
Data Privacy Impact Assessment Procedure and Proforma

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Further information regarding this document

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Version Control

Version History:		
Version Number	Reviewing Committee / Officer	Date
2.0 = policy once reviewed	NHS Bury Clinical Commissioning Group, Information Governance Operational Group	27 th November 2014
3.0 = policy once reviewed	NHS Bury Clinical Commissioning Group, Quality and Risk Committee	18th November 2015
3.1 = policy review	GMSS IG Team	5 th March 2018
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Data Privacy Impact Assessment Proforma

Why do I need to complete a Data Privacy Impact Assessment?

Data Protection Impact Assessments (DPIAs) help organisations identify, assess and mitigate or minimise privacy risks with data processing activities. They're particularly relevant when a new data processing process, system or technology is being introduced.

DPIAs also support the accountability principle, as they help organisations comply with the requirements of the General Data Protection Regulation (GDPR) and demonstrate that appropriate measures have been taken to ensure compliance.

A DPIA is a proforma or risk assessment which asks questions about the process or new system based on data quality / data protection / information security and technology.

When do I complete a Data Protection Impact Assessment?

If you are doing any of the following:

- setting up a new process using personal confidential data (PCD)
- changing an existing process which changes the way personal confidential data is used
- procuring a new information system which holds personal confidential data

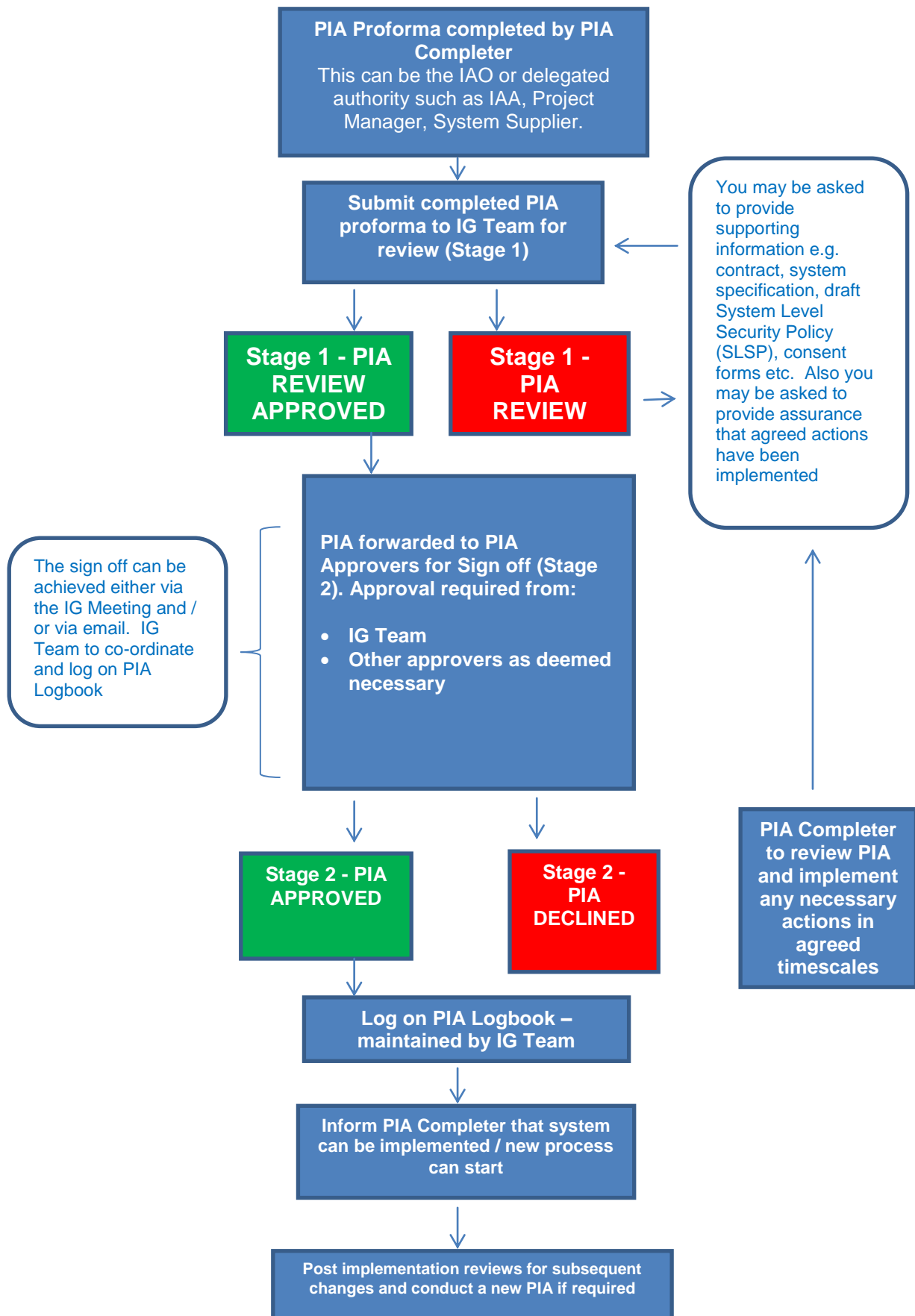
They must be completed as early as possible to ensure risks can be identified and mitigated to an acceptable level.

