OneTrust Assessment Tool

Quick Reference Guide

Introduction

This Quick Reference Guide is designed to assist you through the use of OneTrust and specifically how to complete the International Transfer Impact Assessments (TIA). The purpose of these assessments are to assess to level of risk associated with transferring EEA or UK-origin data to countries outside of the EEA or UK.

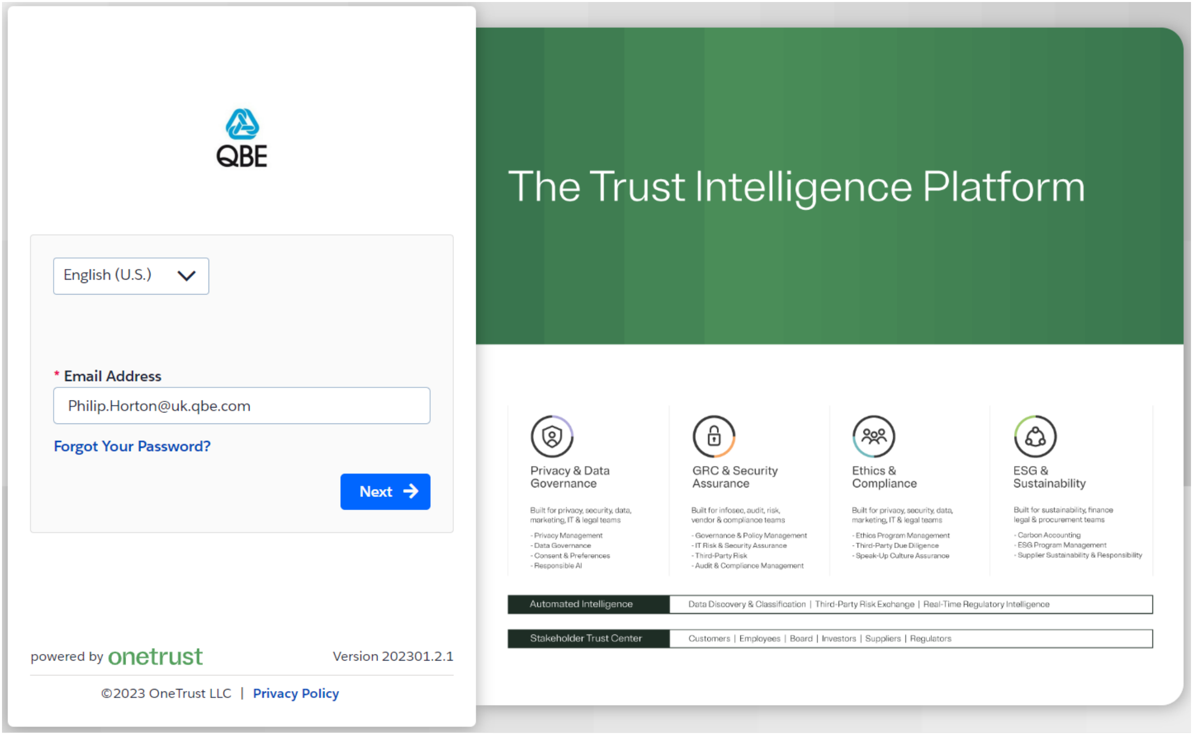
The TIA allows QBE to assess whether any data transfers that suppliers make comply with Schrems II regulations. There are two levels of assessments available in OneTrust;

1) Screening Assessment – International Transfer Impact Assessment (TIA) V2
2) International Transfer Impact Assessment (TIA) V2.6

Both assessments are detailed in this guide.

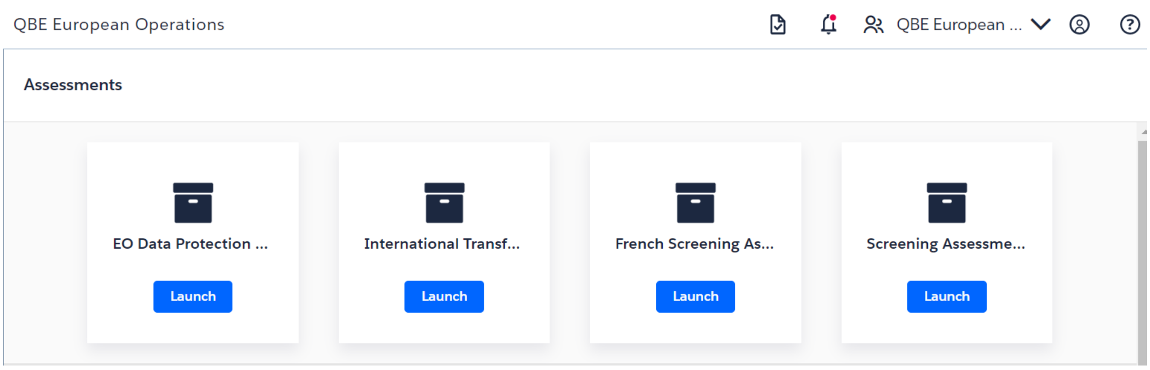
Access to the OneTrust Tool

Follow the URL to gain access to the One Trust Tool [OneTrust | Privacy, Security & Governance]

