

Legitimate Interests Assessment Form

The LIA is a light-touch test complete in three parts.

It is not necessary to follow this exact process, but you can use this form to help assess whether legitimate interest can be applied to your processing of personal data.

You should complete and keep a record of this assessment to provide justification for your decision to use legitimate interest as a legal basis before you start processing the data.

Asset Reference	VEO Camera filming
Process Name / Description	VEO Camera filming
Data Subject(s)	The individual whose personal data is being processed, which includes coaches, players, and children participating in the family hockey program at NPL Hockey club. This includes individual who are members of the club, opposition teams and bystanders. The personal data being processed includes visual footage of training sessions and games captured by the VEO camera.
Nature of personal data processed	The nature of the personal data likely to be processed includes visual footage of coaches, players, children and bystanders participating in training sessions and games at NPL Hockey club, captured by the VEO camera. This may include images of individuals participating in the sport, as well as any other incidental footage captured during the filming. The personal data being processed does not include any sensitive or private information and is limited to visual footage of the training sessions and games.
Special category, criminal offence or children's data?	This is relevant to this assessment as it helps to identify whether any special categories of personal data or criminal offence data are being processed. In this case, it is relevant to note that children's data is being processed as part of the family hockey program. While children's data is not classified as a special category of personal data, it is considered sensitive and requires additional safeguards and measures to ensure its protection. It is also relevant to note that no criminal offence data is being processed in this assessment. Therefore, this question helps to ensure that any personal data being processed is done so in accordance with data protection laws and that appropriate safeguards and measures are in place to protect sensitive data, such as children's data. This assessment takes into account that we are processing the personal data of children.
Are the data assets recorded in the information asset register?	The data assets being processed as part of filming training and games at NPL Hockey club using the VEO camera should be recorded in the information asset register. This will help ensure that the data being

	processed is managed in a secure and responsible manner, in accordance with data protection laws. Recording the data assets in the information asset register will also enable the NPL Hockey club to monitor and manage the processing of personal data, maintain an inventory of the data assets, and ensure that appropriate measures are in place to protect the privacy and security of the personal data being processed. It will also allow us to apply our retention policy so that we do not keep the data for any longer than it is required.
Process owner	Paul Bussetti
Assessment Owner	Gordon Evans
Assessment Start date	1 st April 2023
Decision Date	19 th August 2023

1) Purpose: identify the legitimate interest(s). Consider:

Why do you want to process the data – what are you trying to achieve?	<p>The purpose of processing personal data is to film training sessions and games at NPL Hockey club using the VEO camera for legitimate interests in coaching, analysis, and development purposes. This will allow the coaches, players, and other relevant individuals to review, analyze and improve their performance.</p> <p>When we post social media clippings, we do so to publicise the Club and the sport and the participation of our Club members. This also promotes exercise which is important for good mental and physical health.</p>
Who benefits from the processing? In what way?	The processing will benefit the NPL Hockey club and its members, specifically the coaches and players, by allowing them to analyze and improve their performance. It will also benefit any individuals who have an interest in the sport and who may benefit from observing the training sessions and games. It also encourages others to participate for the benefit of all.
Are there any wider public benefits to the processing?	Yes, there are wider public benefits to the processing. By improving the performance of the players and coaches, the processing could contribute to the development of the sport and promote it to a wider audience. Participation in sport is also conducive to good health.
How important are those benefits?	The benefits are significant as they will contribute to the development of the sport and improve the skills and performance of the coaches and players and the health of participants.
What would the impact be if you couldn't go ahead?	If the processing cannot go ahead, the NPL Hockey club and its members would not be able to review, analyze, and improve their performance, which would negatively impact their development and performance. The Club

