Business change request

Office use:

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| **BCI ID** | **Location** |
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| **Version** | **Change in this version** | **HESA staff responsible** | **Peer reviewer** | **Date** |
| 1.0 |  |  |  |  |

This form captures requests for change to data collections, whether major or minor in character (other than changes to quality rules). This form is designed to facilitate and track dialogue towards the production of a functional specification for new or changed data collection requirements. Your answers help HESA to ensure (and explain why) reporting requirements are necessary and reasonable. Requests pass through four systematic stages:

**1. Establishing the benefits of change** (informed by your answers in sections 1,2 & 3)

**2. Assessment of viability** (informed by your answers in sections 4, 5 & 6 and through consultation)

**3. Functional specification** (a draft specification is worked-up for consultation / investigation and refinement)

**4. Implementation** (office use only sections)

Please complete a separate from for each request (except where an intrinsic link between two changes is best captured by specifying both in a single form). If you need additional guidance, please call us on 01242 388531 or write to the email address below. Expand boxes / add extra lines as required. **Save this form, and forward the completed version to** [liaison@hesa.ac.uk](mailto:liaison@hesa.ac.uk)

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| **Requester information** | | **Organisation 1** | | **Organisation 2** | | **Organisation 3** |
| Organisation(s) requesting change | |  | |  | |  |
| Name(s) of principal contact(s) | |  | |  | |  |
| Job title(s) of principal contact(s) | |  | |  | |  |
| Email address(es) | |  | |  | |  |
| Telephone number(s) | |  | |  | |  |
| Date first submitted to HESA | |  | |  | |  |
| **1. Defining the benefits of change with ‘user stories’**   * What are the business reasons for this proposed change? How would you explain the need to a layperson? * Please try to capture where you expect benefits to accrue to third parties, as well as your own organisation’s interests * Add as many new lines as you need | | | | | | |
| **Item** | **What is the requested change?**  State the goal or desire ‘I want…’ (e.g. to collect data on… ; to link data on X and Y; to create a rule to enforce a relationship that if X then Y…) | | **Who benefits?**  ‘As a…’ (e.g. a particular type of role, customer, or organisation) | | **What is the intended use/outcome?**  ‘To/will …’ (e.g. have better data to make decisions on…; produce a report on... ; benchmark on… ; develop policy on the issue of…; reduce burden of…) | |
| A |  | |  | |  | |
| B |  | |  | |  | |
| C |  | |  | |  | |

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| **2. Background information**  Additional information, links to documents, *etc*. that help explain the context for this request. | | | | |
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| **3. Legal basis of requested change**  *To ensure that HESA processes data lawfully, change requests relating to individuals, for example the Student, AP Student, Staff or Graduate Outcomes records (but may affect other records) must be assessed for compliance with the General Data Protection Regulation. If your request is* ***not*** *related to these data collections please go to question* ***3.8***  *The standard GDPR grounds on which HESA lawfully process data is Article 6 (e) – “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”.* | | | | |
| **3.1** Is the requested change necessary for the performance of a task carried out in the exercise of official authority vested in your organisation? Y/N | No: |  | Yes: | **If you answered “Yes” to 3.1**  **3.1.a** Please specify the statutory basis for the task and briefly explain why the change is necessary. |
| **If you answered “No” to 3.1:**  **3.2** Is the requested change necessary for the performance of a task carried out in the public interest? Y/N | No: | (Go to 3.3) | Yes: | **If you answered “Yes” to 3.2**  **3.2.a** Please specify the public interest served by processing the information and briefly explain why the change is necessary for this purpose. |
| **If you answered “No” to 3.2:**  **3.3** On what GDPR grounds do you consider the processing of change to be lawful? (See Article 6 of the [GDPR](http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN)). Please briefly explain why the additional information is necessary under the specified grounds. |  | | | |
| **3.4** Is the requested change related to one of the following ‘Special categories’ of personal data: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic or biometric data; health or disability; sex life or sexual orientation; gender identity? Y/N | No: |  | Yes: | **If you answered “Yes” to 3.4, go to 3.4.a** |
| **If you answered “Yes” to 3.4:**  **3.4.a** Is the data requested for research into equal opportunities and the elimination of discrimination? Y/N | Yes: |  | No: | **If you answered “No” to 3.4.a, go to 3.5:** |
| **3.5** On what GDPR grounds do you consider the processing of information to be lawful? (See Article 9 of the [GDPR](http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN)). Please briefly explain why the additional information is necessary under the specified grounds. |  | | | |
| **3.6** Is the intended use of the information already adequately described by the existing [Collection Notices](https://www.hesa.ac.uk/about/regulation/data-protection/notices)? Y/N | No: | **If you answered “No” to 3.6 please go to 3.7** | Yes: | **If you answered “Yes” to 3.6:**  **3.6.a** Which section of the relevant collection notice described the intended processing? |
| **If you answered “No” to 3.6:**  **3.7** What additional information in the collection notice would make the intended processing fair and transparent to data subjects?  ***PLEASE NOTE:*** *Changes that require updates to the Collection Notice may have a longer lead time. If it is intended to use the requested information to make decisions about individuals or share information about individuals with third parties, further legal assessment will be required and the change may not be acceptable within current legal frameworks.* |  | | | |
| **3.8** Please explain why this request represents the most suitable or proportionate was of achieving the aims described in Section 1 above. Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’) |  | | | |
| **3.9** Please give details of any other **legal impact assessments** you have done (e.g. for the Competition Act, Equality Act, *etc*.) |  | | | |

