

LG Inform Plus - Record of Processing Activity (RoPA)



- This guide shows you how to create a Record of Processing Activity (ROPA) tailored for your own authority.

August 2020

This document outlines how to create and maintain your authority's RoPA within LG Inform Plus.

What is it?

The RoPA is a document that organisations are required to maintain under the General Data Protection Regulations (GDPR) that came into force in May 2018.

LG Inform Plus's existing Records Retention Tool describes each type of record that an English council is likely to hold to meet legal and business records management requirements. You can download a spreadsheet of pre-populated information for each record type and use this to help build the Records Retention Schedule that your council is required to hold.

For GDPR, record types have been broken down in greater detail and more standard information has been pre-populated. This information forms a template RoPA which you need to supplement with your local information to form your council's full RoPA.

LG Inform Plus lets you:

- download the template RoPA
- upload and download a spreadsheet of your RoPA
- maintain your RoPA online
- Create and save a privacy notice for any record type

The RoPA tool is built by and for a community of local authorities working with the Local Government Association (LGA). Legal and records retention guidance is provided by Kent County Council and delivered via the Records Retention and RoPA Tools. We expect tools and data to be refined as experience builds up across the community of local authorities.

Your record managers and legal team should use the data provided as a guide but you MUST ensure that your own authority's experts review and approve your retention schedule and RoPA.

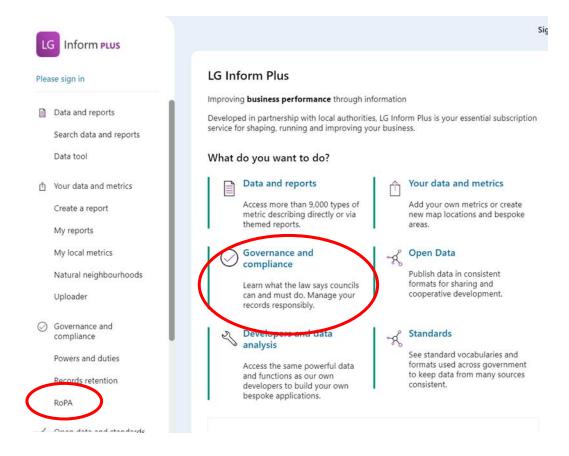
Utilising the RoPA Module

To utilise this module, you will need to sign-in to <u>LG Inform Plus</u> (http://about.esd.org.uk/). If you have not previously registered, use the "Register" option first to register with your council email address.

Your council needs to be subscribed with LG Inform Plus to use this tool. If you don't have access after sign in, contact lginformplus@local.gov.uk or the support team at support@esd.org.uk.

Once you have signed in, follow these instructions to get a RoPA that has generic record type information pre-populated but contains empty fields for information that is specific to your council.

First, click on the 'RoPA' link in the side navigation or the 'Governance and compliance' heading, shown in the image below:

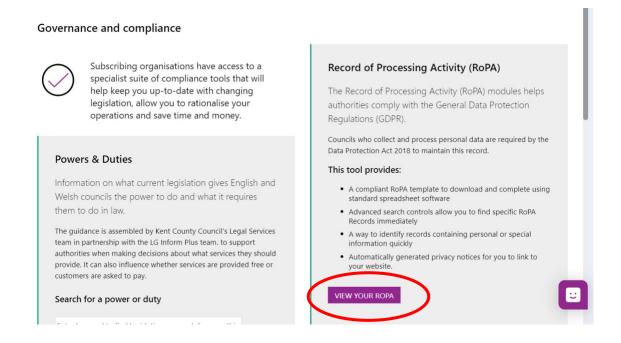


Introduction

By clicking on the 'Governance and compliance' link users are taken to a 'Hub' page which outlines each of the modules: Powers and Duties, Record of Processing Activity (RoPA)' and Records retention'.

The section on 'Record of Processing Activity (RoPA)' provides you with introductory information, such as the requirements of GDPR and the functions which are available with the tool to help you create and maintain your RoPA.

This page also contains functionality and links to get users started with each module.