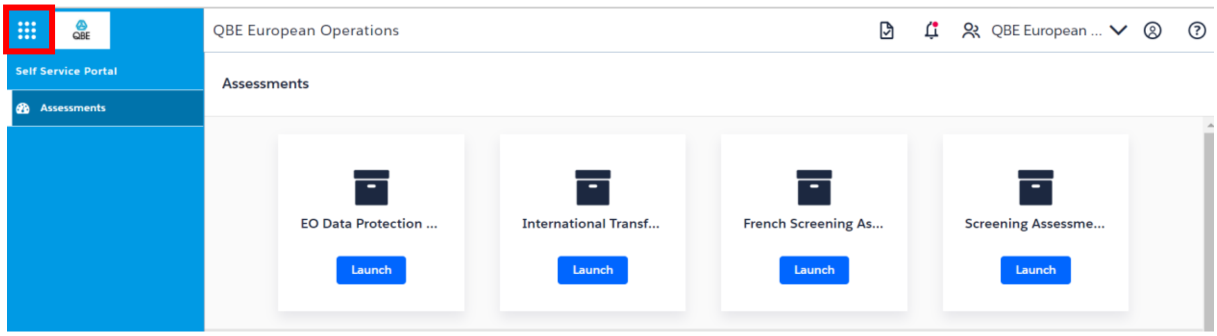


Enter your QBE email address and click '*Next*'

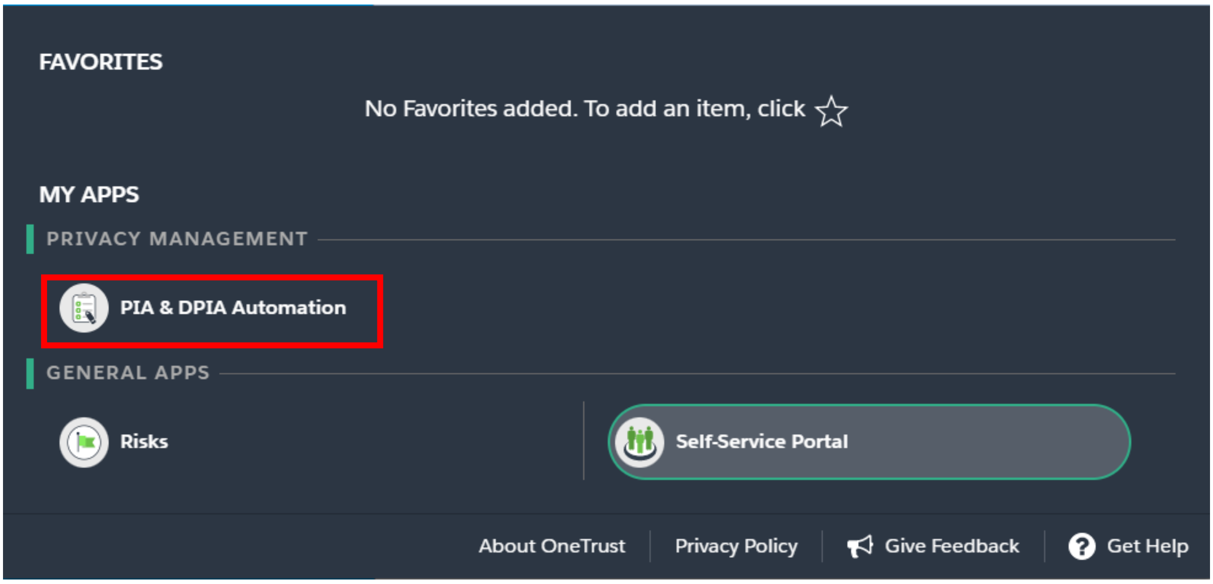
The first time you enter OneTrust you may be taken to the following screen by default:



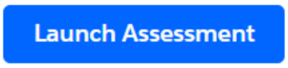
If you see this screen, please select the ‘9 dots’ in the top left-hand corner of the screen as shown below:



Select PIA & DPIA Automation



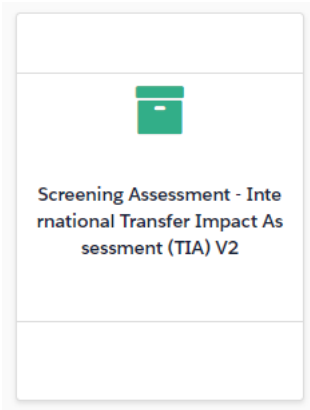
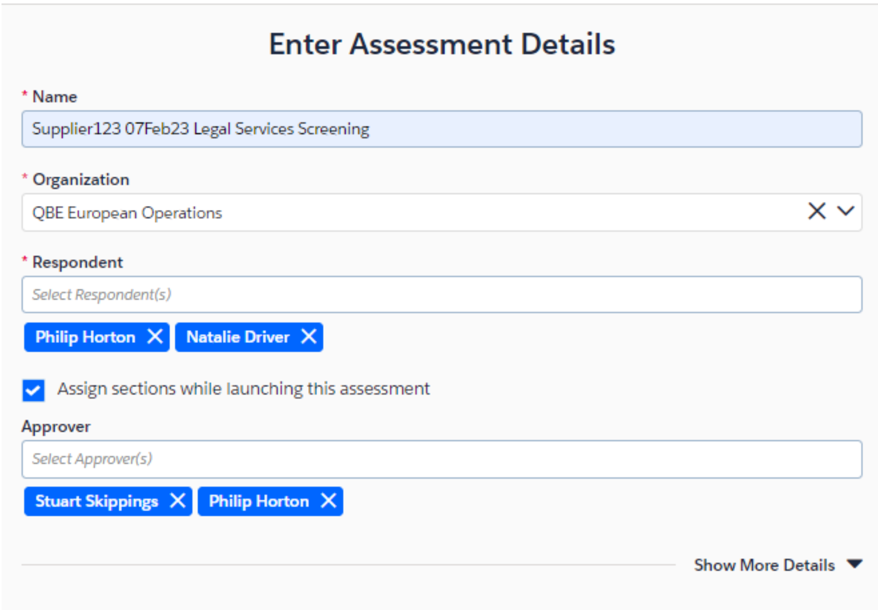
Select Launch Assessment at the top right.



You should only need to follow this route to launch an assessment on the first time using the tool

If you are completing the Screening Assessment, click here.

If you are completing the Transfer Impact Assessment, click here.

	Screening Assessment
1.	**Select the Screening Assessment – International Transfer Impact Assessment (TIA) V2**
	Select the relevant Screening Assessment template: 
2.	**Enter Assessment Details** 

Complete the following:

- **Assessment name:** The following naming convention has been agreed and must be followed:
    - Name of supplier e.g. *Supplier123*
    - Date e.g. 07*Feb23*
    - Service supplier provides e.g. *Legal Services*
    - Reference e.g. *Screening*
    - Unique identifier (Indirect Procurement team only)

Example of how the naming format should be written:

Supplier123 07Feb23 Legal Services Screening

- **Respondent:** Pick your own name (select the '*Assign to Me*' option), if you need to add any additional respondents click the field and select them from the list.

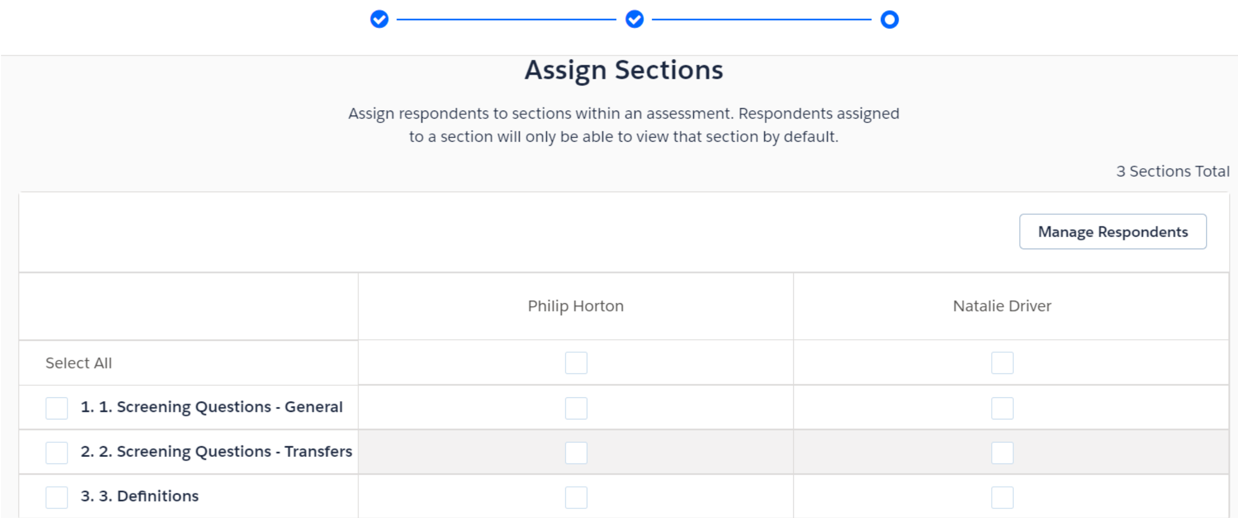
You can start typing a person's email address in the field and it will find the user you are looking for to save time scrolling through the list. If you are adding an external supplier, you will need to type the email address.

