

Data Protection Audit

Date revised: 27.01.20

The purpose of this template is to enable the University to identify where personal data is collected, who collects it, why it is collected and how it is stored and processed across the whole institution. We are aiming to obtain a complete picture, as far as possible, of the structure of personal information flows within the University so that the appropriate compliance procedures can be put in place to ensure that the University deals with personal data in accordance with data protection law, the general law and best practices.

Personal data means data which relate to a living individual who can be identified from that data (a 'data subject'). It includes any expression of opinion about the individual and any indication of the intentions of the University or any person in respect of the individual. Examples of personal data may be staff and student names, addresses, contact details; staff employment details, bank/credit card details, national insurance numbers, PDRs; Next of kin, student health information, student assessment data; Staff and student passport details; staff vehicle details; governor names, addresses, personal details; contractor names and addresses and personal details; supplier personal information; photos.

Guidance on filling in the template

This questionnaire is to be completed for *each* purpose that personal data is collected and retained for any length of time – whether electronically or manually.

Separate templates should be completed for each specific purpose – e.g. student registration, student graduation, student assessment - *not student administration*; student outreach, student recruitment, international student recruitment - *not recruitment and marketing*; staff performance management, staff development and training, paying staff, recruiting staff – *not staff administration*; student support case files; student needs assessments; library membership records – *not student services*

Only answer the questions in respect of the processing that *your* department carries out to fulfil the purpose. Do not answer for other Departments/Schools that may also process data for the same purpose.

If you have any queries, contact Marion Wilks mwilks@ucreative.ac.uk

Name of Person Completing the Form: _____

Job Title: _____

Department: _____

Date Completed: _____

Purpose for which personal data is collected: _____

	Question	Possible answers
1	<p>Provide a full description of the personal data collected for the purpose identified above.</p> <p>Definition: Personal data means data which relate to a living individual who can be identified –</p> <p>(a) from those data, or</p> <p>(b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller,</p> <p>Examples of personal data may be Staff or student names, addresses, contact details; staff employment details, bank/credit card details, national insurance numbers, PDRs, student personal details, student health information, student assessment data, student files; passport details, staff vehicle details; governor personal information; contractor personal data; supplier personal information, photos.</p> <p>The definition includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.</p>	See examples.

	Question	Possible answers
2	<p>Is any of the data collected personal <u>sensitive</u> data?</p> <p>Definition: Personal sensitive data has a <i>legal definition</i>. It relates specifically to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences.</p>	Y or N
3	<p>Is the data password protected or encrypted?</p>	<p>Data is password protected Y or N Data is encrypted Y or N Data is held in a system for which access is via a password Y or N</p> <p>None of the above If None of the above, but some other protection is in place (e.g locked cabinet), please describe.</p>
4	<p>From whom is it collected?</p> <p>Examples: The individual who is the subject of the data; Individuals/organisations who are NOT the data subject: e.g. University staff who are not the data subject; Parent who is not the data subject; academic partner, agent, supplier, GP – please specify</p>	See examples.
4a	<p>Has the consent of the data subject been obtained to process the data for this purpose?</p>	Y N Don't know

	Question	Possible answers
4b	<p>If consent has been obtained, how is this evidenced?</p> <p>Examples: Signed form Checkbox on online system Individual has provided information voluntarily Email Letter</p>	See examples.
4c	If the data is collected from a third party, then which organisation collects the data?	Open text
5	Is the data shared with other departments/Schools in the University, or with any external bodies or individuals?	Y or N
5a	If Y to departments/Schools within the University, then which departments and/or Schools	Open text
5b	If Y to any external bodies or individuals, then who are these?	Open text
6	Is a Data Protection Notification , Privacy Notice, Informed Consent Form or something similar given to the individuals when their data is collected that explains who will have access to the information and what it will be used for?	Y N Don't know
6a	If Y, attach text of the Notice/Form	Attach document
7.	<p>How is the data collected?</p> <p>Examples: Face-to-face interview; Individual fills in a paper form; Individual fills in an electronic form providing free text or selections from drop-down menus;</p>	See examples.

	Question	Possible answers
	third party supplies the data; via emails; Other	
7a	If 'other', then please describe how the data is collected	Open text
8	How is the information stored? Examples: Electronic database on a PC; Electronic database within a University hosted system such as SITs Electronic database hosted externally to the University Electronic free text such as emails; Paper files; Other	
8a	If 'other', then how is the information stored?	Open text
8b	If the data is stored on and processed using a UCA system, then which system?	Open text
9	Is the data transferred to and processed by a third party?	Y or N
9a	If 'Y', then which organisation receives and processes the data?	Open text
9b	If 'Y' in which country is the data stored/processed?	Open text Don't know

	Question	Possible answers
9c	If 'Y', is there a Data Processing contract/agreement with the third party in place?	Y (If 'Y' who holds this agreement?) N Don't know
10	For how long is the data retained before being destroyed?	Check your response is consistent with your department's retention schedule
11	Are the individuals who are the subject of the data able to update or correct the data; or ask to have it deleted (please respond to each of the following options)	individuals can amend their own data Y or N, individuals can contact us and ask us to amend data Y or N, individuals can contact us and ask us to amend data Y or N, individuals can contact us and ask us to delete data Y or N