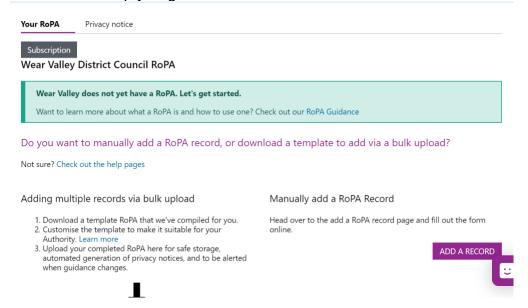


Note: there is a 'Chat' icon if users need specific help:



Creating a new RoPA for your organisation

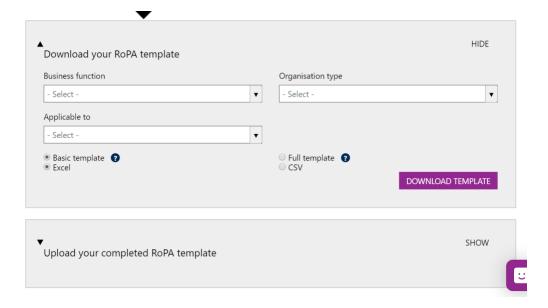
Select 'View your RoPA' from the Governance and compliance hub page. If your organisation has not already created a RoPA in LG Inform Plus you are presented with a page with a wizard to help you get started.



You can either add an individual record to start creating your RoPA (see later in this guide) or download a template which you can use to fill in the relevant information against multiple records before uploading them to LG Inform Plus to create your RoPA.

Before you download the RoPA template you can filter the record types to be included.

Filters which you can choose are shown in the image below:



- Business function choose one or more business functions whose records are to be included in your RoPA. If you don't choose any business function the template includes record types for all business functions
- Organisation type choose your own organisation type to restrict the template to

record types you are most likely to keep.

• **Applicable to** – choose 'Personal' to select only record types which contain personal data and 'Special' to select only record types which contain special or sensitive personal data. To include record types which contain any type of personal data you need to select both 'Personal' and 'Special'.

The format of the template can also be selected:



- **Template format** choose the format you would like your template to be. It can be either:
 - a csv file (comma separated text file) with one row per record type. This
 can typically be read by any spreadsheet application.
 - o an EXCEL file Microsoft Excel spreadsheet

The template can either be:

- a basic template containing fewer columns which can be used to create your RoPA and organise the records into your organisational structure but not to complete the full details
- a full template with more columns which can be used both to organise the records into your organisational structure and to complete the full RoPA details for each record type.

Once you have chosen any filters and the format of the template you require then click on the 'Download template' button to generate your template file.

After a few moments, a file named "RoPA.csv" (or RoPA.xlsx) will be downloaded to your computer.

If you are maintaining your own RoPA offline and you have downloaded the detail template, you can use this file to input to your RoPA details. If you are using LG Inform Plus to maintain your RoPA, progress to the next section of this guide.

Edit RoPA offline and upload changes

1. Edit the CSV or EXCEL file using a spreadsheet tool

Open the RoPA.csv (or RoPA.xlsx) file that you have downloaded from the "Download detail RoPA template" option described above or from a subsequent download of your own RoPA. You can use Microsoft Excel, Google Sheets or any other spreadsheet package that lets you open a CSV or XLSX file, edit it and save it back in CSV or XLSX format.

The CSV/XLSX spreadsheet has columns A to AR as listed here:

Column	Column heading	Notes
А	Organisation Name	Columns that apply to your whole organisation. You need only fill in the first row
В	Data Controller Name	
С	Data Controller Email	
D	Data Controller Address	
E	Data Controller Telephone	
F	Data Protection Officer Name	
G	Data Protection Officer Email	
Н	Data Protection Officer Address	
I	Data Protection Officer Telephone	
J	ROPA ID	RoPA identifier that is assigned automatically to a new entry and used to identify an existing entry that you are editing or deleting. Invalid identifiers are ignored.
К	Retention ID	Records retention record type identifier, which indicates where data for the prepopulated fields comes from

L	Business Function	Pre-populated business function name that you can change if you have a strong preference for using your own function names
М	Service ID (download only)	Columns that are pre-populated according to the record type and cannot be changed
N	Service Name (download only)	
0	Service Legislation Name (download only)	
Р	Service Legislation Power Or Duty (download only)	
Q	Records Description	Pre-populated according to the record type but can be changed to use your own description of the records. Often useful if you have the same record type in different business areas.
R	Contains Personal Information? (download only)	Columns that are pre-populated according to the record type and cannot be changed
S	Contains Special Information? (download only)	
Т	Impact Level (download only)	
U	Legal Or Business Requirement? (download only)	
V	Retention Legislation Name (download only)	
W	Retention Legislation URL (download only)	
Х	Retain Permanently? (download only)	
Y	Retention Requirements	Retention requirements pre-populated from the guidance. You can change this locally if you wish
Z	Notes (download only)	Columns that are pre-populated

