



University of East Anglia

Information Compliance (ITCS)

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01 June 2018

Dear

Freedom of Information Act 2000 – Information request (ref: FOI_18-106)

We have now considered your request of 03 May 2018 for the following information:

'Under Art. 30 GDPR 'Records of processing activities' (ROPA), your University, as a data controller, will be required to maintain a record of processing activities under your responsibility.

I would like to request a copy of the ROPA as currently held by you as part of your preparations for GDPR compliance, whether this is held as a draft or as 'Fait Accompli'.'

Our response is within the attached documents:

- FOI_18-106 Appendix A
- FOI_18-106 Appendix B

Please note, at the time of your request our ROPA was not yet complete. We have chosen to provide two documents because, as of the date of your request, the information intended for inclusion in our ROPA was in two separate formats; one, in Appendix A, based upon a template provided by the Information Commissioner's Office (ICO), and the second, in Appendix B, based on an internal template that had been developed prior to the publication of the ICO template. Given the differences between the templates we felt that it would be clearer if we provided the information within the respective templates.

On this occasion, it is not possible to provide all the requested information. The Act contains a number of exemptions that allow public authorities to withhold certain information from release. We have applied the following exemption to part of your request.

Exemption	Reason
s.40(2), Personal information	Disclosure of information would contravene one of the data protection principles

Exemption explanation

In line with s.40(2) of the Act we have removed certain personal data from the documents FOI_18-106 Appendix A and FOI_18-106 Appendix B.

We believe that information identifying certain individuals as a 'data owner' or 'data administrator' within the requested information are 'personal data', as defined by Article 4(1) of the general Data Protection Regulation (GDPR).

We believe that disclosure of this information relating to these individuals would be contrary to the requirements of Article 5(1)(a) of the GDPR; namely that information must be processed lawfully, fairly and in a transparent manner in relation to the data subject. These individuals would have no expectation that this information would be made publicly available, and we have not identified a lawful basis that would allow or require us to disclose this information.

Where information has been removed from the accompanying file in accordance with s.40(2), we have indicated this clearly.

We hope this information will meet your requirements, however if you are not satisfied you have the right of appeal. If you wish to appeal, please set out in writing your reasons for appealing and send to the above address. You must appeal within 60 calendar days of the date of this letter. Any appeal received after that date will not be considered nor acknowledged. This policy has been reviewed and approved by the Information Commissioner's Office.

You also have a subsequent right of appeal to the Information Commissioner's Office. Further information is available on their website:

https://ico.org.uk/Global/contact_us, or by telephone on 0303 123 1113.

Please note that any material over which UEA has copyright is released on the understanding that you will comply with all relevant copyright rules regarding reproduction and/or transmission of the information provided.

Please quote our reference given at the head of this letter in all correspondence.

Yours sincerely

Dave Palmer
Information Policy and Compliance Manager
University of East Anglia