

FE Sector: Record of Processing Activities/Information Asset Register

Departmental Reference Guide		
Glossary of Terms	Personal data	Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
	Special Category (Sensitive) Personal Data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation
	Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
	Data Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law
	Data Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
	Third Party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data
	Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed
	Data Sharing Agreement	A softer version of a contract, solely for purpose of considering the personal data processing side of a relationship
	Data Protection Impact Assessment	An assessment of data protection implications performed at the start of a new project which impacts on personal data or peoples privacy. Examples include, new technologies, camera installation, large scale processing – anything which will result in high risk.

Functionality Area : Business Engagement

Legislation Ref:

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1.c / 20.2.b	Art 20.1.c / 20.2.b	Art 20.1.a	Art 20.1.a	Article 20.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.e / 20.2.c	Location of data	Volume of data held	Art 9	Art 9	Art 20.2	Art 20.1.f	Art 20.1.g / 20.2.d	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification	
8800X	Business Engagement	Department/Function	Client information																				

Skills Focus



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Name	Academic								6.18 Performance of a contract	DEC	YES	NO	Sharepoint SPICE	<1000	NO	N/A	Specified staff	Electronic	End of project / relationship + 10 years	Staff login credentials	NO	Loss of reputation	Minimal	Confidential
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Skills

• Short course documentation
Enrolment / Evaluation / Certification

(Application /

Name	Contact details								6.18 Performance of a contract	DEC	Yes - contract	NO	Sharepoint	<1000	NO	N/A	Specified staff	Electronic	End of project / relationship + 7 year	Staff login credentials	NO	Loss of reputation freedom of the data subject	Harms to the rights and	Minimal	Confidential
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• Learner Placements

Name	Contact details								6.18 Performance of a contract	DEC	YES	NO	Sharepoint	<1000	NO	N/A	Specified staff	Electronic	End of project / relationship + 7 year	Staff login credentials	NO	Loss of reputation freedom of the data subject	Harms to the rights and	Minimal	Confidential
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HIA

• Recruitment

Name	Contact details								6.18 Performance of a public task	Employer	YES	NO	Sharepoint	<500	NO	N/A	Specified staff	Electronic	End of recruitment process	Staff login credentials	NO	Loss of reputation freedom of the data subject	Harms to the rights and	Minimal	Confidential
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Asset ID	Functionality	Class / Activity	Record Type	Art 85.1.a / 85.2.b	Art 85.1.a / 85.2.b	Art 85.1.a	Art 85.1.a	Article 85.2.a	Art 85.1.b / Art 6	Art 85.1.d	Art 85.1.e	Art 85.1.f / 85.2.c	Art 8	Art 9	Art 85.1	Art 85.1.f	Art 85.1.g / 85.2.d	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification	
CUR001	Curriculum	Departmental Function	Client information																			

Candidate coursework + Portfolios / Assignments / Examinations / Dissertations / Assessments completed as part of their evidence towards achievement

Name	Student ID	Achieved grade	Student of the public	Members	SEC	Awarding Organisation	ETI	N/A	6.18 Performance of a contract	6.1C Legal Obligation	Awarding Organisation	Insurers	MSI	NO	NO	AD hosted portfolio secure storage	20,000	YES	6.10	Specified staff	Electronic Hardcopy	Creation date + duration of the course	Secure storage within restricted access	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Moderate	Confidential
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Identification of accreditation requirements for new courses and obtaining accreditation + Course accreditation submissions

Name	CV	Staff			SEC	Awarding Organisation		N/A	6.18 Performance of a contract		Awarding Organisation			NO	NO	S/Drive	Sharepoint	<100	NO	N/A	Specified staff	Electronic	Creation date + duration of the course	Staff login credentials	NO	Harms to rights and risk and freedom of data subject		Minimal	Confidential
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Details relating to grades / marks awarded to candidates during completion of a specific course →

Name	Student ID	Achieved grade	Staff		SEC	Awarding Organisation	ETI	N/A	6.18 Performance of a contract		Awarding Organisation		ETI	NO	NO	AD hosted portfolio secure storage	20,000	NO	N/A	Specified staff	Electronic Hardcopy	Course duration + 1 year	Secure storage within restricted access	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Minimal	Confidential
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Internal evaluations / monitoring records relating to candidates undertaking a specific course / qualification →

Name	Student ID	Achieved grade	Staff		SEC	Awarding Organisation	ETI	N/A	6.18 Performance of a contract		Awarding Organisation		ETI	NO	NO	AD hosted portfolio secure storage	20,000	NO	N/A	Specified staff	Electronic Hardcopy	Course duration + 1 year	Secure storage within restricted access	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Minimal	Confidential
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Feedback reports from students, staff, employers and other stakeholders (Survey) →

Name	Student ID	Achieved grade	Staff		SEC	Awarding Organisation	ETI	N/A	6.18 Performance of a contract		Statistical data shared with staff	ETI	N/A	NO	NO	S/Drive	Sharepoint	20,000	NO	N/A	Specified staff	Electronic	Course duration + 1 year	Secure storage within restricted access	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Minimal	Open
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Monitoring of submission of assignments by students + Course assignment registers

Name	Student ID	Achieved grade	Staff		SEC	N/A		N/A	6.18 Performance of a contract		Statistical data shared with staff	ETI	N/A	NO	NO	S/Drive	Sharepoint	20,000	NO	N/A	Specified staff	Electronic	Current academic year + 1 year	Secure storage within restricted access	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Minimal	Open
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Monitoring and analysis of completed courses and qualifications + Coloured data - reports/statistics

