

REF 2021 Privacy Notice

Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when controlling and processing your personal data.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:

- **'personal data'** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

The purpose of the Research Excellence Framework 2021 (REF2021) is to assess the quality of UK research and to inform the selective distribution of public funds for research by the four UK higher education funding bodies. The REF is managed by the REF team, based at Research England (RE), on behalf of the four UK higher education funding bodies. RE is part of UK Research and Innovation (UKRI), and under this arrangement UKRI has the role of 'data controller' for personal data submitted by us to the REF.

If you are a researcher who has been included as part of our submission to the REF 2021, in 2020 we will send some of the information we hold about you to UKRI for the purpose of the REF2021. The information will not be in coded form and your name and details such as your date of birth, research groups, and contract dates will be provided along with details of your research. If you are submitted with individual circumstances that allow a reduction in the number of outputs submitted, without penalty, some details of your personal circumstances will be provided.

You can find further information about what data are being collected on the REF website, at www.ref.ac.uk in particular publication 2019/01, 'Guidance on submissions'.

What personal data will be collected

This notice applies only to the following categories of individuals:

- Current employees (employed during the REF assessment period) who are considered to be REF-eligible (Category A eligible), this includes individuals with a primary employment function of "Research only" and may include staff with a primary employment function of "Teaching & Research" (Table 1).

- Former employees (employed during the REF assessment period) who were REF-eligible at the time of ceasing employment and who have research outputs that were generated while they were employed at the College during the REF assessment period (Table 2).
- Individuals who are not employed by the College but whose contract or job role includes the undertaking of research primarily focused at the College during the REF assessment period (Table 3).
- Individuals who are not employed by the College but who have provided testimonials or have agreed to be corroborating contacts in connection with impact case studies in relation to the College's preparations for the REF 2021 exercise (Table 4).

How and when do we collect your personal data?

We have used data already held by the College about you in the course of your employment or your existing association with the College.

You may voluntarily disclose personal circumstances to the college REF Individual Staff Circumstances panel, which could permit us to submit your information to the REF without the 'minimum of one' requirement (without penalty), or to submit a reduced number of outputs without penalty. If (and only if) we apply either form of reduction of outputs, we will need to provide UKRI with data that you have disclosed about your individual circumstances, to show that the criteria have been met for reducing the number of outputs. Please see the 'Guidance on submissions' document (paragraphs 151-201) for more detail about reductions in outputs and what information you need to submit.

Submitted data will be kept confidential to the REF team, the Equalities and Diversity Advisory Panel, and main panel chairs. All these bodies are subject to confidentiality arrangements. Within the college, your submission will be seen by HR staff, who will provide anonymised details to the panels (the Individual Staff Circumstances Panel and the associated Appeals Panel) to decide on the numerical reduction in expected outputs. The REF team will communicate the numerical reduction (but no other details) only to those authorised to see them as part of their role in the REF in the college or in Research England. The REF team will destroy the submitted data about individuals' circumstances on completion of the assessment phase in December 2021.

The information that UKRI will publish on behalf of the four UK higher education funding bodies will include a single list of all the outputs we have submitted, apart from redacted items. The list of outputs will include standard bibliographic data (including the author name) for each output, but will not be listed by author name.

Personal data from third parties

If you have given your permission, we may on occasion receive information about you from third parties such as research users.

Why do we collect this data, how do we use it and what is our legal basis for doing so?

We collect and use your personal information for the purpose of the REF 2021 exercise, principally to ensure that the College meets the validation requirements for the submission for REF 2021. For example, REF 2021 requires the College provide key information about current staff in scope for submission.

We also use individual information to help us understand the make-up of our research active staff population. We use it to undertake equality impact assessments to help inform our decision-making processes in relation to current and future research assessments.

UKRI will publish the results of the assessment exercise in December 2021 on behalf of the four UK higher education funding bodies. The published results will not be based on individual performance nor identify individuals.

Those parts of submissions that contain factual data and textual information about research activity will also be published by UKRI, on behalf of the four UK higher education funding bodies, and will be made available online. Published information is likely to include **textual information including impact case studies in which you may be referenced**. Your name and job title may be included in this textual information. Other personal and contractual details, including your date of birth and all information about individual staff circumstances will be removed.

UKRI will also publish a list of the outputs submitted by us in each UOA. This list will not be listed by author name. The tables below describe the information we hold and what we need it for. They also explain the basis we can legally rely on to request and retain information about you. In the main, legal basis will be “the College’s legitimate interest”. This means we need the information to ensure that the College can participate fully in the REF 2021 process, the purpose of which is to:

- provide accountability for public investment in research and produce evidence of the benefits of this investment;
- provide benchmarking information and establish reputational yardsticks, for use within the higher education sector and for public information;
- and, importantly, inform the selective allocation of funding for research.

