

Ask the experts:

Using the ICO's data protection audit tools



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Audits



Toolkits

[Accountability](#)

This toolkit will help you better understand what you need to put in place for good corporate governance and how to achieve accountability in your organisation.

[Records management](#)

This toolkit will help you assess whether you have met the minimum standards for creating records and have effective mechanisms to locate and retrieve them.

[Information & cyber security](#)

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This toolkit sets out some of the issues to consider to ensure you deliver appropriate staff training throughout your organisation.

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This toolkit provides practical guidance about when and how you can share personal information. It complements our Data sharing code.

[Requests for data](#)

This toolkit will help you understand what measures you should have in place to respond to requests for access, commonly referred to as subject access requests, effectively and in a timely manner.

[Personal data breach management](#)

This toolkit will help you put measures in place to detect and prevent a personal data breach.

[Artificial intelligence](#)

This toolkit will help you understand and address the basic principles of data protection in the context of your AI, whether as a developer or deployer of the system. It complements our AI guidance and risk toolkit.

[Age appropriate design](#)

This toolkit will help you assess whether you are complying with your obligations under data protection law to protect children's information online. It complements our Age appropriate design code.

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Records management framework

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At a glance

Records management
framework

Data collection

Record creation

Data mapping and recording

Access

Movement and retrieval

Maintenance and accuracy

Retention

Disposal and deletion

Right to be forgotten

Control measure: Records management responsibilities are allocated and the records management function and processes are subject to effective oversight at a senior level.

Risk: Without effective governance in place, there may be inadequate oversight of records management strategy and risks.

Ways to meet our expectations:

- Assign strategic responsibility and oversight of records management to an appropriate executive board member (eg Senior Information Risk Owner (SIRO) or equivalent).
- Assign operational responsibility and development of records management to an appropriate manager.
- Assign responsibility for implementing records management processes to local business areas (eg Information Asset Owners (IAOs), Information Asset Administrators (IAAs) and department managers).
- Have a regular steering group or meeting that monitors records management processes and functions and includes or reports to senior management.

Options to consider:

- Document information asset responsibilities in job descriptions.
- Add records management as a standing agenda item on relevant team and senior management meetings.
- Record minutes of meetings where records management performance is discussed.

Records management

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RECORDS MANAGEMENT Master Sheet

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- Fully meets
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Records management framework	1.1	Records management responsibilities are allocated and the records management function and processes are subject to effective oversight at a senior level.	1.1.1	Assign strategic responsibility and oversight of records management to an appropriate executive board member (eg Senior Information Risk Owner (SIRO) or equivalent).						
			1.1.2	Assign operational responsibility and development of records management to an appropriate manager.						
			1.1.3	Assign responsibility for implementing records management processes to local business areas (eg Information Asset Owners (IAOs), Information Asset Administrators (IAAs) and department managers).						
			1.1.4	Have a regular steering group or meeting that monitors records management processes and functions and includes or reports to senior management.						
	1.2	Records management processes are documented in policies, approved by senior management, and reviewed periodically to align to latest guidelines.	1.2.1	Document each records management process in sufficient detail in policies, including who oversees processes and how.						
			1.2.2	Ensure policies have appropriate document and version control.						
			1.2.3	Ensure policies follow a standard format.						
			1.2.4	Ensure policies are approved by senior management.						
			1.2.5	Communicate these policies to staff who create or manage records, and make policies readily available for them to refer to.						
			1.2.6	Keep policies up-to-date, particularly with any changes to data protection law.						
	1.3	Staff receive formal records management training, and good records management practices are promoted.	1.3.1	Train new staff on records management at induction.						
			1.3.2	Provide refresher training on records management processes to all staff periodically.						
			1.3.3	Track training completion and report it to senior management.						
1.3.4			Get input into training content from records management managers and subject matter experts.							
2.1	Fair processing information is comprehensive and actively communicated to people at the point that data is collected.	2.1.1	Publish privacy information that includes all the information required by data protection law.							
		2.1.2	Provide privacy information at the point that you collect personal information.							
			Produce privacy information in a variety of formats							