Name	Date of Birth	Contact details	Student ID	Course details	Previous Qualifications	Student	Applicant	SEC	N/A	N/A	6.18 Performance of a public task	Not shared	N/A	N/A	N/A	EMS	Inquiry portal	up to 30,000	NO	N/A	Specified staff	Electronic	Current academic year + 5 years	Staff login credentials	NO	Harms to rights and risk and freedom of data subject	Loss of reputation	Minimal	Confidential
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Individual learner record →

Name	Student ID	DOB	Academic progress	Student	SEC	N/A	IT Asset	6.18 Performance of a public task	ETI	Processor	NO	NO	NO	NO	NO	Sharepoint	IT Asset	<500	YES	6.10	Specified staff	Electronic	End of engagement with course + 2 years	Staff login credentials	NO	Harms to the rights and freedoms of the data subject		Moderate	Confidential
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Legislative Act				Art 80.1.e / 80.2.a	Art 80.1.f / 80.2.b	Art 80.1.g	Art 80.1.h	Art 80.1.i	Art 80.1.j	Art 80.1.k	Art 80.1.l	Art 80.1.m	Art 80.1.n	Art 80.1.o	Art 80.1.p	Art 80.1.q	Art 80.1.r	Art 80.1.s	Art 80.1.t	Art 80.1.u	Art 80.1.v	Art 80.1.w	Art 80.1.x	Art 80.1.y	Art 80.1.z		
Asset ID	Functionality	Class / Activity	Record Type	Category of personal data	Category of data subject	Does it fall into sensitive data?	Does it fall into special categories (if applicable)	Does it fall into special categories (if applicable)	Purpose of data processing (if applicable)	Public or not (information shared with eg. 3rd parties)	Does it fall into sensitive data?	Does it fall into special categories (if applicable)	Does it fall into special categories (if applicable)	Location of data	Volume of data held	Does this contain special category data?	Purpose of lawful basis for processing special category data	Who has access to this data or category of data?	Retention period of the data	Description of technical and security measures	If applicable, is there an opt-out for data processing in place?	Risk / Impact of a data breach?	Risk rating	Security classification			
UCBA																											
UCBA - Governance & Corporate																											
UCBA - Governance & Corporate - Departmental Function																											
UCBA - Governance & Corporate - Departmental Function - Client Information																											
	Annual signed register of interest forms	Annual signed register of interest forms	Client Information	Name Organisation Membership employees	Relationship with Governing Body members	Staff	SRM	None	None	6.11 Performance of a Public Task	Public	NO	NO	Sharepoint Secure physical storage	<100	NO	N/A	CEO Secretary Governing Body Chairperson	Electronic Hardcopy	End of Governor's Terms + 6 years	Staff login credentials within restricted access	Secure storage	NO	None	Minimal Public		
	Governor appraisal forms	Governor appraisal forms	Client Information	Name	Governing Body members	SRM	Department for Economy	None	None	6.11 Performance of a Public Task	Department for Economy	NO	NO	Sharepoint	<100	YES	6.2(f)	CEO Secretary Governing Body Chairperson	Electronic	End of Governor's Terms + 6 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation	Moderate Confidential		
	Signed code of conduct	Signed code of conduct	Client Information	Name	Governing Body members	SRM	None	None	None	6.11 Performance of a Public Task	None	N/A	N/A	Electronic	<10	NO	N/A	CEO Secretary Governing Body Chairperson	Electronic	End of Governor's Terms + 6 years	Staff login credentials	NO	None	Minimal Confidential			
	Signed ICT acceptable use	Signed ICT acceptable use	Client Information	Name	Governing Body members	SRM	None	None	None	6.11 Performance of a Public Task	None	N/A	N/A	Electronic	<10	NO	N/A	CEO Secretary Governing Body Chairperson	Electronic	End of Governor's Terms + 6 years	Staff login credentials	NO	None	Minimal Confidential			
	Signed HRMC and bank details	Signed HRMC and bank details	Client Information	Name National Insurance Number	Bank & Details Governing Body members	SRM	None	None	None	6.11 Performance of a Public Task	HRMC provider	NO	N/A	Electronic	<100	YES	N/A	Specified staff	Electronic	End of Governor's Terms + 6 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation	Severe Confidential		
	Signed induction confirmation	Signed induction confirmation	Client Information	Name	Governing Body members	SRM	None	None	None	6.11 Performance of a Public Task	None	N/A	N/A	Electronic	<10	NO	N/A	CEO Secretary Governing Body Chairperson	Electronic	End of Governor's Terms + 6 years	Staff login credentials	NO	None	Minimal Confidential			
