

Legitimate Interest

Administration of accounts

Sensitive Data? Possibly but client can't control

Who do we collect the data from? Data subject and internally input

What do we aim to achieve by the processing? Provide an effective means of administering our accounts to manage the financial health of the organisation.

Who benefits from the processing? The organisation / clients

In what way do they benefit? Effective accounts management improves our relationship with clients, eases the process of sending and receiving invoices and controlling credit.

Are there wider public benefits to the processing? No

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Clients / Donors / Debtors / Creditors

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? None

Do Data Subjects include children or vulnerable adults? Unable to predict

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Administration of employment

Sensitive Data? N/A

Who do we collect the data from? Internally input by client's staff

What do we aim to achieve by the processing? To more effectively manage the organisation's functions, facilitate effective information sharing between those internal (and sometimes) external stake-holders who have a right to know and are bound by appropriate confidentiality.

Who benefits from the processing? The organisation and the data subject

In what way do they benefit? Both the organisation and the data subject benefits by effective processes and communication.

Are there wider public benefits to the processing? Yes, but these are limited to the organisations interactions the general public and the value its goods/services provide to further and enhance human economic, physical and psychological experiences.

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee / Worker

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Only insofar as effective administration may mean disciplinary, capability and termination decisions

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures We are committed to abiding by the relevant tort and statute laws.

Balancing the factors above does our interest override the data subject's interest?

Measures in place Yes Pending By next review No

Can we offer an opt out? Yes - but we would still need to process data so consent is not appropriate Yes No

Relevant to client Yes

Legitimate Interest

Appraisal forms and related documents

Sensitive Data?	N/A	
Who do we collect the data from?	Data subject and internally input	
What do we aim to achieve by the processing?	Records are crucial to ensuring the performance and success of the business. They enable us to operate an effective performance appraisal and review process to ensure transparency and effective management.	
Who benefits from the processing?	The organisation, the Data Subject and other employees.	
In what way do they benefit?	The Company and the Data Subject have an opportunity to provide feedback regarding performance and related factors and to set appropriate objectives and personal development goals going forward.	
Are there wider public benefits to the processing?	Yes, compliance with duty of care and adjustments is in the public interest.	
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
What is the nature of the relationship with the Data Subject?	Employee / Worker	
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Would the Data Subject expect us to process the Data this way?	Certainly yes	
Do we explain our processing to the Data Subject?	Yes - in our privacy notice	
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there possible negative impacts on the Data Subject?	Data breach or inappropriate access to performance related data.	
Do Data Subjects include children or vulnerable adults?	No - neither children nor vulnerables	
Can we adopt safeguards to minimise these negative impacts?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe measures	Data Security Policy contains relevant guidance.	Balancing the factors above does our interest override the data subject's interest?
Measures in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out	Relevant to client <input checked="" type="checkbox"/> Yes

Legitimate Interest

Client contact personal data

Sensitive Data? N/A

Who do we collect the data from? The data controller (where client is

What do we aim to achieve by the processing? To track and record client worker placement information / to manage client relationships / to invoice for services rendered / to facilitate entering into binding contracts with clients.

Who benefits from the processing? The data subject, their employer, our employees and our organisation.

In what way do they benefit? Effective communication between the Company and client in relation to all aspects of client management

Are there wider public benefits to the processing? No

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Contracting party

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? No

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Client satisfaction / feedback forms

Sensitive Data? N/A

Who do we collect the data from? Business Partner or client

What do we aim to achieve by the processing? Engagement with clients to gauge success in our service is crucial to the longevity of the business. Obtain relevant feedback from client.

Who benefits from the processing? The Company, its clients and its employees.

In what way do they benefit? By identifying any problems with the worker so that these can be addressed in the future.

Are there wider public benefits to the processing? No

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee / Worker

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Poor feedback may be relevant to employee performance.

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures Any process in relation to performance will be taken in compliance with legal safeguards.

