

Friends of English Bowling - Legitimate Interests Assessment

There are three lawful bases for processing data. You will need to choose which one you will use:

- Consent
- Necessary for the performance of a contract
- Legitimate interests

To use 'Legitimate Interests' you need to conduct a Legitimate Interest Assessment (LIA). This requires you to identify a legitimate interest, show what processes are necessary to achieve it and balance it against the individual's interests, rights and freedoms. For example, the children, young people that attend your project are members of your organisation. Therefore, the data that you keep is required to keep them both informed and safe.

A copy of this LIA will be kept on record and reviewed annually as part of our general policy review.

Details of Legitimate Interests must be included in your privacy notice, which is why completing the 'Identified Legitimate Interests' tables will help you to identify and protect the interests of children, young people, parent/carers, staff and volunteers.

As an organisation we have checked the following:	Tick:
We have checked that Legitimate Interests is the most appropriate basis.	√
We understand our responsibility to protect the individual's interests.	√
We have conducted a Legitimate Interests Assessment (LIA) and kept a record of it, to ensure that we can justify our decision.	√
We have identified the relevant Legitimate Interests (see tables of data collected)	√
We have checked that the processing is necessary and there is no less intrusive way to achieve the same result.	√
We have done a balancing test and are confident that the individual's interests do not override those legitimate interests.	√
We only use individuals' data in ways they would reasonably expect, unless we have a very good reason.	√
We are not using people's data in ways they would find intrusive, or which could cause them harm, unless we have a very good reason.	√
If we process children's data, we take extra care to make sure we protect their interests.	√
We have considered safeguards to reduce the impact where possible.	√
We have considered whether we can offer an opt out.	√
If our LIA identifies a significant privacy impact, we have considered whether we also need to conduct a DPIA (Data Protection Impact Assessment).	√
We keep our LIA under review and repeat it if circumstances change.	√
We include information about our Legitimate Interests in our privacy notice.	√

Identified Legitimate Interests

Data we use about children and young people.

Data Type	Purpose	Do we need it?	Who might we share it with?
Name	Identify Members	To identify members	Bowls England
Address	A base point	A back up to email & for those not online	
Telephone Numbers	Contact Information	For urgent communication regarding games and places available	
Email Address	Contact Information	Main source of contact media	
County	Location	For ensuring Members are members of a County	
Club	Members of a bowls club	To ensure Members are covered by Insurance	
Playing Position	Where they play	For selecting for games	

Data we use about staff, volunteers (inc. management committee/trustees).

Data Type	Purpose	Do we need it?	Who might we share it with?
Name	Identify Members	To identify members	Bowls England
Address	A base point	A back up to email & for those not online	
Telephone Numbers	Contact Information	For urgent communication regarding games and places available	
Email Address	Contact Information	Main source of contact media	
County	Location	For ensuring Members are members of a County	
Club	Members of a bowls club	To ensure Members are covered by Insurance	
Playing Position	Where they play	For selecting for games	

ICO Check List for using 'Legitimate Interest' as the lawful basis for processing data.

Policy Adopted: May 2018, reviewed: Nov 2021, Reviewed: Nov 2022