Craigdale Housing Association
Legitimate Interests Assessment (LIA) Void Property Management (debt recovery – former tenants)

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 ensure that CHA debts left by former tenants can be recovered.
- What benefit do you expect to get from the processing?
  Save the RSL money so it can be better spent elsewhere.
- Do any third parties benefit from the processing?
  Yes – other tenants.
- Are there any wider public benefits to the processing?
  Yes – public money is being spent more effectively.
- How important are the benefits CHA you have identified?
  Highly desirable.
- What would the impact be if you couldn't go ahead with the processing?
  Debtors would not repay their debts and the RSL would have less money to spend elsewhere.
- Are you complying with any specific data protection rules CHA apply to your processing (e.g. profiling requirements, or e-privacy legislation)?
  Yes or N/A.
- Are you complying with other relevant laws?
  Yes or N/A.
- Are you complying with industry guidelines or codes of practice?
  Yes or N/A.
- 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 CHA 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, only the minimum amount of personal data required is used or shared, e.g., name, forwarding address and other contact details.

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 CHA 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?
  No.
- Is it data which people are likely to consider particularly 'private'?
  Not particularly – names, forwarding addresses and other contact details.
- Are you processing children's data or data relating to other vulnerable people?
  Not children's data. Some former tenants may be vulnerable and we would account for this if and when pursuing debts.
- Is the data about people in their personal or professional capacity?
  Personal.

Reasonable Expectations

- Do you have an existing relationship with the individual?
  Sometimes, but in any event a former relationship.

- What's the nature of the relationship and how have you used data in the past?
  Former tenants with whom we had a contract.

- Did you collect the data directly from the individual? What did you tell them at the time?
  Yes, and a Privacy Notice was provided when they applied to become a tenant.

- 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?
  N/A.

- How long ago did you collect the data? Are there any changes in technology or context since then CHA would affect expectations?
  The data was collected when the data subject became a tenant. There are no relevant changes to technology etc.

- Is your intended purpose and method widely understood?
  Yes.

- Are you intending to do anything new or innovative?
  No.

- Do you have any evidence about expectations – e.g. from market research, focus groups or other forms of consultation?
  No.

- Are there any other factors in the particular circumstances CHA mean they would or would not expect the processing?
- No.

Likely Impact

- What are the possible impacts of the processing on people?
  Debtors will be informed of their responsibilities and will be pursued for their debts. There is no severe detrimental impact.

- Will individuals lose any control over the use of their personal data?
  No.

- What is the likelihood and severity of any potential impact?
  Unlikely and Low.

- Are some people likely to object to the processing or find it intrusive?
  Yes.

- Would you be happy to explain the processing to individuals?
  Yes.

- Can you adopt any safeguards to minimise the impact?

Yes – before pursuing debts we will consider cases individually and deal with the matter sensitively ensuring CHA the data protection principles are adhered to, eg, data minimisation.	
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
Do you have any comments to justify your answer? (optional) The data processing is common/accepted practice and is for the benefit of the public purse, the RSL and other data subjects.	
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.