Table 1: Personal data of current Category A Eligible/Submitted staff

<i>The information the College holds</i>	<i>What the College needs it for</i>	<i>Why the College processes it (i.e. the legal basis, and specific condition (where relevant))</i>
HESA staff identifier and/or staff number.	To assist with the College's REF 2021 preparations. Data required by REF 2021 for all Category A Submitted staff on form REF1a. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Name (initials and surname).	To assist with the College's REF 2021 preparations. Data required for all Category A submitted staff on form REF1a form (REF 2021 "Information on Category A Submitted staff in post on the census date (31 July 2020)"). Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Open researcher and contributor ID (ORCID) (where held).	To assist with the College's REF 2021 preparations. Data required by REF 2021 for all Category A Submitted staff on form REF1a. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Job title/position	To assist with the College's REF 2021 preparations. Data required to assist in the determination and proof of Category A Eligible staff for inclusion in the REF 2021 exercise. Data will only be shared with REF if required to do so on auditing, except for individuals involved in the underpinning research of case studies (whose data will be submitted to REF as part of the College's submission, November 2020)	The College's legitimate interest.

Grade	To assist with the College's REF 2021 preparations. Data required to assist in the determination and proof of Category A Eligible staff for inclusion in the REF 2021 exercise. Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Contracted hours/FTE.	To assist with the College's REF 2021 preparations. Data required by REF 2021 for all Category A submitted staff on form REF1a. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Information about contract type and any secondments/periods of unpaid leave, including dates.	To assist with the College's REF 2021 preparations. Data required by REF 2021 for all Category A submitted staff on form REF1a. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Whether any personal data should be omitted from the published data for specific reasons, such as commercial sensitivity or security.	To assist with the College's REF 2021 preparations. Data required by REF 2021 for all Category A submitted staff on form REF1a. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
If ECR (started career as an independent researcher on/after 1 August 2016), date of commencement of ECR status.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest.

Information about maternity leave, adoption/surrogacy leave, paternity leave, shared parental leave, time off for dependants within the assessment period, including dates.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Information about time off for caring responsibilities within the assessment period (such as caring for an elderly or disabled family member), including dates.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Details of sick leave within the assessment period*.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest. Special category: substantial public interest; and archive, statistical and research purposes (monitoring equal opportunities).
Information about any medical or health conditions you have or have had within the assessment period*.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest. Special category: substantial public interest; and archive, statistical and research purposes (monitoring equal opportunities).
Information about any leave associated with gender reassignment within the assessment period*.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest. Special category: substantial public interest; and archive, statistical and research purposes (monitoring equal opportunities).

Your disability status*.	To identify occurrence of special circumstances to facilitate associated reduction of outputs to a submitting unit of assessment. Summary data will be submitted to REF as part of the College's submission, November 2020. Details will only be shared with REF if required to do so on auditing.	The College's legitimate interest. Special category: substantial public interest; and archive, statistical and research purposes (monitoring equal opportunities).
Information about protected characteristics including: age, disability*, sex/gender, gender reassignment*, marriage and civil partnership#, pregnancy* and maternity#, race*, ethnic origin*, religion or religious beliefs*, and sexual orientation*.	To facilitate equality impact assessments to be undertaken at key points during the REF 2021 exercise, including, but not limited to Mock REF and related exercises and preparation of codes of practice. Following data processing for the EIA, data will be anonymised (where possible) prior to being shared (EIAs will be made publicly available in 2021). To protect the identity of individuals, data classifications of less than 5 will not be published.	The College's legitimate interest. Special category: substantial public interest; and archive, statistical and research purposes (monitoring equal opportunities).

* Denotes data that is classed as a "special category" of personal information.

Denotes data that might disclose a "special category".

The College must have both a legal basis and a specific condition to process "special category" personal information. Special Category is defined as personal data which is more sensitive and so needs more protection. In order to lawfully process special category data both a legal basis (under GDPR Article 6) and a separate condition (under GDPR Article 9) must be identified.

