

Introduction to the Legitimate Interest Assessment (LIA)

When to use this template

A Legitimate Interest Assessment (LIA) must be completed whenever your Scout Group relies on **Legitimate Interest** as the lawful basis for processing personal data under GDPR. The below is in relation to Scout Groups processing photographs under lawful basis Legitimate Interest.

What this pack includes

Below you will find a **sample LIA template**. It's purpose is to provide a practical starting point to help Scout Groups think through the key considerations when processing **photographs, videos, and other media** that may directly or indirectly identify individuals. This sample focuses specifically on **photographs**.

How to use it

- If your Scout Group **does not already have an LIA**, use this sample as a guide to create your own version that reflects **your group's specific purposes and processing activities**.
- **Do not adopt the sample "as is."** **It must be reviewed, adapted, and completed to reflect your Scout Group activities.**
- If your Scout Group **already has an LIA**, use the sample to **cross-check** your existing document and make sure **no important elements are missing**.
- You **do not need** to share your LIA with members or parents / guardians etc, this is an internal process and is to help your Scout Group ensure they are handling imagery in a GDPR compliant manner. The LIA should be saved within the Scout Groups document repository.

Why the LIA is important

Completing an LIA helps ensure that your media processing is **necessary, proportionate, and respectful** of the rights and reasonable expectations of volunteers, youth members and their families. It documents your decision-making and demonstrates accountability.

What the LIA must cover

Your assessment should, at a minimum:

- **Identify the purpose(s)** for processing images/media and how they support your group's activities.

- **Assess necessity:** explain why the processing is needed to achieve those purposes and whether less intrusive options exist.
- **Balance interests vs. rights:** consider the potential impact on individuals (especially children), including reasonable expectations, potential risks, and safeguards.
- **Set safeguards and controls:** e.g., consent options where appropriate, opt-out routes, minimisation, limited retention, secure storage, access controls, and safe sharing practices.
- **Record outcomes:** note your decision, residual risks, and any actions required to reduce risk further.

When to review the LIA

Review your LIA **regularly (at least annually)** and **whenever your practices change**, for example, when introducing new platforms, new sharing methods (e.g., public social media vs. private channels), new events, or new types of media.

Who should complete it

The LIA should be completed by the **Group Leader, Data Protection Lead / point of contact**, or another **designated volunteer** responsible for handling media within the group, with input from relevant volunteers as needed.

Practical tips for volunteers

- Prefer **privacy-friendly defaults** (e.g., closed sharing groups, minimal tagging, restricted audiences).
- **Minimise** what you capture and share; avoid unnecessary identifiers (e.g., full names with images).
- Provide **clear notices** and **simple opt-out routes** for parents/guardians and youth members.
- Apply **short, appropriate retention periods** and delete media you no longer need.
- Keep a record of **decisions and safeguards**—this LIA is part of that record.

If you need further support or guidance, you can always reach out to National Office Data Protection Officer (dataprotection@scouts.ie).

A pre-populated sample template is the on the next page

Legitimate Interest Assessment (LIA)

1. Assessment Details

Field	Entry
Processing Activity	Collection, storage and sharing of photographs of [Insert Scout Group Name] activities
Date of Assessment	[Insert date]
Assessor / Department	[Insert name, role,]
Review Date	[Insert review date, e.g. annually or if a new processing activity identified]

2. Purpose Test – Identifying the Legitimate Interest

a. What is the purpose of the processing?

The Scout Group wishes to collect and process photographs taken during group activities in order to:

- ✓ **Share updates with parents and guardians** through private communication platforms such as:
 - WhatsApp groups
 - Closed/private groups on Facebook
- ✓ **Inform and coordinate volunteers** involved in the Scout Group by sharing images that illustrate activities, attendance, and engagement.
- ✓ **Document group activities** for organisational memory and historical record keeping.
- ✓ **Promote participation and community engagement** by demonstrating the types of activities the Scout Group provides.
- ✓ **Safeguarding and transparency:** providing parents/guardians visibility of the activities their children participate in.
- ✓ **Internal learning and reflection:** allowing volunteers to review activities and improve future programming.

b. What are the organisation's legitimate interests?

The Scout Group operates on a volunteer basis and relies on regular communication with parents, guardians, and volunteers to maintain engagement, trust, and transparency.

Photographs are an effective way to:

- Show the nature of activities
- Reassure parents about the environment their children are in
- Celebrate achievements and participation
- Maintain a historical record of the group's development.

These purposes are reasonable and expected within the context of Scout Group participation.

c. Are these interests legitimate (i.e., lawful, clearly articulated, and necessary)?

Yes. The interests identified are legitimate. The Scout Group has a reasonable and lawful interest in documenting its activities and communicating with parents, guardians, and volunteers about the participation and experiences of youth members. Sharing photographs within restricted communication channels (such as private messaging groups or closed social media groups) helps keep parents and guardians informed about activities, supports transparency, and assists volunteers in coordinating and reviewing activities.

These interests are clearly articulated and directly related to the normal operation of a volunteer-run youth organisation. Photographing activities also supports the group's interest in maintaining a record of events and preserving the history of the organisation.

