**GCU Researchers Data Protection Guidance and Checklist**

GCU processes personal data for a variety of purposes including research purposes. Changes to legislation will have an impact on the way research involving human participants or which involves the use of data relating to identifiable living individuals is conducted and the data is managed.

This document is intended to provide researchers and staff involved in research with guidance as to how they can comply with the UK GDPR and Data Protection Act 2018.

The requirements outlined in this guidance relate to personal data and will not apply where participants cannot be identified either directly or indirectly.

Below is a checklist which sets out the steps to follow when embarking on a research project which involves personal data. This document is for students and academic researchers and should be consulted at the beginning of research planning.

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|  | **Requirement** | **Details** | **Action Required** | **Completed** |
|  | Data Protection Awareness  | In advance of carrying out research all researchers to are to ensure that they have completed GCU’s mandatory data protection training. Researchers are also required to read and understand the University’s data protection and privacy policy at <https://www.gcu.ac.uk/dataprotection/>  | All researchers to confirm that their data protection training is up to data have read and understood the policy. Any questions about the policy can be directed to dataprotection@gcu.ac.uk.  | Y/N |
|  | Data Minimisation | Researches must not collect and use personal data in excess of that which is required for the purposes of the research project. Personal data is any data that can be used to identify a living individual. Special category data is data is more sensitive data such as health data or information about religious beliefs.  | * Document personal data or special category data to be processed
* Confirm that all data is required – could less data be collected?
* Could the data be anonymised to protect the privacy of individuals?
 | Y/N |
| 3. | Compliance with Data Protection Principles | Research must be carried out in a manner which is compliant with the requirements of data protection law. These principles are: * Lawful, fair and transparent, we tell participants how their personal data is used;
* Compatible with the research purposes that we have defined;
* Adequate and necessary, we only use the data we need to use;
* Accurate and up to date;
* Not excessive, we only keep the data for as long as we need it; and
* Secure and protected.
 | Consider the 6 principles and whether it is possible to comply with these requirements. If unsure, please contact dataprotection@gcu.ac.uk | Y/N |
| 4. | Identify a lawful basis for processing personal data.  | The lawful bases under which GCU is permitted to process personal data are set out under Article 6 of the UK GDPR and Article 9, where special category data is processed. Researchers a required to define a lawful basis for processing personal data about individuals. For example, we may obtain consent from research participants to use their information. It’s crucial that we document this.  | Researchers to confirm the lawful basis for processing personal data and liaise with dataprotection@gcu.ac.uk for assistance.  | Y/N |
| 5.  | Data Sharing  | Confirm whether the personal data that will be collected and used will be shared with any third parties. Also confirm if it will be shared with any parties outside the UK. If personal data is being shared, researchers need to make sure that appropriate agreements are put in place to safeguard the information.  | If data is to be shared with any third parties, get in touch with dataprotection@gcu.ac.uk for advice.  | Y/N |
| 6.  | Data Protection Impact Assessment (DPIA) | If the processing of personal data used for research purposes is sensitive, high in volume or being processed in a new way using new technology, it’s likely a DPIA will be required due to the level of risk. The DPIA template can be accessed here <https://www.connected.gcu.ac.uk/sites/InformationMatters/DataProtectionPrivacy/Documents/DPIA%20Template%20VO2.docx> All DPIA’s must be shared with the University’s Data Protection Officer (‘DPO’).  | Contact the DPO to discuss the completion of a DPIA dataprotection@gcu.ac.uk.  | Y/N |
| 7 | Privacy Notice | Researchers must clearly inform participants about how their personal data will be used. This may require a privacy statement or notice to be created, which might incorporate a consent form. This information must be provided to research participants before their personal data is processed.  | Provide privacy information to research participants. Contact dataprotection@gcu.ac.uk. for support.  | Y/N |
| 8 | Survey Tools | When selecting a survey tool to use for research purposes, you must ensure that the platform has been approved for use by GCU i.e. Jisc, Microsoft Forms.  | Researchers to only use GCU approved survey tools. Seek advice from IT in relation to approved survey platforms.  | Y/N |
| 9 | Security | All personal data must be processed securely with access to personal data limited to those who ‘need to know’. Researchers must use GCU approved software and devices when conducting research activities. If research interviews are being conducted remotely and video or audio recordings must be kept securely.  | Researchers to protect the personal data they use at all times. Seek advice from IT and data protection in relation to security of software and devices. | Y/N |
| 10 | Information Asset Register  | All research activities which involved the processing of personal data must be documented in the Information Asset Register (IAR)  | Researchers to make sure that all research activities are documented in the IAR.  | Y/N |