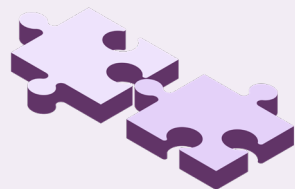
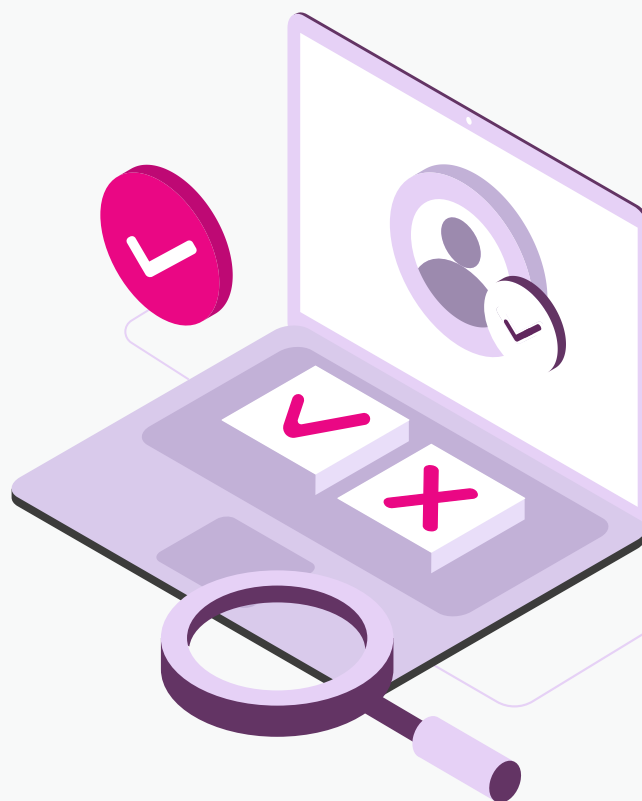


# Information Governance Considerations for System or Process Testing

System or process testing is an important part of the methodology of service delivery change and project management. It is also necessary to allow you to meet your obligations under data protection law, if your system or process uses personal data.

These considerations fit within an outcomes-driven methodology that LOTI recommends and they form part of a continuous improvement approach. For example, when testing a prototype, before increased roll out, or after significant changes.

It is assumed that you have, if necessary, completed a Data Protection Impact Assessment (DPIA) before you began developing a new system or process. These questions help you assess whether you are meeting the objectives listed within your DPIA and what needs to change.



**The answers to the questions will help you consider how you comply with your information governance responsibilities, but many of the questions can be helpful when you are not using personal data.**

You can combine this with other aspects of system or process testing such as technical, user experience, and value for money.

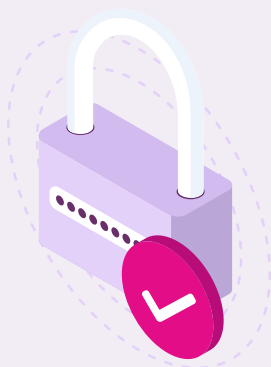


## Actions During Testing

When your system or process uses the personal data of individuals, you have the legal and ethical duty to respect the personal data. You must try to ensure that all possible areas of failure or improvement are addressed before you implement the system/process or use it more widely.

System/process testers need to front-load their use by trying it more than normal during the testing period. For example:

- ✓ If you plan to use it once a week normally, use it 3-4 times a week during testing.
- ✓ Test the system/process for every type of work for which it will be used.
- ✓ Have relevant people, like end users, managers or relevant professionals, review your outputs.



A user testing phase should be more intensive as users try to both test and 'break' the system or process.



## Questions for System/Process Testers to Answer

Any significant changes will mean reviewing the DPIA, your process, and your use of data.

<b>Does the system/process work as expected? Can you meet your objectives?</b>	<ul style="list-style-type: none"><li>✓ Yes - record this in your justification of the data use eg the DPIA.</li><li>✗ No - what needs to change to meet your stated objectives, or is this an unjustifiable use of the data?</li></ul>
<b>Anything else you want the system/process to do? Do you want extra data included?</b>	<ul style="list-style-type: none"><li>✓ Yes - assess whether the proposed data use is justified and proportionate. Why is this necessary and what would it allow you to do?</li></ul>
<b>Is there anything you don't need or that is of low value to you? Can you reduce the amount or sensitivity of the data?</b>	<ul style="list-style-type: none"><li>✓ Yes - consider reducing your data use eg is age sufficient instead of date of birth?</li></ul>
<b>Can you anonymise or pseudonymise the data?</b>	<ul style="list-style-type: none"><li>✓ Yes - good, this is a less intrusive approach.</li></ul>
<b>Is there sufficient data quality, accuracy and precision to meet your objectives?</b>	<ul style="list-style-type: none"><li>✗ No - make changes to improve, or consider not using the data.</li></ul>
<b>Were inaccurate or inappropriate assumptions made? What happened?</b>	<ul style="list-style-type: none"><li>— Review the data use and the process to correct any errors or unintended consequences.</li></ul>
<b>Can anyone identify individuals or learn something new about them from anonymised outputs?</b>	<ul style="list-style-type: none"><li>✓ Yes - change your process and/or reconsider your use of the data and the outputs.</li></ul>
<b>Can you access what you need? Can you access things you don't need?</b>	<ul style="list-style-type: none"><li>— Correct access rights. Only allow access to the data where it is necessary.</li></ul>
<b>Is there any part of the system/process that makes you uncomfortable?</b>	<ul style="list-style-type: none"><li>— What changes would make you more confident? Is the use of the data justifiable and is the process effective and secure? Have you engaged appropriately with individuals? Do you want to seek opinions from specialists?</li></ul>