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Data collection	2.1	Fair processing information is comprehensive and actively communicated to people at the point that data is collected.	2.1.1	Publish privacy information that includes all the information required by data protection law.							
			2.1.2	Provide privacy information at the point that you collect personal information.							
			2.1.3	Produce privacy information in a variety of formats (eg posters and leaflets), in addition to online privacy notices.							
	2.2	Fair processing information is in understandable and accessible languages and formats.	2.2.1	Present privacy information clearly and prominently on your website or in another appropriate format at the point that you collect it.							
			2.2.2	Provide privacy information in a layered format (eg summaries at the top with further detailed information below).							
			2.2.3	Provide privacy information in different languages or styles to ensure people can understand it, including separate age-appropriate notices, where relevant.							
			2.2.4	Have the ability to provide privacy information in more accessible formats (eg in braille or large font).							
			2.2.5	Use clear, plain, non-technical language when explaining processing.							
	Record creation	3.1	Processes for creating records or documented information are in place and outlined in policies.	3.1.1	Document record creation processes in sufficient detail in policies, including document management protocols, metadata use, and record formatting and classification.						
				3.1.2	Highlight changes to processes clearly in policies (eg in a change history).						
3.1.3				Communicate processes to staff who create records and make policies readily available for them to refer to.							
3.2		Records are appropriately identified and classified.	3.2.1	Assign appropriate security classification to records and personal information.							
			3.2.2	Clearly identify and describe records and personal information (eg in file names and metadata).							
			3.2.3	Document classification and identification processes in sufficient detail in policies, including document management protocols, metadata use, and record formatting.							
			4.1.1	Complete a comprehensive information audit across all areas or departments.							

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			4.1.2	Produce an information flow map based on the information audit.						
			4.1.3	Repeat the information audit and review the information flow map regularly to capture changes.						
			4.1.4	Log details about information assets in an information asset register.						
			4.1.5	Assign responsibilities for maintaining and amending the information asset register.						
	4.2	An inventory or asset register is in place which includes details of records held, the information they contain, the format, and their value.	4.2.1	Have a controlled inventory or register of all records.						
			4.2.2	Keep the inventory or register updated.						
			4.2.3	Audit the inventory or register regularly to ensure it is accurate.						
			4.2.4	Use the inventory or register to inform records management practices.						
	4.3	The Record of processing activities (ROPA) includes details of all processing, informed by data flow mapping exercises.	4.3.1	Update the ROPA if there are any changes to the inventory or register of information flows to ensure details match.						
			4.3.2	Document the purpose, categories of people, and categories of personal information, for each processing activity in your ROPA and whether you are a controller, joint controller or processor.						
			4.3.3	Document the lawful basis, and additional conditions, if required, for each processing activity in your ROPA.						
			4.3.4	Document the source of personal information you process, where and how you store it, and the retention period, for each processing activity in your ROPA.						
			4.3.5	Document the technical and organisational security measures for each processing activity in your ROPA.						
4.3.6			Document the recipients of shared information, and safeguards and adequacy decisions if information is transferred internationally, for each processing activity in your ROPA.							
4.3.7			Include links to other relevant information (eg consent logs, third-party contracts, data protection impact assessments (DPIA), and personal data breach reports)							

Fully meets

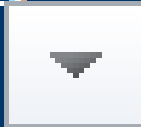
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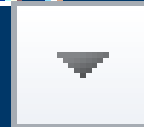
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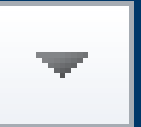
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Reasons for Status



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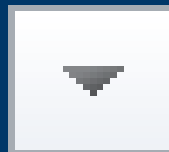
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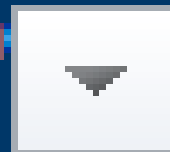
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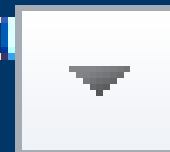
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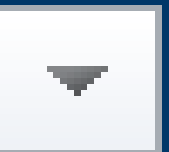
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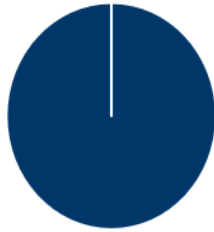
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4.1	A data flow mapping exercise is undertaken to document the data that flows in, around, and out of information processing systems or services.	4.1.1	Complete a comprehensive information audit across all areas or departments.	Not meeting our expectation	No information audit carried out since 2018	<p>Liaise with IT and KIM to develop information audit strategy.</p> <p>Inform Department Heads of requirement to complete information audit of their areas including both electronic and physical records.</p>	AS	Not started	31/01/2025