You should add relevant stakeholders from the Business, Procurement and any Third-party Supplier as needed**.** You may assign sections to internal stakeholders and external suppliers as needed.

- **Approver:** Always select Stuart.Skippings@uk.qbe.com as an approver in the dropdown list. To receive notifications include yourself as an approver too.

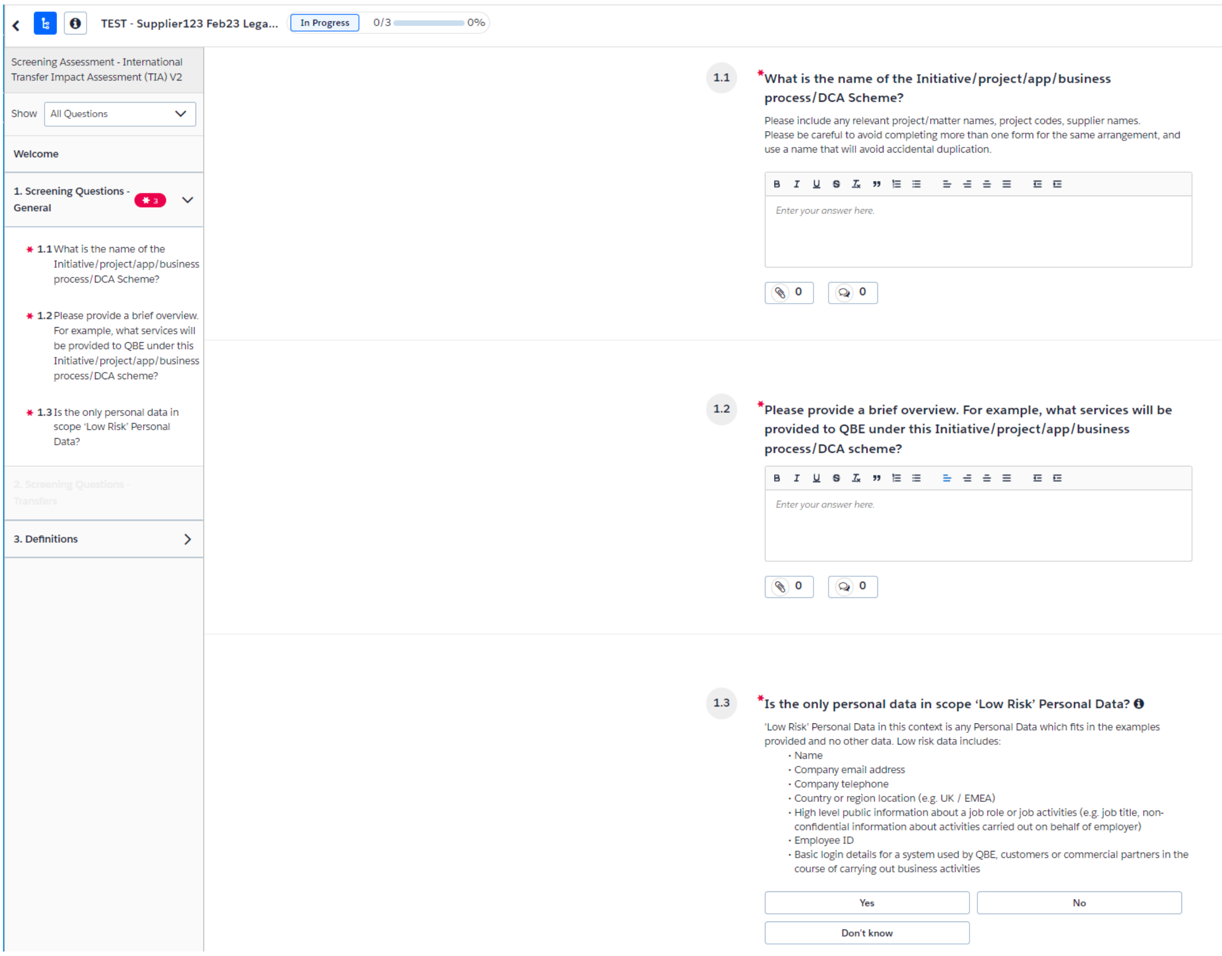
Click '*Next*' once you have completed the mandatory fields.

