



DCU Data Protection Guidance: Google Forms

1. General Data Protection Guidance

1.1 Do not use Google Forms if an alternative is available

1.2 Normal Data Protection rules apply

2. Google Forms Guidance

2.1 Limit and control access

2.2 Review and Test your Google Form

2.3 Publish or Circulate your Google Form

Appendix 1: Data Protection Unit – Contact details

Appendix 2: Further reading

Important note:

This guidance is not definitive, and does not constitute legal or technical advice.
Use this document as a guide, only, to understand your options while using Google Forms.



1. General Data Protection Guidance

1.1 Do not use Google Forms if an alternative is available

Where alternative forms and survey software platforms are in place, in accordance with a licence or agreement with DCU or a DCU School/Unit, then these should be used instead of Google Forms.

Such software platforms include Drupal and Qualtrics.

It remains the recommendation of the DCU Data Protection Unit to avoid using Google Forms, unless its use is absolutely unavoidable and necessary.

If the use of Google Forms is absolutely unavoidable and necessary, then only the version of Google Forms, accessed through your DCU Google Account, may be used (i.e. using [DCU's Google Apps for Education](#), or "G Suite").

1.2 Normal Data Protection rules apply

Data Protection and data security

Each Google Forms user has a responsibility to ensure they understand and comply with basic Data Protection and data security requirements.

The majority of Data protection Breaches occur due to human error, rather than as a result of a technological fault. Therefore, users should be familiar with data protection rules and the functionalities of Google Forms before use, and be mindful of these requirements while using Google Forms.

Familiarise yourself with your Data Protection obligations

The DCU Data Protection Unit (DPU) recommends that all DCU staff and researchers complete the DPU's online training module, before using Google Forms. This is a short introductory course, setting out key data protection principles, concepts and requirements under GDPR.

- This module can be accessed at the following link: [Introduction to GDPR](#)



Personal Data and GDPR obligations

- **Personal data** means “any information relating to an identified or identifiable person,” whether directly or indirectly. This includes written information and records, video images and still images, Student ID, user names and user nicknames.
- When using Google Forms, DCU is regarded as a ‘Data Controller’. **Accordingly, all DCU staff as employees of the Data Controller, must abide by data protection rules and obligations under GDPR when using Google Forms.**
- Google Forms is a ‘Data Processor’ where a user, such as DCU, uses its services. Google Forms provides a service to and for DCU, and must itself comply with GDPR.

Familiarise yourself with Google Forms

All DCU staff and researchers are strongly encouraged to familiarise themselves with the features, configurations and settings within Google Forms.

- **Please consult the ‘Further Reading’ listed in the Appendix of this document**

Specific queries

For specific queries concerning data protection, please contact the Data Protection Unit (DPU).

- [Data Protection Unit](#)

For specific queries concerning Google Forms or technical issues, please contact Information Systems Services (ISS).

- [Information Systems Services](#)



2. Google Forms Guidance

Google Forms is designed for simple surveys, such as customer satisfaction feedback. **It is not advisable to use Google Forms for more complex or in-depth research projects or surveys, or for projects or surveys involving sensitive or Special Categories of Personal Data.**

When using Google Forms for any purpose, the following aspects are important to ensure are in place and understood by all users, to help reduce the risk of a data breach:

- **Limit and Control Access**
- **Review and Test your Google Form before it goes live**
- **Publish or Circulate your Google Form to Survey Participants**

The Data Protection Unit recommends that, before a Google Form is prepared, tested and eventually published, **you ensure that you know and understand that you are working with personal data, and ensure that you design your Google Form with data protection and security in mind.**

2.1 Limit and Control Access

It is important that users understand how to share links to the form, what the links are for, and who should have access to which kind of link.

In essence there are two circumstances where you may need to share your Google Form, using a link.

- A. Where the Form needs to be shared with a colleague or team member who is amending, editing or otherwise working on the Form with you; **or**
- B. Where the Form needs to be published or circulated among survey participants/respondents.

These are two very different scenarios, and should not be confused: any error or lack of understanding about these respective cohorts, and which Google Form link which should be shared with which groups, could result in a data breach.