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4.1	A data flow mapping exercise is undertaken to document the data that flows in, around, and out of information processing systems or services.	4.1.1	Complete a comprehensive information audit across all areas or departments.	Partially meeting our expectation	Information audit complete in all areas apart from HR who are awaiting the implementation of a new system.	HR to complete information audit using agreed strategy following implementation of new system	AS	Overdue	31/01/2025

Breakdown of 'Current status' of all categories



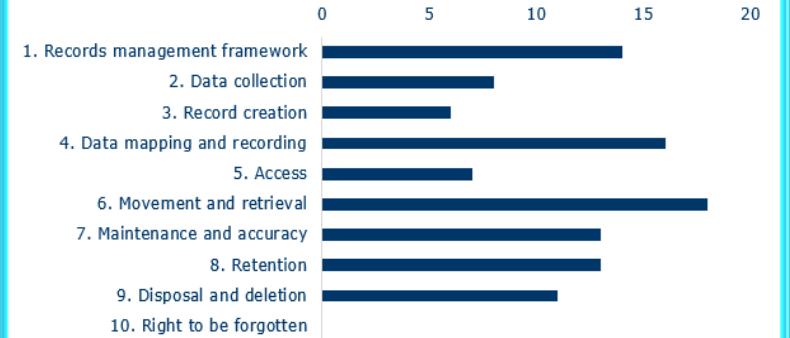
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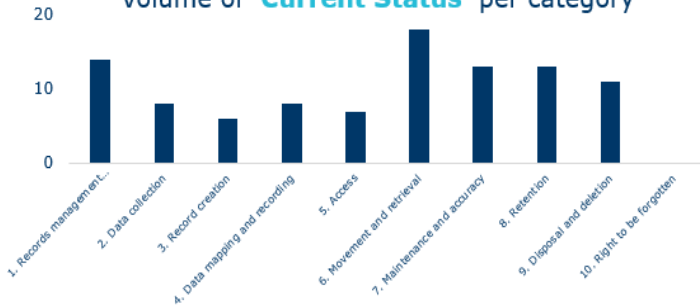
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Volume of 'Action Status' per category



