Personal Data Checklist
Ask yourself: Could this information identify someone, directly or indirectly?

Direct Identifiers
Can identify a person on its own

☐ Full Name
☐ Previous Names
☐ Alias or preferred name(s)
☐ *Initials (in some contexts)*
☐ Home Address
☐ Email address
☐ Personal phone number
☐ Date of birth
☐ NHS number
☐ National Insurance (NI) number
☐ Employee or service user ID
☐ Passport number
☐ Driving Licence number
☐ Customer Account number
☐ Payroll number
☐ Staff badge number
☐ *Social media username*
☐ Fingerprints
☐ DNA profile
☐ Facial recognition template
☐ Voiceprint used for identification

Indirect Identifiers
May not identify someone on their own, but could be when combined with other information

☐ Date of Birth
☐ Age
☐ Gender
☐ Postcode
☐ Location Data
☐ IP Address
☐ Vehicle registration number
☐ Job Title
☐ Employer Name
☐ Year of Birth
☐ Ethnicity
☐ Nationality
☐ Marital Status

ASC Health & Care Information
Special Category Data in purple

☐ Medical Records
☐ Diagnoses
☐ Medication records (MAR/eMAR charts)
☐ Care plans
☐ Mental health information
☐ Disability information
☐ Risk assessments
☐ Allergies information
☐ GP details
☐ Hospital attendance records
☐ Clinical notes
☐ Social care assessments
☐ Safeguarding concerns/records
☐ Capacity assessments
☐ Incident reports
☐ Complaints files/records
☐ Service user/resident photographs
☐ Family contact details
☐ NHS numbers
☐ Staff supervision notes
☐ DBS records
☐ Professional registration numbers
☐ Care home room number
☐ Rostering/Rota records

Employment Information

☐ Job title
☐ Employment history
☐ Performance reviews
☐ Sickness records
☐ Disciplinary records
☐ Training records
☐ DBS status
☐ Shift rotas
☐ Salary information
☐ Pension information
☐ Time and attendance records
☐ Annual leave records
☐ Staff photographs
☐ Professional registration numbers
☐ Date of birth
☐ Age

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Employment Information (Cont.)

☐ Gender
☐ Postcode
☐ Employer name
☐ Shift pattern

Financial Information

☐ Bank account details
☐ Sort Code and/or Account number
☐ Payment records/history
☐ Invoice records
☐ Benefits Information
☐ Tax Records
☐ Credit ratings
☐ Debt information
☐ Direct debit information

Online & Technical Identifiers
Often overlooked but specifically recognised under GDPR

☐ IP Address
☐ Cookie Identifiers
☐ Device IDs
☐ Mobile Advertising IDs
☐ User Account IDs
☐ Login Names
☐ Website Session IDs
☐ Browser Fingerprints
☐ CCTV Camera IDs linked to a person
☐ Vehicle Telematics Identifiers
☐ Smart Device Identifiers
☐ Call Recording Reference Numbers
☐ Website Activity Logs

Less Obvious Examples
Opinions & Judgements
Many people miss these. GDPR makes clear that opinions & references about a person can be personal data.

☐ Manager comments about an employee
☐ Care worker observations
☐ Safeguarding concerns
☐ Professional opinions

Less Obvious Examples
Opinions & Judgements (Cont.)

☐ Personal opinions
☐ Performance ratings
☐ Behaviour assessments
☐ Risk scores
☐ Sustainability assessments
☐ Investigation findings/notes
☐ Complaint outcomes

Images, Audio and Video

☐ Photographs
☐ ID photographs/cards
☐ CCTV footage
☐ Body-worn camera footage
☐ Video recordings
☐ Audio recordings
☐ Voicemail messages

Biometric & Genetic Data

☐ Fingerprints
☐ Facial recognition templates
☐ Iris scans
☐ Voiceprints
☐ DNA profile
☐ Genetic test results
☐ Hand geometry scans

Location Data

☐ GPS coordinates
☐ Real-time location tracking
☐ Vehicle tracking records
☐ Staff visit logs
☐ Digital care monitoring records
☐ Building access logs
☐ Swipe card records
☐ Clock in clock out locations
☐ Swipe card records

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Obscure examples of Personal Data
A vehicle registration number linked to an individual
A unique care home room number linked to a resident
A combination of age, postcode and gender that identifies someone
A distinctive job title in a small organisation
A map showing a worker's home location
An unusual dietary requirement linked to one resident
Browser fingerprinting data
Smartwatch activity data
Door access logs
Printer usage logs
Wi-Fi connection logs
Signature examples
Keyboard typing patters
Voice assistant recordings
Employee productivity metrics
High risk residents' flags
Behaviour scores
Notes stating "likely to resign"
Notes stating "suspected dementia"
A list of people attending a meeting
Visitor sing-in logs/books
Uniform sizes
Vehicle mileage records allocated to one staff member
Shift patterns that identify one employee
Pseudonymised records where a key exists to re-identify the individual

Information	**Direct Identifier**	**Why?**
NHS Number	Yes	Uniquely identifies a person
Full Name	Yes	Directly identifiers the individual
Photograph of a resident	Yes	The person can be recognised
Mobile Phone Number	Yes	Identifies and contacts the individual directly
Service user ID	Yes	Links directly to a specific person in records
Age 87	No	Does not identify someone on its own
Gender	No	Not unique to an individual
Postcode	No	May identify a group rather than a person
Care Home Name	No	Identifies an organisation, not a person

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Ask yourself: Could this information identify someone, directly or indirectly?

Remember

- Personal data does NOT have to include a person's name
- Information can identify someone when combined with other data
- Opinions, observations, and professional judgements about a person are also personal data
- If the information tells you something about a person's physical or mental health, care needs, disability, genetics, biometrics, ethnicity, religion, political views, trade union membership, or sexual orientation, it is likely to be Special Category Data and requires extra protection
- **When in doubt, treat the information as personal data and handle it securely**