Where the Google Form needs to be shared with a colleague for editing

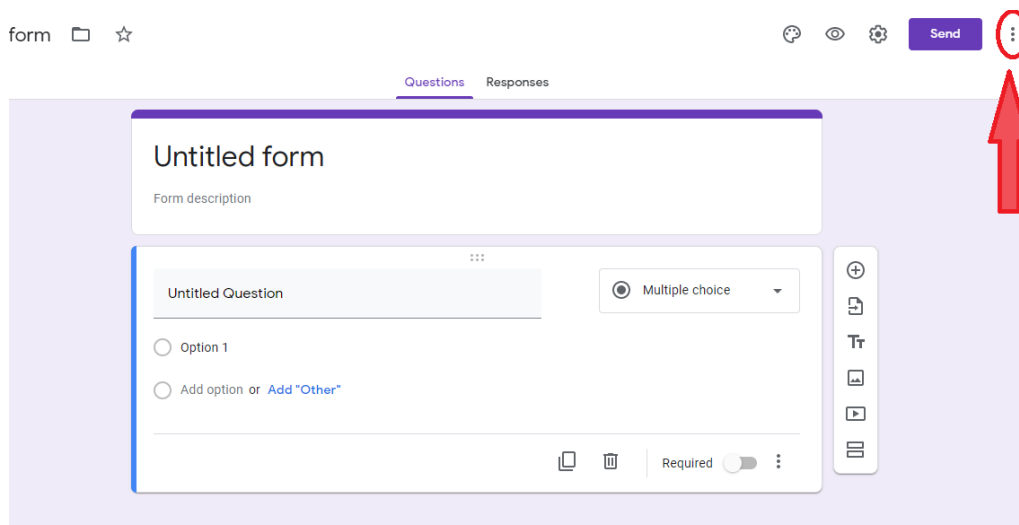
To share the form with colleagues for editing purposes, you can configure the Google Form's settings and permissions to allow 'collaborators' to edit the Form. Once the settings have been configured, a link to the Google Form is generated and can be shared with collaborators.

This link is a specific link which allows editing and other permissions on the Google Form. It must not be shared publicly, and must not be shared with survey participants/respondents, etc.

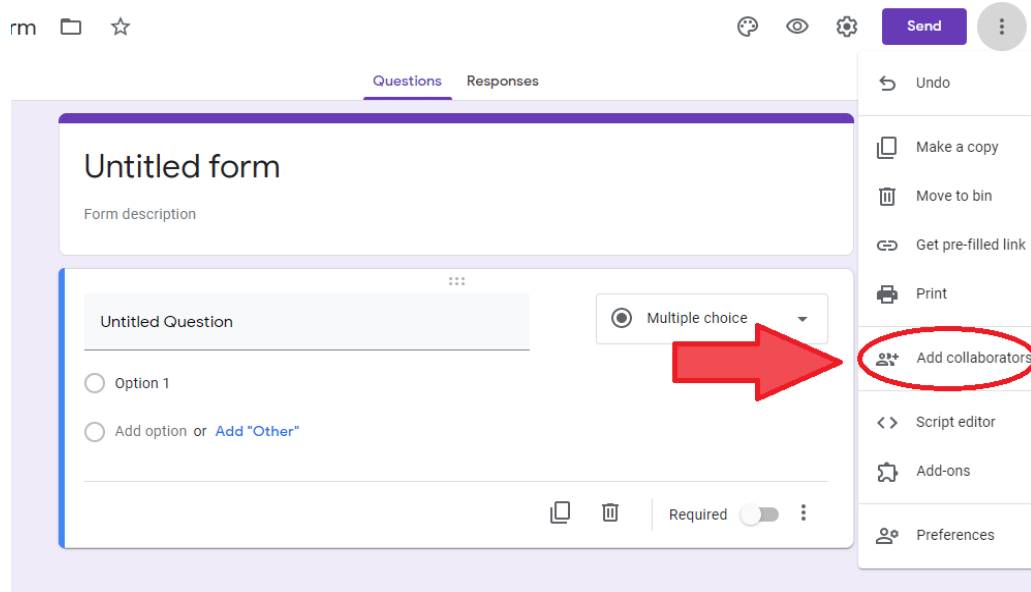
This link, which allows editors and team members to work on a Google Form while editing (see Section 2.3, below), must not be confused with the direct link to the finished Google Form.

