

# Sample LIA template

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside our [legitimate interests guidance](#).

## Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- **Why do you want to process the data?** – to provide a Good Neighbour Scheme (GNS)
- **What benefit do you expect to get from the processing?** – enough information to provide a good service.
- **Do any third parties benefit from the processing?** – no
- **Are there any wider public benefits to the processing?** – no
- **How important are the benefits that you have identified?** – very important for the GNS.
- **What would the impact be if you couldn't go ahead with the processing?** – less than suitable service.
- **Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?** – good arrangements for privacy and security.
- **Are you complying with other relevant laws?** – yes, eg DBS checks
- **Are you complying with industry guidelines or codes of practice?** – as far as is applicable for volunteers.
- **Are there any other ethical issues with the processing?** – no

## Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- **Will this processing actually help you achieve your purpose?** – yes
- **Is the processing proportionate to that purpose?** – yes
- **Can you achieve the same purpose without the processing?** – no
- **Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?** – no. Information collected solely for operating the GNS. Data is not shared with any other party.

## Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

<b>Nature of the personal data</b>
<ul style="list-style-type: none"><li>• <b>Is it special category data or criminal offence data?</b> - no</li><li>• <b>Is it data which people are likely to consider particularly 'private'?</b> – not particularly private</li><li>• <b>Are you processing children's data or data relating to other vulnerable people?</b> – potentially vulnerable adults but no children</li><li>• <b>Is the data about people in their personal or professional capacity?</b> – personal</li></ul>
<b>Reasonable expectations</b>
<ul style="list-style-type: none"><li>• <b>Do you have an existing relationship with the individual?</b> – not before request is made from either client or volunteer.</li><li>• <b>What's the nature of the relationship and how have you used data in the past?</b> – data mainly relating to name, address and contact details</li><li>• <b>Did you collect the data directly from the individual? What did you tell them at the time?</b> – to be collected from individuals or with their agreement</li><li>• <b>If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?</b> –the Policy sets out how data is processed and in what special circumstances it will be shared, eg in emergency or safeguarding issues.</li><li>• <b>How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?</b> – since the start of Good Neighbours in February 2021. No changes since then</li><li>• <b>Is your intended purpose and method widely understood?</b> - yes</li><li>• <b>Are you intending to do anything new or innovative?</b> - no</li><li>• <b>Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?</b> – not yet</li><li>• <b>Are there any other factors in the particular circumstances that mean they would or would not expect the processing?</b> – no, all legitimate reasons for gathering and holding information.</li></ul>
<b>Likely impact</b>
<ul style="list-style-type: none"><li>• <b>What are the possible impacts of the processing on people?</b> – as good a service as possible.</li></ul>

<ul style="list-style-type: none"> <li>• <b>Will individuals lose any control over the use of their personal data?</b> - no</li> <li>• <b>What is the likelihood and severity of any potential impact?</b> – non foreseen</li> <li>• <b>Are some people likely to object to the processing or find it intrusive?</b> - no</li> <li>• <b>Would you be happy to explain the processing to individuals?</b> - yes</li> <li>• <b>Can you adopt any safeguards to minimise the impact?</b> – yes, paper documents kept securely, electronic data password protected. Data to be shared only on a need-to-know basis for benefit of person.</li> </ul>	
<b>Can you offer individuals an opt-out?</b>	Not if a service is requested by a client or a volunteer wants to join GNS.

## Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

<b>Can you rely on legitimate interests for this processing?</b>	Yes
<b>Do you have any comments to justify your answer? (optional)</b>  The minimum data necessary is obtained in order to operate the GNS service as safely as possible and with maximum benefit for clients and volunteers. Data Protection policy in place, agreed and adopted by GNS Committee on 13 January 2021 and reviewed on 19 January 2022, January 2023 and January 2024. Policy recommended by Somerset County Council for the operation of Good Neighbours Schemes.	
LIA completed by	Cathy Butterworth
Date of review	8 February 2024

## What's next?

Chair's signature: Johnny Torrens-Spence



Date: 8 February 2024

Next Review due: February 2025