If you have selected to assign sections to different respondents select which section to assign. Each section needs to be assigned to at least 1 respondent. The definitions section should be sent to all respondents.



3. Complete the Screening Assessment (Procurement, Business or QBE Supplier)

Answer all relevant questions. The '*Submit*' button will not be available until you have completed the mandatory questions. Mandatory questions are marked with a red asterisk.



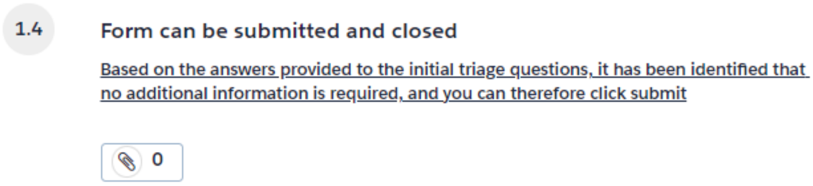
Use the 'Definitions' tab on the left-hand side of the screen to access further information to support your answers.

If you click 'Yes' to Q1.3 then go to [Step 4]

If you click 'No' to Q1.3 then go to [Step 5]

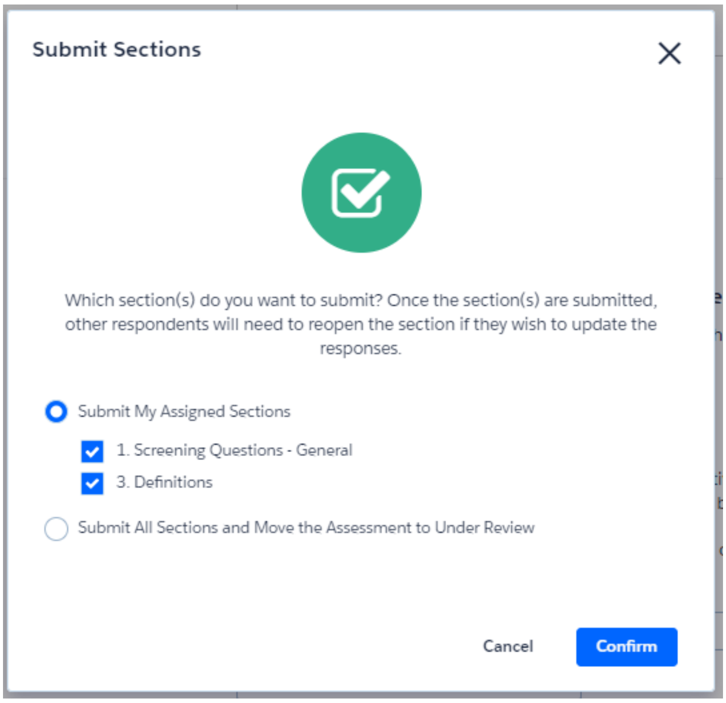
4. Q1.3 Is the only personal data in scope ‘low risk’ personal data? Yes…

If you answer ‘*Yes*’ to question 1.3, then you may proceed with your new business or renewal process without awaiting a response from the Data Protection Team(DP Team) as the system will confirm an auto approval.



Once you have answered all the mandatory questions, click ‘*Submit*’.

If you have assigned sections to other respondents, you will see this message:



Always select ‘Submit My Assigned Sections’

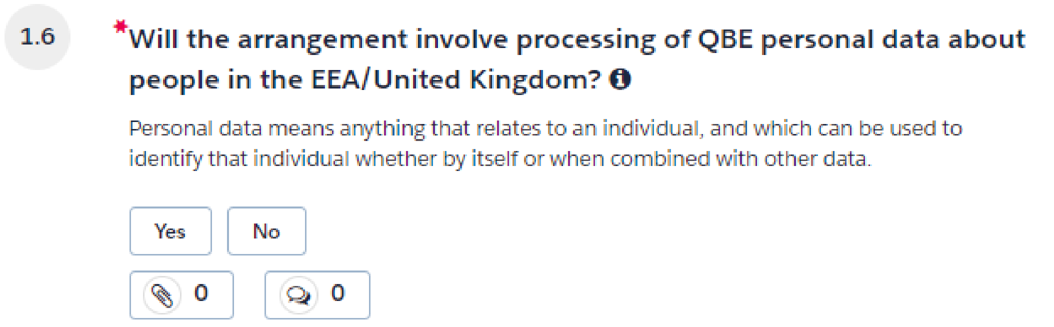
When each section is completed, it will have a tick next to it as shown above.

Click ‘Confirm’ to submit sections.