To generate this link to allow editing, follow the steps below:

Step 1: Click on the icon in the top right-hand side of the screen with three vertical dots:



Step 2: In the drop-down menu that appears, click on the 'Add collaborators' option:

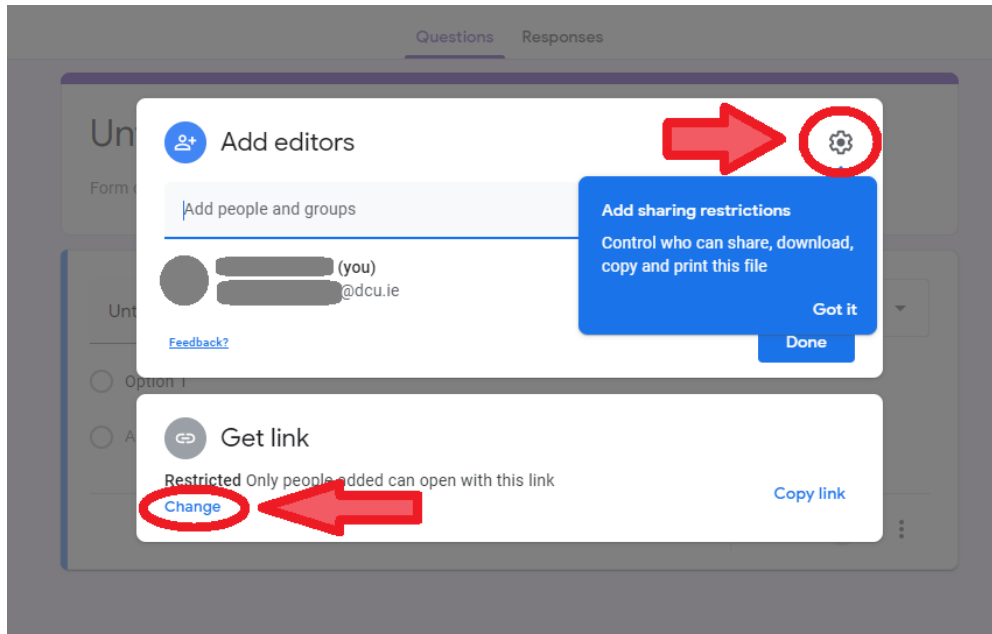


Step 3: The pop-up box which appears (see image below) allows you to configure your settings and permissions for who may be a collaborator on the form, and what collaborators can or cannot do.

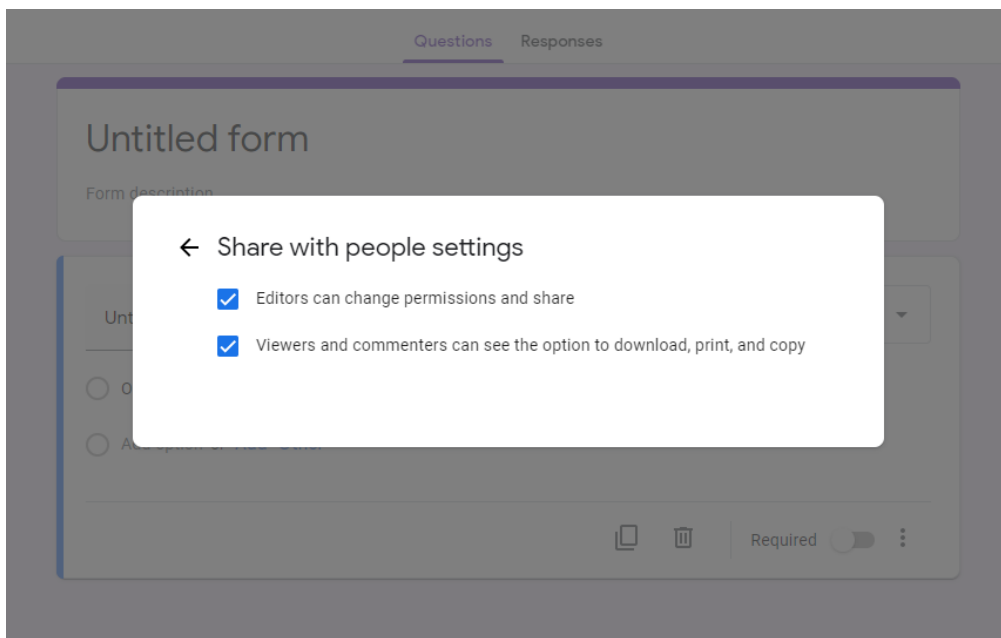
You can access the settings configurations using the **settings cog icon** in the top right-hand corner of the pop-up box, and using the **'Change'** feature in the bottom left-hand corner of the box (under the heading 'Get link').