Who needs to complete a Data Privacy Impact Assessment (DPIA)?

It is the Information Asset Owners / Administrators responsibility to ensure this is completed and submitted. They can delegate this task to an Information Asset Administrator (IAA) / Project Manager and or suppliers of a system / asset.

PIA Process Flowchart

The following flowchart highlights the steps once the PIA has been completed until either approval and / or rejection decision has been reached.



Important

By completing this Data Privacy Impact Assessment, you agree to adhere to the IG Toolkit requirements and have Information Governance and Information Security Policies in place which includes:

- Information Governance Policy
- Completion of Information Governance mandatory training
- Information Governance Incident Reporting Procedures
- Secure Transfers of Information Procedure
- Information Asset Register

The list above is not exhaustive.

In the event of an incident and failure to have the above may incur to a larger monetary penalty being levied upon you by the Information Commissioners Office (ICO).

Help and Advice

For further help and advice, please contact the Senior IG Officer for your CCG.

Screen 1: Basic Information

Reference: 00 PIA Title:

PIA Completer Name: <i>(please note this can be Project Manager / IAO / IAA or whoever has been requested to complete the proforma):</i>	
Department:	
Email:	
Telephone No.:	
New System / Process Name:	
New System Supplier Name: (if applicable):	
Date System due to go live (if applicable):	
Project Proposal / Purpose for completing PIA:	
Link to wider initiative <i>(if applicable):</i>	

Information Technology Involvement	List any applicable electronic systems/software to this initiative (current and/or new): <table border="1" data-bbox="636 244 1617 499"> <thead> <tr> <th data-bbox="636 244 853 339">System name</th> <th data-bbox="860 244 1126 339">Used by e.g. organisation and dept.</th> <th data-bbox="1133 244 1617 339">Parties/system supplier</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>			System name	Used by e.g. organisation and dept.	Parties/system supplier															
System name	Used by e.g. organisation and dept.	Parties/system supplier																			
Are any other organisations are involved in this initiative?																					
Confirm all relevant organisations have or are working towards cyber essentials	<table border="1"> <thead> <tr> <th data-bbox="629 616 936 751">Organisation/Parties/ system supplier</th> <th data-bbox="943 616 1464 751">Cyber essentials Y/N Working towards/cyber compliance defined under terms of contract</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	Organisation/Parties/ system supplier	Cyber essentials Y/N Working towards/cyber compliance defined under terms of contract																		
Organisation/Parties/ system supplier	Cyber essentials Y/N Working towards/cyber compliance defined under terms of contract																				
Is this initiative in line with or achieving national or local guidance/ strategy or mandate?	If yes give details																				

Screen 2: Screening Questions

Documenting here which of the screening questions are applicable to your initiative will help to draw out the particular privacy considerations that will help formulate your risk register later in the template

		Yes	No	Unsure	Comments <i>Document initial comments on the issue and the privacy impacts or clarification why it is not an issue</i>
a)	Is the information about individuals likely to raise privacy concerns or expectations e.g. health records, criminal records or other information people would consider particularly private?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
b)	Will the initiative involve the collection of new information about individuals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
c)	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
d)	Will the initiative require you to contact individuals in ways which they may find intrusive ¹ ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
e)	Will the information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
f)	Does the initiative involve you using new technology which might be perceived as being intrusive? e.g. biometrics or facial recognition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
g)	Will the initiative result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.
h)	Will the initiative compel individuals to provide information about themselves?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Click here to enter text.