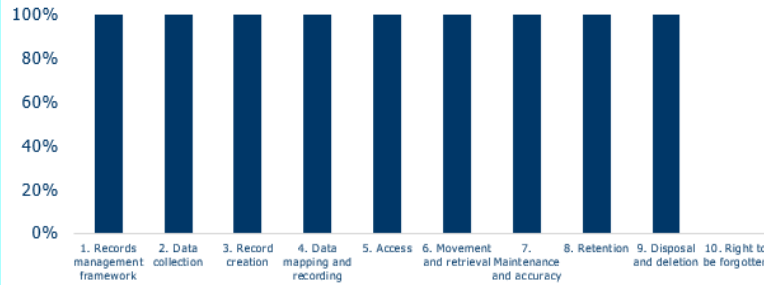
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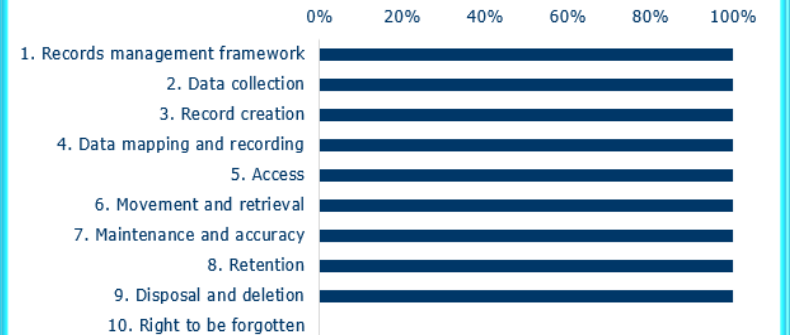
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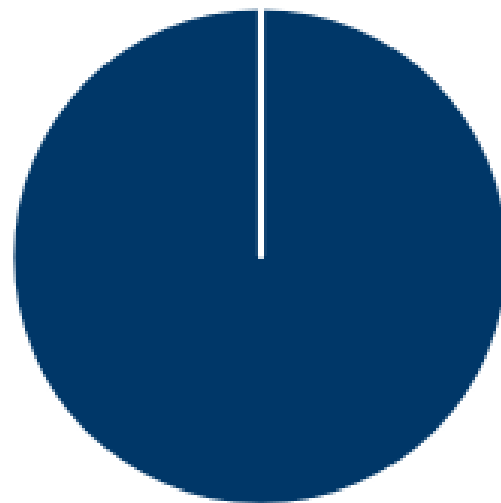