Each of these – the settings cog icon and the 'Change' feature – allow you to configure different settings in different ways. **Therefore, it is important that you familiarise yourself with each of these and how they work.**

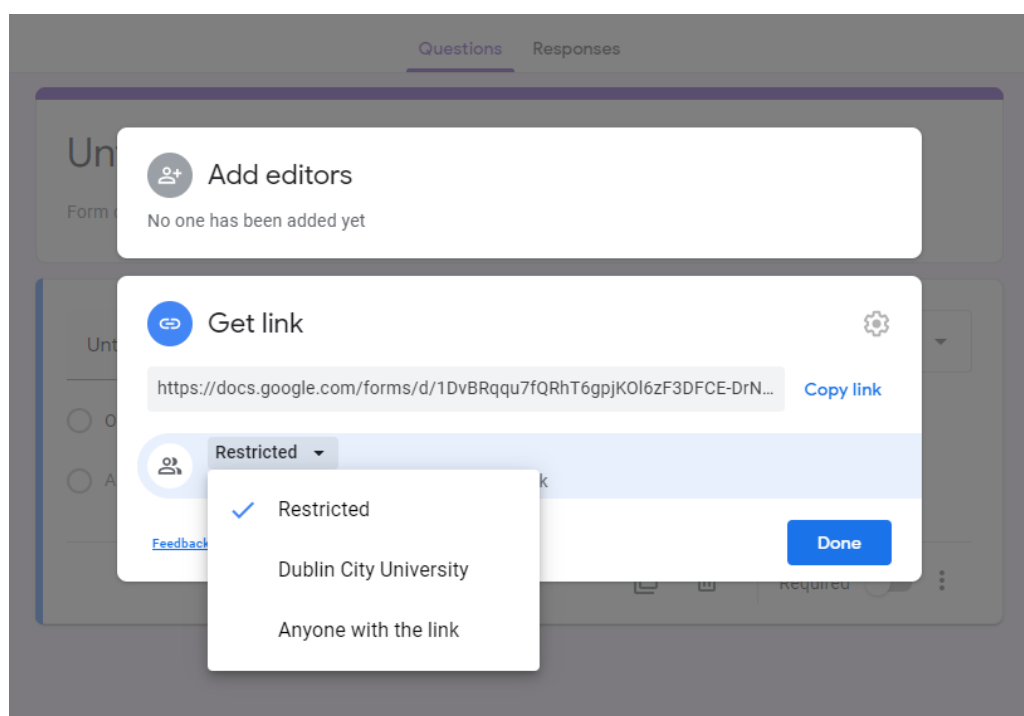
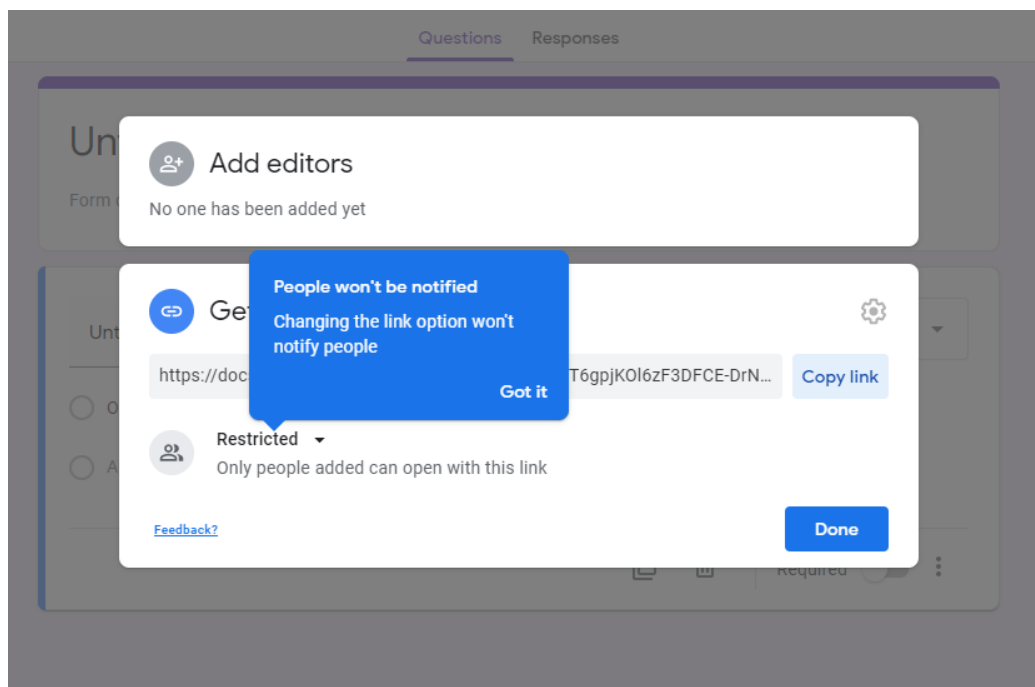
Errors in configuring settings may result in data incidents or breaches.