If you answered **YES** or **UNSURE** to any of the above you need to continue with the Privacy Impact Assessment.

Sign off if no requirement to continue with Privacy Impact Assessment:	
Confirmation that the responses to a – h above is NO and therefore there is no requirement to continue with the Privacy Impact Assessment	
Agreed by:	Click here to enter name of group or individual(s).

Screen 3: Contact Information

Project Management Details	
Project Manager:	
Project Manager Email:	
Project Manager Telephone No.:	
Information Asset Owner (IAO) Details	
IAO Name:	
IAO Title:	
IAO Department:	
IAO Email:	
IAO Telephone Number:	
Information Asset Administrator (IAA) Details	
IAA Name:	
IAA Title:	
IAA Department:	
IAA Email:	
IAA Telephone Number:	

Screen 4: Personal Confidential Data Items

What data items are being processed e.g. for collection, storage, use and deletion: If there is a chart or diagram to explain please attach as an appendix			
Data Item	Description	Specific data item(s)	Justification Reason that the data items(s) are needed – this must stand up to scrutiny for Caldicott justification
Personal Details	Information that identifies the individual and their personal characteristics	<p>Check all that apply:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Forename(s) <input type="checkbox"/> Surname <input type="checkbox"/> Address <input type="checkbox"/> Postcode <input type="checkbox"/> Date of Birth <input type="checkbox"/> Age <input type="checkbox"/> Gender <input type="checkbox"/> Physical description <input type="checkbox"/> Home Telephone Number <input type="checkbox"/> Mobile Telephone Number <input type="checkbox"/> Other Contact Number <input type="checkbox"/> Email address <input type="checkbox"/> GP Name and Address <input type="checkbox"/> Legal Representative Name (Next of Kin) <input type="checkbox"/> NHS Number <input type="checkbox"/> National Insurance Number <input type="checkbox"/> Photographs/Pictures of persons <input type="checkbox"/> Other – if this is ticked please list 'Other' personal data items to be processed below: <p>See attached</p>	Click here to enter text.
Physical or Mental Health or	Information relating to the individuals physical	<ul style="list-style-type: none"> <input type="checkbox"/> Yes <input type="checkbox"/> No 	Click here to enter text.

What data items are being processed e.g. for collection, storage, use and deletion:

If there is a chart or diagram to explain please attach as an appendix

Data Item	Description	Specific data item(s)	Justification Reason that the data items(s) are needed – this must stand up to scrutiny for Caldicott justification
Condition	or mental health or condition. NB. For mental health this would include the mental health status i.e. whether detained or voluntary under the Mental Health Act.	<input type="checkbox"/> Not applicable List any data items below or attach as an appendix: [Click here to enter text.]	
Sexual Identity and Life	Information relating to the individuals sexual life	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: [Click here to enter text.]	[Click here to enter text.]
Family Lifestyle and Social Circumstances	Information relating to the family of the individual and the individuals lifestyle and social circumstances	<input type="checkbox"/> Marital/partnership status <input type="checkbox"/> Carers/relatives <input type="checkbox"/> Children/dependents <input type="checkbox"/> Social status e.g. housing <input type="checkbox"/> Not applicable <input type="checkbox"/> Other - please specify below: [Click here to enter text.]	[Click here to enter text.]
Offences including Alleged Offences	Information relating to any offences committed or alleged to have been committed by the individual	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	[Click here to enter text.]

What data items are being processed e.g. for collection, storage, use and deletion:

If there is a chart or diagram to explain please attach as an appendix

Data Item	Description	Specific data item(s)	Justification Reason that the data items(s) are needed – this must stand up to scrutiny for Caldicott justification
		List any data items below or attach as an appendix: [Click here to enter text.]	
Criminal Proceedings, Outcomes and sentences	Information relating to criminal proceedings outcomes and sentences regarding the individual	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: [Click here to enter text.]	[Click here to enter text.]
Education and training details	Information which relates to the education and any professional training of the individual	<input type="checkbox"/> Education/training <input type="checkbox"/> Qualifications <input type="checkbox"/> Professional training <input type="checkbox"/> Not applicable <input type="checkbox"/> Other - please specify below: [Click here to enter text.]	[Click here to enter text.]
Employment details	Employment and career history	<input type="checkbox"/> Employment status <input type="checkbox"/> Career details <input type="checkbox"/> Not applicable <input type="checkbox"/> Other - please specify below: [Click here to enter text.]	[Click here to enter text.]
Financial details	Information relating to the financial affairs of	<input type="checkbox"/> Income <input type="checkbox"/> Salary	Click here to enter text.

