

Guide for completing an Information Asset Register

Defining and Identifying an Information Asset

An information asset can be broadly defined as

“a body of information, defined and managed as a single unit so it can be understood, shared, protected and exploited efficiently” (National Archives)

The key element here is that an information asset is not a granular or discrete piece of information in and of itself, say for example a particular field within a spreadsheet or a list of data forming a particular dataset. An asset is a combination of types of data and/or datasets that together form a coherent body of information, which can be used for a specific business purpose and be managed as a single unit.

When seeking to identify an Information asset, remember that assets have recognisable and manageable value, risk, content and lifecycles. If you believe you have identified a potential information asset, but remain unsure whether to record it as such on the template IAR, ask yourself the following questions:

- Would there be legal, reputational or financial repercussions if you couldn't produce that body of information on request?
- Would it have an effect on operational efficiency if you could not access that body of information easily?
- Would there be consequences of not having that body of information?
- Are there risks associated with the information? (such as risks around accuracy or access)

If, on the whole the answer to these questions is yes, the body of information that you have identified shares the main qualities associated with being an information asset and should be entered on the IAR.

Completing the template

Business function

This should be the department/section for which you are completing the IAR.

Nominal Information Asset Owner

In legal terms, the 'owner' of the data is the University of Kent as Data Controller. However it is useful from an Information Governance perspective to identify an individual who is nominally 'in charge' of the data from an operational perspective. They might be the person who would ultimately be responsible for the day-to-day maintenance, development and use of the data asset. This person may also determine how the data asset should be exploited and may also be responsible for aspects of data quality management in respect of the asset. To be clear, when talking of an Information Asset Owner, we are not seeking to apportion any further liability for data protection non-compliance; we are simply seeking to identify who the best person may be to contact when reviewing data assets in the future. Please use the person's job title and not their name.

Asset Name

Some easily identifiable assets may already will have established names derived from their use or may have names relating to the source of the information that comprises the asset. If you are identifying an asset that has previously not been identified before or does not have a widely

accepted name, you may have to allocate that asset a name. When decided how to name an asset, choose a name that best labels the asset so that it can be easily identified at a later date. For example, the Information Compliance Office maintains a spreadsheet of all those who have made subject access requests, alongside corresponding files that contain copies of correspondence and our final responses to requests. We have grouped these discrete sets of data as one asset (because they all relate to our processing of data subject access request). I have named this asset 'Record of Data Rights requests', because it helps me identify the use of the data contained in the asset. There is no right and wrong method of naming an asset- the name needs simply to be a logical and reasonable label for the body of information.

Source of data

We need to establish where the data that comprises the Information Asset originated. If we have captured the information directly from a data subject, the source of the data is the Data Subject themselves. If the data is fed into the information asset from a system, then that system should be named as the source of the data. If it is non-personal data, produced by a department for use by another department, then the department producing the data should be named as the source of the data. Again, as long as we are able to identify the flow of the data concerned, that would be sufficient for the purposes of the IAR.

Purpose of processing

We need to understand how the data is being used and linking it to a clearly defined purpose. All you will need to provide is a brief description as to the purpose of processing that data. It may be that perhaps a 'catch all' term would be appropriate such as when the asset is used for a specific task, or in some instances a brief sentence may be needed where an asset is used for wider (and distinct) purposes by your team.

Types of recipients

We also need to understand how data from one data asset flows out of that asset for use by other teams. This allows us to identify how information flows round the organisation and feeds into various systems. For example, we might have been able to identify an Information Asset called 'Student data', this asset may be held in a bespoke system such as SDS. There may be instances when information is drawn from that system and given to another team for a different type of processing (ie. contact details passed on in order to market an event). We would record the name of that Team as a recipient. It should also be noted that there may recipients may be internal or external. Regardless of this, the recipients should be listed.

Storage

We need to record where the data asset is held. Information Assets may be easily identifiable because they have their own bespoke systems designed and built to exploit the data contained within them. It may be that the data is held within the Microsoft Office environment, so this could be the storage method. There will be instances where the asset is in paper form- in which case the storage method may be "filing cabinet in 'X' Office". The important thing here is that should any of these storage methods be compromised (i.e. a system hacked, a cabinet lost in a move etc.) that we can use the IAR to make an assumption as the type and sensitivity of the data that may have been breached.

When the asset contains personal data

You will notice that there is a particular section of the IAR to be completed if the data set has personal data contained within it. Personal data is defined as

*“Only information relating to natural persons who:
can be identified or who are identifiable, directly from the information in question; or
who can be indirectly identified from that information in combination with other information.”*

This information is important to record as it allows the university to comply with the legal requirement to maintain a Record of Processing Activity (ROPA).

Types of personal data

Where you have identified that an Information Asset contains personal data, the types of personal data should be listed i.e. First Name, Surname, Contact details, etc.

Special category data

Special Category data is defined as data that when processed could create more significant risks to a person’s fundamental rights and freedoms. For example, by putting them at risk of unlawful discrimination, this includes information such as

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.

Where the personal data contained in an information asset has elements of special category data, an overview of the types of special category data should be listed.

Types of data subjects

This should be an overview of the types of data subjects whose data we hold in the information Asset. For example, much of the information contained in SDS will concern students. So one of the types of data subject to be listed for that asset should be ‘students’.