Settings cog icon: Clicking this will display the following options. By default, these options are automatically selected (ticked boxes). Therefore, you must ensure that you understand the implications of these settings, and correctly select or de-select these options.



'Change' feature: This allows for further configurations and changes to permissions and access. Again, you must ensure that you are familiar with these settings and features **before** using Google Forms in your work.



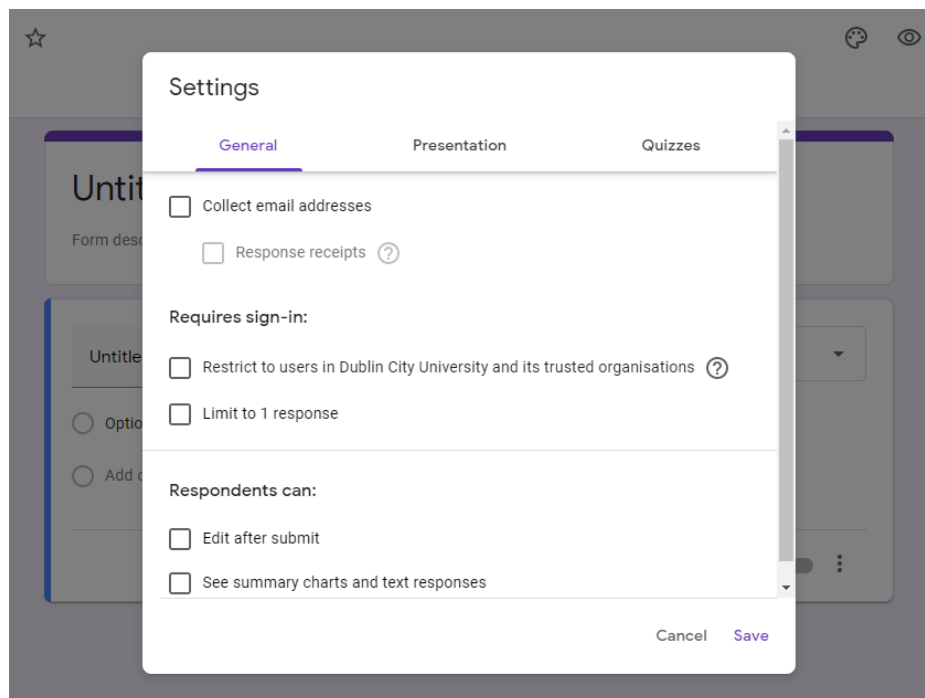
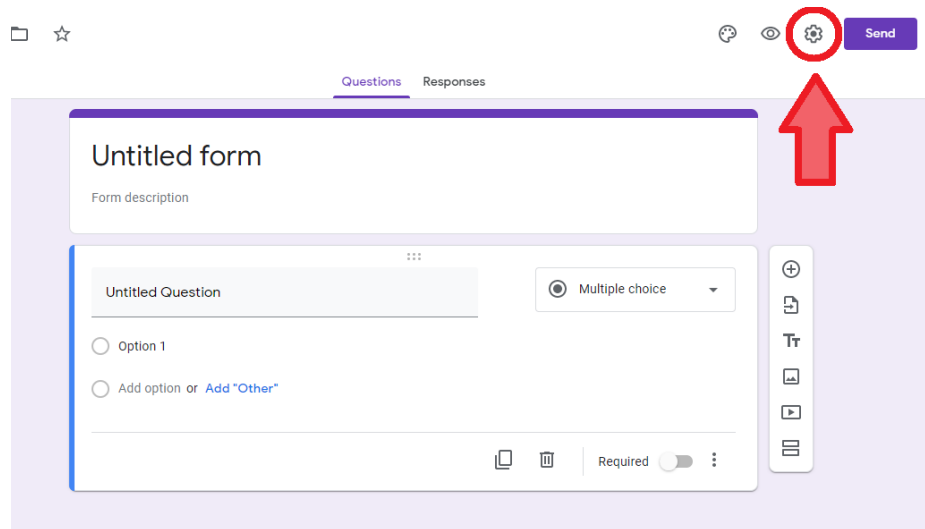