AA	Added Date (download only)	according to the record type and cannot be changed.
АВ	Updated Date (download only)	
AC	Data Processing Name	Columns that describe your own RoPA records. These should be filled in by you
AD	Data Processing Email	in the spreadsheet and/or online.
AE	Data Processing Address	
AF	Data Processing Telephone	
AG	Processing Purpose	
АН	Joint Controller Name	
Al	Categories Of Individual	
AJ	Categories Of Personal Information	
AK	Categories Of Recipients	
AL	Contract Link	
AM	Details Of Transfer	
AN	Safeguards	
AO	Security Measures	
AP	Legal Basis For Processing	
AQ	Basis For Processing Special	
AR	Delete	Enter "yes" here if you want to delete the RoPA record identified by the ROPAID column. All other values are ignored.

Note that the basic template you can use to create your own RoPA organisational structure contains only columns A to AB. All columns are in the full template.

You can populate the category fields with any text values that you wish, but these are the standard lists of values offered. Use the standard categories unless your organisation has agreed different values for good reason.

Categories of individual

- Employees
- Customers
- Members
- Patients
- Pupils

Categories of personal information

- Contact details
- Health data
- Financial information
- Employment data
- Education data
- Race
- Ethnic origin
- Politics
- Religion
- Trade Union membership
- Genetics
- Biometrics (where used for ID purposes)
- Health
- Sex life
- Sexual orientation

Categories of recipients

- Suppliers
- Credit reference agencies
- Government departments
- Court and police services
- Banks and insurance companies

If more than one category applies for a single RoPA record, put a "|" symbol between each category. For example "xxxxx|yyyyy". The "|" is known as a "pipe" symbol. It usually comes above the "\" at the bottom left of a PC keyboard.

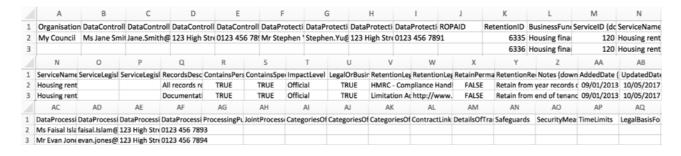
2. Points to note on CSV/XLSX editing and upload

- You need only provide organisation details in columns A to I on the first row of data, that is row 2 of the spreadsheet
- If you leave the ROPA ID column empty on a row, a new RoPA record will be added on upload provided at least one of the columns of local information (columns AC to AQ) is filled in
- If you want more than one record of the same record type, simply duplicate a row in

the spreadsheet with the same Retention ID

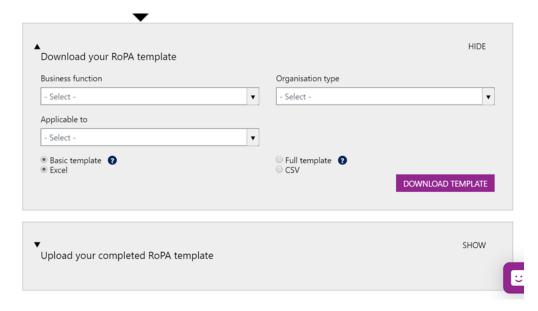
- If you fill in the ROPA ID column your existing RoPA record with that identifier will be edited on upload
- Columns expecting a Boolean value will accept the values "yes" and "no" which are not case sensitive. An empty value is also accepted where the field is not mandatory.

Two rows of a completed sample RoPA spreadsheet are shown below:

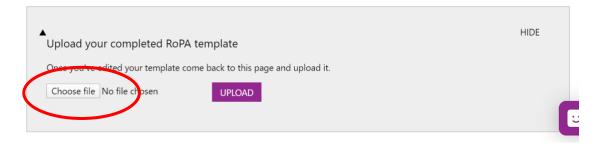


3. Upload your RoPA

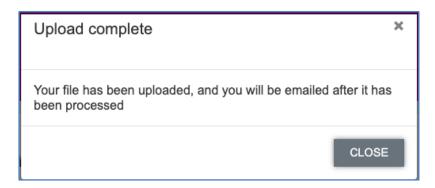
Scroll to the 'Upload your completed RoPA template' pane and open it by clicking on the downward arrow. Choose the file you want to upload by clicking on the 'Choose file' button.



Choose your file of edited RoPA records and, once the name of your chosen file is shown as in the image below, click "UPLOAD" to upload it for storage, viewing and editing online.