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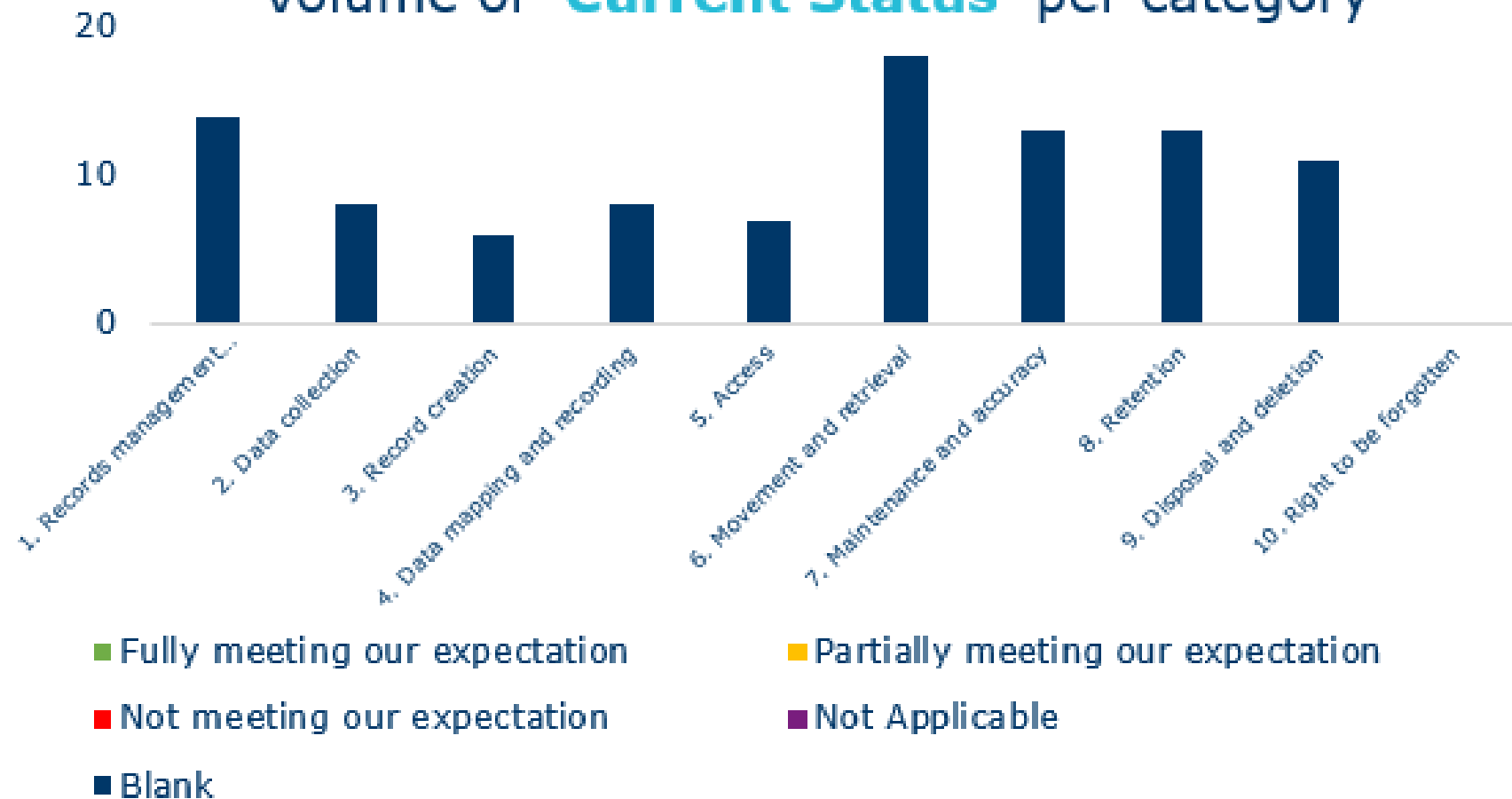
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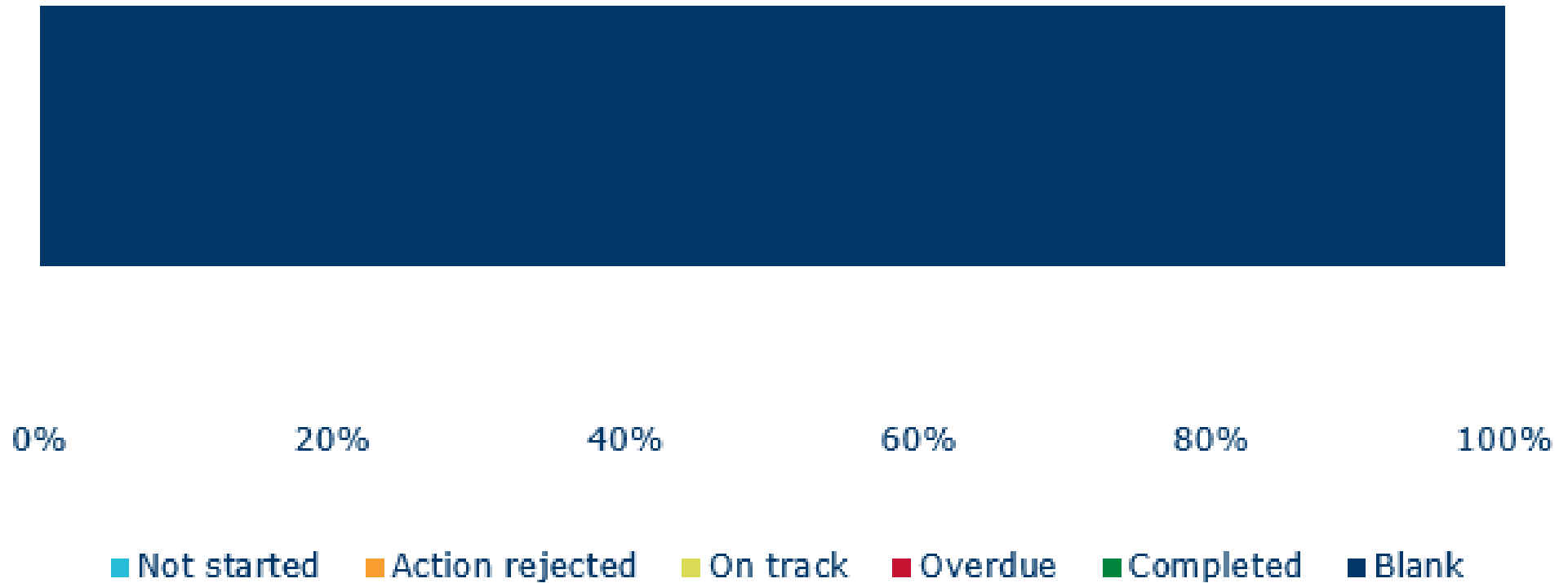


