

**RECORD OF PROCESSING ACTIVITIES**

**Introduction**

The purpose of this document is to describe:

- The reasons why we process (see Note 1) personal information (see Note 2)
- The legal basis for processing personal information (see Note 4)
- The types of personal information processed e.g. name, address, age
- Whether the personal information processed constitutes a 'special category of personal data' (i.e. is considered to be sensitive personal data) (see Note 3)
- Who provides the personal information to us e.g. applicant
- Who the personal information is about e.g. donor, person using a foodbank, employee
- How long we retain the personal information e.g. 2 years, indefinitely
- Recipients that we share the personal information with e.g. Trussell Trust
- Third party organisations used to process personal information e.g. software provider (Microsoft, Google etc.)



	Processing purpose	Lawful basis for processing	Data subject	Personal data	Special category personal information	Source of personal information	Retention period for the personal information	Retention period reason e.g. HMRC guidance for gift aid	Recipients of the personal information	Third parties used to process the personal information
1	To provide help to people who use foodbanks	Legitimate interest Consent	People that use foodbanks	Name Addresses Dependents Reason why need help DOB and Age	Health	Data subject referral agency	6 years (electronic record in DCS) 2 years (paper record vouchers)	To provide appropriate support and for statistical monitoring and research	Trussell Trust Named referral agencies	Bitzesty (DCS) AWS
4	To commission / undertake surveys and research	Consent	People that use foodbanks Foodbank staff, volunteers supporters public TT staff	Name Addresses Dependents Reason why need help Age	Health Ethnicity Religion	Survey participants	12 months after survey is completed when results are anonymised. If not anonymised before	Participant details are retained for 12 months after survey as during this period we would still be working on the research report and if they have consented we may need to recontact them. After work has completed on the research project (max 12 months after survey/ research participation) then all results will be anonymised.	Trussell Trust	Peakon
5	Campaigns and advocacy	Consent	Supporters	Name Address Email address Contact preferences	N/A	Data Subject	2 years after last interaction	Supporter details are kept so that we can contact them about campaigns where they have consented to this. Two years after the last interaction we will assume that we need to re-seek consent and would therefore remove their details if they do not consent to continued contact.	Trussell Trust	e.g. Mailchimp
6	To raise awareness of the work of the food bank (including case studies)	Consent	People that use foodbanks Foodbank staff, volunteers supporters	Name Addresses Dependents Reason why they need help /support Personal and background information Images/Video/Testimonies	Health Sexuality Ethnicity Religion	Data subject OR legal guardian where subject is aged 16-17 y/o	3 years after date of consent	Integral to multiple elements of our organisation, i.e. real life stories/accounts/quotes vital for campaigning for change. Images vital for media, social media and marketing collateral to explain what we do and how we are helping. Case studies significantly help explain our work for fundraising needs	Trussell Trust, Corporate Partners Bids (externally sent)	Wordpress (Website), local publishers
7	Electronic direct marketing (PECR) - to develop relationships & communicate with supporters	Consent	supporters	Name Address IP address Email address Contact preferences Relationship notes		Data Subject	2 years from last interaction	Supporter details are kept so that we can contact them about campaigns where they have consented to this. Two years after the last interaction we will assume that we need to re-seek consent and would therefore remove their details if they do not consent to continued contact.		print companies Mailchimp online giving platforms e.g. Just Giving Assemble (VMS) Google Analytics Facebook Wordpress (website)
8	To develop relationships & communicate with supporters	Legitimate interest	Supporters: Campaigners, Financial Donor, Non financial Donor	Name Address Contact preferences Relationship notes	N/A	Data subject	Supporters: Campaigners - 2 yrs. Financial Donor - 7 years Non financial Donor - 3 years	Supporter details are kept so that we can contact them about their giving or support. The retention varies dependant on the subject type.		DCS Mailchimp

10	To run events (internal) and public (external) events	Consent	Supporters staff volunteers attendees	Name Address Email address Contact preferences Dietary requirements Relationship notes Job title	Health	data subject	3 years after date of consent	Event participants may be motivated by particular types of event e.g. cycling. These events are not necessarily annual. Participant data is retained to ensure effective communication about non regular events which may be of interest.	catering company venue provider event management company	Mailchimp Eventbrite
11	processing non financial gift in kind	performance of a contract	Donors	Name Address Email Phone Motivations	N/A	Data subject	3 years from last donation	To continue effective communication with individuals who support our work through donations in line with the organisation's charitable purpose		Bit Zesty (DCS)
12	processing monetary donations	performance of a contract	Donors	Name Address Tax status Financial information	N/A	Data subject	7 years from last donation	Statutory requirement for tax and anti-money laundering purposes	HMRC Bank	online giving platform e.g. Just Giving
13	To claim GiftAid	performance of a contract	Donors	Name Address tax status financial information Gift Aid Declaration (GAD)	N/A	Data subject	7 years from last donation	Statutory requirement for tax and anti-money laundering purposes	HMRC	e.g. Just giving e.g. Microsoft for storage of GAD image files
14	To recruit volunteers	Consent	Volunteer applicant	Name Address Contact details Emergency contact details Date of birth Motivations Character references	Medical Criminal conviction data	Data subject DBS/ Disclosure Scotland or Access NI Referee	3 months	Applicant data is retained for 3 months in order to process a person's application request.		Do-it.org Gravity (wordpress website) Google Suites (@foodbank.org.uk email account)
15	Volunteer Administration	performance of a contract	Volunteers	Name Address Contact details Emergency contact details Date of birth Motivations Character references	Medical Criminal conviction data Ethnicity Religion	Data subject DBS/ Disclosure Scotland or Access NI Referee	6 years after volunteering ceases	We hold the personal information where it is necessary to do so for the management of any active or potential legal proceedings, to resolve or defend claims,	Trussell Trust	Peakon Assemble (VMS) DCS (BitZesty)
16	To recruit new members of staff	performance of a contract	Applicants	Name Address Contact details Date of birth Criminal conviction Gender Nationality References	Medical Sexual orientation Ethnicity Religion	Data subject Referee	6 month if unsuccessful or 6 years after employment ceases	The organisation needs to process data to take steps at your request prior to entering into a contract with you. In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations	previous employer	DBS (or equivalent e.g. Access NI or Disclosure Scotland),
17	Employee administration	Performance of a contract Consent Statutory requirement	Employee	Name Date of birth Address Telephone number Next of kin Qualifications Salaries Gender Nationality References Photograph Passport details NI Driving Licence Insurance	Medical Sexual orientation Ethnicity Religion	Employee	At least 6 years after employment ceases	The organisation needs to process data to ensure that it is complying with its legal obligations. Most records will be retained for six years after employment ceases but others e.g. pension contribution records will be kept for longer	Employee assistance scheme Trussell Trust Bank	HMRC Peakon DCS

