



# Records of Processing Activities (ROPA)

Information Governance & Data Protection

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<b>Document Owner:</b>	Data Protection Officer

## Document History and Reviews

Version	Date	Revision Author	Summary of Changes
1.0	May 2018	R. Platt	New document
1.1	June 2020	Brenda Waterman	Updated in line with current processing - Covid
1.2	March 2022	Brenda Waterman	Updated to include special circumstances to cover Covid, historical records, and unforeseen circumstances.

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## 1 Details of the Organisation

The University is a registered data controller with the Information Commissioners Office (ICO) registration number: Z5785872.

The University's Senior Information Risk Owner (SIRO), Andrew Connolly, details can be found [on our senior staff pages](#).

The University's data protection officer is Brenda Waterman.

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## 2 Purposes of Processing

The University delivers many services to fulfil its obligations as an Educator, Research Institution, Service provider, Employer, and Partners to facilitate the processes which include:

- Recruitment and admission process of Staff and Students
- Employment and support of staff
- Provides services to enhance and support education delivery, including extensive use of digital learning resources, on-line examinations and communications
- Research activity including partnerships
- Clinical Trials
- Maintain contracts
- To meet legislation relevant to our processing and functions for example
- Fulfils regulatory obligations
- To meet Health and Safety regulations to offer protection to everyone on site
- Provide Occupational health and wellbeing support to staff and students
- Host events and associated accommodation where applicable.
- Facilitate Student accommodation and support
- Supporting investigations and disciplinary proceedings against students and staff.
- Facilitates members of the public, students, and staff to use University of Exeter Sports Hall
- Promotes its own activity as a public authority, a charity, and a commercial entity.
- Protect the security of individuals and property through physical (CCTV), body worn devices, recordings of conversations for the prevention of crime
- Digital network monitoring to protect individuals and the University's data and network against malicious attacks.

All these activities require the collection and use of the personal data of individuals.

## 2 Who we work with as an employer, provider of education and research partnerships

The University works with and for individuals who fall into one or more of the following categories:

- Alumni
- Associates
- Business and Industry Partners
- Complainants and Enquirers
- Donors
- Employees and contracted personnel
- Employers of Apprenticeships
- Enquirers
- External third parties
- Exchange Students
- Former Employees including retirees
- Local authorities and police
- International Partners/agents
- Governmental institutions
- INTO
- School Students
- Prospective Employees
- Prospective Students
- Research Participants
- Withdrawn Students
- Visitors
- Volunteers
- Website users
- Users of University Services and events
- University Partners

## 3 Data we collect

The University collects many different categories of data, due to the nature of the requirements by the business and meeting regulatory and legal undertakings:

- Basic identifiers,
- Communication Details,
- Details of next of kin,
- Education details and student records,
- Employment details,
- Disciplinary and attendance details,
- Details of criminal convictions,
- Lifestyle and social circumstances
- Visual images, photographs, video and CCTV recordings
- Tech Identifiers such as IP addresses and device type
- Financial details
- Special category data where necessary including:
  - race and ethnic origin
  - criminal convictions
  - vetting checks
  - ethnic origin
  - politics
  - religion
  - trade union membership
  - genetic data
  - biometrics (where used for ID purposes or research)
  - health data
  - sexual orientation
  - artificial Intelligence (for educational pilot or research purposes)

The University always aims to minimise the use of personal data and only collects details which are necessary to carry out its legal duties or specific functions which you will be notified of at the point of data collection. You can see an [index of our privacy notices on our website](#).

### Research

Due to the nature of the research, a significant amount of personal data covered in the above will be collected as part of the research. Such data is collected in the public interest to undertake research in line with the University's ethics policies. More details about research ethics at the University of Exeter can be found [on our ethics web pages](#).

### Secure Data Research Hub

Some research data needs to be stored to a higher level of security, for example, NHS data, and commercially sensitive data.

The SDRH will hold both personal and special category data.

Data is collected and stored for the lawful reason of Public Interest.

Retention will be in line with the project requirements which are variable. See the Ethics document on each project.

## 4 Recipients and Transfers

The University works with several key partners across the globe to provide services and support to staff and students. The University will notify individuals of specifics at the appropriate time. The University endeavors to contain data within the UK or EU, there may be instances where the best solution is outside of these areas.

There are several common categories of data recipients which include:

- Partner Universities
- Support for study abroad
- Partner Employers
- Support for research visits
- Partners for research
- Corporate research partners
- Funding partners
- Agents assisting with applications
- Overseas governments to assist with visa applications and similar
- Regulatory/Governmental Agencies /Law enforcement

To continue to undertake innovative research or explore methodology to deliver exceptional applications for education the data may be held outside of these areas. Due diligence is undertaken by Information Governance, IT Security and where appropriate Legal Services to ensure all precautions are in place to protect your data.

The University provides lists of such services within the relevant privacy policies published [on our website](#) which go into details specific to the relevant service users. Where data is processed in a third country, the University will ensure specific legal agreements are in place (Standard Contractual Clauses). We will also always look to minimise the required data to share.

## 5 Retention

The University maintains a comprehensive retention schedule which is available [on our website](#). These schedules are informed by various legal and business requirements in line with relevant legislation and the University's [Information Retention Policy](#).

## 6 Technical and Organisational Security

The University takes the security and integrity of its data and systems incredibly seriously. Due to the nature of the threats posed in this area the University will not disclose details of the specific measures taken to protect our networks. This is to prevent such details from being used to triangulate attack vectors against University systems and Cyber Security.

In addition to network security, there are several other tools and techniques which are employed by University employees during the gathering of data. The data uses at the University are diverse and policies, procedures, technologies and guidance are available to staff and students depending on their needs.

## 7 Special Circumstances

*There are occasions due to unplanned or unforeseen circumstances that disrupt our normal processing, and we have to share staff and student information outside of our normal stated processing as above this may include special category data as appropriate. The change in processing will be to protect individuals, to allow the continuation of education and research, security of individuals and property, and contractual, regulatory, or legal requirements due to unforeseen or unplanned circumstances. During such times we may be required to collect new data and share with other agencies where appropriate. In these circumstances, the ROPA will be updated appropriately.*

*During these times the Lawful reason for processing will be within:*

***Legitimate process*** – to continue delivery of our services, to protect staff, students and property.

***Vital Interest*** – to protect individuals in extenuating circumstances.

***Public Interest*** – to fulfil a function that would meet the public interest requirements such as prevention of crime, pandemic, and continuation of the delivery of education and research.

***Legal requirement*** – to meet legal and regulatory requirements

*All Information collected during these times will be retained in line with our retention policy and may be anonymised for historical reference.*

*Due to the pandemic (2020 – to date), the University of Exeter has shared information relating to staff and students to meet government legislation, regulatory authorities and Public Health England to facilitate the management and assist staff and students affected.*

*Information may also be shared with our insurers dependent on circumstances.*

Data Protection Officer