What data items are being processed e.g. for collection, storage, use and deletion:

If there is a chart or diagram to explain please attach as an appendix

Data Item	Description	Specific data item(s)	Justification Reason that the data items(s) are needed – this must stand up to scrutiny for Caldicott justification
	the individual	<input type="checkbox"/> Benefits <input type="checkbox"/> Not applicable <input type="checkbox"/> Other – please specify below: [Click here to enter text.]	
Religious or other beliefs of a similar nature	Information relating to the individuals religion or other beliefs	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: [Click here to enter text.]	Click here to enter text.
Trade union membership	Information relating to the individuals membership of a trade union	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable List any data items below or attach as an appendix: [Click here to enter text.]	[Click here to enter text.]

You must confirm that the data items you have ticked above are relevant and necessary to your project and there is a justified reason for it –if they are not you must amend the above selections to remove those items not relevant/necessary

Confirm

Screen 5: Legal Basis for Processing the Data

Is the initiative delivering for Direct Care?

The definition of direct care is: A clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. It includes:-

- *supporting individuals' ability to function and improve their participation in life and society*
- *the assurance of safe and high quality care and treatment through local audit,*
- *the management of untoward or adverse incidents*
- *person satisfaction including measurement of outcomes*

undertaken by one or more registered and regulated health or social care professionals and their team with whom the individual has a legitimate relationship for their care

Yes (go to Q2) **No (go to Q1)**

<p>1a. If not Direct care, what is it delivering and how is the consent being obtained</p> <p>1b. What is the legal basis that permits you to carry this out for indirect care?</p>	<p>Indirect care</p> <ul style="list-style-type: none">• Commissioning <input type="checkbox"/>• Monitoring Health and social care <input type="checkbox"/>• Public health <input type="checkbox"/>• Research <input type="checkbox"/>• Other <input type="checkbox"/> specify <p>Legal basis:</p> <ul style="list-style-type: none">• Explicit consent <input type="checkbox"/>• Section 251 <input type="checkbox"/>• Other legal gateway (please state) <input type="checkbox"/> <p>Click here to enter text.</p>
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<p>Informing individuals: Please state how patients and / or staff will be informed / have been informed of the data collection and processing?</p>																									
<p>Information Sharing within UK: Will personal confidential data be shared with any other organisation?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please state who the information will be shared with and how and enter in the table:</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">From Originator Organisation:</th> <th style="width: 33%;">Data sent to via:</th> <th style="width: 33%;">To Receiving Organisation:</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table> <p>Is the information from receiving organisation sent back to originating organisation? If yes, please state how the information is transferred back and enter in the table:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">From Receiving Organisation:</th> <th style="width: 33%;">Data sent back via:</th> <th style="width: 33%;">To Originating Organisation:</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	From Originator Organisation:	Data sent to via:	To Receiving Organisation:										From Receiving Organisation:	Data sent back via:	To Originating Organisation:									
From Originator Organisation:	Data sent to via:	To Receiving Organisation:																							
From Receiving Organisation:	Data sent back via:	To Originating Organisation:																							
<p>Information Sharing outside the UK: Will Personal Confidential Data be sent outside the UK?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please state who the data will be sent to and how?</p> <div style="border: 1px solid black; height: 60px; margin-top: 10px;"></div> <p>Will Personal Confidential Data be sent outside the European Economic Area (EEA)?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>																									

<p>If yes, please state who the data will be sent to and how?</p>	<div style="border: 1px solid black; height: 60px; width: 100%;"></div>
<p>Have data protection checks been undertaken to ensure that the non EEA country has adequate data protection / information security standards in place? If yes, please state what checks have been made:</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable </p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>
<p>Sending data to the USA?</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable </p>