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Copy of driving licence

Sensitive Data?	N/A	
Who do we collect the data from?	The Data Subject themselves	
What do we aim to achieve by the processing?	Verify ID / ensure employee drivers are road legal / satisfy insurance requirements.	
Who benefits from the processing?	The Company, the Data Subject, members of the public who use roads, the vehicle insurer.	
In what way do they benefit?	The Company and Data Subject benefit because producing licence to verify ID is convenient and easy. The Company benefits by avoiding vicarious liability for an employee who is not properly road legal. The public benefits from reduced risk of accidents. The insurer benefits by satisfaction of a reasonable condition to the insurance contract.	
Are there wider public benefits to the processing?	Yes, the requirement of truthfulness and accuracy in applications for employment is a wider public benefit, particularly where access to children and vulnerable individuals is concerned or in relation to positions that are regulated.	
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
What is the nature of the relationship with the Data Subject?	Employee / Worker	
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Would the Data Subject expect us to process the Data this way?	Certainly yes	
Do we explain our processing to the Data Subject?	Yes - in our privacy notice	
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there possible negative impacts on the Data Subject?	Identity theft in case of data breach	
Do Data Subjects include children or vulnerable adults?	No - neither children nor vulnerables	
Can we adopt safeguards to minimise these negative impacts?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe measures	Data Security Policy contains relevant guidance.	Balancing the factors above does our interest override the data subject's interest?
Measures in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out	Relevant to client <input checked="" type="checkbox"/> Yes

Legitimate Interest

Employee C.V.s

Sensitive Data? Racial or ethnic origin

Who do we collect the data from? Internally input by client's staff

What do we aim to achieve by the processing?

Who benefits from the processing? The organisation and the data subject

In what way do they benefit? Both the organisation and the data subject benefits by effective processes and communication.

Are there wider public benefits to the processing? Yes, but these are limited to the organisations interactions the general public and the value its goods/services provide to further and enhance human economic, physical and psychological experiences.

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Only insofar as effective administration may mean disciplinary, capability and termination decisions

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures We are committed to abiding by the relevant tort and statute laws.

Balancing the factors above does our interest override the data subject's interest?

Measures in place Yes Pending By next review No

Can we offer an opt out? Yes - but we would still need to process data so consent is not appropriate Yes No

Relevant to client Yes

Legitimate Interest

GP Fit notes and correspondence (other)

Sensitive Data? Physical or mental health

Who do we collect the data from? The data subject's medical advisor/s

What do we aim to achieve by the processing? Following initial 4 year retention period required under Reg 2 Statutory Sick Pay (General) Regulations 1982 - Ongoing monitoring and management of employee / worker absences due to ill health where subsequent absences are related or follow a pattern / information relevant to duty of care and duty to consider adjustments

Who benefits from the processing? The data subject, our organisation and our other employees.

In what way do they benefit? The Company benefits by effective management of absences and its duties in relation to health and well-being, the Data Subject and others benefit by the Company's management of its duties in relation to employee health and well-being in his/her case and more generally.

Are there wider public benefits to the processing? Yes, proper recruitment processes comply with the wider public interest of equal opportunity.

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Breach of confidentiality in data breach scenario.

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures Data Security Policy contains relevant guidance.

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Induction documentation

Sensitive Data?	N/A	
Who do we collect the data from?	Data subject and internally input	
What do we aim to achieve by the processing?	Effective induction and record keeping. These forms and associated documents collate notes on which aspects of induction an employee has completed and is a tool to induct, including orientation of policies and legal requirements. The form may also be required in case of legal claims.	
Who benefits from the processing?	The organisation, the Data Subject and other employees.	
In what way do they benefit?	The Data Subject receives a structured and comprehensive induction and the organisation can demonstrate this if required.	
Are there wider public benefits to the processing?	Yes, the requirement of truthfulness and accuracy in applications for employment is a wider public benefit, particularly where access to children and vulnerable individuals is concerned or in relation to positions that are regulated.	
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
What is the nature of the relationship with the Data Subject?	Employee / Worker	
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Would the Data Subject expect us to process the Data this way?	Certainly yes	
Do we explain our processing to the Data Subject?	Yes - in our privacy notice	
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there possible negative impacts on the Data Subject?	Data breach or inappropriate access to performance related data.	
Do Data Subjects include children or vulnerable adults?	No - neither children nor vulnerables	
Can we adopt safeguards to minimise these negative impacts?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe measures	Data Security Policy contains relevant guidance.	Balancing the factors above does our interest override the data subject's interest?
Measures in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out	Relevant to client <input checked="" type="checkbox"/> Yes

