



Legitimate Interests Assessment Form – Keble College Archives

Although it is not compulsory for an organisation to have a written record of an LIA, the ICO does state that this process does help demonstrate compliance in line with the College's accountability obligations under Articles 5(2) and 24 of the GDPR.

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

Department Name	Keble College Archives
Data Subject(s)	Students, staff (academic and non-academic), alumni, visitors, associated individuals, donors, researchers, enquirers.
Nature of personal data processed	See the Archives ROPA for full details.
Special category, criminal offence or children's data?	Some special
Are the data assets recorded in the ROPAs?	Yes
Department Head	Faye McLeod
Assessment Owner	Faye McLeod
Assessment Start date	10 th May 2019
Decision Date	10 th May 2019

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

Why do you want to process the data – what are you trying to achieve?	The College has a legitimate interest in maintaining a record of its activities and cultural life as part of a long established university with a strong identity and history, and in maintaining such records for future research. The College has a legitimate interest in maintaining the integrity of its archives, to ensure they are kept securely and are available as a resource for researchers and others with a legitimate interest in reviewing the archives.
Who benefits from the processing? In what way?	The processing benefits the College by enabling it to fulfil its business, legal, teaching and research operations. The further processing of data allows information to be available as a research resource for future generations.
Are there any wider public benefits to the processing?	The college archives are available to the public as well as internal researchers, as an important historical resource. The maintenance and integrity of the archives allow the college to provide employment and academic references. Processing is necessary for the maintenance of the integrity of the holdings and ensuring their availability to researchers and enquirers.
How important are those benefits?	These benefits are very important, given the College's place as part of a long established university with a strong identity and history.
What would the impact be if you couldn't go ahead?	The College may not be able to its business, legal, teaching and research operations. It would lose part of its heritage and identity, adversely affecting future research. The archive may have to be closed to researchers.
Would your use of the data be unethical or unlawful in any way?	No.
Have you considered any Tribunal judgements/case law in identifying 'legitimate interests'?	None extant.



2) Necessity: apply the necessity test. Consider:	
Does this processing actually help to further that interest?	Yes
Is it a reasonable way to go about it?	No
Is there another less intrusive way to achieve the same result?	No
3) Balancing test: Do the Individual's interests override the legitimate interest?	
What is the nature of your relationship with the individual? Is it pre-existing and have you used their data previously?	The archives hold data on: <ul style="list-style-type: none"> Current and former students Current and former staff of the College Individuals who have donated material to the archives Researchers visiting the archives, and those submitting enquiries Other third parties referred to in the archival records
How has the data been obtained? If supplied from a third party what did they tell the individual about reuse?	The majority of data is generated internally within the college. Donors of material to the archives can reasonably be expected to communicate the donation to affected parties when the data donated is not in the public domain.
Do you have the means and processes to keep the information up to date?	This is not in the nature of archives.
Is any of the data particularly sensitive or private?	Some of the data is sensitive or private. We do not gather such information about external researchers, except for disability information provided by the data subject when an archival research visit is planned. This information is destroyed 12 months after the appointment date.
Would people expect you to use their data in this way?	We believe so.
Are you happy to explain it to them?	Yes.
Are some people likely to object or find it intrusive?	We do not believe so. However, there is a procedure in place, should anyone choose to object.
What is the possible impact on the individual?	Minimal.
How big an impact might it have on them?	The impact is believed to be minimal, as access to archival material is subject to appropriate access controls. We do not process personal data in a way that would cause substantial damage or distress to a data subject.
Are you processing children's data?	No.
Are any of the individuals vulnerable in any other way?	We do not believe so.
Can you adopt any safeguards and technical measures to minimise the impact?	Yes. These include: restricting access, redaction, anonymization, encryption, and password protection.
Can you offer an opt-out?	Yes. Those wishing to do so should contact: The Data Protection Officer Keble College Oxford OX1 3PG



Decision	
Outcome Date	10 th May 2019
Outcome	Approved
How was the outcome decided	Reviewed by DPO
Further Action	N/A
Next Review date	May 2020
Agreed by	Roger Boden (DPO)