



Legitimate Interests Assessment Form

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	College Office
Data Subject(s)	Applicants and Prospective Students
Nature of personal data processed	Information provided on admissions applications, including personal details, school record, and records generated by the admissions procedures; see Applicants and Prospective Students ROPA for full details.
Special category, criminal offence or children's data?	Yes. Applicants for undergraduate admissions are normally minors. In very rare instances, records of criminal convictions may be disclosed
Are the data assets recorded in the ROPAs?	Yes
Department Head	Alisdair Rogers
Assessment Owner	Alisdair Rogers
Assessment Start date	21 January 2019
Decision Date	

1) Purpose: identify the legitimate interest(s). Consider:	
Why do you want to process the data – what are you trying to achieve?	To make admissions decisions and ensure that, where required, appropriate reasonable adjustments and contextual assessments are made.
Who benefits from the processing? In what way?	Applicants benefit from their applications being considered in a fair, transparent and lawful manner. The College (and all other colleges) benefit from appropriate information on applicants including any special needs to be taken into account in, for example, arranging interviews.
Are there any wider public benefits to the processing?	Yes, including statutory compliance. Given the public scrutiny to which the University's admissions systems are subject, there is an interest in knowing that they are conducted fairly and in accord with the relevant legislation on, among other things, equality and safeguarding.
How important are those benefits?	Very important
What would the impact be if you couldn't go ahead?	We would not be able to make informed, rational or fair decisions on admissions, or comply with national legislation
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'?	No
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?	Yes
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?	In most cases there is no pre-existing relationship (some graduate applications are an exception). The College has a relationship with each individual during the period in which applications are considered (normally no longer than 24 months, including retention for unsuccessful applicants). Relationships with successful applicants will last longer and be more multiplex
How has the data been obtained? If supplied from a third party what did they tell the individual about reuse?	The data are obtained from the individual, their schools (for undergraduates), the University of Oxford and the Universities and Colleges Admissions Service (UCAS).
Do you have the means and processes to keep the information up to date?	Yes
Is any of the data particularly sensitive or private?	Yes, for example information relating to disability or health
Would people expect you to use their data in this way?	Yes
Are you happy to explain it to them?	Yes
Are some people likely to object or find it intrusive?	No. Note that from 2019-20 there are no questions on criminal convictions at the application stage, only at the offer stage. It is possible that some applicants – a handful a year across the whole University - may find this intrusive. Some processing is also necessary for statutory compliance.
What is the possible impact on the individual?	In the case of special category data (e.g. disability) they may receive reasonable adjustments to the admission interview procedure. In the case of criminal convictions, in extremis an offer may be withdrawn; this would follow an assessment by the Criminal Convictions panel chaired by the Director of either Graduate or Undergraduate Admissions as appropriate, . Also in rare cases, membership of a proscribed organisation – if revealed during application – might lead to the withdrawal of an offer, again following due process by the University authorities.
How big an impact might it have on them?	The impact would be minor except, potentially, in the very rare cases mentioned above
Are you processing children's data?	Yes. However, they would be regarded as competent under DPA legislation to exercise their own data protection rights.
Are any of the individuals vulnerable in any other way?	Very unlikely, though possible – for example mental health issues or disabilities.
Can you adopt any safeguards and technical measures to minimise the impact?	Yes, which have been adopted. These include: restricting access, anonymization, encryption, and password protection.
Can you offer an opt-out?	No

Decision

Outcome Date	30 January 2019
Outcome	Approved
How was the outcome decided	Reviewed by DPO
Further Action	N/A
Next Review date	January 2020
Agreed by	Roger Boden (DPO)