Legitimate Interest

Maternity / Family-friendly Rights / Benefits

Sensitive Data?	Physical or mental health	
Who do we collect the data from?	The Data Subject themselves	
What do we aim to achieve by the processing?	To comply with and manage pregnancy, maternity and parental rights [and to provide additional benefits]	
Who benefits from the processing? In what way do they benefit?	Our organisation, the data subject and their family.	
Are there wider public benefits to the processing?	Yes, the public interest in the promotion of equal opportunities and enhanced parental experience and nurturing.	
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
What is the nature of the relationship with the Data Subject?	Employee	
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Would the Data Subject expect us to process the Data this way?	Certainly yes	
Do we explain our processing to the Data Subject?	Yes - in our privacy notice	
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there possible negative impacts on the Data Subject?	Breach of confidentiality in data breach scenario.	
Do Data Subjects include children or vulnerable adults?	Yes - but only children	
Can we adopt safeguards to minimise these negative impacts?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe measures	Data Security Policy contains relevant guidance.	Balancing the factors above does our interest override the data subject's interest?
Measures in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out	Relevant to client <input checked="" type="checkbox"/> Yes

Legitimate Interest

Medical information / vaccinations

Sensitive Data? Physical or mental health

Who do we collect the data from? The Data Subject themselves

What do we aim to achieve by the processing? Protect the vital interests of our employees and other personnel when they are deployed (data retained in these data fields collaterally to isolated worker profile).

Who benefits from the processing? The data subject, our organisation and other employees who act to protect the data subject's health and

In what way do they benefit? By receiving the most appropriate medical care and thereby minimising risk to their health and wellbeing

Are there wider public benefits to the processing? Yes, the promotion of health in a deployment scenario is also in the interests of those affected by disaster

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee / Worker

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Breach of confidentiality in a data breach scenario

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures Data Security Policy contains relevant guidance.

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Operational Documents

Sensitive Data?	N/A
Who do we collect the data from?	Data subject and internally input
What do we aim to achieve by the processing?	Providing a central location for all documents relating to a particular operation where all important information can be found and referred to by the team, including various kinds of operational documents including personnel outlines, situation reports, meetings minutes which may all contain various personal data.
Who benefits from the processing?	The organisation / the operational team / those effected by operations / clients
In what way do they benefit?	The team will have an effective means of reaching documents in an online portal which will impact operational effectiveness, and indirectly impact clients / at-risk individuals and the organisation's reputation.
Are there wider public benefits to the processing?	No
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
What is the nature of the relationship with the Data Subject?	Employees / Contractors / At-risk individuals /
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Would the Data Subject expect us to process the Data this way?	Certainly yes
Do we explain our processing to the Data Subject?	Often, otherwise reliance on Art 14 (5)(a)
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there possible negative impacts on the Data Subject?	No
Do Data Subjects include children or vulnerable adults?	No - neither children nor vulnerables
Can we adopt safeguards to minimise these negative impacts?	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No
Describe measures	
Measures in place	<input type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out
Balancing the factors above does our interest override the data subject's interest?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Relevant to client	<input checked="" type="checkbox"/> Yes