	Minutes and Papers	Minutes and Papers	Client Information	Name	Employer	Staff	SRM	SRM	N/A	6.11 Legal Obligation Performance of a public task	Public For Economy	Department	N/A	N/A	Secure Sharepoint Physical storage	Secure 10,000+	NO	N/A	Public Senior Management team CEO/PA	Electronic Hardcopy	Permanent	Staff login credentials within restricted access	Secure storage	N/A	Public, Name Organisational Risk, Loss of reputation	Confidential - Moderate Public Confidential	
	Sharepoint Minutes and Papers Retention Schedule	Sharepoint Minutes and Papers Retention Schedule	Client Information	Name	Employer	SRM	SRM	SRM	N/A	6.11 Performance of a Public Task	No	N/A	N/A	Sharepoint i/Drive	30,000+	NO	N/A	Senior Management team CEO/PA	Electronic	Record subject to an ongoing update and review	Staff login credentials	NO	Loss of reputation	Minimal Confidential			
	Sharepoint Communications	Sharepoint Communications	Client Information	Name	Address Nature of correspondence	SRM	SRM	SRM	N/A	6.11 Performance of a Public Task	N/A	N/A	N/A	CEO Drive	<100	Yes	6.2(f)	CEO Office	Electronic	Current academic year + 5 years	Staff login credentials within restricted access	Secure storage	N/A	Harms to rights and freedoms of data subject Loss of reputation	Severe Confidential		
	Identification, assessment and management of risks to the UK's financial system	Identification, assessment and management of risks to the UK's financial system	Client Information	Name	Staff	SRM	SRM	SRM	None	6.11 Performance of a Public Task	Department for Economy Northern Ireland Audit Office	No	N/A	Sharepoint i/Drive physical storage	Secure 100+	NO	N/A	Executive team	Electronic Hardcopy	Current academic year + 5 years	Staff login credentials within restricted access	Secure storage	NO	Harms to rights and freedoms of data subject Loss of reputation	Moderate Confidential		
	Review of the UK's Financial System or Assessment and Management of Risks to the UK's Financial System	Review of the UK's Financial System or Assessment and Management of Risks to the UK's Financial System	Client Information	Name	Telephone	Staff	SRM	SRM	N/A	6.11 Performance of a Public Task	N/A	N/A	N/A	Sharepoint i/Drive physical storage	Secure 1	NO	N/A	SRM Senior CFA	Electronic Hardcopy	Record subject to an ongoing update and review	Staff login credentials within restricted access	Secure storage	N/A	Organisational Risk	Severe Confidential		
	Whistleblowing register	Whistleblowing register	Client Information	Identity of whistleblower Identity of staff involved Nature of disclosure	Identity of staff Any involved parties	Student	SRM	N/A	None	6.11 Legal Obligation Performance of a public task	6.11 Department for Economy	PNW Yes - contract	N/A	N/A	i/Drive	<10	Yes	6.2(f)	Specified staff	Electronic	End of investigation/ appeal + 5 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation Corporate Risk	Severe Confidential	
	Investigation / appeal documentation	Investigation / appeal documentation	Client Information	Identity of whistleblower Identity of staff involved Nature of disclosure	Identity of staff Any involved parties	Student	SRM	N/A	None	6.11 Legal Obligation Performance of a public task	6.11 Department for Economy	PNW NO	N/A	N/A	i/Drive	<1	Yes	6.2(f)	Specified staff	Electronic	End of investigation/ appeal + 5 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation Corporate Risk	Severe Confidential	
	Whistleblowing Feedback	Whistleblowing Feedback	Client Information	Name	Notes of discussion	Student	SRM	N/A	None	6.11 Performance of a Public Task	N/A	N/A	N/A	CEO secure storage	<100	Yes	6.2(f)	CEO Office	Hardcopy	Record subject to an ongoing update and review	Staff login credentials within restricted access	Secure storage	N/A	Harms to rights and freedoms of the data subject	Severe Confidential		
	Equality	Equality	Client Information	Name Gender Background Disability or other characteristic	DOB Religion Ethnicity Sexual Marital status	Staff	SRM	N/A	None	6.11 Consent Performance of a public task	6.11 Equality commissioner	N/A	N/A	Q/Drive/i/Drive	UP TO 6000	Yes	6.2(f)	Specified staff	Electronic	Retain for current academic year + 5 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation	Severe Confidential		
	Equality Complaints and Investigations	Equality Complaints and Investigations	Client Information	Name Gender Background Disability or other characteristic	DOB Religion Ethnicity Sexual Marital status	Staff	SRM	N/A	None	6.11 Consent Performance of a public task	6.11 ICO	N/A	N/A	i/Drive	<10	Yes	6.2(f)	Specified staff	Electronic	Retain for current academic year + 5 years	Staff login credentials	NO	Risks to rights and freedoms of the data subject Loss of reputation	Possible ECD violation	Severe Confidential		