After your file has been uploaded, this message will appear:



Keep an eye on your email inbox for a message from support@esd.org.uk telling you that your upload is complete as shown below:

From: <support@esd.org.uk>
Date: 20 February 2018 at 12:44
Subject: Your ROPA upload completed successfully
To: nick@porism.com

Dear Nick Bryan,

Your upload has completed with records 2 added, 0 updated and 0 deleted.

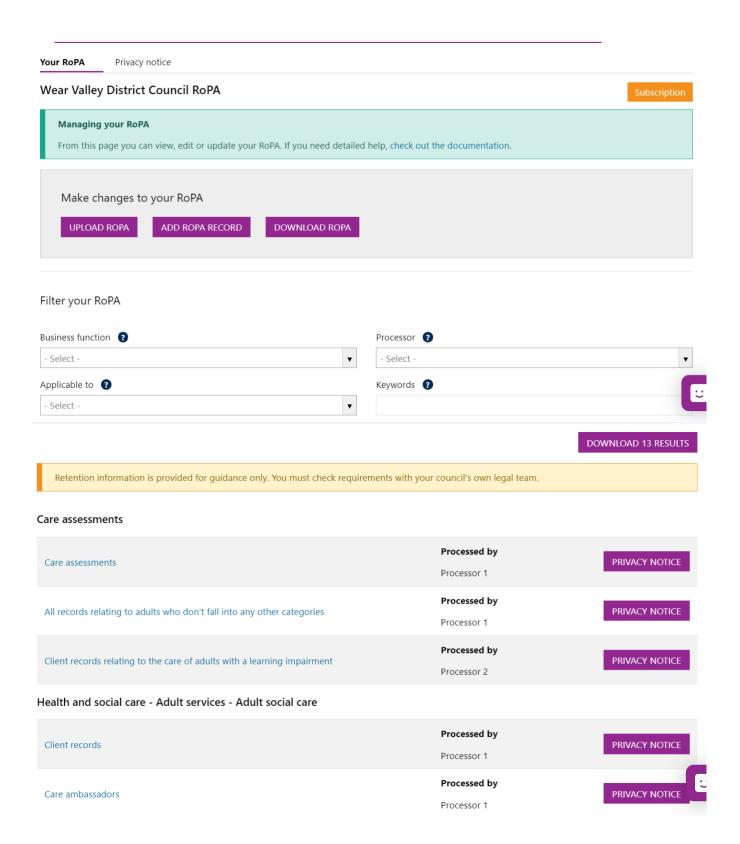
Kind regards,
LG Inform & LG Inform Plus support team

http://lginformplus.local.gov.uk/

If any rows in your spreadsheet have not been processed because of errors the email message will provide details so that you can fix the errors and upload again.

Note that if your upload is part complete you will need to edit your spreadsheet so that only the rows which failed to process are included to avoid duplication.

Following successful import, you can refresh or go back to the 'Your RoPA' page which will show the records that have been imported.

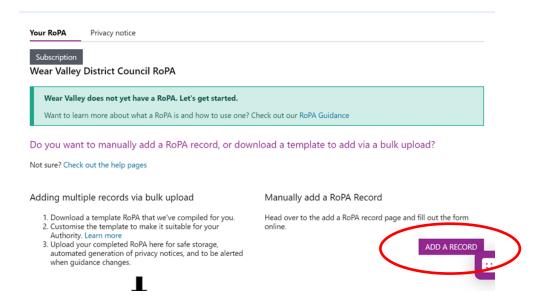


Once you have added records to create your RoPA you will no longer see the 'wizard' when you choose the 'My RoPA' option but will see the records in your RoPA together with options to view and maintain your RoPA on an ongoing basis.

See 'Viewing and editing your RoPA' and 'Privacy Notices' later in this guide.

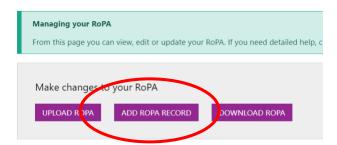
Adding a RoPA record online

If you prefer to create your RoPA by adding records individually online instead of uploading from a completed template you can do this from the wizard by clicking on the 'Add a record' option.

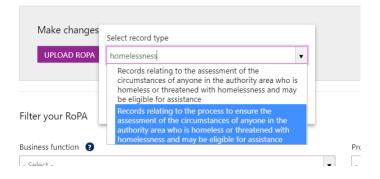


When you choose the 'Add a record' option you are first asked to choose the record type for your new RoPA entry. You can see what record types are available by typing search text into the dropdown box displayed and then scrolling through matching record types to find the one most relevant.