Legitimate Interest

Reference Request Forms and Responses

Sensitive Data?	N/A	
Who do we collect the data from?	Person given as referee in recruitment	
What do we aim to achieve by the processing?	Best practice recruitment procedure and in the case of access to children and vulnerable individuals Safer Recruitment Procedure. To ensure successful applicants are suitable for appointment / confirmation in position.	
Who benefits from the processing?	The organisation, its clients, workers, other employees and the data subject.	
In what way do they benefit?	Benefits to these entities and groups is derived by the appointment of suitable and truthful applicants to hold company positions.	
Are there wider public benefits to the processing?	Yes, the requirement of truthfulness and accuracy in applications for employment is a wider public benefit, particularly where access to children and vulnerable individuals is concerned or in relation to positions that are regulated.	
Is the data used unethically in any way?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Does the processing further the interests identified?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is the processing a reasonable means of furthering those interests?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Is there a less intrusive way to achieve this?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
What is the nature of the relationship with the Data Subject?	Employee / Worker	
Is the Personal Data particularly sensitive or private?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Would the Data Subject expect us to process the Data this way?	Certainly yes	
Do we explain our processing to the Data Subject?	Yes - in our privacy notice	
Are Data Subjects likely to find the processing intrusive?	<input type="checkbox"/> N/A <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Are there possible negative impacts on the Data Subject?	A reference request may be sent to, or received by, the wrong person.	
Do Data Subjects include children or vulnerable adults?	No - neither children nor vulnerables	
Can we adopt safeguards to minimise these negative impacts?	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Describe measures	Our Data Security Policy provides guidance on ensuring addresses are accurate.	Balancing the factors above does our interest override the data subject's interest?
Measures in place	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Pending <input type="checkbox"/> By next review <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Can we offer an opt out?	No - we cannot sensibly allow individuals to opt out	Relevant to client <input checked="" type="checkbox"/> Yes

Legitimate Interest

Sickness self-cert forms and related data

Sensitive Data? Physical or mental health

Who do we collect the data from? Data subject and internally input

What do we aim to achieve by the processing? To track, monitor and analyse absenteeism and thereby effectively manage malingering and/or better understand patterns of absence that may underlie a health problem or disability.

Who benefits from the processing? Our organisation, the data subject and our other employees.

In what way do they benefit? Reduction and discouragement of unnecessary absenteeism or better compliance with duty of care and duty of adjustment.

Are there wider public benefits to the processing? Yes, to the extent that compliance by employers with their duties of care and equal opportunities is a matter of public interest.

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Employee

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Data breach of confidential health information. It is also possible that information provided may inform a

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures Data Security Policy contains relevant guidance.

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Staff application documents

Sensitive Data? N/A

Who do we collect the data from? The Data Subject themselves

What do we aim to achieve by the processing? Effective recruitment of the best candidate.

Who benefits from the processing? The data subject, our organisation and our other employees.

In what way do they benefit? The Company is able to follow its recruitment process and the Data Subject is thereby recruited. Other employees benefit from effective and appropriate recruitment decisions.

Are there wider public benefits to the processing? Yes, proper recruitment processes comply with the wider public interest of equal opportunity.

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Applicant

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? Identity theft / fraud in case of a data breach.

Do Data Subjects include children or vulnerable adults? No - neither children nor vulnerables

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures Data Protection Policy contains relevant guidance.

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes

Legitimate Interest

Website IP address and metadata

Sensitive Data? N/A

Who do we collect the data from? The Data Subject's device

What do we aim to achieve by the processing? Enhance the effectiveness of our website.

Who benefits from the processing? The Organisation

In what way do they benefit? Ability to use web analytics to monitor and increase effectiveness of Search engine optimisation and indirect marketing.

Are there wider public benefits to the processing?

Is the data used unethically in any way? N/A Yes No

Does the processing further the interests identified? N/A Yes No

Is the processing a reasonable means of furthering those interests? N/A Yes No

Is there a less intrusive way to achieve this? N/A Yes No

What is the nature of the relationship with the Data Subject? Web user

Is the Personal Data particularly sensitive or private? N/A Yes No

Would the Data Subject expect us to process the Data this way? Certainly yes

Do we explain our processing to the Data Subject? Yes - in our privacy notice

Are Data Subjects likely to find the processing intrusive? N/A Yes No

Are there possible negative impacts on the Data Subject? None

Do Data Subjects include children or vulnerable adults? Unable to predict - unlikely

Can we adopt safeguards to minimise these negative impacts? N/A Yes No

Describe measures

Measures in place Yes Pending By next review No

Can we offer an opt out? No - we cannot sensibly allow individuals to opt out

Balancing the factors above does our interest override the data subject's interest?

Yes No

Relevant to client Yes