Screen 6: Asset / System Information

<p>ICO Notification: If a system is being used, is the Supplier (of this system) registered with the Information Commissioners Office (ICO). If yes, please state their registration number:</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (Please specify reason: _____) </p>
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<p>IG Toolkit: Has the Supplier / Third party completed an Information Governance Toolkit Assessment and / or had a ISO27001 accreditation?</p> <p>As regards the IG Toolkit, please state which version was submitted and if this achieved a satisfactory or non-satisfactory status?</p>	<table border="0"> <tr> <td>IG Toolkit completed:</td> <td>IG Toolkit audited</td> <td>ISO 27001 Accreditation</td> </tr> <tr> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> Yes</td> <td><input type="checkbox"/> Yes</td> </tr> <tr> <td><input type="checkbox"/> No</td> <td><input type="checkbox"/> No</td> <td><input type="checkbox"/> No</td> </tr> </table>	IG Toolkit completed:	IG Toolkit audited	ISO 27001 Accreditation	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No	<input type="checkbox"/> No
IG Toolkit completed:	IG Toolkit audited	ISO 27001 Accreditation								
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes								
<input type="checkbox"/> No	<input type="checkbox"/> No	<input type="checkbox"/> No								
<p>Contract: Has the third party signed the relevant contract (containing the Information Governance clauses), e.g. NHS E contract / SLA with IG Clause</p> <p>If yes, please state which contract type they have signed up to:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>									
<p>Asset / System Operation:</p> <p>Does the asset use privacy invasive technologies for staff and / or patients, e.g Smartcards?</p> <p>If yes, please state the technology being used:</p> <p>Will the asset / system process different personal confidential data items which have not been processed previously? If yes, please state the new personal</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <hr/> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>									

confidential data items to be processed:

Will the asset / system involve new or changed identity authentication requirements that may be intrusive for staff and / or patients?

- Yes
- No

If yes, please state the new identity authentication requirements:

Marketing:

Will the asset / system send marketing messages by electronic means?

- Yes
- No

If yes, please state what you are intending to send for marketing purposes:

Have individuals been informed of the marketing and the option to opt in to this?

- Yes
- No

<p>Automated Decision Making:</p> <p>Is automated decision making to be used within the asset / system?</p> <p>If yes, please briefly describe the process and the reason for it?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 100px; margin-top: 20px;"></div>
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Screen 7: System Security and Functions – only to be completed for systems / software

<p>Pseudonymisation / Anonymisation:</p> <p>Can personal confidential data be anonymised or pseudonymised using the system / asset?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Data Quality:</p> <p>How will the personal confidential data be kept up to date and checked for accuracy?</p>	
<p>Access:</p> <p>Who will have access to the system and the personal confidential data? How will access be controlled?</p>	

<p>Auditing:</p> <p>Is there an audit trail for the system?</p> <p>Please can you describe briefly how the audit trail works?</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
<p>Storage of data:</p> <p>Where will the system information be stored securely?</p>	<p><input type="checkbox"/> Within a paper based system stored securely</p> <p><input type="checkbox"/> Within a system / application stored on secure network</p> <p><input type="checkbox"/> Within a database / spreadsheet stored securely on network</p> <p><input type="checkbox"/> Other</p> <p>If Other, please state:</p>
<p>Back Up:</p> <p><u>Applicable for IT systems only:</u> Are there secure and reliable back up processes in place for the data stored on the system?</p> <p>If yes, please briefly describe what these are.</p> <p><i>Please note you may need to contact IT Services for guidance regarding this question</i></p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div>

<p>Retention: Please state the retention periods for the information processed in the system? <i>Please refer to the Records Management: NHS Code of Practice for Health & Social Care 2016 for assistance with this.</i></p>	
<p>Disposal: How will the personal confidential data be disposed of when this is no longer required..</p>	
<p>Training: Each party to confirm that information governance training is in place and all staff with access to personal data have had up to date training</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

