What on earth is RoPA?

What does it stand for?

Record **o**f **P**rocessing **A**ctivities

..but what's a Processing Activity?

You'll wish you hadn't asked!

The definition of processing appears in Article 4(2) of the GDPR:

"'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means"

followed by a large list of examples:

"collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction"

Now in English!

What it really means is that Processing Activities is everything you could conceivably do with personal data whether it exists on paper or electronically.

WHAT IT MEANS TO YOUR SCHOOL

If you carry out Processing Activities for your students, staff or others regularly, you must document, on paper or electronically, the nature of this processing. This will include:

- ☐ What is the purpose of the processing, including the lawful basis?
- ☐ Whether you are controller or joint controller – or processor.
- ☐ Whose data you process (categories of data subjects).
- ☐ What sort of personal data you process
- ☐ Who does the processing: which members of your staff and any organisations you share data with in the process.
- ☐ Where does the processing takes place
- ☐ Is there any automation or profiling carried out on the data
- ☐ How long is the data kept and how is it destroyed
- ☐ What technical and organisational security measures exist including encryption, access controls, training

Document the items above and you have a **RoPA**!

DATA CONTROLLER, PROCESSOR, WHAT'S THAT ABOUT?

DATA CONTROLLER THE BOSS!

If you are the Data Controller, which you are in many instances, then you decide everything that happens to the personal data you hold or share. You are in charge; others MUST do as you instruct. Joint Controllers mean 2 or more organisations share this responsibility.

DATA PROCESSOR THE WORKER!

The Data Processor must do as instructed by the Controller. They will be breaking the law if they do not.

*You'll see the term **Public Task** or Interest; its used a lot in schools. This means that you are carrying out processing to fulfil a public duty, ie educate students.*