

Meeting the Requirements Information Asset Register

PECYN CYMORTH LLYWODRAETHU GWYBODAETH CYMRU
WELSH INFORMATION GOVERNANCE TOOLKIT



Introduction

As well as being a requirement under the UK General Data Protection Regulation (UK GDPR), it is important for organisations to know what information they hold, if it's correct and up to date, who it's shared with and how it's processed. An Information Asset Register is a useful tool to track this information and not only show what information is held where, but to also map out the information flows to ensure there are appropriate security measures and controls in place based on how information moves around. Organisations should consider all personal data it holds when developing a register, therefore business information such as staff details should become part of the register as well as patient data. ['Table One'](#) details the ICO's expectations for developing and maintaining an Information Asset Register.

Keeping the register up to date and effective is just as important as having one. In any new projects which are considered, the information flows should be part of the early planning, together with the completion of a Data Protection Impact Assessment.

How do we reach Attainment Level 1?

The organisation should maintain an internal record of key personal information processing activities. It should document what personal information it holds, where it came from and who it's shared with.

The Information Asset Register is a mechanism for understanding and managing the organisation's information assets and the risks to personal information. The IAR should encompass all types of records held by the organisation and should link information assets to dependencies including risk assessments, retention schedules and information owners.

The organisation should appoint a department and/or individual to have responsibility for the management and upkeep of the IAR

The ICO have developed a ['template'](#) to help organisations document their processing activities.

How do we reach Attainment Level 2?

The IAR should be maintained and regularly updated, with responsibility for each information asset assigned to a senior member of staff within the organisation, known as an Information Asset Owner. The IAR should be referenced in organisational policies and procedures, this should include a documented process to ensure all changes in processing activity are reflected on the IAR or notified to the responsible department without delay.

The IAR should be used to easily identify ongoing sharing activity, security measures in place and any areas of non-compliance. There should be a documented process in place detailing how non-compliant systems are identified and recorded. Any systems which do not support individual log in should be identified, with the risks outlined along with any mitigating measures that are in place.

How do we reach Attainment Level 3?



The IAR should remain as an ongoing working document, which is referred to and maintained on a daily basis.

Providing staff with written procedures and training does not provide sufficient assurance that the procedures have been understood and are being followed. Therefore, compliance spot checks should be conducted. Policies and procedures which reference the IAR should be regularly reviewed to ensure they remain up to date and align with central guidance.

The accountability principle is a key aspect of data protection legislation, therefore details and performance of the IAR should be reported to the relevant forum, such as the relevant Board or Committee, to ensure appropriate oversight.

Supporting Resources

ICO: Guidance on Documentation

ICO: Documentation template for controllers

ICO: The Accountability Framework - *Accountability is one of the key principles in data protection law*

The National Archives: What is an Information Asset Register

Summary Requirement

Attainment Level	Summary Requirement
1	The organisation has an extensive Information Asset Register (IAR)
2	There is a reporting procedure available to notify the responsible department of any new/changes with the processing activities and to highlight any areas of non-compliance
3	The IAR is a working document and the reporting procedure is regularly reviewed to ensure it remains effective and up to date

