



**The
Pensions
Regulator**

Making workplace pensions work

What is a Record of Processing Activities (ROPA)?

Data Privacy and Compliance Team

UK General Data Protection Regulation (UK GDPR)

- The UK GDPR applies to ‘controllers’ and ‘processors’.
- A controller determines the purposes and means of processing personal data.
- A processor is responsible for processing personal data on behalf of a controller.
- You can think of these as TPR being a controller and its staff are the processors.
- As a processor, the UK GDPR places specific legal obligations on us; for example, maintaining a record of processing activities (ROPA).

ROPA Compliance

To meet the Information Commissioner's Office (ICO) expectations:

- TPR has a record of processing activities in electronic form so we can add, remove and amend information easily.
- TPR must regularly review the record against processing activities, policies and procedures to ensure that it remains accurate and up to date,
- That someone at TPR is assign responsibilities for doing the above.
- That TPR regularly reviews the processing activities and types of data we process for data minimisation purposes.

ROPA Requirements

What we need from you:

- the purposes of the processing;
- a description of the categories of individuals and of personal data;
- the categories of recipients of personal data;
- details of transfers to third party countries, including a record of the transfer mechanism safeguards in place;
- retention schedules;
- directorate and department details;
- business/process owner;
- a description of the technical and organisational security measures in place.

What do we need from you?

We've created a [SharePoint Form](#) which you can use to submit for each different processing activity.

The form has descriptions to help you understand what we need

Try to complete as many of the fields you can but don't worry if you can't as the Data and Privacy Team will have the knowledge to complete any missing information missing from your entry

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”.

Types of personal data?

- Contact Details (name, contact number, email)
- Employment Details (NI number, Salary information, Performance rating)
- Travel information (Transport bookings, Hotel bookings)
- Financial information (Staff banking details, pension contributions)

What is special category data?

Some of the personal data you process can be more sensitive in nature and therefore requires a higher level of protection. The UK GDPR refers to the processing of these data as 'special categories of personal data'.

Types of special category?

- race;
- ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data (where this is used for identification purposes);
- health data;
- sex life; or
- sexual orientation.

What is criminal offence data?

The UK GDPR gives extra protection to ‘personal data relating to criminal convictions and offences or related security measures’. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

It includes not just data which is obviously about a specific criminal conviction or trial, but also any other personal data ‘relating to’ criminal convictions and offences. For example, it can also cover suspicion or allegations of criminal activity.

‘Relating to’ should be interpreted broadly. It covers any personal data which is linked to criminal offences, or which is specifically used to learn something about an individual’s criminal record or behaviour.