Craigdale Housing Association
Legitimate Interests Assessment (LIA) References

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 the ICO's 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?
Craigdale Housing Association wishes to process personal data in relation to former employers of potential employees in order to obtain from them confirmation as to the potential employee's work history. This will assist Craigdale Housing Association to assess the suitability of candidates for positions within the Craigdale Housing Association. Potential employees also benefit from this processing as it assists them insofar as the reference provides confirmation of their statements in relation to their previous employment history. The process assists our recruitment process. There are no relevant industry guidelines or codes of practice. There are no ethical issues in relation to 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?
Yes, the processing achieves the stated purpose and the processing is proportionate to that purpose. It is not possible to achieve the purpose without the processing taking place. It is not possible to achieve the purpose by processing less data or

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 category or criminal offence data is processed. The data is not considered to be particularly private, insofar as it will only relate to contact details of a previous employer. Data is not processed in relation to children or other vulnerable people. The data relates to people in their personal capacity.
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?

There is no direct existing relationship between Craigdale Housing Association and the previous employer. The relationship exists between the job applicant and the previous employer.

We are not proposing to do anything new or innovative.

We do not propose to obtain any evidence to support this legitimate interest assessment.

There are no specific factors which need to be considered in relation to this processing. Recipients of requests for references will be expected by previous employers.

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?

Individuals will receive a request for a reference. They will not lose any control over the usage of their personal data. Both the likelihood and severity in relation to this processing is considered to be low. It is unlikely that anybody would object to the processing or to find it intrusive. We would be happy to explain the processing to individuals. There are no additional safeguards deemed necessary for the processing.

Can you offer individuals an opt-out?	~~Yes~~ / 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 / ~~No~~
Do you have any comments to justify your answer? (optional)	
LIA completed by	Claire Beckley, DPO
Date	10.8.26
LIA approved by	Corporate Manager
Signature	F Cunningham
Date	14.09.26

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.