

COMPLIANCE WORKING RECORD

ROPA validation report

example-harbour-services-ropa.csv · United Kingdom · controller record · generated 6 August 2026 · fictional sample

Document control

Field	Value
Document type	ROPA validation report
Document reference	example-harbour-services-ropa.csv
Jurisdiction	United Kingdom
Version	1.0
Status	Working validation record
Classification	Fictional sample - not for operational use
Prepared on	6 August 2026
Rule pack	2026.07.31
Sources reviewed	31 July 2026
Generated	6 August 2026

Run record

Item	Result
Input SHA-256	f69c8297ba09acfbедba0f342d73b8b681acb8bacb72cc9e4f566dac202a34d7
Worksheet	Sheet1
Heading row	1
Data rows	2
Role	controller

Article 30(5) context

A recorded trigger makes the derogation unavailable

Even below 250 employees, the derogation does not apply where any current Article 30(5) trigger is present.

Validation summary

Status	Count
Found	16
Missing	1
Uncertain	1
Conflicting	1
Possible duplicate	2
Inconsistent	1

Findings

Status	Row	Field	Detail
Conflicting	2	International transfers	The transfer field says no transfer, but a destination or safeguard is also recorded.
Inconsistent	Data set	Retention or erasure period	Rows 2, 3 share an Activity ID but contain different values for this field.
Missing	3	Transfer destinations	A transfer is recorded, but no destination is present.
Uncertain	3	Transfer safeguards	A transfer is recorded. Confirm whether a safeguard or Article 49 documentation must be stated.
Possible duplicate	2	Record	This row has the same deterministic record key as row 3. Review before merging.
Possible duplicate	3	Record	This row has the same deterministic record key as row 2. Review before merging.

Header mapping

Field	Classification	Source column
Activity ID	supporting	A: Activity ID
Processing activity	supporting	B: Processing activity
Organisation name	core	C: Organisation name
Organisation contact details	core	D: Organisation contact
Joint controller details	conditional	Not mapped
Representative details	conditional	Not mapped
DPO contact details	conditional	Not mapped
Purposes of processing	core	E: Purposes of processing
Categories of people	core	F: Categories of people
Categories of personal data	core	G: Personal data categories
Categories of recipients	core	H: Recipient categories
International transfers	core	I: International transfers
Transfer destinations	conditional	J: Transfer destinations
Transfer safeguards	conditional	K: Transfer safeguards
Retention or erasure period	core	L: Retention period
Security measures	core	M: Security measures
Lawful basis	supporting	Not mapped
Special-category or criminal data	supporting	N: Special category data
Special-category condition	supporting	Not mapped
Source of personal data	supporting	Not mapped
Record owner	supporting	Not mapped
Last reviewed	supporting	O: Last reviewed

Assumptions

- Role selected by user: controller.
- 42 employees recorded.
- Risk trigger: no.
- Non-occasional processing trigger: yes.
- Special-category or criminal-data trigger: no.
- Heading row selected by user: 1.

Limitations

- Only the first worksheet is read. Formulas, comments, styles, macros and hidden-sheet logic are not interpreted.
- The corrected workbook preserves a displayed-value source snapshot and records the input SHA-256; it never overwrites the uploaded file.
- A present value is not a finding that the content is accurate, sufficient, lawful or up to date.
- Conditional duties, exemptions and transfer safeguards require human review.
- The current Article 30(5) sub-250 framework is used. Proposed changes are not treated as law.

Official sources

Source	Provision	Date	Link
UK legislation: UK GDPR Article 30: Records of processing activities	Article 30	31 July 2026	https://www.legislation.gov.uk/eur/2016/679/article/30
Information Commissioner's Office: What do we need to document under Article 30 of the UK GDPR?	Documentation guidance	31 July 2026	https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/documentation/what-do-we-need-to-document-under-article-30-of-the-gdpr/