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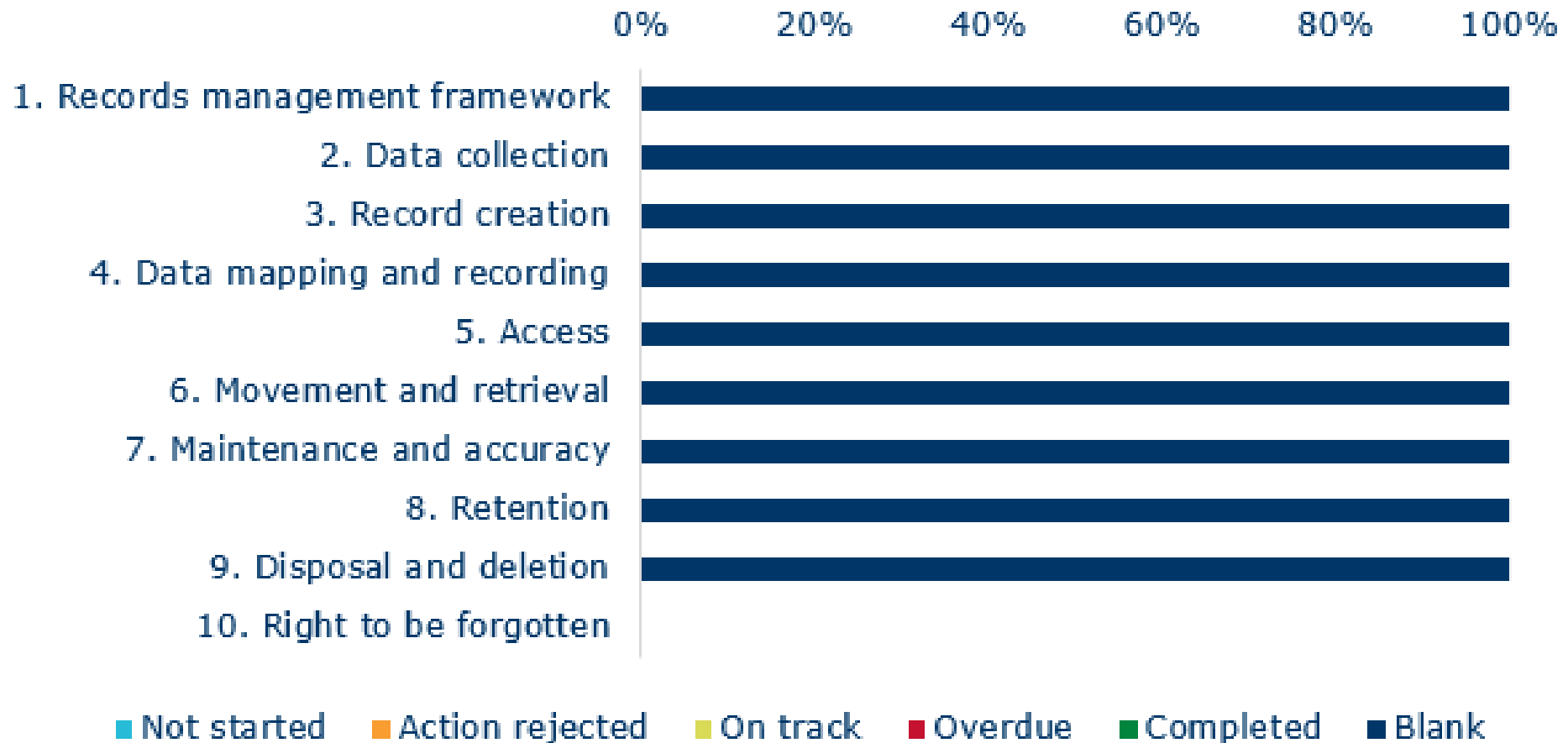
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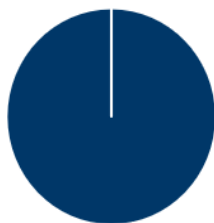
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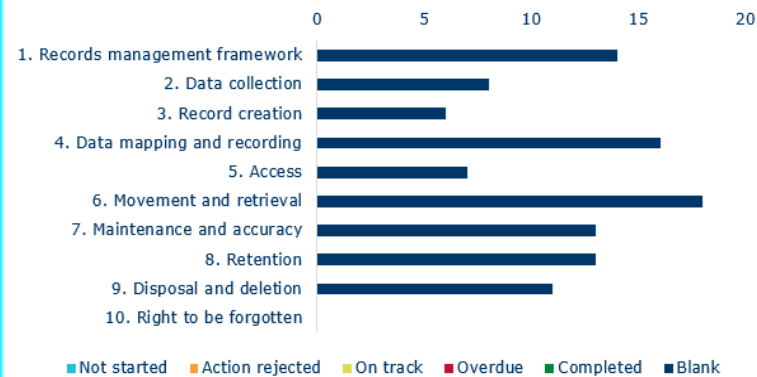
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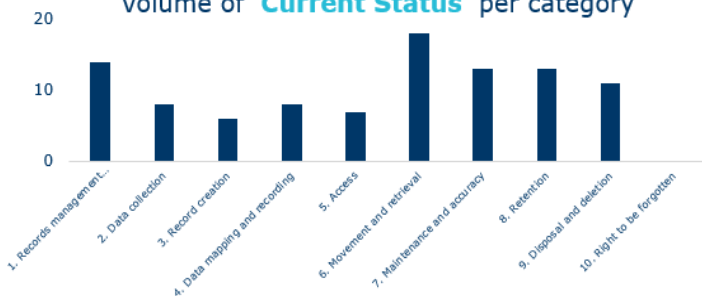