Screen 8: Business Continuity

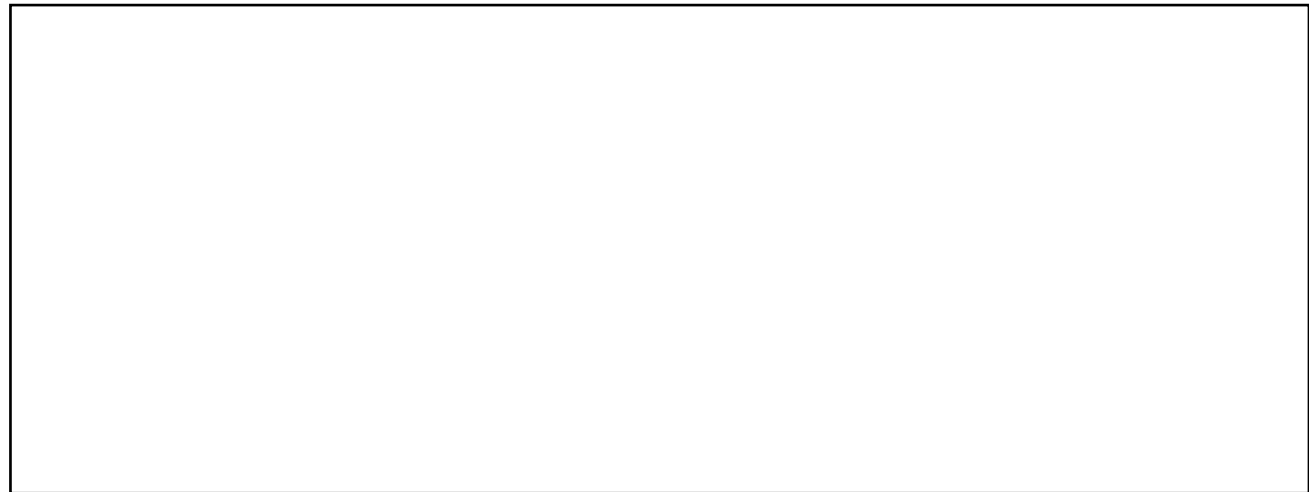
<p>Do you have a Business Continuity Plan in place if the system and / or process fail or is unavailable for any reason?</p> <p>If yes, briefly describe what the business continuity plan will be in the box:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <div style="border: 1px solid black; height: 150px; width: 100%; margin-top: 10px;"></div>
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Screen 9: Additional Comments

Do you wish to supply additional comments about the system / asset?

- Yes
 No

If yes please input comments in box:



Screen 10: Approval and Sign off

PIA Completed by:

Organisation	Name	Date	Signature

Approved by:

Organisation	Name	Date	Signature

Glossary of Terms

Item

Definition

Personal Data

This means data which relates to a living individual which can be identified:

- A) from those data, or
- B) from those data and any other information which is in the possession of, or is likely to come into the possession of, the data controller.

It also 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

Sensitive Data

This means personal data consisting of information as to the:

- A) racial or ethnic group of the individual
- B) the political opinions of the individual
- C) the religious beliefs or other beliefs of a similar nature of the individual
- D) whether the individual is a member of a trade union
- E) physical or mental health of the individual
- F) sexual life of the individual
- G) the commission or alleged commission by the individual of any offence
- H) any proceedings for any offence committed or alleged to have been committed by the individual, the disposal of such proceedings or the sentence of any court in such proceedings

Direct Marketing

This is “junk mail” which is directed to particular individuals. The mail which are addressed to “the occupier” is not directed to an individual and is therefore not direct marketing.

Direct marketing also includes all other means by which an individual may be contacted directly such as emails and text messages which you have asked to be sent to you.

Direct marketing does not just refer to selling products or services to individuals, it also includes promoting particular views or campaigns such as those of a political party or charity.

Automated Decision Making

Automated decisions only arise if 2 requirements are met. First, the decision has to be taken using personal information solely by automatic means. For example, if an individual applies for a personal loan online, the website uses algorithms and auto credit searching to provide an immediate yes / no decision. The second requirement is that the decision has to have a significant effect on the individual concerned.

Information Assets

Information assets are records, information of any kind, data of any kind and any format which we use to support our roles and responsibilities. Examples of Information Assets are databases, systems, manual and electronic records, archived data, libraries, operations and support procedures, manual and training materials, contracts and agreements, business continuity plans, software and hardware.

SIRO (Senior Information Risk Owner)

This person is an executive who takes ownership of the organisation's information risk policy and acts as advocate for information risk on the Board