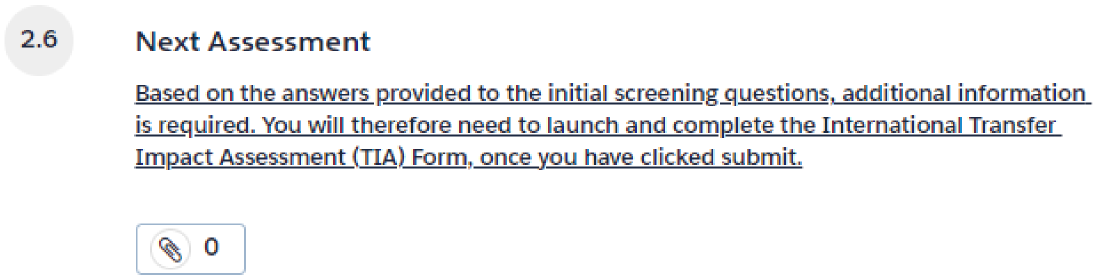
In this scenario you will get an auto complete outcome.

5. **Q1.3 Is the only personal data in scope ‘low risk’ personal data? No…**

If you answer ‘*No*’ to question 1.3 you will then see question 1.6 you need to complete the additional questions.



Depending on whether you click ‘Yes or No’ determines whether further questions are required. If you see the below message once you have completed all questions, you will need to launch and complete the International Transfer Impact Assessment (TIA).



Click ‘*Submit*’ once you have completed all mandatory questions, and if relevant, complete the International Transfer Impact Assessment (TIA).

6. **Review Screening Assessment (DP Team)**

Once you click the ‘*Submit*’ button the assessment will be automatically approved.

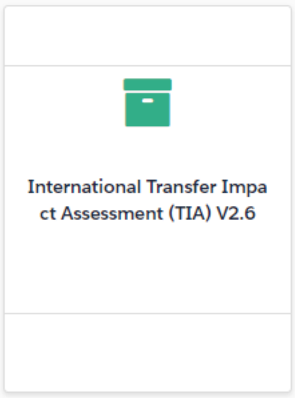
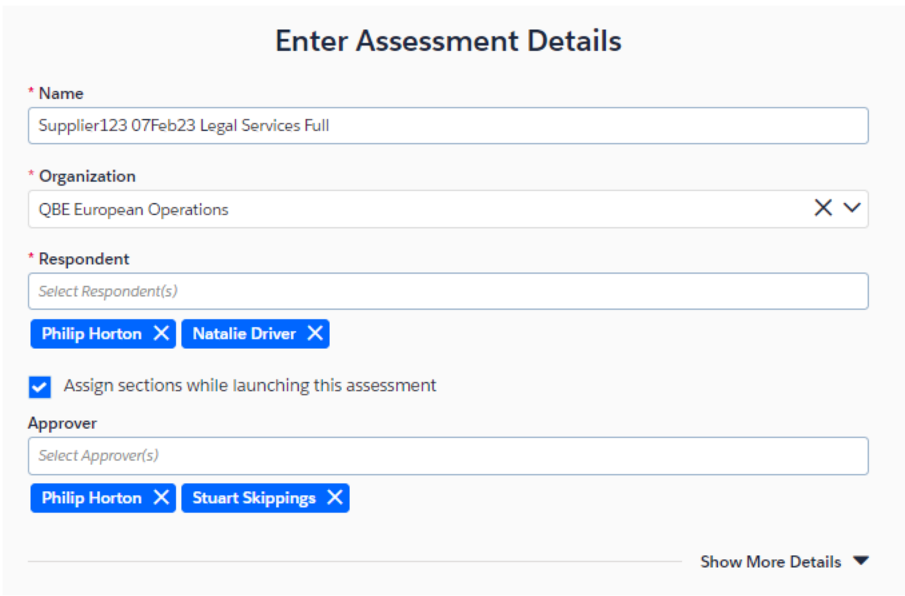
A notification is sent to the approver (within the DP Team) when an assessment has been submitted. The DP Team will then be able to carry out checks to see if the questions have been answered correctly based on information provided.

7. **Screening Assessment Outcome (DP Team)**

If it has not been automatically approved the Data Protection Team (DP Team) will review the completed assessment and select a result from this drop down menu:

- Approved
- Additional assessment to be completed

	Once the review is complete, you will receive an email notification with the outcome (as long as you have added yourself as an 'responder'), which will include any comments made by the DP Team about the assessment in question.
8.	**Notifications**
	Automated reminders will be sent weekly from OneTrust to anyone who has been assigned as a 'responder', note the 'creator' of the assessment will not receive these reminders if they are not also listed as an 'approver.'