■ Not started ■ Action rejected ■ On track ■ Overdue ■ Completed ■ Blank

Volume of 'Action Status' per category

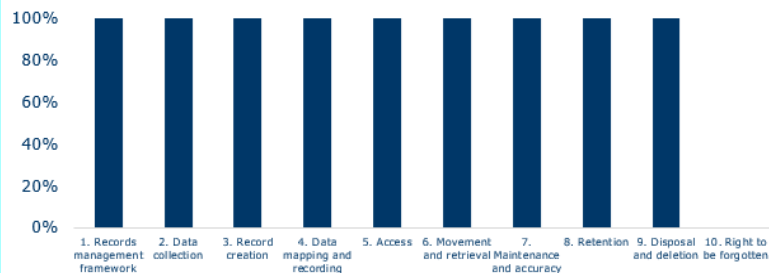


Volume of 'Current Status' per category



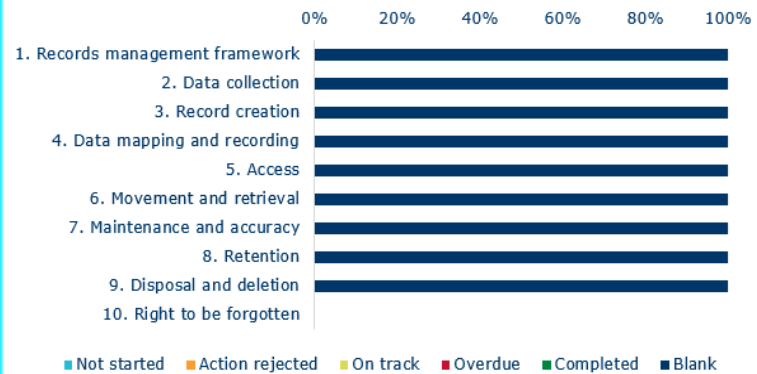
■ Fully meeting our expectation ■ Partially meeting our expectation
■ Not meeting our expectation ■ Not Applicable
■ Blank

Breakdown of 'Current Status' per category



■ Fully meeting our expectation ■ Partially meeting our expectation
■ Not meeting our expectation ■ Not Applicable
■ Blank

