DPA CoP 05: Information Asset Register

Information Asset Register

1.1 This Code of Practice is to be read in conjunction with the Data Protection Policy and wider Information Governance Policy Framework.

1.2 It governs the use of the Information Asset Register (also referred to as the "IAR"), and the requirement for Information Asset Owners (also referred to as "IAOs") to register, and maintain the registration of, their information assets in the IAR.

Key terms

2.1 The following key terms have been defined in the Information Governance Policy Framework and are of relevance in this Code of Practice:

2.1.1 Information Asset

Information which satisfies each of the following criteria will qualify as an "Information Asset" for the purposes of asset registration and must have an entry in the Information Asset Register:

- The information being collected / processed / stored is for a defined purpose and contains personal data and/or sensitive personal data relating to an identifiable or potentially identifiable natural living person or persons;
- the information is intended to be kept for more than 6 months or may be kept for less than 6 months but could still represent a significant risk to the university if a data breach / data loss / a data incident occurred; and
- each record within the information, whether in digital or physical format, will have shared purpose, risk profile, and risk mitigation measures that make the information a logical collection of data.

There must be a lawful basis within the meaning of the General Data Protection Regulation (GDPR) for the processing of any personal data and/or sensitive personal data within each Information Asset. Collection of personal data or sensitive personal data without a lawful basis for the collection is not permitted.

The following are some examples of Information Assets:

- A database of staff or students data.
- A digital platform or system that is used to either collect, process or retain personal data.

- All files connected with a specific project or research study/project (across electronic and manual formats).

- A team who process data pertaining to staff / students as part of their core activities. In this instance the team will be registered according to the activities they undertake and then any additional information assets will be linked to the team.

2.1.2 Information Asset Owner

IAOs are senior/responsible individuals working in a relevant business area. Their role is to understand what information is held within their business area, what is added and what is removed, how information is moved, who has access and why. As a result, they are able to understand and address risks to the information and ensure that information is used within the law and in line with the university's objectives and provide written input to the Senior Information Risk Owner on the security and use of their information assets.

An IAO will be responsible for an information asset in terms of:

- identifying risks associated with the information asset;

- managing and operating the asset in compliance with policies and standards; and

- ensuring controls implemented manage all risks appropriately.

2.1.3 Information Asset Administrator

Information Asset Administrators (also referred to as "IAAs") work on a day-to-day basis with information contained in an information asset. They have day-to-day responsibility for the asset, and make sure that policies and procedures are applied and adhered to by staff and can recognise actual or potential security incidents relating to their information asset. They are responsible for reporting such incidents to their IAO and consulting the IAO on incident management. The role is flexible and is expected to be performed in addition to existing duties. It is possible that the IAO of an information asset is also the IAA of that asset.

2.1.4 Dataset

A logical collection of data which may consist of a single or multiple files/lists (for example electronic/paper files, database etc.) that are processed for a particular/common purpose and are derived from the same origin.

Data Activity Risk-assessment Tool (DART)

2.2 DART is an online tool, which registers and assesses risks associated with data processing activities, going through a set of questions.

2.3 Completion of DART Registrations will appease two legal requirements as defined under GDPR:

- It will populate the university's IAR and Records of Processing Activity (RoPA) ensuring compliance with Article 30 of the UK GDPR.
- It will create Data Protection Impact Assessments (DPIA) as defined under Article 35 of the UK GDPR.

2.4 DART entries:

Each DART entry and associated data set must be fully completed, have an allocated IAO and an IAA. The owner and administrator can, if necessary, be the same person and an IAO/IAA can have more than one information asset. For more information please see the Data Activity Risk-assessment Tool / https://www.imperial.ac.uk/admin-services/secretariat/policies-and-guidance/data-assessments/.

Document Control

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Notes and latest changes:		May 2018 V1.0 - Initial draft June 2018 V1.0 - Approved August 2020 V1.1 - Existing IAR has been decommissioned and an interim SharePoint site is being used whilst a new IAR is sourced. CoP written to reflect this change. October 2023 V1.2 - New IAR has been commissioned - Removal of old references and replaced with reference to DART - URLs corrected - Removal of Appendix A and B due to replacement of old IAR February 2025 V2.0 - Updated to meet new brand standard - Removal of references to 'College' - Corrected URL's November 2025 V2.1 - Removed hidden URLS to improve accessibility - Renamed DART	