	would also not be able to advertise the benefits to health of participation in sport.
Would your use of the data be unethical or unlawful in any way?	Would your use of the data be unethical or unlawful in any way? No, the use of the data would not be unethical or unlawful as it is for legitimate interests and will be processed in accordance with data protection laws.
Have you considered any Tribunal judgements/case law in identifying 'legitimate interests'?	Yes, we have considered relevant Tribunal judgments and case law in identifying legitimate interests. Legal advice was also given.
2) Necessity: apply the necessity test. Consider:	
Does this processing actually help to further that interest?	Yes, this processing helps to further the legitimate interests of coaching, analysis, and development purposes.
Is it a reasonable way to go about it?	Yes, using the VEO camera is a reasonable way to achieve the legitimate interests of coaching, analysis, and development purposes.
Is there another less intrusive way to achieve the same result?	No, there is no other less intrusive way to achieve the same result.
What is the nature of your relationship with the individual? Is it pre-existing and have you used their data previously?	
What is the nature of your relationship with the individual? Is it pre-existing and have you used their data previously?	The individuals whose personal data will be processed have a pre-existing relationship with the NPL Hockey club as coaches or players. Their personal data has been used previously for legitimate interests.
How has the data been obtained? If supplied from a third party what did they tell the individual about reuse?	The personal data has been obtained directly from the individuals, who have been informed of the purpose of processing and the legitimate interests pursued. No personal data has been supplied by a third party.
Do you have the means and processes to keep the information up to date.	Yes, the NPL Hockey club has processes in place to keep the personal data up to date.
Is any of the data particularly sensitive or private?	No, none of the data is particularly sensitive or private.
Would people expect you to use their data in this way?	Yes, people would expect the NPL Hockey club to use their data in this way, as it is necessary for coaching, analysis, and development purposes.
Are you happy to explain it to them?	The NPL Hockey club is happy to explain the use of personal data to the individuals whose data is processed.
Are some people likely to object or find it intrusive?	It is possible that some individuals may object or find it intrusive, but the NPL Hockey club has measures in place to inform the public and minimize any potential impact on individuals.
What is the possible impact on the individual?	The possible impact on the individual is minimal. The personal data being processed is limited to visual footage of training sessions and games, which is not sensitive or private. The impact on the individual is

	limited to being filmed during these sessions and games, which is a common practice in the sport.
How big an impact might it have on them?	The impact is not expected to be significant, and any potential impact on individuals is minimized by adopting appropriate safeguards and technical measures. The NPL Hockey club also has measures in place to inform individuals of the use of their personal data and to provide an opt-out if they object to being filmed.
Are you processing children's data?	In the context of processing personal data for legitimate interests in filming training and games at NPL Hockey club using the VEO camera, it should be noted that children's data is also being processed, specifically for the family hockey programme. As children are considered vulnerable individuals, the impact on them needs to be carefully considered.
Are any of the individuals vulnerable in any other way?	While none of the individuals are vulnerable in any other way, the fact that children's data is being processed requires additional safeguards and technical measures to minimize any potential impact.
Can you adopt any safeguards and technical measures to minimise the impact?	The NPL Hockey club will ensure that appropriate measures are in place to protect the privacy and safety of children, such as being transparent about the collection of the data, obtaining parental consent (where necessary) for additional usages and ensuring that only authorized individuals have access to the personal data. The data will also only be used for the purposes of coaching, analysis, and development. {see point about social media usage which is a separate form of processing}
Can you offer an opt-out?	Under legitimate interest, parents may request the NPL Hockey club to remove their children's personal data or any filming which may have taken place. The NPL Hockey club recognizes that parents have a right to control the use of their children's personal data, and as such, will honour any reasonable requests to remove or delete such data in a proportionate way – this may require the deletion of footage. Parents can contact the NPL Hockey club to request the removal of their children's personal data or footage, and appropriate measures will be taken to comply with such requests.

Decision

Outcome Date	19/8/23
Outcome	THIS DOCUMENT SETS OUT CLUBS POLICY
How was the outcome decided	THROUGH CONSULTATION WITH A SOLICITOR
Further Action	NONE REQUIRED
Next Review date	19/8/24
Agreed by	GORDON EVANS