	International Transfer Impact Assessment (TIA) V2.6
1.	[Access the OneTrust tool](). Select the relevant TIA form: 
2.	**Assessment Details** 

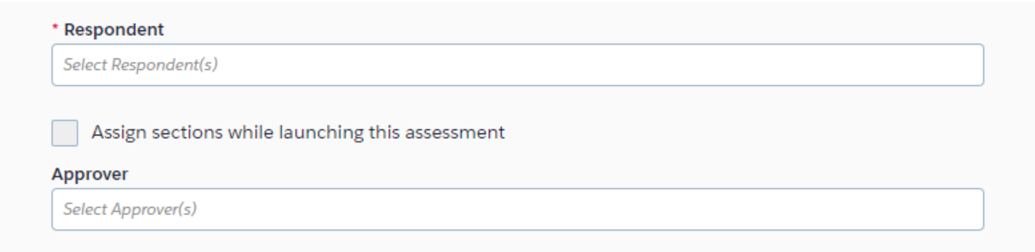
- **Assessment name:** The following naming convention has been agreed and must be followed:
    - Name of supplier e.g. *Supplier123*
    - Date e.g. 07*Feb23*
    - Service supplier provides e.g. *Legal Services*
    - Reference e.g. *Full*
    - Unique identifier (Indirect Procurement team only)

This **MUST** be the same name used for the Screening Assessment so that both questionnaires can be linked.

- **Respondent:** Identify all the respondents that need to take part or complete any section in the International Transfer Impact Assessment. Click the field and select them from the list or start typing their name and select them when they appear. If the responder is external such as a supplier, you would need to manually type in their email address.

You should add relevant stakeholders from the Business, Procurement and any Third-party Supplier as needed**.** You may assign sections to internal stakeholders and external suppliers as needed.

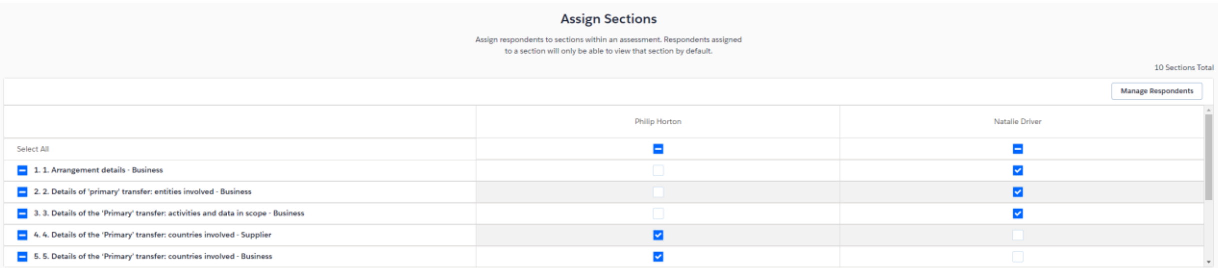
Select '*Assign sections while launching this assessment*'



- **Approver:** Always select Stuart.Skippings@uk.qbe.com as an approver in the dropdown list. To receive notifications include yourself as an approver.

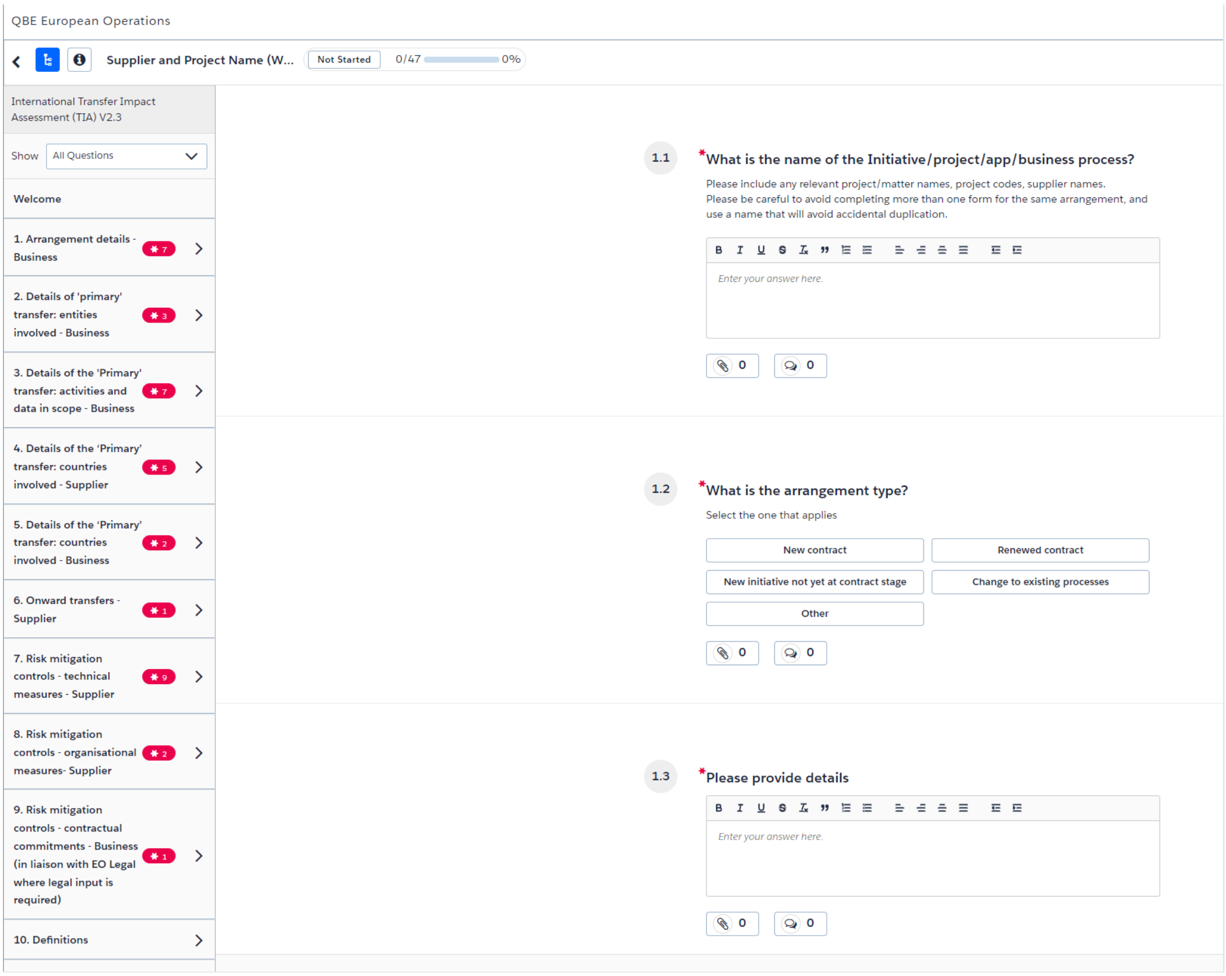
Click '*Next*' once you have completed the mandatory fields.

