

# **Guidance for University Data Classification Matrix**

## **Intended for public disclosure?**

You should ask yourself:

* Has the data come from an open, publicly-accessible source?
* Do I intend to publish the data ‘as-is’ in a publicly-accessible location?
* Is there anything confidential in the data?

## **Would the data present a safety risk?**

You should ask yourself:

If the data was accidentally disclosed, would it pose a risk to the data subject(s) personal safety?

There are very many scenarios where research data could put personal safety at risk, but a few examples might be data containing:

* The views of people living under politically unstable regimes and/or war-zones
* Details of victims and/or perpetrators of crime
* Interviews with domestic violence survivors

- If the data was accidentally disclosed, would it pose a risk to anyone else’s personal safety?

- Again, there are many scenarios where this could be the case, but some examples are:

* Risk to researchers or other staff from data disclosing too much specific detail of research into sensitive/emotive areas e.g. animal testing, counter-terrorism
* Risk to users of University buildings from disclosing too much detail of specific locations of sensitive/emotive research facilities

## **Does the data set include sensitive data?**

You should ask yourself:

Is there anything within the data set that makes it unsuitable for widespread access. This could include data that identifies individuals, or subject matter such as:

* Pornography or other ‘adult’ material
* Extremist or terrorist related material
* Commercially-sensitive material
* Video of traffic accidents

## **Does the data set include Sensitive personal data?**

This relates to data identifying living people requiring additional protection including ‘special category data’ as defined by the Data Protection Act 2018 and Article 9 of the General Data Protection Regulation (GDPR) and the Information Commissioner’s Office and ‘protected characteristics’ under other legislation such as the Equality Act 2010\*\*.

You should ask yourself:

- Whether the data identifies individuals, or, when combined with other data would enable the identification of individuals, and contains any of the following:

* Racial or ethnic origin
* An individual’s political opinion
* Membership of trade union
* Religious, faith or similar beliefs
* Physical or mental health or condition
* Data concerning a natural person’s sex life or sexual orientation
* Gender, sexual orientation etc.
* Criminal offences, alleged criminal offences, convictions etc.
* Biometric data for the purpose of uniquely identifying a natural person

\*\*All require Combined ROPA (Register of Processing Activities) and Threshold DPIA assessment and are likely to require a Full DPIA before processing commences.

## **Are there any ethical or moral issues connected to the data?**

Even where data is not protected by specific legislation such as the Data Protection Act 2018/GDPR, there may be ethical and moral considerations.

You should ask yourself:

- Does the data contain details that could be hurtful, distressing or offensive to individuals should it be disclosed?

- Examples of such data might be:

* Specifics about cause of death of identified individuals
* Sensitive personal data relating to deceased individuals

## **Is the data set subject to other contractual, legislative or regulatory conditions?**

Data must be protected and managed in the way we have agreed as a condition of receiving the data.

You should ask yourself:

* Is there a contract (e.g. data sharing contract) with specific restrictions on my handling of the data?
* Have we agreed that another organisation may audit us as a condition of receiving the data?
* Is the data subject to a higher-level contract e.g. the University’s NHSDigital (formerly HSCIC) framework contract?
* Is the data part of a commercial contract which might impose restrictions?
* Does the regulatory body of my research area impose restrictions on my handling of the data?