



Informal Web Guidance

Do you need to update your data protection registration?

Whilst accountancy firms may be aware of the need to register with the Information Commissioner's Office (ICO) under the Data Protection Act, the circumstances which could give rise to the need to update registration or reregister could be being overlooked by practices.

Registration or "notification" costs £35 and lasts one year. The circumstances in which the registration may need to be updated include but are not limited to:

- Where there is a change of the name of the data controller. (If, however there is a change of legal entity, for example Bloggs & Co become Bloggs & Co Ltd, then a fresh notification would be required.)
- Where there is a change of address - both data controller and contact address may need to be updated.
- Where there is a change to other contact details for example telephone and fax numbers, or e-mail address etc.
- If a firm begins to process personal data for another use, for example by offering a completely different service which isn't covered under the declared purposes a fresh purpose would need to be added to the register entry.
- Likewise, where the addition or removal of registration codes is appropriate - i.e. Data Subjects, Data Classes, Recipients, Overseas Transfers, or when an entry no longer appropriately describes the processing.
- Where there have been changes in the representative details.
- Where you acquire or change your trading name(s). Whilst this is not a mandatory part of registration, the information assists in the transparency and usefulness of the public register.
- Addition/deletion of the Statement of Exempt Processing.
- Addition of the Freedom of Information marker.
- Removal of a register entry.

If a practice is unclear as to their obligations the ICO is happy to receive calls from Data controllers and to give advice regarding notification requirements. Callers should contact the Notification Department on 01625 545740.

The ICO has also issued a Notification Handbook – which gives more comprehensive guidance on notification. This is available from the ICO website:

http://www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/notification_handbook_final.pdf

To access further information that the Institute has issued on data protection issues, go to our lead data protection page at:
[http://www.icaew.com/index.cfm/route/135335/icaew_ga/en/Technical amp Business Topics/Topics/Law and regulation/Data Protection](http://www.icaew.com/index.cfm/route/135335/icaew_ga/en/Technical_amp_Business_Topics/Topics/Law_and_regulation/Data_Protection)

Date updated: 22/10/2008

© The Institute of Chartered Accountants in England and Wales 2008

All rights reserved

This publication has been prepared for the assistance of readers, using the knowledge and experience of Institute staff but without extensive due process. No responsibility for loss occasioned to any person acting or refraining from action as a result of any material in this publication can be accepted by the Institute.