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1 / 20.2.0		Art 20.1.0		Art 20.2.0		Art 20.2.0		Location of data	Volume of data held	Does this contain special category data?	Purpose / lawful basis for processing special category data	Who has access to this data / category of staff	Format of the data	Retention period	Description of technical and security measures	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification			
				Categories of personal data	Categories of data subject	Who is the data collected?	Who is the data collected for (purpose)?	Who is the data processed for (purpose)?	Who is the data transferred to another entity / international organisation?	Is there a data sharing agreement / contract in place?	Is this data transferred to another entity / international organisation?															
Staff Records																										
			• Staff appraisal (performance)	Software	Staff	SAC	N/A	N/A	4.18 - Performance of a public task	N/A	N/A	QDrive	<50	No	N/A	Specified staff	Electronic	Full of 3 years + 3 years	Staff login credentials	NO	Loss of reputation	Minor	Confidential			
			• Application forms / interview notes / files relating to recruitment as they become applicable (only)	Name Address Contact details/Qualifications Employment history Reference	Staff	Reference	SAC	N/A	4.1C - Legal obligation	None	N/A	QDrive	restricted access	Secure storage within	<50	Yes	3.25	Specified staff	Electronic hardcopy	Full of 3 years + 3 years	Staff login credentials Restricted access to locked storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential
			• Application forms / interview notes / files relating to recruitment as they become applicable (only)	Name Address Contact details/Qualifications Employment history Reference	Staff	Reference	SAC	N/A	4.1C - Legal obligation	None	N/A	QDrive	restricted access	Secure storage within	<500	Yes	3.25	Specified staff	Electronic hardcopy	Appointed to the post + 1 year	Staff login credentials Restricted access to locked storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential
Access to Disclosure																										
			•	Name	Contact details	Suicidal applicant	SAC	N/A	4.1C - Legal obligation	N/A	N/A	Secure storage within restricted access	up to 10	Yes	3.25	Specified staff	hardcopy	Recruitment decision + 3 months	Restricted access to storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential		
Staff Records																										
			• Staff personnel files	Name Bank details Medical details/Reference	Staff	SAC	none	N/A	4.18 - Performance of a contract	N/A	N/A	QDrive	restricted access	Secure storage within	up to 2000	Yes	3.25	Specified staff	Electronic hardcopy	Termination of employment + 6 years (unless Health & Safety issue highlighted, see Medical Reports below)	Staff login credentials Restricted access to locked storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential
			• Approving the performance of individual members of staff (annual performance appraisal reports)	Staff name	Training need	Staff	SAC	N/A	4.18 - Performance of a contract	N/A	N/A	QDrive	<50	N/A	N/A	Specified staff	Electronic	Termination of employment + 6 years (unless Health & Safety issue highlighted, see Medical Reports below)	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Low	Moderate	Confidential		
			• Probation reports	Name Contact details Bank details Medical details/Reference	Staff	SAC	N/A	N/A	4.18 - Performance of a contract	N/A	N/A	QDrive	up to 3000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years (unless Health & Safety issue highlighted, see Medical Reports below)	Staff login credentials Restricted access to locked storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential		
			• Staff development	Staff name	Training need	Staff	SAC	N/A	4.18 - Performance of a contract	N/A	N/A	QDrive	up to 3000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years (unless Health & Safety issue highlighted, see Medical Reports below)	Staff login credentials Restricted access to locked storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential		
Staff Employment Records																										
			• Information relating to redundancies	Name Employee ID Age Date of service	Staff	SAC	N/A	SAC	4.1C - Legal obligation	SAC	MS	QDrive	JMS system	up to 1000	N/A	N/A	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Moderate	Confidential		
			• Making any payments (FOR MCCAS)	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	up to 1000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• Pensions	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	\$0,000 +	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• Payout calculations records including Overtime, additional hours and flexibilities, wage, holiday months, Christmas salary payments, Statutory returns + notices (P45, P46, P47, P48, P49, P50)	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	\$0,000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• BACS submission report	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	<50	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• Statutory maternity pay records and calculations	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	up to 500	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• Statutory sick pay records and calculations	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	up to 1000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
			• Shared parental leave records and calculations (including unpaid leave)	Name	Employee ID	Staff	SAC	N/A	4.18 - Performance of a contract	SAC	MS	QDrive	JMS system	up to 100	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential	
Medical Records																										
			• Health records	Name Contact details	Employment	Staff	SAC	Occupational health CHRD	4.1C - Legal obligation	GDPR MSGDCC Personnel records	Yes	QDrive	100 to 3000	Yes	3.25	Specified staff	Electronic	Termination of employment + 6 years	Staff login credentials	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential		
Legal Records																										
			• Files relating to disciplinary, grievance and Assessment findings	Name Contact details Description of complaint	Staff	SAC	Legal representation	N/A	4.1C - Legal obligation	Legal representation	Yes	QDrive restricted access	Secure storage within	<10	Yes	3.25	Specified staff	Electronic hardcopy	Termination of employment + 6 years	Staff login credentials	Restricted storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential
			• Industrial tribunal papers	Name Contact details Description of complaint	Staff	SAC	Legal representation	N/A	4.1C - Legal obligation	Legal representation, Invoices	Yes	QDrive restricted access	Secure storage within	<10	Yes	3.25	Specified staff	Electronic hardcopy	Out of bound case + 6 years	Staff login credentials	Restricted storage	NO	Harassment rights and freedoms of data subject / Loss of reputation	Possible sanction from ICO	Severe	Confidential