Breakdown of 'Action Status' per category



■ Not started ■ Action rejected ■ On track ■ Overdue ■ Completed ■ Blank

Breakdown of 'Current status' of all categories



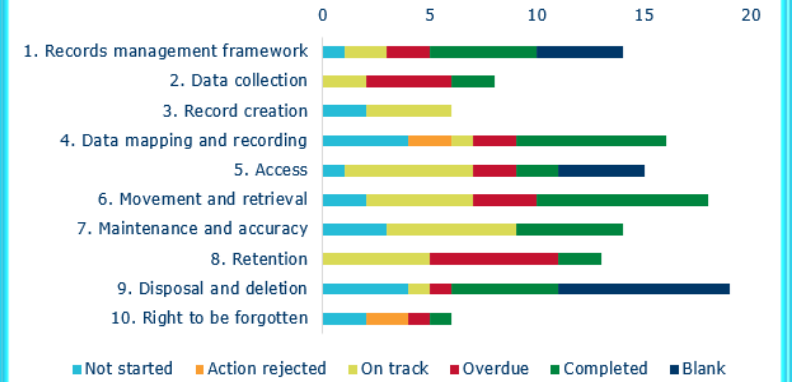
■ Fully meeting our expectation ■ Partially meeting our expectation
■ Not meeting our expectation ■ Not Applicable
■ Blank

Breakdown of 'Action Status' for all categories

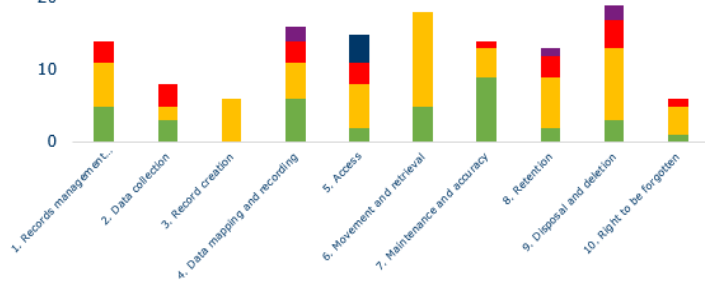


■ Not started ■ Action rejected ■ On track ■ Overdue ■ Completed ■ Blank

Volume of 'Action Status' per category

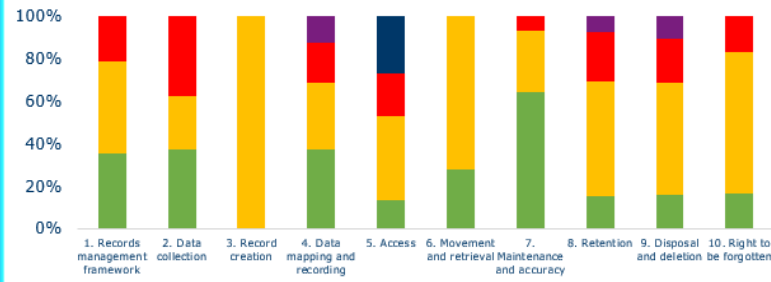


Volume of 'Current Status' per category



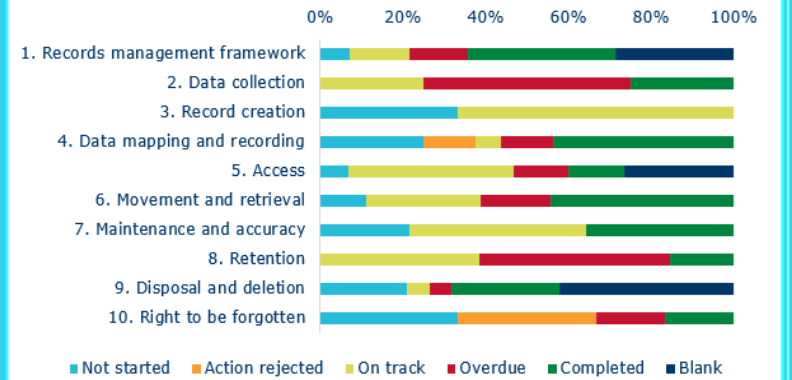
■ Fully meeting our expectation ■ Partially meeting our expectation
■ Not meeting our expectation ■ Not Applicable
■ Blank

Breakdown of 'Current Status' per category



■ Fully meeting our expectation ■ Partially meeting our expectation
■ Not meeting our expectation ■ Not Applicable
■ Blank

Breakdown of 'Action Status' per category



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