



To: Privacy International

By email only: @privacyinternational.org

23 June 2022

Dear Privacy International

Introduction to Deliveroo and our relationship with riders

We have invested in and pioneered a flexible system of work based on our understanding of what our riders' care about most - flexibility.

This flexibility means riders have complete freedom to choose if they wish to work, when they choose to log in and make themselves available for work, and when they choose to log out. They have complete freedom to accept or reject offers of work made to them, can work with multiple platforms at the same time (called multi-apping) and can appoint substitutes to complete work on their behalf.

A recent groundbreaking study from the Social Market Foundation - [Rides and Responsibilities](#) - looked at the needs and preferences of those who work in the gig economy. It concluded that *'most Deliveroo riders consider riding with Deliveroo to be good work, and choose it deliberately because they value its autonomy and flexibility. They are as happy with their work as people in conventional employment. They make an informed choice to ride with Deliveroo in preference of other activities, often because they value the flexibility this offers more highly than they prize the characteristics of conventional employment.'* Ultimately, this study found that our riders are economic actors making informed choices about how and where to use their time, puncturing the simplistic and potentially patronising narrative that gig work is a last resort.

Alongside this flexibility, we were one of the first platforms to provide riders with free personal accident insurance and have gone further in many markets by also covering them for short-term sickness, and by giving a payout on the birth of a child so they can spend time with their new baby. More information on our insurance products can be found on our [Rider Website](#).

Lastly, as you may have seen, we have recently signed a historic union recognition deal in the UK with the GMB covering the 90,000 self-employed riders who choose to work with us. This agreement provides an innovative blueprint for the future of work, and will see the GMB having rights to collective bargaining on pay and consultation rights on benefits and other issues, including riders' health, safety and wellbeing. GMB will also be able to represent individual riders who are GMB members in disputes, giving them a stronger voice.

Our approach to data protection

We place a great emphasis on data protection and see this as a core part of treating riders with dignity and respect and welcome the positive commentary in your report *"Managed by*



Bots” regarding our approach to handling data subject access requests¹. We have invested in our efforts to ensure compliance with applicable data protection law (for example, by growing our DPO, legal, compliance, data management and information security functions), as well as making sure that we are transparent with our riders (and other individuals) about how we process their personal data. This includes providing accessible information on our data processing and providing easy ways for riders to exercise their data rights as set out in our Rider Privacy Policy, available on our [Rider Website](#).

Our approach to automated decision-making and information on metrics, measures and variables and in relation to work allocation

At Deliveroo, we aim to get orders delivered to customers as quickly as possible. We do this through our despatch algorithm, which finds the rider who is best located to deliver the order. Our despatch algorithm estimates the collection time of the food and then calculates which rider is best placed to collect the order, based on their location and vehicle type.

The despatch algorithm **does not** take into account a rider's individual activity, such as any assessment of a rider based on their previous deliveries, how frequently they log in to work, or how frequently they accept or reject orders.

We provide information to riders on how the despatch algorithm works on our Rider Website (for a summary see [here](#)), as well as information on the prioritisation of certain vehicle types [here](#).

Information on human reviews within Deliveroo

We do not use solely automated processes to make a decision about whether to end a rider's supplier agreement. A **Deliveroo team member will always review the case and investigate before any decision is taken to offboard a rider.**

This manual review of the information collected is performed by trained operations representatives, in our Rider Reviews team. This person completing the manual review then makes a decision about the severity of the issue and the action required. The action taken could include termination of a rider supplier agreement.

Any decision taken to terminate a rider supplier agreement may also, where appropriate, be checked by another member of our Rider Operations team to confirm the decision taken by the person who examined the case.

We provide more information to riders on the process for disputing a termination of a rider supplier agreement on our Rider Website (see [here](#), including a link provided directly on the webpage for riders to contact our Rider Support team). This ensures even riders who have had their rider supplier agreements terminated and no longer have access via the rider app can continue to engage with us to have a termination reviewed again (manually).

We hope our response above answers your queries.

¹ pg. 56 of your “Managed by Bots” report: “*Out of the seven companies we have made requests to, Deliveroo was the most compliant.... Deliveroo responded to the requests within the legal time limit, provided a guidance document, clearly annotating the data categories and communicated with us through the process.*”



Yours sincerely,



Director of Policy