2.2 Configure, Review and Test your Google Form

A. Configure

There are separate settings which must be configured before finalising and publishing/circulating your Google Form to survey participants.

These can be accessed via the settings cog icon in the top right-hand corner of the screen. Once again, you must ensure that you are familiar with these settings and features when using Google Forms.

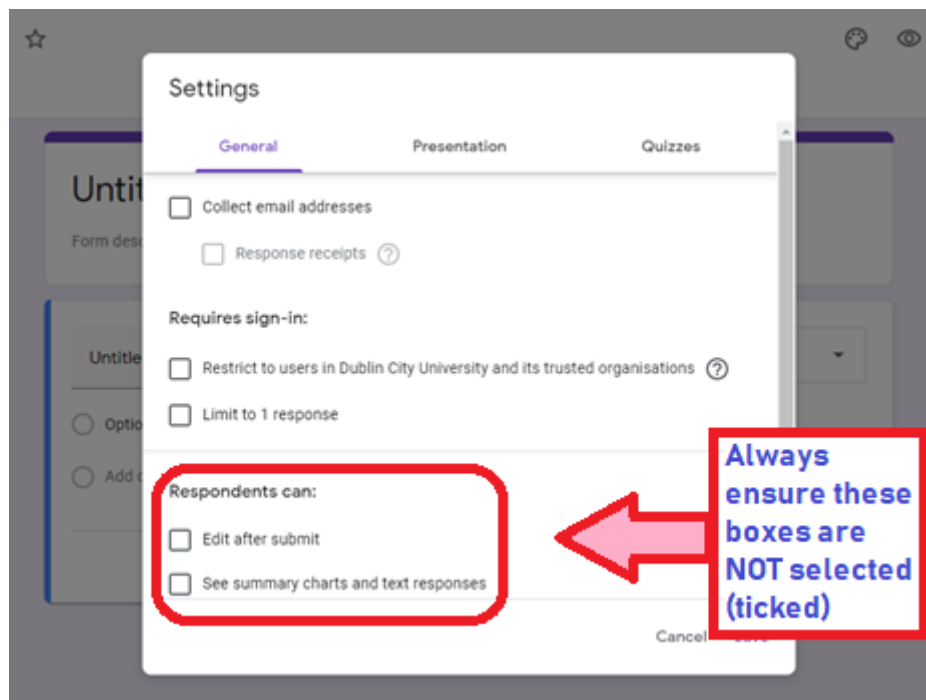




B. Review and Test

Before your Google Form 'goes live' and is published or circulated to respondents, you should comprehensively review and test the Form. Some of the considerations you should take into account when reviewing and testing your Google Form include:

- Reviewing your Google Form settings, permissions and features.
- **Ensuring none of the settings allow respondents to view answers.** This is extremely important, and cannot be emphasised enough:



- Designating another member of your team to carry out a second check of the Google Form and its settings, permissions and features.
- Testing the finalised Google Form before it 'goes live' from within your team (from DCU accounts) **and** from outside your team (from external sources and devices, including 'incognito' browser windows).

2.3 Publish or Circulate your Google Form to Survey Participants



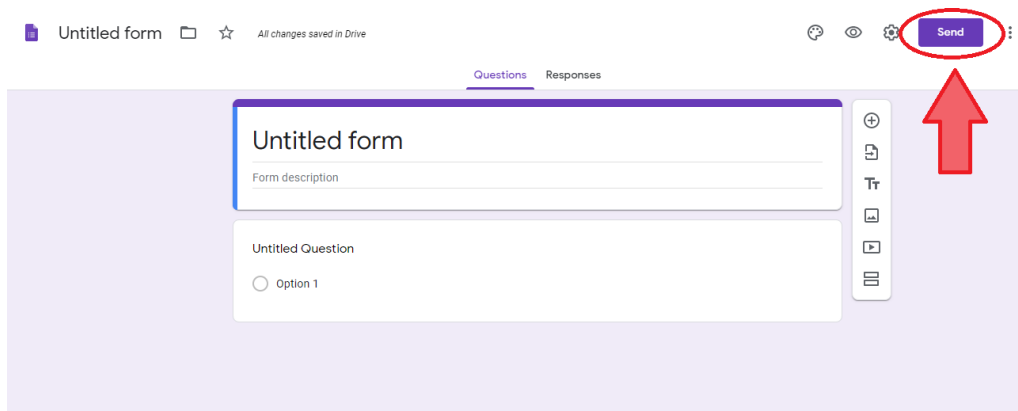
In order to publish or circulate your completed Google Form, you must use the 'Send' button on the edit page of your Google Form. Clicking this will provide you with options, including obtaining the direct link for the finished Google Form.

This direct link to the finished Google Form should not be confused with the link which allows editors and team members to work on a Google Form while editing (see Section 2.1, above).

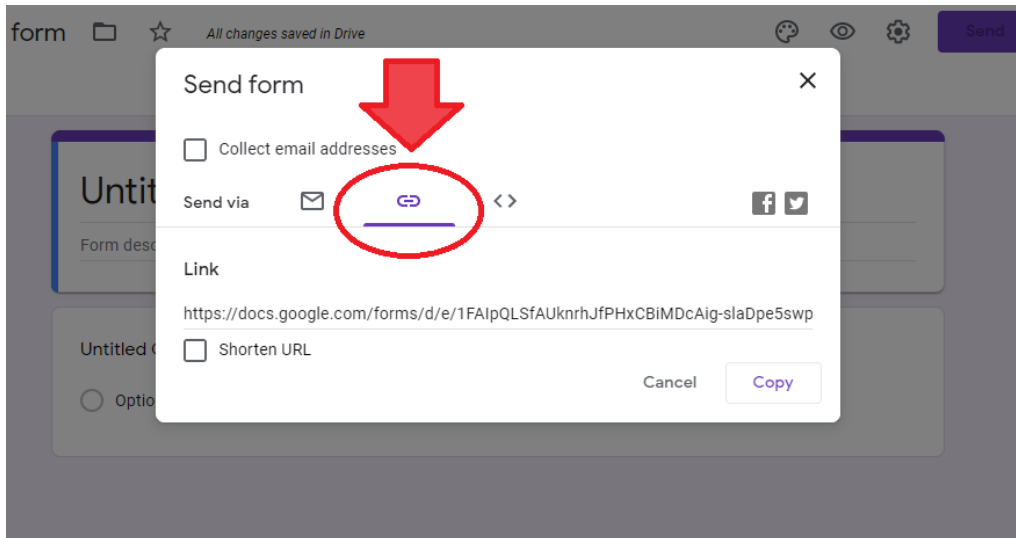
To publish a Google Form on a web page or circulated by email, you can get a link to the form by following these steps:

Step 1: Open a form in [Google Forms](#).

