would not be able to be proactive in offering support and information about our service could only be 'marketed' by using social media and other forms of advertising such as posters in public places
- Would your use of the data be unethical or unlawful in any way?
 - No

2. Is keeping the data a necessity?

- Does this processing actually help to further that interest?
 - Yes, as detailed above we couldn't operate as we do now without processing the data
- Is it a reasonable way to go about it?
 - It is the only way to ensure that we are directly in touch with carers in a way that is private and personal and relevant to their needs
- Is there another less intrusive way to achieve the same result?
 - No

3. Balance of interests test

- What is the nature of your relationship with the individual?
 - We provide a service giving information, practical and emotional support
- Is any of the data particularly sensitive or private?
 - It may be depending on their circumstances and those of the person they care for. That is why we keep the data securely.
- Would people expect you to use their data in this way?
 - Yes, they understand that it would be very difficult to continue to support them in the best way unless we held their data.
- Are you happy to explain it to them?
 - Yes
- Are some people likely to object or find it intrusive?
 - Very occasionally in which case we only have their data temporarily whilst we deliver the specific support they need at that time
- What is the possible impact on the individual?
 - They will receive the appropriate support
- How big an impact might it have on them?
 - By holding the data they get the appropriate information in a timely way. If we didn't hold it that wouldn't happen.
- Are you processing children's data?
 - If the carer is caring for a child with additional needs
- Are any of the individuals vulnerable in any other way?
 - All of the cared for are vulnerable depending on their illness or condition
- Can you adopt any safeguards to minimise the impact?
 - All the data is held securely and is not accessible to anyone other than staff or other agencies that we have been authorised to share the data with.
- Can you offer an opt-out?
 - We could delete any or all of the information about any individual if they asked us to. This would have an impact on the service we could deliver but we would still be able to give support if they contacted us.

Outcome

Legitimate Interests is the correct conclusion.

We will review Data Protection annually and its impact carers.

Because the legislation is new we have conducted a Data Protection Impact Assessment which will also be reviewed annually.

Further information is available in Knowsley Carers Privacy Notice.