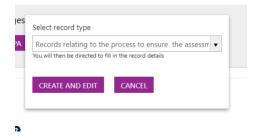
Records can also be added manually here:



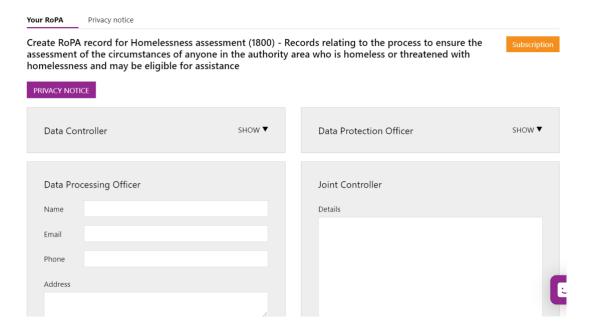
Note that the record types here have generic names and that when you are adding a record you can change the name to match local terminology if you wish. Just find the record type which most closely matches what you need.



Click on the record type you want so that the name is inserted in the search box and then click on 'CREATE AND EDIT'.



A page in which you can add all the details about your new RoPA record is displayed.



At the top of the page are panes in which you can enter information about the people in your organisation responsible for the records.

To enter the name, email, phone and address information for either the Data Controller or the Data Protection Officer for your organisation click on the down arrow beside the job title. Note that these are organisational roles and once entered for one RoPA record are displayed as entered against all others. If they are changed against any record they are changed against all.

To record details of the Data Processing Officer responsible for your new RoPA records complete the details in the pane displayed. If there is a joint controller responsible for your records then enter details in the text box provided.

Scrolling down the entry page you can enter information about the records you are adding to your RoPA and about how you are processing those records.

Records relating to the process to ensure the assessment of the circumstances c
Homelessness and prevention
Retain from date process changes for 6 years.
 (a) Consent (b) Contract (c) Legal obligation (d) Vital interests (e) Public task (f) Legitimate interests

Some of the information is pre-filled with standard information held about the record types in LG Inform Plus. This includes:

- Record type description
- Business function
- Retention requirements
- Basis of processing
- Basis of processing special (where the record type contains special personal information)

You can use the standard information or change any of the pre-filled values to match

your local situation.

If you have changed a value from the pre-filled standard information and would like to reset it back then you can use the reset (\mathfrak{S}) button on the right hand side of the field to do so.

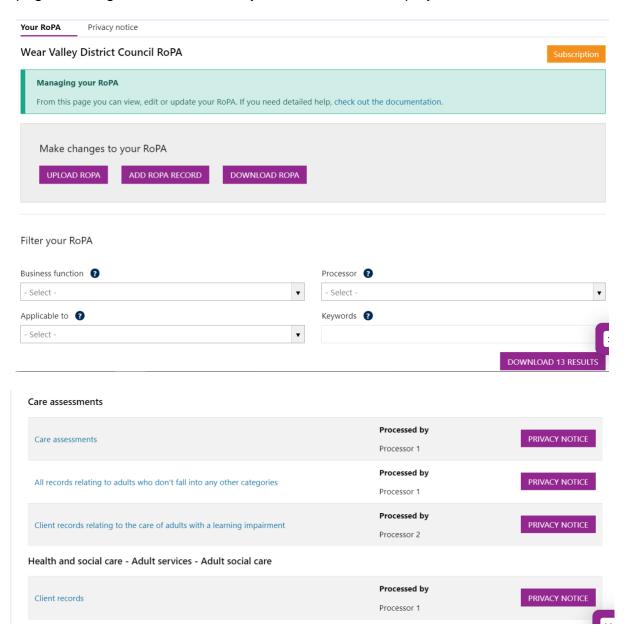
The 'categories' which are required information for a RoPA record can be completed by either typing in your own terms or by placing the cursor in the input box to display a list of pre-defined or previously used terms for the category. You can mix your own terms with those selected from the displayed list and can enter as many categories as you wish.

Once you have entered a term against any of the categories it will be displayed in the list of pre-defined terms for future RoPA entries.

When you are happy that you have entered all the information needed for your RoPA entry then click on the 'SAVE' option at the bottom of the page to add your RoPA record.