Functionality Area: ICT

Legislation Ref:

Asset ID	Functionality	Class / Activity	Record Type	Art 30.1.c / 30.2.b	Art 30.1.c / 30.2.b	Art 30.1.a	Art 30.1.a	Article 30.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.e / 30.2.c	Art 9		Art 9		Art 30.2	Art 30.1.f	Art 30.1.g / 30.2.d		Risk / Impact of a data breach?	Risk rating	Security classification		
				Categories of personal data	Categories of data subject	Who is the data controller?	Who is the joint controller? (if applicable)	Who is the data processor? (if applicable)	Purpose / lawful basis for this data 'processing'	Who is this information shared with? Eg. 3rd parties	Is there a data sharing agreement / contract in place?	Is this data transferred to another country / international organisation?	Location of data	Volume of data held	Does this contain 'special category' data?	Purpose / lawful basis for processing special category data	Who has access to this data ie category of staff?	Format of the data	Retention period				Description of technical and security measures	If applicable, is there an up to date DPIA in place?
ICT00X	ICT	Departmental Function	Client information																					
	ICC	User account log-on audits	→	Login activity	Student Staff	SRC	N/A	Office 365	6.1E Performance of a public task	Processor	YES	YES	Hosted servers Internal servers	<10	NO	N/A	Specific IT staff	Electronic	Creation date + up to 1 year	Staff login credentials	NO	Loss of reputation	Moderate	Confidential
		Web filtering / firewall logs	→	Login activity	Student Staff	SRC	N/A	Palo-alto	6.1E Performance of a public task	Processor	YES	YES	Hosted servers Internal servers	1	NO	N/A	Specific IT staff	Electronic	Creation date + 1 year	Staff login credentials	NO	Loss of reputation	Moderate	Confidential
		Operation of data back-up logs and archiving routines	→	Login activity	Student Staff	SRC	N/A	Office 365	6.1E Performance of a public task	Processor	YES	YES	Hosted servers Internal servers	<10	NO	N/A	Specific IT staff	Electronic	Record subject to on-going update and review	Staff login credentials	NO	Loss of reputation	Moderate	Confidential
		Active directory accounts / VLE accounts for staff	→	Staff Name Student Name	Staff Student	SRC	N/A	Office 365 Canvas	6.1E Performance of a public task	N/A	YES	YES	Hosted servers Internal servers	14,000	NO	N/A	Specific IT staff End user	Electronic	Duration of employment or study + 6 months	User account MFA Security measures	IT YES	Compromised College Security Possible ICO sanction Loss of reputation	Severe	Confidential
		Exchange mailboxes	→	All personal data held by the end user in their email account	Staff Student	SRC	N/A	Office 365	6.1E Performance of a public task	Dependent on nature of data communication and actions of end user	NO	NO	Hosted servers Internal servers	14,000	YES	9.2G	Specific IT staff End user	Electronic	Duration of employment or study + 6 months	User account MFA Security measures	IT YES	Compromised College Security Possible ICO sanction Loss of reputation	Severe	Confidential
		Staff and student home drive data	→	All personal data held by the end user in their email account	Staff Student	SRC	N/A	Office 365	6.1E Performance of a public task	N/A	NO	NO	Hosted servers Internal servers	14,000	YES	9.2G	Specific IT staff End user	Electronic	Staff - duration of employment + 6 months Students - duration of study + no longer than 6 months	User account MFA Security measures	IT YES	Compromised College Security Possible ICO sanction Loss of reputation	Severe	Confidential

Functionality Area: Insurance

Legislation Ref:

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1.c / 20.2.b	Art 20.1.c / 20.2.b	Art 20.1.a	Art 20.1.a	Article 20.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.e / 20.2.c	Location of data	Volume of data held	Art 9	Art 9	Art 20.2	Art 20.1.f	Art 20.1.g / 20.2.d	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification
ING00X	Insurance	Departmental Function	Client Information																			

Fruitless payments →

Name details	Contact Date of birth	Staff Public	Student	SRC	Marsh (Broker)	N/A	6.1.C Legal Obligation	Broker	Yes - contract	NO	I/Drive Secure storage	S/Drive <20	YES	9.2F	Specified EST staff	Electronic Hardcopy	Creation date + 3 years	Login credentials restricted access	Secure storage within	NO	Loss of reputation freedoms of the data subject	Harms to rights and Possible ICO sanction	Severe	Confidential
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Insurance documentation / schedule →

Name details	Contact Details of solicitor	Staff Public	Student	SRC	Marsh	N/A	6.1.C Legal Obligation	Broker	YES	NO	I/Drive Secure storage	S/Drive <100	YES	9.2F	Specified EST staff	Electronic Hardcopy	Creation date + 6 years	Login credentials restricted access	Secure storage within	NO	Loss of reputation freedoms of the data subject	Harms to rights and Possible ICO sanction	Severe	Confidential
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Insurance broker payments / excess payments →

Name	Claimant			SRC	Solicitor	NA	6.1.C Legal Obligation	Solicitor	NO	NO	I/Drive Secure storage	S/Drive <20	NO	N/A	Specified EST staff	Electronic	Creation date + 6 years	Login credentials restricted access	Secure storage within	NO	Loss of reputation		Minimal	Confidential
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Claims history * Files + Correspondence

Name	Address																							
Date of birth	National																							
Insurance Number	Claims history	Claimant parties	Involved	SRC	Marsh (broker)	N/A	6.1.C Legal Obligation	Broker	Yes - Contract	NO	I/Drive Secure storage	S/Drive <10,000	Yes	9.2F	Specified EST staff	Electronic Hardcopy	Creation date + 10 years	Login credentials restricted access	Secure storage within	NO	Loss of reputation Harms to rights and freedoms of the data subject	Possible ICO sanction	Severe	Confidential

Records documenting all student placement data including name, address, contact details, DOB, next of kin details, health data, placement job description, company details and all insurance details (Claims submitted only) →

Name	Date of birth	Course	Student	SRC	Marsh	N/A	6.1.C Legal Obligation	Marsh	Yes - contract	NO	I/Drive	S/Drive	<200	NO	N/A	Specified EST staff	Electronic	Current academic + 5 years	Login credentials	NO	Loss of reputation		Moderate	Confidential
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Functionality Area: MIS

