Code of practice 5 - internal registration

1. What data processing must be registered?

In order for the College to meet its legal obligations under the Data Protection Act 1998 and be able to notify the Information Commissioner of its activities in relation to processing personal information and to handle Data Subject Access requests, it needs to hold a register of all systems holding personal information. These systems can be electronic, including video footage, or structured manual filing systems in which information about an individual is readily accessible.

The personal data has to be about living individuals who can be identified from those data, or from those data and from other data which is in the possession, or likely to come into the possession of the College. This includes not only facts about individuals, but also any expression of opinion about an individual and any indication of the intention of the College or other third party in respect of the individual.

It follows, therefore, that any data about individuals collected, held in or processed by manual or electronic systems must be registered with the College unless:

- the data held is purely about dead persons, unless it is possible to make connections with living persons from it or,
- the data has been anonymised i.e. the person cannot be identified from it.

(NB. If personal data has been treated in such a way that a code or other identifier has been used to conceal the personal identity for security reasons, but a record of that code or identifier has been retained elsewhere in electronic form or hard copy, then this is regarded as coded data and not anonymised data and must be registered).

2. Mechanism of registration

A registration form must be completed by a Data Owner in respect of each purpose for which personal data is held or otherwise processed. Thus each registration will comprise the first page of the document attached, together with one other section duly completed by ticking the relevant boxes. Completed forms should be sent to the Data Protection Co-ordinators for your particular College Administrative Unit (CAU). That person in turn will produce a composite registration covering the data processing activities being carried out in the CAU and send it to the College Data Protection Officer.