If you have selected to assign sections to different respondents, each section needs to be assigned to at least 1 respondent select which section to assign. The definitions should be assigned to all respondents.



4. Complete all questions in the TIA Assessment (Procurement, Business, Supplier)

Stakeholders will be able to see the sections of the form relevant to them. Questions can be answered all at once or in several sessions as information entered will be saved and can be submitted later.



All mandatory questions (marked with a red asterisk) must be answered before the ‘Submit’ button is available.

Use the ‘Definitions’ tab on the left-hand side of the screen to access further information to support your answers.

Click ‘*Submit*’ once the assessment questions are complete.

6.	**Review TIA Assessment (Data Protection Office Team)**
	Once you click the '*Submit*' button a notification is sent to the approver (within the DP Team) stating that an assessment has been submitted for review. Any queries from the DP Team regarding the answers in the TIA are sent to the respondent(s) of the particular question that the query relates to from within the OneTrust Tool. If you have not had a response from the DP Team after 10 working days then escalate to Mark Kingsbury. If the DP Team have not received a response from a respondent within 5 working days, then the DP Team will escalate to the creator of the assessment.
7.	**TIA Assessment Outcome (DP Team)**
	The approver (DP Team) opens the assessment to review the answers given. If the answers are clear and no further information is required for the specified arrangement with the supplier one of the following options, will be given: • **Approved:** On the basis that the information provided is in order and no further action is needed. Go to Step 8 - Approved. • **Approved with conditions:** The DP Team will outline conditions that need to be met by either the supplier or the business (i.e., end to end encryption). Go to Step 9 - Approved with conditions. • **High Risk Escalation:** Based on the information provided, or as a result of conditions stipulated not being met by one or both parties, the arrangement cannot proceed and requires to be considered for high-risk escalation. Go to Step 10 – High Risk Escalation.
8.	**Approved**
	Procurement can proceed with the supplier contract.
9.	**Approved with conditions**
	Procurement and/or the Business need to ensure that any conditions stipulated are met by the Supplier. Once they are met evidence needs to be sent to the DP Team at dpo@uk.qbe.com for evaluation. If met, then approval will be given, and the evidence will be uploaded to the TIA Assessment by the DP Team It is the team's responsibility who launched the assessment to inform all relevant stakeholders of the outcome of the assessment
10.	**High Risk Escalation**
	If the outcome of the assessment is 'High Risk Escalation', a decision is to be made from Procurement and the Business as to whether to terminate the relationship with the supplier or escalate and seek risk acceptance. To seek risk acceptance please follow the Schrems High Risk Escalation process.

11.	**Notifications**
	Automated reminders will be sent weekly from OneTrust to anyone who has been assigned as a ‘responder’, note the ‘creator’ of the assessment will not receive these reminders if they are not also listed as an ‘approver.’