Legislation Ref

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1.c / 20.2.b	Art 20.1.c / 20.2.b	Art 20.1.e	Art 20.1.a	Article 20.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.e / 20.2.c	Art 9	Art 9	Art 20.3	Art 20.1.f	Art 20.1.g / 20.2.d									
MIS001	MIS	Department/Function	Client Information	Categories of personal data	Categories of data subject	Who is the data controller?	Who is the joint controller? (if applicable)	Who is the data processor? (if applicable)	Purpose / lawful basis for this data 'processing'	Who is this information shared with? Eg. 3rd parties	Is there a data sharing agreement / contract in place?	Is this data transferred to another country / international organisation?	Location of data	Volume of data held	Does this contain 'special category' data?	Purpose / lawful basis for processing special category data	Who has access to this data in category of staff?	Format of the data	Retention period	Description of technical and security measures	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification	
		<u>Timetables</u>	→	Staff name Staff ID	Staff	SRC	N/A	N/A	6.1E Performance of a Public Task	N/A	NO	NO	SBS	20,000	NO	N/A	MIS staff Students	Curriculum staff	Electronic	Current academic year +2	SBS credentials Staff login	NO	Loss of reputation	Minimal	Public
		<u>Enrollment records full time and part time including authorisation to changes of student details</u>	→	All student personal data recorded on SBS (for CDW)	Student	SRC	Department of Economy	N/A	6.1B Performance of a contract	Department for Economy	NO	NO	S/drive	20,000	YES	9.2G	Specific MIS staff		Electronic	Current academic year +7	Staff login credentials	NO	Harms to rights and freedoms of the data subject Loss of reputation	Risk of Severe	Confidential
		<u>Students (email, onover electronic)</u>	→	Student name Student ID Staff name Staff ID	Student staff	SRC	N/A	N/A	6.1C Legal Obligation	N/A	NO	NO	SBS	20,000	NO	N/A	MIS staff Campus Services	Curriculum staff Faculty Admin	Electronic	Current academic year +7	SBS login Staff credentials	NO	Loss of reputation	Minimal	Open
		<u>Course set-up</u>	• Authorized course set-up documentation	Staff name Staff ID	Staff	SRC	N/A	N/A	6.1E Performance of a public task	N/A	NO	NO	S/drive	7,500	NO	N/A	MIS staff Faculty Admin	Curriculum staff	Electronic	Retain until external audit complete (or up to 3 years, whichever is shorter)	Specific staff login credentials	NO	Loss of reputation	Minimal	Confidential
			• Authorized course amendment documentation	Staff name Staff ID	Staff	SRC	N/A	N/A	6.1E Performance of a public task	N/A	NO	NO	S/drive	2,500	NO	N/A	MIS staff Faculty Admin	Curriculum staff	Electronic	Retain until external audit complete (or up to 3 years, whichever is shorter)	Specific staff login credentials	NO	Loss of reputation	Minimal	Confidential
			• Authorized course cancellation documentation	Staff name Staff ID	Staff	SRC	N/A	N/A	6.1E Performance of a public task	N/A	NO	NO	S/drive	800	NO	N/A	MIS staff Faculty Admin Services staff	Curriculum staff Specific Campus	Electronic	Retain until external audit complete (or up to 3 years, whichever is shorter)	Specific staff login credentials	NO	Loss of reputation	Minimal	Confidential
		<u>Withdrawal forms / transfer forms / amendments</u>	→	Student name Student ID	Student	SRC	N/A	N/A	6.1E Performance of public task	N/A	NO	NO	S/drive	1,200	YES	9.2G	MIS Finance	Faculty staff Campus Services	Electronic	Creation date +3	Staff login credentials	NO	Harms to rights and freedoms of the data subject Loss of reputation	Risk of Moderate	Confidential
		<u>Student database eg QLS, QLP and LMS (SBS)</u>	→	All student data	Student staff	SRC	N/A	Data based hosts	6.1B Performance of a contract	Department for economy	NO	NO	Applicable system	500,000 +	YES	9.2G	Specific staff		Electronic	End of relationship +10	Specific staff login credentials	NO	Harms to rights and freedoms of the data subject Loss of reputation	Risk of Severe	Confidential