18	To run payroll	Performance of a contract	Employees	Name Marital status National insurance number Bank account details	N/A	Employee	6 years at the end of each tax year after employment ceases	The organisation needs to process data to ensure that it is complying with its legal obligations including statutory requirements under the taxes management act	HMRC	Payroll processor
19	To process expenses	Performance of a contract	Staff Trustees Volunteers	Name Email address Address Bank account details	N/A	Data subject	6 years at the end of each tax year after employment ceases	The organisation needs to process data to ensure that it is complying with its legal obligations including statutory requirements under the taxes management act	HMRC	Accounts package
21	To pay suppliers	Performance of a contract	Supplier employees	Name Contact details Bank account details	N/A	Supplier's employee	6 years at the end of each tax year after contract ceases	The organisation needs to process data to ensure that it is complying with its legal obligations including statutory requirements under the taxes management act	Auditors	Accounts package
22	To maintain health and safety records	Legal obligation	Employees Volunteers Visitors Contractors	Name	Medical	Data subject	6 years	personal information is held where it is necessary to do so to meet legal obligations, for the management of any active or potential legal proceedings, to resolve or defend claims under the Limitations Act	HSE	software vendor
23	Governance (of the organisation)	Legal obligation	Trustees	Name Contact details Date of birth Bank account details	N/A	Data subject	6 years after trusteeship ceases	Personal information is kept for the purposes of satisfying any legal, accounting, or reporting requirements. Some records e.g. trustee meeting minutes will need to be kept for longer	Charity Commissions Trussell Trust HMRC ICO Fundraising regulator	accountants
24	To respond to reported safeguarding concerns	Legal obligation Performance of a contract	Employees, Volunteers or Trustees, Contractor, Service user, Member of public	Name Address DOB Email	Medical Ethnicity Religion	Data subject/person disclosing	75 years after last contact with the subject of the concern	The organisation needs to process data to ensure that it is complying with its legal obligations including a duty to cooperate with statutory services as part of any safeguarding or police investigation	thirtyone:eight statutory agencies (vital interest)	
25	To respond to general enquiries	Legitimate interest	Enquirers	Name Email address contact telephone number	N/A	Data subject	2 years	To enable timely support to those accessing our services, and to understand who is contacting us and why. This data is used to improve our customer support services		Email client Website
26	To deal with complaints	Legitimate interest	Complainant	Name Contact details inc: address and email		Data subject	6 years if the complaint is upheld 3 years after complaint is dealt with if not upheld	Personal information is held where it is necessary to do so to meet legal obligations, for the management of any active or potential legal proceedings, to resolve or defend claims under the Limitations Act	Trussell Trust	

**Note 1**

Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

**Note 2**

Personal information' is any information relating to an identifiable person. An identifiable person is someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person

**Note 3**

Special categories of personal information include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation

**Note 4**

For processing to be lawful under the GDPR, you need to identify a lawful basis before you can process personal data. These are often referred to as the "conditions for processing". You must be able to satisfy at least one of these conditions. GDPR conditions for processing personal information are:

**For processing personal data**

6(1)(a) – Consent of the data subject

6(1)(b) – Processing is necessary for the Performance of a contract with the data subject or to take steps to enter into a contract

6(1)(c) – Processing is necessary for compliance with a legal obligation

6(1)(d) – Processing is necessary to protect the vital interests of a data subject or another person

6(1)(e) – Processing is necessary for the Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

6(1)(f) – Processing is necessary for the purposes of Legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject

Processing special categories of personal data

Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation is prohibited unless ....

9(2)(a) - the data subject has given explicit consent to the processing of those personal data for one or more specified purposes

9(2)(b) - processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

9(2)(c) - processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent

9(2)(d) - processing is carried out in the course of its Legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects

9(2)(e) - processing relates to personal data which are manifestly made public by the data subject

9(2)(f) - processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity

9(2)(g) - processing is necessary for reasons of substantial public interest

9(2)(h) - processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services

9(2)(i) - processing is necessary for reasons of public interest in the area of public health

9(2)(j) - processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes