

### Step 3: a balancing test.

We have a professional and supportive relationship with the individuals we help. They have been referred to us by responsible organisations and they have consented to work with us. We acknowledge that the data we need to use includes information about family circumstances and emotional health that is particularly sensitive, but we are respectful in our approach and check that people expect us to use their data to assess their needs and guide our interventions. This is something we explain to them at many stages of our involvement, and allow them to say if they object or find it intrusive.

We know that the impacts of our sharing data unnecessarily or breaching confidentiality about the detailed content of sessions can be severe and our professional standards are set very high to guard against these risks. This is particularly important because we are processing children's data, and the individuals and often their families are vulnerable because of mental health issues, deprivation or other challenges to their wellbeing, so we operate layers of professional safeguards, ranging from staff training and supervision to physical security of premises and record keeping systems.

Where individuals wish to opt out of sharing specific pieces of information that we might normally expect to have, we explain the implications and consider whether there are ways we can still provide a service without processing this information.

Having considered the impact of our processing, we fully recognise the high levels of sensitivity around our work, but come to the conclusion there is nothing which might override the interests we have identified.

### Further information

As we state in our Privacy Notices, if anyone would like to know more, or has any complaints about how we use their information, or if for any reason does not wish to have their information used in any of the ways described in our documentation, they should tell us. Individuals are entitled to withdraw any consent that they have previously provided. They don't need to give reasons for their choices, but we may need to explain any impact on the ways in which we can continue to work with them.

### **Our contact is the Data Protection Officer:**

Marie Blythe  
Director of The Bungalow Partnership

Anyone who is not happy about what we do with their personal information, can also complain to the Information Commissioner: <https://ico.org.uk/concerns/>

or call 0303 123 111

### **THE BUNGALOW PARTNERSHIP**

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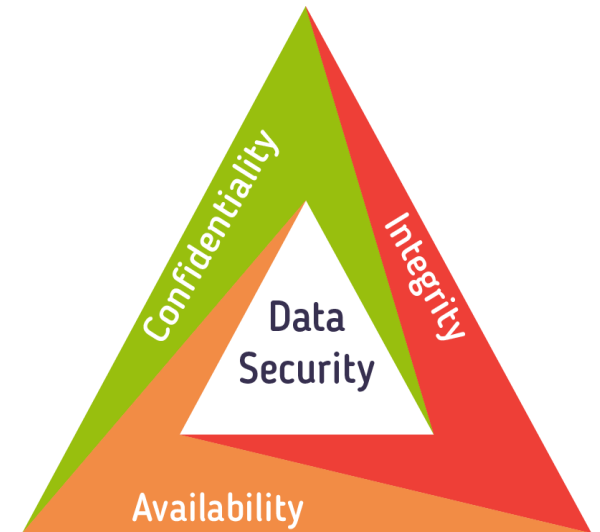
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## LEGITIMATE INTEREST ASSESSMENT



**The Lawful Basis for Processing Personal Data  
for Children, Young People, their Families and  
other clients**

## **Introduction**

The Bungalow Partnership works with parents/carers, their families and/or their child and other individuals. We therefore need to use information about those parents/carers, their families and/or their children and other individuals to enable us to carry out specific functions for which we are responsible and to provide a service that will benefit them.

We receive information from the referring agency (usually a school) and from parents/carers and/or the children themselves and other individuals.

Parents/carers, and children over 13 who have capacity, give their consent to the referrals and to us receiving information from the referring agencies. We may also receive information from other agencies who work with parents/carers, families and/or children and other individuals, where this is relevant to our work and they have a lawful basis to share it with us.

We let parents/carers, children where applicable, and other individuals know that we process information on a “legitimate interests basis”. We seek further specific consents to process sensitive (special category) information and to process information in circumstances where “legitimate interests” may not provide a clear lawful basis.

## **Legitimate Interests Assessment**

A Legitimate Interests Assessment (LIA) is a type of light-touch risk assessment based on the specific context and circumstances in which we process personal data. It helps us ensure that our processing is lawful. We have recorded this LIA to help demonstrate GDPR compliance in line with our accountability obligations under Articles 5(2) and 24.

### **Step 1. Identifying the legitimate interests**

We provide therapeutic interventions that benefit children and young people and other individuals. Cases are referred to us by organisations (for example schools who contribute to the cost of our services) or directly by other individuals. We need information about individuals and families to inform our assessments and to conduct the interventions. We also need to report back to the referring organisations, and to co-ordinate with other agencies to ensure effective support for children and their families .

It is the children and young people themselves who benefit most from the processing of their information. They receive the most effective service possible, which maximises their chances of success at school and improves their emotional wellbeing. Families and schools also benefit from improvements in behaviour, concentration and social skills. Schools can use evidence of their involvement with the Bungalow Partnership as part of their accountability for their wider responsibilities towards vulnerable pupils.

Other individuals also benefit from the processing of their information. They receive the most effective service, which maximises their chances of success at work and improves their health, emotional wellbeing, relationships with colleagues, family and friends.

There are wider public benefits too; our activities, which would not be possible without processing personal information, have a positive impact on the wellbeing of children, young people, and other individuals helping them to be constructive members of society.

The benefits of our activities are very important to families, individuals, schools and the wider community. If our work could not go ahead, there would be an unmet need for support and a detrimental impact on the wellbeing of the children, young people and other individuals we work with.

There is nothing in any way unethical or unlawful in the way we use data. To the extent that we need to process sensitive (special category) information, we obtain specific consent. Unless separate specific consent is given, individuals and families are only identified to agencies who are already working with them or who need to know about them. The therapists who carry out interventions are members of professional bodies and operate in line with strict ethical codes, and any evaluation, monitoring and reporting we need to conduct is done in a way that ensures anonymity, unless specific consent is given, for example to use a case study with details that may identify someone.

### **Step 2: Applying the necessity test**

We process data sensitively, efficiently and professionally, so that we can carry out our work effectively. We can demonstrate positive impacts and take account of feedback from both referring agencies and people we have helped. We do not do anything unreasonable and we make it clear that families/individuals should let us know if they feel we are being unnecessarily intrusive. We have not identified any way of performing our work in an even less intrusive way.