Functionality Area: Quality <i>(Information)</i>				Art 20.1.c / 20.2.b		Art 20.1.c / 20.2.b		Art 20.1.c		Art 20.1.c		Article 20.2.a		Art 20.1.b / Art 6		Art 20.1.d		Art 20.1.e / 20.2.c		Art 9		Art 9		Art 20.2		Art 20.1.f		Art 20.1.g / 20.2.d							
Asset ID	Functionality	Class / Activity	Record Type	Categories of personal data		Categories of data subject		Who is the data controller?	Who is the joint controller? (if applicable)	Who is the data processor? (if applicable)	Purpose / lawful basis for this data processing	Who is this information shared with? (eg. 3rd parties)	Is there a data sharing agreement / contract in place?	Is this data transferred to another country / international organisation?	Location of data	Volume of data held	Does this contain special category data?	Purpose / lawful basis for processing special category data	Who has access to this data in category of staff?	Format of the data	Retention period	Description of technical and security measures	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification									
Quality	Quality	Department/Function	Client Information																																
		<u>Current student examination and assessment evidence (exam papers)</u>	→	Student name Student ID Staff name	Student date of birth Student achievement	Student Staff	SAIC	Awarding Body	N/A	6.18: Performance of a contract Performance of a public task	6.1E: Awarding Body verifiers	External	NO	NO	Sharepoint	<3000	YES	9.2G	Specified staff	Electronic	Current academic year + 12 weeks post certification	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential									
		<u>Teaching / lesson observation reports, recorded lesson observations, SAs</u>	→	Staff name	Performance level	Staff	SAIC	Awarding Body	N/A	6.18: Performance of a contract Performance of a public task	6.1E: Awarding Body verifiers	External	NO	NO	S/Drive	<150	NO	N/A	Specified staff	Electronic	Current academic year + 1 year	Staff login credentials	N/A	Harm to rights and freedoms of the data subject Loss of reputation	Minimal	Confidential									
		<u>Awarding organisation course quality assurance evidence (internal audit, external examiner reports / subject partnership manager reports)</u>	→	Staff name Student name Student date of birth achievement	Staff qualification Student ID Student	Student Staff	SAIC	Awarding Body	N/A	6.18: Performance of a contract Performance of a public task	6.1E: Awarding Body verifiers	External	NO	NO	Sharepoint	S/Drive	<300	NO	N/A	Specified staff	Electronic	Current academic year + 1 year	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential								
		<u>Self evaluation reports</u>	→	Course review/ self evaluation reports Staff name		Staff	SAIC	N/A	N/A	6.1E: Performance of a public task	N/A	N/A	NO	NO	Sharepoint		NO	N/A	Specified staff	Electronic	Current academic year + 2 years	Staff login credentials	NO	Loss of reputation	Minimal	Confidential									
		<u>Open / unit reviews</u>	→	Staff name		Staff	SAIC	N/A	N/A	6.1E: Performance of a public task	N/A	N/A	NO	NO	Sharepoint		NO	N/A	Specified staff	Electronic	Current academic year + 2 years	Staff login credentials	NO	Loss of reputation	Minimal	Confidential									
		<u>Complaints and awards records (SAs)</u>	→	Student name	Student performance	Student	SAIC	N/A	N/A	6.1E: Performance of a public task	N/A	N/A	NO	NO	Sharepoint	<30	NO	N/A	File, staff only	Electronic	Current academic year + 2 years	Staff login credentials	NO	Loss of reputation	Minimal	Confidential									
		<u>Records documenting the customer feedback policy including all complaints and complaints handled, student requests and the College response</u>	→	Complainant name Email Student ID / enrolment	Address Telephone Course of application	Complainant Staff	SAIC	N/A	N/A	6.1A: Consent 6.1B: Performance of a contract 6.1C: Legal Obligation	6.1E: External Verifier ICD	External	NO	NO	S/Drive Outlook	<300	Yes	9.2G	Specified staff	Electronic	Current academic year + 2 years	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation Possible ICO sanction	Severe	Confidential									
		<u>Teaching lesson and observation report and performance observations of report, performance observations, evidence</u>	→	Staff name	Staff performance	Staff	SAIC	N/A	N/A	6.18: Performance of a contract Performance of a public task	6.1E: N/A	N/A	NO	NO	S/Drive	<50	NO	N/A	Specified staff	Electronic	Current academic year + 2 years	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential									
		<u>Internal college quality analysis / audit reports</u>	→	Staff name	Staff performance	Staff	SAIC	N/A	N/A	6.1E: Performance of a public task	N/A	N/A	NO	NO	S/Drive	Sharepoint	<50	NO	N/A	Specified staff	Electronic	Current academic year + 2 years	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential								
		<u>Assessment feedback, internal verification and student grade</u>	→	Staff name Student achievement	Student name	Staff Student	SAIC	N/A	External Verifier	6.1E: Performance of a public task 6.1F Legitimate interests	External Verifier	External	NO	N/A	Sharepoint	VLE Up to 750,000	NO	N/A	Specified staff	Electronic	Handcopy year + 6 years	Staff login credentials within restricted access	Secure storage	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential								
		<u>Case conference records in student, student incidents and cases</u>	→	Staff name Student achievement attendance	Student name Student	Staff Student	SAIC	N/A	N/A	6.1F Legitimate interests	N/A	External	NO	N/A	Sharepoint	VLE Up to 10,000	NO	N/A	Specified staff	Electronic	Current academic year + 6 years	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential									
		<u>Academic conduct / appeal and assessment evidence (written/verbal/ academic misconduct)</u>	→	Student name Student ID Student Achievement	Student date of birth Staff Name Student	Student Staff	SAIC	N/A	N/A	6.1E: Performance of public task	Awarding Body verifiers	External	NO	NO	S/Drive	Sharepoint	<50	YES	9.1B	Specified staff	Electronic	Settlement +6 years	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential								
		<u>SLI / SAs</u>	→	Staff name	Staff performance	Staff	SAIC	N/A	N/A	6.1E: Performance of a public task	None	N/A	N/A	N/A	S/Drive	Sharepoint	<50	NO	N/A	Specified staff	Electronic	Record subject to on-going update and review	Staff login credentials	N/A	Harm to rights and freedoms of the data subject Loss of reputation	Minimal	Confidential								
		<u>Awarding organisation approval documents</u>	→	Staff name	Staff qualification	Staff	SAIC	N/A	N/A	6.18: Performance of a contract 6.18: Performance of a public task	Awarding Body verifiers	External	NO	N/A	S/Drive	Sharepoint	<3000	NO	N/A	Specified staff	Electronic	Record subject to on-going update and review	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential								
		<u>Accredited action learning records</u>	→	Student name Student ID Educational history	Student achievement Achievement /	Student	SAIC	N/A	N/A	6.1E: Performance of a public task	N/A	External	NO	N/A	Sharepoint	<3000 per annum	NO	N/A	Specified staff	Electronic	Record subject to on-going update and review	Staff login credentials	NO	Harm to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential									

