

Personal Data Processing Audit

Organisation:

Please complete this form for a particular processing operation

Processing operation (overall purpose of data collection. See note 1.)	
Why is this data needed? (Your specific reason for processing if unclear from above)	
Collection method (describe when and how the data is collected, and note any special form that is used)	
What data is collected (list all categories. See note 2.)	
Does this include special category data? (See note 3.)	
Does this include criminal conviction data? (see note 4.)	
Processing method (how is the data actually used. See note 5.)	
External organisations with whom the data is shared (please list)	
Storage method (see note 6.)	
Length of time data is kept	

GDPR Lawful Basis for Processing (see note 7.)	
Justification for above (any legitimate interests must be assessed and stated. See note 8.)	
Additional Condition (if applicable. See note 9.)	
Other actions	
Privacy Impact of processing operation Comments	<p style="text-align: center;">High Medium Low (Please circle)</p>

Date of audit:

Prepared by:

Review date:

Notes

1. Processing operation will be one the separate instances when you process data e.g. providing a specific service (give description or name of the service), general enquiries, recruiting staff and volunteers, payroll, fundraising, running events, invoicing etc.
2. Categories of personal data includes name, address, date of birth, telephone numbers, email addresses etc., photographs, special category data (see note 2), criminal conviction data (see note 3).
3. Special category data includes characteristics such as race, sex, disability, sexuality, gender reassignment, health/medical conditions, religion, trade union membership.
4. Criminal conviction data would be that covered by a DBS check
5. Processing method eg. email, online database/CRM, paper form, handwritten notes, telephone etc. (If you conduct automatic processing, profiling or high risk processing (i.e. to individual rights), a separate Data Protection Impact Assessment (DPIA) will be needed.
6. Storage method is however you hold your data e.g. a CRM system, directory, cloud-based service, filing cabinet etc.
7. The GDPR lawful basis will be one or more of the six lawful bases provided by the regulation. If any special category or criminal conviction data is processed then one of the additional conditions provided by the DPA 2018 must also apply.
8. Before relying on a legitimate interest as your lawful basis for processing, you need to assess in accordance with the ICO's three-part test: Is the purpose legitimate? Is it necessary? Are the rights and freedoms of the individual maintained? (For more information please see the Green Pepper briefing *Legitimate Interest and Data Processing*)
9. Processing of special category and criminal conviction data will need to meet, in addition to the lawful basis, one of the conditions set out in the GDPR and Data Protection Act 2018 Schedules 1-3.