

NUI Galway Data Protection Office



Guide to preparing and using the NUI Galway Record of Processing Activities (ROPA)



Data Protection - Why must we protect Personal Data?

- Legal requirement.
- Human right of individuals.
- Promotes good information handling practices.
- Protects you & University's reputation.
- Individuals OWN their own personal data and organisations must protect it.



Data Protection Legislation

The use and processing of personal data is regulated by both EU and Irish legislation:

- Data Protection Act 2018.
- Article 40.3 of the Constitution of Ireland 1937. Constitutional Right to Privacy.
- The General Data Protection Regulation in force from 25 May 2018.



Record of Processing Activities (ROPA)

- The University and each unit area are legally obliged to under Article 30 of the GDPR (See: <https://gdpr-info.eu/art-30-gdpr/>) to maintain a Record of Processing Activities (“ROPA”) of personal data under its control.
- The purpose of the ROPA is to assist members of staff, researchers and others in meeting their legal obligations when interacting with, or processing, personal data in any way for which NUI Galway is ultimately responsible.
- The University is subject to significant fines from the Office of the Data Protection Commissioner if a ROPA is not maintained.



Record of Processing Activities (ROPA)

- The benefits in recording what personal data a unit holds is that the more the University and each unit understands about the personal data held by a unit, the more effectively and efficiently we can protect and manage it.
- The insights contained in a unit Records of Processing Activities provide the necessary foundation for protecting the personal data of our students and staff(and others).
- It aligns with data protection requirements.
- It implements sound personal data management practices across the University.

Record of Processing Activities (ROPA)

- A ROPA identifies what personal data is held, whose personal data, why it is held, where it is held, who has access, who it may be transferred to and under what conditions, when, and how.
- The completion of the ROPA process also helps embed an understanding and a culture of awareness of the importance of how we treat personal data.



Record of Processing Activities (ROPA)

A Record of Processing Activities requires to be documented:

- The name and contact details of the personal data controller (normally for our purposes NUI Galway) the controller's representative (the named NUI Galway Unit) and the University Data Protection Officer.
- The purposes of the personal data processing (for example this could include teaching, research, HR administration, exams etc).
- A description of the categories of data subjects (for example this could include, students, staff, agency workers, research participants).



Record of Processing Activities (ROPA)

A Record of Processing Activities requires to be documented:

- The categories of personal data processed. This could include for example CVs, Garda vetting details, extenuating circumstances forms, annual leave forms etc.
- The categories of recipients to whom the personal data have been or will be disclosed. It is very important that we identify and document who we are disclosing personal data to as that is a key step in maintaining control and protection of personal data.
- Identification of where there are transfers of personal data to a country or an international organisation outside of the EC.



Record of Processing Activities (ROPA)

A Record of Processing Activities requires to be documented:

- Identification of where there are transfers of personal data to a country or an international organisation outside of the EC.
- Where there are transfers of personal data to a country or an international organisation outside of the EC, documentation of the safeguards used to protect the transfer. Please see:

<https://www.dataprotection.ie/en/organisations/international-transfers>



Record of Processing Activities (ROPA)

A Record of Processing Activities requires to be documented:

- The time limits for erasure of the different categories of data (these are in the process of being identified centrally).
- A general description of the technical and organisational security measures. These measures are largely set out in University IT Policies and Procedures which all members of the University should familiarise themselves with. Please note that there is online IT Security training available on:
<https://www.nuigalway.ie/itsecurity/training/>



Explanation of some key Data Protection Definitions

What is Personal Data?

- ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- The definition is – deliberately - a very broad one. In principle, it covers any information that relates to an identifiable, living individual.



Explanation of some key Data Protection Definitions

What is Sensitive Personal Data or Special Categories of Personal Data?

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data uniquely identifying a natural person
- data concerning health or data concerning a natural person's sex life or sexual orientation



Explanation of some key Data Protection Definitions

- **‘controller’** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **‘processor’** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;



Record of Processing Activities Template

- We would be obliged if you could please complete the NUI Galway Record of Processing Activities return available on:
- [Record of Processing Activities \(ROPA\) return](#)



Further Guidance

- <https://www.dataprotection.ie>
- <http://www.nuigalway.ie/data-protection/>
- <https://www.nuigalway.ie/data-protection/staffandstudentresources/recordsofprocessing/>
- <http://gdprandyou.ie/>
- <https://www.nuigalway.ie/itsecurity/>