Functionality Area: Record Management

Legislation Ref:

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1.e / 20.2.b	Art 20.1.e / 20.2.b	Art 20.1.e	Art 20.1.e	Article 20.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.a / 20.2.c	Location of data	Volume of data held	Art 9	Art 9	Art 20.2	Art 20.1.f	Art 20.1.g / 20.2.d	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification
800000	Record management	Departmental Function	Client Information																			

DPA / FOI / GDR

Requests / Responses / Refusal notices / Internal review, requests, responses / Responses to ICO investigations

Name of requestor	Address	Student	Staff						6.2A - Performance of a contract																	
Contact details	Student ID	Requestor		SAC	ICO				6.2E - Performance of a public task	ICO	NO	NO	S/Drive	<50 (FOI & GDR)	NO	N/A		Specified staff	Electronic	Response / Appeal Response + 3 years	Staff login credentials	N/A	Loss of reputation freedoms of the data subject	Harms to rights and	Moderate	Confidential

Data breach records

→

Student Name	Student ID								6.2D - Vital Interests	6.2F - Legitimate Interests																		
Course of enrolment	Applicant								6.2D - Vital Interests	6.2F - Legitimate Interests	ICO	NO	NO	S/Drive	<50	YES	6.2G		Specified staff	Electronic	End of investigation + 3 years	Staff login credentials	NO	Loss of reputation freedoms of the data subject	Possible ICO sanction	Harms to rights and	Severe	Confidential

Investigations of allegations

→

Subject Name	Subject contact details	Student ID	Staff						6.2D - Vital Interests	6.2E - Performance of a public task	6.2F - Legitimate Interests																		
Course of enrolment	Staff	Student	Staff						6.2D - Vital Interests	6.2E - Performance of a public task	6.2F - Legitimate Interests	ICO	NO	NO	S/Drive	<100	YES	6.2G		Specified staff	Electronic	End of investigation + 3 years	Staff login credentials	NO	Loss of reputation freedoms of the data subject	Possible ICO sanction	Harms to rights and	Severe	Confidential

Functionality Area: Training Organisation

Legislation Ref

Asset ID	Functionality	Class / Activity	Record Type	Art 20.1.c / 20.2.b	Art 20.1.c / 20.2.b	Art 20.1.a	Art 20.1.a	Article 20.2.a	Art 20.1.b / Art 6	Art 20.1.d	Art 20.1.e / 20.2.c	Location of data	Volume of data held	Art 9	Art 9	Art 20.2	Art 20.1.f	Art 20.1.g / 20.2.d	If applicable, is there an up to date DPIA in place?	Risk / Impact of a data breach?	Risk rating	Security classification
TC001	Head of organisation	Departmental Function	Client information																			

Training for Success (TFS)

→

Name	Address																								
Date of birth	Contact number	Trainee	Trainee next of kin	Department for Economy	SRC	Department for Economy	SRC	N/A	6.18 Performance of contract	Employers of trainee	YES	NO	GBS portal TMS system	<5000	YES	9.2G	Specified staff	Electronic Hardcopy	Termination of relationship + 16 years	Staff login credentials within restricted access	Secure storage	NO	Harms to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential

Acas

- Apprenticeship NI 2013
- Apprenticeship NI 2017
- Apprenticeship NI 2021

Name	Address																								
Date of birth	Contact number	Trainee	Trainee next of kin	Department for Economy	SRC	Department for Economy	SRC	N/A	6.18 Performance of contract	Employers of Apprentice	YES	NO	GBS portal TMS system	<4500	YES	9.2G	Specified staff	Electronic Hardcopy	31st December 2010 (or 7 years after receipt of last payment date – whichever is later)	Staff login credentials within restricted access	Secure storage	NO	Harms to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential

Name	Address																								
Date of birth	Contact number	Trainee	Trainee next of kin	Department for Economy	SRC	Department for Economy	SRC	N/A	6.18 Performance of contract	Employers of Apprentice	YES	NO	GBS portal TMS system	<4500	YES	9.2G	Specified staff	Electronic Hardcopy	31st December 2010 (or 7 years after receipt of last payment date – whichever is later)	Staff login credentials within restricted access	Secure storage	NO	Harms to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential

Name	Address																								
Date of birth	Contact number	Trainee	Trainee next of kin	Department for Economy	SRC	Department for Economy	SRC	N/A	6.18 Performance of contract	Employers of Apprentice	YES	YES	GBS portal TMS system	<4500	YES	9.2G	Specified staff	Electronic Hardcopy	31st December 2010 (or 7 years after receipt of last payment date – whichever is later)	Staff login credentials within restricted access	Secure storage	NO	Harms to rights and freedoms of the data subject Loss of reputation	Moderate	Confidential