

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

x Will this processing actually help you achieve your purpose?

The processing is required in order to achieve the intended purpose

x Is the processing proportionate to that purpose?

The processing is proportionate with appropriate controls implemented to protect the data being processed.

x Can you achieve the same purpose without the processing?

It is unlikely the same benefits could be achieved without processing the data.

x Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

Specific personal data is required in order to achieve the intended benefits, it is unlikely in this case that less data could be processed to achieve a representative and proportionate outcome.

complaint was allocated to. If it is the Disciplinary Proceedings Track, BACP takes ownership of the complaint and so the Complainant is not able to withdraw. If the complaint is referred to the Practice Review Track, the Complainant may be able to withdraw up until the hearings stage but that will depend on the reasons and what point the process is at. If a complaint reaches the hearing stage, an independent panel would be asked to make the decision to close the complaint or retain complaints, related evidence and all correspondence in line with our retention policy ± six years at the time of writing.

x What is the likelihood and severity of any potential impact?
Please refer to the relevant DPIA for more details.

x Are some people likely to object to the processing or find it intrusive?
There may be occasions where data subjects will complain about the use of the data. Where processing can be stopped (see control section above) it will be. However, there are occasions where processing may be carried out despite objection from the data subject (when it needs to be carried out as part of BACP's protective function)

x Would you be happy to explain the processing to individuals?
The processing is explained as part of standard processes.

x Can you adopt any safeguards to minimise the impact?
Safeguards can be adopted, please refer to the DPIA for further details.

Can you offer individuals an opt -out?	In certain cases (see control section above)
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LIA completed by	Register team and Data Protection Lead
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