

Brasenose Colleges GDPR ROPA - Archive Activities v1.4 (Reviewed July 2023)

ID.	Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/criminal allegation grounds	Criminal conviction/criminal allegation grounds
1	Names, contact information, the dates and nature of enquiries relating to visitors, enquirers, researchers, volunteers/casual workers and accessions/donors to our archives. Records include the contact details of applicants for access to College archives, records of applications including the reasons for the application, the nature of the records requested and the access granted. Records may include disability information if this is relevant to accessibility of the archive. It may also include information about the reasons for the researcher's interest, which may refer for example to their religion or belief.	We obtain this data from you We generate this data about you	To maintain a record of how our archives have been used and who has previously used them, so that we can monitor the use and integrity of our archives. It is useful to refer back to earlier enquiries on similar topics. This information is also retained for the security of the collections.	Permanently, except for disability information provided to us solely for accessibility purposes, which will be retained for 12 months after your last contact with us.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining the integrity of its archives, to ensure they are kept securely and are available as a resource for researchers and others with a legitimate interest in reviewing the archives.	Processing is necessary for compliance with equality law (Substantial public interest under the UK Data Protection Act)	In the case of processing disability data relevant for access requirements, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments. Such processing must be carried out without consent so as not to prejudice those purposes. In the case of other special category data, the processing is necessary for archiving and/or scientific or historical research purposes, and is in the public interest.	N/A	
2	Records of College cultural life: photographs, pictures, audiovisual material, written records, student handbooks, prospectuses, trophies, other memorabilia and ephemera of college members, alumni and staff, teams, choirs, clubs and societies, plays and performances, of participation in events and sporting fixtures and of the outcomes. This may include written correspondence and minute books relating to these matters.	We obtain this data from you We generate this data about you We obtain this data from other third parties e.g. student societies.	As part of the College archive recording College life, which may be relevant to you individually (for example if you later request a reference from us), but which is also part of the College's own record of what its members have achieved over time.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its cultural life.	Processing is necessary for archiving purposes in the public interest as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data for archiving purposes, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.
3	Conservation information relating to items in the College archive, including the identity of who carried out the conservation and of the item on which the conservation measures were performed.	We obtain this data from you We generate this data about you Third party	To maintain a record of conservation measures applied to items in our archive to help with future conservation.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining records of conservation measures which will assist future conservators to make decisions about the appropriate conservation techniques to use.	N/A			
4	Personal papers and collections donated to the College archive. These may consist of correspondence and documents relating to and/or referring to the donor or third parties.	We obtain this data from you We may receive this from third parties (e.g. donors)	As part of the College archive we accept and maintain papers and collections of significance to the College or which are otherwise of importance as an archive.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in receiving collections and papers for its archive, and donors have a legitimate interest in giving such collections and papers to the College.	Processing is necessary for archiving purposes in the public interest and for research purposes as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes criminal convictions data for archiving purposes, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of

5	Records of the acquisition of items in the archive, including who the item was received from and the date of receipt. Catalogues, indexes and lists of items in the archive including the same information.	We generate this data about you	To maintain a record of the content of our archive and how it was acquired, as a record in its own right and in case enquiries are subsequently made about the archived item itself (for example, about ownership of the item).	Permanently.	Processing is necessary for the performance of a task carried out in the public interest Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in recording, indexing and cataloguing its archive acquisitions.				
6	Archives of academic conferences, seminars and lectures hosted and/or organised by the College, consisting of the names of attendees, agenda/programmes, papers delivered. These records may include the personal data of attendees and organisers.	We obtain this data from you		Permanently.	Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in archiving past conferences, seminars and lectures that it hosted and/or organised.				
7	Student files including dates of attendance, course of study and outcome of their studies, results of College examinations ("collections"), University examinations, College and University assessments, awards, scholarships and prizes conferred, applications (e.g. UCAS forms and references), academic and disciplinary records. These files may include information about a former student's personal life including their health, family circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs, criminal convictions or allegations, gender, background, family circumstances and/or financial circumstances.	We generate this data about you; We obtain this data from the University of Oxford.	So that we have a record of student results, as a record of your academic progression and if we are later asked for a reference or verification of your attendance. To maintain the College archive of its former students and to historically document the College's teaching function, and for the purposes of future research.	Permanently.	Processing is necessary for performance of our contract with you; Processing is necessary for the performance of a task carried out in the public interest; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in maintaining an archive of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.	Processing is necessary for archiving in the public interest, and/or for historical research purposes.	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a
8	Employee records for academic staff consisting of the employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph, records of references given.	We obtain this data from you We generate this data about you	To maintain historic records of College employees for the archive, and in case we are approached for references.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research. The College, its former employees and other parties have a legitimate interest in the College being able to provide references for former staff.	Processing is necessary for archiving in the public interest, and/or for historical research purposes.	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions
9	Employee records for non-academic staff, consisting of the employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph, records of references given.	We obtain this data from you We generate this data about you	To maintain historic records of College employees for the archive, and in case we are approached for references.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research. The College, its former employees and other parties have a legitimate interest in the College being able to provide references for former staff.				

10	Governing body and committee agenda, minutes and related correspondence. These may include personal data of the meeting attendees, correspondents and of individuals referred to in the documents.	We obtain this data from you We generate this data about you	To maintain a historic record of College administration.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.	Processing is necessary for archiving purposes in the public interest as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions
11	Financial records and legal records relating to College assets and the College estates and property portfolio. These may include the personal data of individuals involved in managing the College assets and estate, witnesses and parties to legal documents and tenants/vendors/purchasers of College estates.	We obtain this data from you We generate this data about you	To maintain a historic record of College finances and assets.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.				
12	Records relating to College buildings, including architectural records and maintenance records. These may include the personal data of those involved in construction and maintenance of College buildings.	We obtain this data from you We generate this data about you	To maintain a historic record of College architecture, and to assist future conservation of College buildings.	Permanently.	Processing is necessary for the performance of a task carried out in the public interest; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining its historic buildings. It also has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.				
13	Governance documents: College statutes and documents relating to their interpretation, including Privy Council documents and correspondence, decisions and documents relating to the College Visitor, Royal Commissions and related documents. These records may include the personal data of those named in the documents, including correspondents.	We obtain this data from you We generate this data about you	To maintain a historic record of governance documents relating to the College.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its governance documents for future reference.				
14	Records relating to College events. These records may include the personal data of invitees and their guests.	We obtain this data from you We generate this data about you		Permanently.	Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in archiving past events that it hosted and/or organised.				
15	Records relating to benefactions and trusts. These records may include the personal data of benefactors and recipients.	We obtain this data from you We generate this data about you		Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its benefactions and trusts.				
16	Records relating to payments made for research or copies of archives, including names, contact information and associated correspondence.	We obtain this data from you We generate this data about you	To process payments.	Seven years from end of the financial year in which the transaction occurred.	Processing is necessary for compliance with a legal obligation					