

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?
- Warwick Volunteers processes data in order to support specific community need through providing appropriate volunteers recruited from within the student cohort of the University of Warwick. It further seeks to use these community volunteering placements as an opportunity for the student cohort of the University to exercise and develop their skills whilst developing a sense of community.
 - Warwick Volunteers benefit from the processing of data allowing the matching of relevant quantities of volunteers to relevant volunteering opportunities; students benefit through access to extracurricular opportunities; the community outside of the membership of the University of Warwick benefit from the efforts of those student volunteering, there is wider public benefit through diversity and inclusivity and breaking down societal barriers.
 - The students of Warwick Volunteers invest a significant amount of time in the communities they serve, often working with very disadvantaged groups, as well as addressing the physical environment; on an annual basis some 133 third sector charity and community groups along with 43 schools receive assistance from students, this impact is of substantial importance and value to locally and nationally.

- Without data processing it would be impracticable and unsafe to operate the volunteering operation.
- Warwick Volunteers undertakes no automated data processing. Profiling is undertaken only to ensure that the opportunities provided are accessible to the widest cross section of the student cohort of the University of Warwick. Warwick Volunteers complies with the University of Warwick Data Protection policy. Data is also processed to ensure appropriate safeguarding is undertaken on behalf of "At Risk" groups with whom volunteers will be interacting in line with Government guidance on regulated activity. There are no ethical issues with the processing.

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?
- Warwick Volunteers needs to process data in order to ensure:
 - The matching of volunteering opportunities with appropriate volunteers in proportionate measures.
 - Any necessary training has been undertaken prior the volunteers becoming active.
 - That, where applicable, appropriate safeguarding checks have been undertaken for regulated activities.
 - Participation levels in volunteering opportunities are viable and of interest to the volunteers and that volunteering hours are logged
 - That involvement is recorded for the purposes of insurance, health & safety and in the event of dispute or investigation.
 - Appropriate rewards and recognition can be applied to the volunteer membership as well as to facilitate employment references.
 - That no barriers exist to volunteering opportunities being equally open to all student members of the University of Warwick.
 - Accurate records are maintained of volunteer expenses in order to meet financial obligations
 - Warwick Volunteers limits the data it processes to the minimum required to safely operate its volunteering activities; the processing is proportionate to fulfilling that purpose.
 - Without this processing it would be impracticable to run the volunteering programme.

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
<ul style="list-style-type: none">• 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?
<ul style="list-style-type: none">• No data is processed in any special category or regarding criminal offences• No data is such that individuals might consider particularly 'private'.• Warwick Volunteers does not process children's, Adults at Risk or data relating to other vulnerable people.• The data held relates to activities undertaken by people in their personal capacity.
Reasonable expectations
<ul style="list-style-type: none">• 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?
<ul style="list-style-type: none">• Data is only recorded once the person has expressed a desire to volunteer and

no further data will be recorded unless and until the individual progresses through any relevant screening, training or actively participates in volunteering.

- Where volunteers have previous involvement with Warwick Volunteers their data may exempt them from repeating screening and training.
- The data may be collected directly from the individual or be provided by the senior volunteer responsible for the activity before and after the activity has occurred. Data may also come from third parties who have received the volunteer introduction from Warwick Volunteers as confirmation of activity.
- The only third-party data Warwick Volunteers obtains is from a volunteering delivery partner confirming the participation of a member. The original data this is appended to was received from the individual and shared with the aforementioned partner though the active consent of the member.
- Data will only be held for a maximum of 7 years in line with the Statute of Limitations.
- The scope and purpose of membership in student group extracurricular activity is widely understood in the student body at the University of Warwick as elsewhere.
- It is not the intention of Warwick Volunteers to do anything new or innovative with the data it holds.
- Warwick Volunteers believes its members would not find it unreasonable that details of their membership are processed by Warwick Volunteers, the act of joining Warwick Volunteers is in itself voluntary.
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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 impact on the processing of individuals data is that they will be permitted to participate in the activities for which they have expressed interest.

<ul style="list-style-type: none"> • • Individuals will lose control over the use of their personal data only in that a record needs to be kept of participation up to the Statute of Limitations in order to secure Warwick Volunteers against any claim or litigation regarding volunteering activity undertaken under its auspices. • The processing of membership data is unlikely to have any major impact and its severity would be very low. • It is highly unlikely any individuals would object, on joining a membership organisation, to their membership details being processed or to find this intrusive. • It would be simple to explain the processing to individuals as Warwick Volunteers processing is common practice across any membership organisation and in particular common to higher education and student extracurricular activities. • University of Warwick data security principles are implemented on data storage and staff and volunteer leaders undertake annual training regarding data processing and security principles. 	
Can you offer individuals an opt-out?	No

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.

Can you rely on legitimate interests for this processing?	Yes
<p>Do you have any comments to justify your answer? (optional)</p> <p>It would be impossible to run a membership organisation, placing volunteering into community projects without processing their data. Data processing is limited to that necessary for undertaking this object and participation in Warwick Volunteers is an optional activities for students of the University of Warwick.</p>	

LIA completed by	Paul Barlow
Date	25 th November 2020

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.