The processing is considered necessary because photographs provide an effective way of demonstrating activities and engagement in a manner that written updates alone cannot fully achieve. The processing is limited to appropriate contexts and is carried out with safeguards to protect the rights and freedoms of children and their parents or guardians, in line with the principles of the General Data Protection Regulation and the Data Protection Act 2018.

3. Necessity Test – Is the Processing Necessary?

a. Is the processing necessary to achieve the stated purpose?

Yes. Photographs provide a clear and effective visual record of Scout Group activities and allow parents and volunteers to quickly understand what has taken place.

b. Is there a less intrusive way to achieve the same result?

Alternative methods (text updates only) would not:

- Communicate the activities as clearly
- Provide the same level of transparency
- Create an accurate historical record of events.

4. Balancing Test – Assessing Impact on Individuals

a. Who are the data subjects and what is their relationship with the organisation?

Youth Members volunteers and in some cases parents / guardians of youth members if attending an event organised by the Scout Group.

b. What types of data are processed?

Photographs and short video recordings.

c. What is the potential impact on individuals?

The processing involves taking and sharing photographs of Scout Group activities, which may include identifiable images of children. The potential impact on individuals may include concerns about privacy, control over personal images, or the possibility that images could be shared beyond the intended audience if recipients redistribute them.

There is also a potential impact if a child or parent/guardian does not wish for the child to appear in photographs, or if images could inadvertently reveal personal information such as participation in the group or attendance at specific events.

However, the overall impact is considered **low**, as photographs are taken in the context of normal group activities and are shared only within restricted communication channels intended for parents/guardians and volunteers (such as private messaging groups or closed social media groups). The images are not used for commercial purposes and are not publicly published without additional safeguards.

Measures are in place to minimise potential impact, including informing parents/guardians about the use of photographs, providing an opportunity to object or opt out, limiting the sharing of images to closed groups, avoiding the inclusion of identifying information with images, and ensuring volunteers follow appropriate guidance when taking and sharing photographs.

d. What safeguards are in place to mitigate risks?

The Scout Group will implement the following protections:

Safeguard	Details
Transparency	<p>Parents/guardians will be clearly informed that photographs may be taken and used for the purposes described.</p> <p>Information will be provided through:</p> <ul style="list-style-type: none"> • Registration forms • Privacy notices • Group communications
Opt-Out Mechanism	<p>Parents/guardians will have the option to:</p> <ul style="list-style-type: none"> • Object to photographs being taken of their child, or • Object to their child’s images being shared. <p>Where an objection is received, reasonable steps will be taken to ensure the child is not included in photographs.</p>

<p>Limited Sharing</p>	<p>Photographs will only be shared through restricted platforms, such as:</p> <ul style="list-style-type: none"> • Private messaging groups for parents • Closed social media groups accessible only to verified parents/guardians • Internal volunteer communications. <p>Images will not be publicly posted unless explicit consent has been obtained.</p>
<p>Minimisation</p>	<p>The group will ensure:</p> <ul style="list-style-type: none"> • Only relevant images are shared • No full names or identifying personal details are attached to photos • Photos that could compromise dignity or safety are not taken or shared.
<p>Security</p>	<p>Photographs will be stored securely by authorised volunteers and:</p> <ul style="list-style-type: none"> • Not shared outside the group • Deleted when no longer needed • Removed if requested by a parent or guardian where reasonable.
<p>Volunteer Guidance</p>	<p>Volunteers will be informed about appropriate photography practices including:</p> <ul style="list-style-type: none"> • When photos may be taken • What types of images should be avoided • Where images may be shared.

Retention	<p>Photographs may be retained:</p> <ul style="list-style-type: none"> • For short-term communication purposes, and • Selected images may be retained longer for historical record keeping. <p>Images will be periodically reviewed and deleted if no longer required.</p>
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e. Do the individuals’ interests override the organisation’s legitimate interest?

As photographs may include children (minors), extra care is required. Potential risks include:

- Unwanted sharing outside the intended audience
- Misuse of images
- Identification of children without permission
- Discomfort for some parents/guardians or children.

However, the Scout group will implement safeguards to ensure that the rights and freedoms of individuals are not overridden.

5. Outcome and Next Steps

Field	Entry
Conclusion	<p>After considering:</p> <ul style="list-style-type: none"> • The legitimate interests of the Scout Group • The reasonable expectations of parents and guardians • The safeguards implemented • The limited and controlled sharing of images <p>The Scout Group concludes that:</p> <p>The processing of photographs for the purposes described is justified under legitimate interests and does not override the rights and freedoms of the children or their parents/guardians.</p>
Additional Actions Required	Conduct periodic review of access controls and retention practices. Provide clear information in privacy notice.
Decision Approved By	[Name, position, date]

6. Privacy Notice Reference

[Outline where the privacy information notice on the processing of data will be made available to the individuals and their parents / guardians of youth members.]

7. Optional Annexes

[Outline any additional policies or processes or useful documents that can help support this LIA.]