Viewing and editing your RoPA

Once you have added one or more sets of records to your RoPA, either by uploading or adding online, the wizard is no longer available. If you choose the 'Your RoPA' option a page showing all the record sets you have added is displayed.



1. Viewing your RoPA

Records in your RoPA are sorted by business function (alphabetically) and then by the record type name within each business function.

If you scroll down the page you can see all the records which have been added to your RoPA.

Alternatively you can filter the list by:

- Business function
- · Processing officer name
- Applicable to (to filter by record types containing personal data or those containing special data)
- Keywords (user defined keywords)

to see only those record types matching your filter criteria.

You can see the full details of any RoPA record by clicking on the record type name in the list. This displays the current information for the record type.

2. Editing your RoPA

Editing an existing record

Any details can be edited at this point by simply changing the necessary fields and then clicking on the 'SAVE' option.

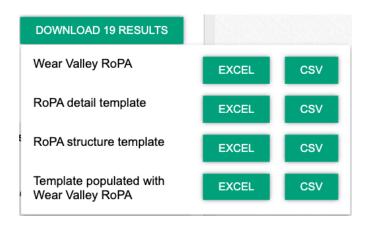
You can also delete the RoPA entry by clicking on the 'DELETE' option and then confirming that you wish to delete in the lightbox displayed.

If you just wanted to view the details of a RoPA entry but not make any changes then the 'CANCEL' option returns to the list page.

Editing on a spreadsheet

You can also download your RoPA in a spreadsheet format (CSV or XLSX) to make changes offline and then upload them.

To download simply click on the 'DOWNLOAD' option and choose the format of your download.



Options are:

- Organisation name RoPA to download your full RoPA or the records you
 have filtered from your RoPA. Use this to download and save or edit your
 existing RoPA.
- Detail template to download as a template any records in your RoPA which
 match your filters plus any record types (in the LG Inform records retention
 schedule) which also match your filters. Use this to add records to your RoPA
 (or update details of existing records. Records already in your RoPA will have a
 number filled in in the RoPA ID column but will not show all the RoPA details.
- Structure template to download as a structure only (without full RoPA details)
 any records in your RoPA plus record types which match your filters. Use this to
 add new records to your RoPA in your organisational structure without needing
 to add all the details at this time
- Template populated with organisation name RoPA to download full details
 of records in your RoPA which match your filters plus any record types which
 also match your filters. Use this option to add new records to your RoPA and
 update details of any existing records.

All the downloads are available in either Excel or CSV format.

Points to note when editing your RoPA from a template:

- Do not delete or change the RoPA ID for existing records. This is used to find and update an existing record.
- If you want to delete an existing record (with a RoPA ID) enter 'yes' in the delete (last) column on the spreadsheet
- If you want to create more than one record of the same record type simply copy the details to a new row (blank out the RoPA ID in the new row if there is one)
- Any row in your spreadsheet which does not have a RoPA ID will be added when you upload. Make sure you delete any rows you do not need.

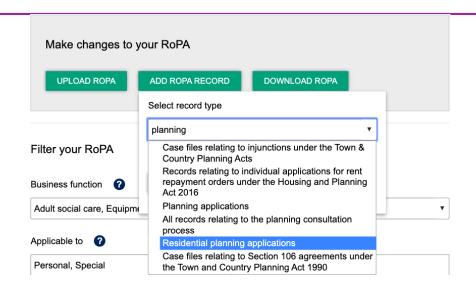
Once you have edited and saved your spreadsheet you can upload the results to update your RoPA.

To do this click on the UPLOAD option at the top of the page, choose your file and then click on the 'UPLOAD' button to start the upload. You will be emailed with the results of your upload as soon as it has finished.

Once you have received the email you will see any new records in the list of your RoPA records. Clicking on the header will display full details of each RoPA entry.

Adding a new RoPA record online

Instead of using a spreadsheet download/upload you can add a single RoPA record online. To do this click on the 'ADD ROPA RECORD' option at the top of the page to display a page with a form in which you can enter details of the new record.



You need to choose the record type of the records you wish to add to your RoPA. To do this enter one or more keywords into the box and then pick the record type which most closely matches your records by clicking the description in the list and then clicking on the 'CREATE AND EDIT' button.

The record type name you see is a generic name but you will be able to change this to suit local terminology once you have chosen it.

A page in which you can enter the details of your RoPA record is displayed.

Organisation level information (Data controller details and Data Protection Officer details) are displayed when you click on the down arrow beside the headers. These are filled in for you from your organisation details. If you change them here they will change against all RoPA records.