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| **4. Data quality parameters**  *Please explain your rationale as fully as you can in each area below, to help us to specify this requirement* | |
| **4.1** What **population** is expected to be covered by the data? *Who/what is definitely* ***included****?*  *Who/what is definitely* ***excluded****?* |  |
| **4.2** Is returning this data **compulsory**?  *and for whom/what?* |  |
| **4.3** Is returning this data **optional**? *and for whom/what?* |  |
| **4.4** **Geographical** **regions** where this requirement applies  *and where it doesn’t* |  |
| **4.5** What proportion of **unknowns** can be tolerated?  *What is the ideal level and why?*  *What is the minimum acceptable level and why?* |  |
| **4.6** Are you aware of any pre-existing **coding frames** or list of values that might be applied in this case? |  |
| **4.7** What is the expected **precision** or **granularity** of this data? *If there is no established coding frame, what valid entries might you expect there to be and do you have draft valid entries in mind? What are they?*  *If the data are numerical, what is the possible range of values? To what place value is data required? What should be the intervals between values?* | *For instance, eye colour could be described using 3 valid entries, 10 valid entries, or RGB colour values with hundreds of possibilities.*  *Equally, height could be described in metric or imperial, and to the nearest centimetre, millimetre or inch.* |
| **4.8** Should there be **restrictions** on the **valid range** or **format** for this data?  *Tell us about any maxima, minima, numbers of characters, and other validity rules.* |  |
| **4.9** **When** will data from the changed collection be required?  *Why this timescale? Is there a subsequent frequency by which updates are needed? Please explain the consequences should this timescale prove impractical.* |  |
| **4.10** **When** do you anticipate this data will no longer require collection? |  |
| **4.13** Do this data require **verification** for **accuracy** or **consistency**through an independent cross-check?  *Please explain why, and indicate what sort of check is required. See also 3.3* |  |
| **4.14** Do you have **expectations** around the **consistency** of this data? *Year-on-year? Across the sector? Something else? Please explain* |  |
| **4.15** Can you identify any **other** **assumptions** this request relies upon? |  |

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| **5. Customer impact assessment**  *Please help us to understand the effect HESA’s work will have on your organisation* | | | | |
| **5.1**  What would be the **impact if HESA did not collect** this data? Please explain. |  | Please characterise the impact: | High |  |
| Medium |  |
| Low |  |
| **5.2** What is the **impact of not meeting the standards** you expressed in the data quality parameters section (4. above) on your business and processes? |  | Please characterise the impact: | High |  |
| Medium |  |
| Low |  |
| **5.3.** Are there any **other** **factors** you regard as **critical** **to** the **success** of this request? |  | | | |

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| **6. Guiding HE providers**   * How would you explain this requirement to those responsible for collecting and recording the data for supply to HESA? * What changed to make this requirement necessary? |
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