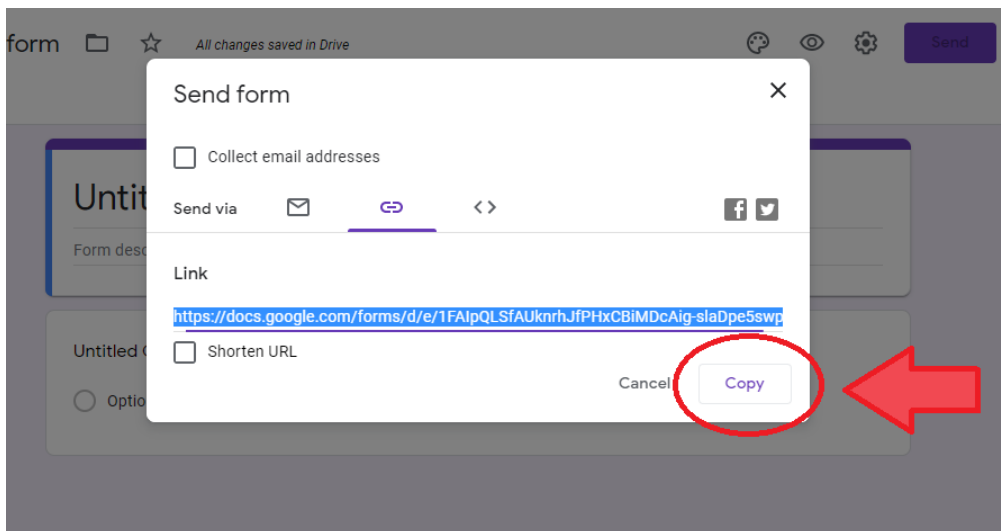
Step 2: In the top right-hand side of the screen, click the 'Send' button:



Step 3: At the top of the window that appears, click the **Link** icon:



Step 4: Copy the link that appears: click **Copy** (or using your keyboard, press *Ctrl + C* (in Windows), or press *⌘ + C* (on a Mac)):





Appendix 1:

Data Protection Unit – Contact details

DCU's Data Protection Unit (DPU) is part of the [Office of the Chief Operations Officer](#).

DPU web pages

www.dcu.ie/ocoo/data-protection.shtml

Email address

data.protection@dcu.ie

Staff

Martin Ward, DCU Data Protection Officer & Deputy Chief Operations Officer. Tel.: 01-700 7476.

Joan O'Connell, Data Protection / FOI Coordinator Tel.: 01-700 6466.

Noel Prior, Risk & Compliance Officer Tel.: 01-700 8706.

- Please note: Due to Covid-19 restrictions, the DPU telephone lines may not be attended.

Postal Address

Data Protection Unit
Room A145, Albert College Extension
Dublin City University
Glasnevin Campus
Dublin 9
D09 V209

- Please note: Due to Covid-19 restrictions, the DPU postal address may not be attended.



Appendix 2: Further reading

Google. How to use Google Forms.

<https://support.google.com/docs/answer/6281888>

Google. Sending Google Forms.

<https://support.google.com/docs/answer/2839588>

Google. G Suite Data Protection Implementation Guide - Google Services.

https://services.google.com/fh/files/misc/gsuitedataprotectionimplementationguide_092018.pdf

Google Support. 'Respondents can edit my Google Form.' (14 June 2019)

<https://support.google.com/docs/thread/8003034>

G Suite Learning Center. What can you do with Forms?

<https://support.google.com/a/users/answer/9302965#!/>

G Suite Admin Help. Prevent data loss using new DLP for Drive.

<https://support.google.com/a/answer/9646351>

How to Geek: The beginner's guide to Google Forms.

<https://www.howtogeek.com/434570/the-beginners-guide-to-google-forms/>

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