Fill in all the details and click on 'SAVE' to add your new record.

For more details about how to fill in the page see 'Adding a RoPA record online' earlier in this guide.

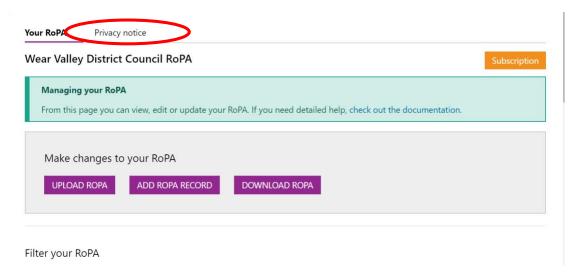
Creating Privacy Notices

You can create and save one or more privacy notices against each of your RoPA records. A privacy notice is something you can give to those whose information you hold to explain what information you hold about them and what you are doing with that information (how you are keeping it, who you are sharing it with, how long you will keep it etc.).

Your organisation may have a standard format privacy notice already defined (or multiple ones used for different types of data or audience).

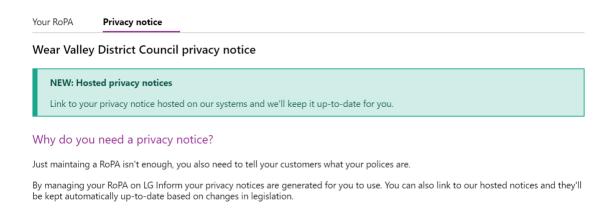
You can set these up as 'templates' which can then be linked to appropriate RoPA records. Once you have linked a template to a RoPA record you can edit it to be more specific to that set of records if you wish.

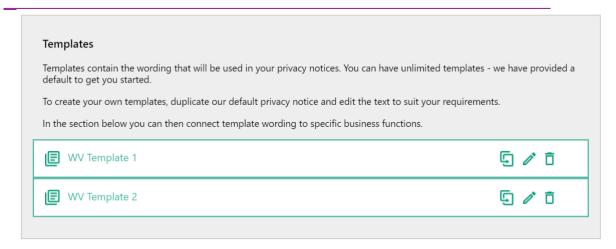
1. Creating template privacy notices

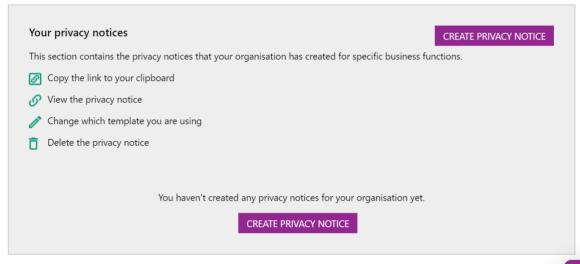


To create a customised template privacy notice click on the 'Privacy notice' option in the top menu.

The page explains a little about your RoPA and privacy notices and then has a pane for templates.





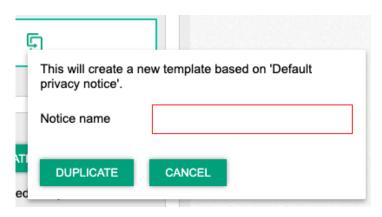


There is a default privacy notice template provided for you and you can simply use this if you wish.

The privacy notice text and retention information is provided for guidance only. You must check requirements with your council's own legal team. You may wish to provide

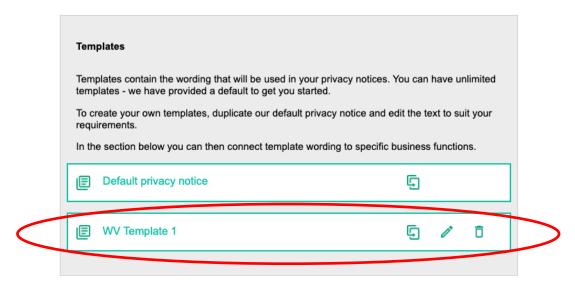
different privacy notices for different record types and different audiences.

Alternatively you may wish to create your own templates, possibly for each business function or for specific record types or customers. To create a template click on the 'duplicate privacy notice' button ($\frac{\Box}$) to display the default template for editing. When prompted enter a name for your template and then click on 'DUPLICATE' to add the new template.



Note that once you have created your own templates you will be able to duplicate and edit from these rather than the default template if you prefer.

Once created your new template is added to the list of templates.



