

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?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

The data will be processed and sent only to Parish resident's and friends of the Parish (who have confirmed their interest in receiving such communications). No third parties will be contacted.

The data will consist of:

1. Parish Council material such as, minutes, agendas, precepts, accounts, Neighbourhood Planning documentation and Local Authorities correspondence.
2. Items of a general or specific interest to Parish residents. These will be items of information and /or requests for help from other community members, for example - in the case of a missing pet. Other notifications of community benefit would be details of local events; sharing information from village groups; communications from the Neighbourhood Watch coordinator; notification of any unexpected disruption to traffic near the villages; warnings about scams; changes in the opening hours of local businesses and sharing news of awards to local businesses.
3. The key areas are: notifying villagers of urgent news; supporting the local community; sharing information about local businesses for the benefit of the residents.

The Parish Council communications will assist in keeping residents informed on their Parish Council activities.

The remaining communications assists in fostering a sense of community within the Parish, providing Parish residents with local information in a timely but unobtrusive manner.

The Parish Council website will include much of the material, but residents would have to take the initiative in finding out the information. The immediacy of the item 2 information could not be achieved without using an email system.

The Parish Council is registered with the ICO and its procedures are followed to ensure residents can withdraw from the service and that their data is protected.

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?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

Much of the Parish Council material can be accessed via the Parish Council's website and in the case of Agendas and minutes by residents looking at the Parish noticeboards. Local Authorities information can be accessed by residents joining their circulation list.

However, the use of a resident's email facility brings the information to residents without them having to access either a website, notice boards or having to register with Local Authorities.

The immediacy of the other use of the email circulation list cannot be replicated effectively by other means.

Only the minimum amount of data in each case is circulated.

The use of the email circulation list in each of the cases is proportionate the benefits that residents receive from receiving the communication.

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.

Nature of the personal data

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?
- Is the data about people in their personal or professional capacity?

No special, children, personal or professional data will be held or circulated.

Reasonable expectations

- Do you have an existing relationship with the individual?
- What's the nature of the relationship and how have you used data in the past?

- Did you collect the data directly from the individual? What did you tell them at the time?
- 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?
- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?
- Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

The email list has been built up over several years and in no case has an individual resident objected to the use made of their personal information. Residents were informed of the use that would be made of their email details at the time their personal data is obtained. Individuals can opt-out at any time and contact details are provided on each communication to allow residents to contact the Parish Clerk.

Likely impact

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the impact?

The Parish Council will inform residents on every Newsletter from autumn 2020 on what their information is used for, how they can both amend and remove their personal details from the listing.

The information circulated is not considered in anyway to be intrusive.

Can you offer individuals an opt-out?	Yes
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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 interest's basis.

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer?	
<p>Increasing the exposure of residents to their Parish Council activities is a legitimate activity of the Parish Council and its use of the email circulation list is considered to be legitimate. It assists in keeping residents informed and adds to the transparency of the Parish Council's functions.</p> <p>The remaining notices are of interest to residents and it assists in developing and maintaining a sense of community.</p> <p>None of the information is intrusive.</p> <p>No commercial, political, ethical or religious views will be circulated.</p>	
LIA completed by	
Date	

What's next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.

Include details of your purposes and lawful basis for processing in your privacy information, including an outline of your legitimate interests.