You can then edit the template as required by clicking on the edit button ($^{\prime\prime}$) to display the template for editing.

Note that editing a template is an advanced feature which requires some knowledge of HTML. You may have officers in your organisation who can do this but, if not, or if oyou would like some help the support team (support@esd.org.uk) would be pleased to help if you contact them.

WV Template 1 Privacy Notice for 19 September 2019 is committed to protecting your privacy when you use our services. This Privacy Notice explains how we use information about you and how we protect your privacy. This Privacy Notice relates to If you have any concerns or questions about how we look after your personal information, please contact in the first instance the Data Protection Officer,, at, at or by calling Alternatively you can contact the Data Controller, at or by phone on or the Representative, at or on What is personal information? Personal information can be anything that relates to a living person which, on its own or when put together with other information, can be used to identify a person. For example, this could be your name, your email address and/or your postcode. Some information about a person is considered 'special' and needs more protection due to its sensitivity. It's often information you would not want widely known and is very personal to you. This is likely to include anything that can tell others anything about your: race ethnic origin politics religion EDIT (ADVANCED) COPY TO CLIPBOARD **PRINT** The privacy notice text and retention information is provided for guidance only. You must check requirements with your council's own legal team. You may wish to provide different privacy notices for different record types and different audiences.

The template above is the default template. Note that where a row of dots is displayed this is information which will be completed with the relevant RoPA details when you generate a privacy notice for a RoPA record.

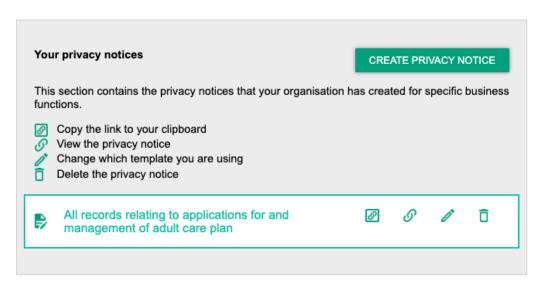
To edit the template click on the EDIT (ADVANCED) button. Edit the HTML as required and click on the 'SAVE' option to save your new template.

There are also options to copy the template to your clipboard which could be used to edit offline or to print the template so that you can see what it would look like when printed.

Creating a privacy notice for your RoPA records

Once you have defined your privacy notice templates you can link a template with a set of records in your RoPA to create a privacy notice for the records.

You can do this from the pane on the 'Privacy notice' page using the 'Create privacy notice' option.



When you click on the option a lightbox is displayed in which you need to choose:

- The template for your privacy notice from a list of all available
- The RoPA record which will use privacy notice from a list of all your RoPA records. You can scroll through the list or enter text to find matching records.

Once you have chosen both your template and the RoPA records using the template then click on the 'CREATE' button to add the privacy notice.

The privacy notice will be added to the list on the page and you will then have options to:

- copy a link to the privacy notice to your clipboard so that you can use the link elsewhere. For example on a web page where customers can look at the notice online if they wish to know what you are doing with their records
- •• view the privacy notice in your browser. You may want to do this to check the formatting and information in the privacy notice
- Change the template used for the privacy notice. When you click on the option you see a lightbox in which you can select an alternative template
- Delete the privacy notice. Remove the link between the RoPA record and the privacy notice template. You will be asked to confirm that you wish to delete.

As an alternative way of adding a privacy notice to a RoPA record you can go to the 'Your RoPA' page from the menu and then scroll down to the list of RoPA records.

To the right of each RoPA record is a 'PRIVACY NOTICE' button.



If you click on the button you will see 3 options:

- Create to link the RoPA record with a privacy notice template
- View to view the privacy notice in your browser
- Copy link to copy the link to the privacy notice to the clipboard so that you can
 use the link elsewhere

The view and copy links are disabled until you have used create to link your RoPA record with a privacy notice template. The create option is disabled once you have added a privacy notice for the RoPA record.

This may be the preferred way of adding privacy notices once your RoPA has a larger number of records.

Need more help?

We hope you found the introduction to the RoPA tool useful, but if you have any further questions or would like to learn more, please get in touch.



Use the Help link in the navigation bar anywhere in LG Inform Plus to read through our online help guides, or send an email to support@esd.org.uk and the support team will get back to you (Monday – Friday, 9 a.m. to 5.30 p.m.).

For more information please contact

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Contact the Local Government Association

Telephone: 020 7664 3000 Email: info@lga.gov.uk Website: www.local.gov.uk

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