Table 2: Personal data of Former Staff

<i>The information the College holds</i>	<i>What the College needs it for</i>	<i>Why the College processes it (i.e. the legal basis)</i>
HESA staff identifier and/or staff number.	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Name (initials and surname).	Data required by REF 2021 to be submitted on the REF1b form (REF 2021 "Information about former staff to whom submitted outputs are attributed"). Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Open researcher and contributor ID (ORCID) (where held).	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Contracted hours (FTE of REF-eligible contract(s)).	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Job title/position when at the College.	Data required to assist in the determination and proof of eligibility for inclusion in the REF 2021 exercise. Data will only be shared with REF if required to do so on auditing, except for individuals involved in the underpinning research of case studies (whose data will be submitted to REF as part of the College's submission, November 2020)	The College's legitimate interest.
Grade when at the College.	Data required to assist in the determination and proof of eligibility for inclusion in the REF 2021 exercise. Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.

Employment dates (on REF-eligible contract) at the College and as a researcher.	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Early career researcher status.	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Details of any periods of secondment or unpaid leave during which any outputs were first made publicly available.	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Whether any personal data should be omitted from the published data for specific reasons, such as commercial sensitivity or security.	Data required by REF 2021 to be submitted on the REF1b form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.

Table 3: Personal data of Category C Staff

<i>The information the College holds</i>	<i>What the College needs it for</i>	<i>Why the College processes it (i.e. the legal basis)</i>
Staff reference code (academic visitor number, where available).	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Name (initials and surname).	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Employing organisation.	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Position/job title (including: details about specific research responsibilities).	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Details of affiliation with the College (including: evidence that research is primarily focused in the submitting unit; any honorary positions; and duration of affiliation).	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Details of any teams/groups/collaborators that the individual has/is a member of at the College.	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.

Details of any student supervision that the individual has undertaken at the College.	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.
Funding (including: details of grants held during the assessment period).	Data required to be available to REF 2021 for audit purposes (corroboration of key claims made by the College in the REF submission). Data will only be shared with REF if required to do so on auditing.	The College's legitimate interest.

Table 4: Personal data of Witnesses/Testimonial Providers

<i>The information the College holds</i>	<i>What the College needs it for</i>	<i>Why the College processes it (i.e. the legal basis)</i>
Organisation	Data required by REF 2021 to be submitted on the REF3 form: "Case studies describing specific examples of impacts achieved during the assessment period (1 August 2013 to 31 July 2020), underpinned by excellent research in the period 1 January 2000 to 31 December 2020". Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Position (where appropriate)	Data required by REF 2021 to be submitted on the REF3 form. Data will be submitted to REF as part of the College's submission, November 2020.	The College's legitimate interest.
Name	Data required by REF 2021 to be submitted to accompany the REF3 form. Data will be submitted to REF as part of the College's submission, November 2020, but will only be used if required for auditing.	The College's legitimate interest.
Contact details	Data required by REF 2021 to be submitted to accompany the REF3 form. Data will be submitted to REF as part of the College's submission, November 2020, but will only be used if required for auditing.	The College's legitimate interest.

How long the College will retain your personal data

The College must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the College has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the College's continued retention of the personal data
- the purposes for which the College may process your personal data
- whether the College is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

While the College will retain the personal data of its current and former staff in line with existing retention periods, the REF Team will dispose of all personal data for current and former staff, as well as for individuals who have provided testimonials which it has processed for the purpose of the REF submission, no later than the end of December 2022. Note that for former staff this may be longer than the standard 6 year retention period for personal data.

Sharing your personal data with third parties

We share categories of your personal data with REF 2021 to meet the validation requirements of the submission. Other third parties we share your data with are listed below. In these circumstances, we will only share your data if we are required to do so by law, you ask us to do so, or we are contractually obliged to do so.

- Higher Education Statistics Agency (HESA) to enable it to verify coded data returned to it as part of our HESA staff return; see the collection notice at <http://www.hesa.ac.uk/collection-notice>). Data returned to the REF will be linked to that held on the HESA staff record to allow UKRI and the organisations listed above to conduct additional analysis into the REF and fulfil their statutory duties under the Equality Act 2010 (England, Wales and Scotland) or the Northern Ireland Act 1998 (Northern Ireland).
- Research Councils, and other prospective and actual funders of research.
- Government bodies that run Research Excellence Framework (REF 2021), including the UK higher education funding bodies such as the Scottish Funding Council.
- Other Higher Education Institutions (HEI) with which the College are in partnership for specific REF 2021 Unit of Assessment (UOA) Joint Submissions. In this instance, only data that will be submitted on the REF1a form (all non-special category data) for staff within a particular UOA would be shared with the partner institution for that UOA. We are in the process of developing formal agreements (Memoranda of Understanding and Data Processing/Sharing Agreements) with these institutions which will ensure the responsible use, storage and timely disposal of any Royal Holloway staff personal data. These agreements will be in place before any personal data are shared with partner institutions.

UKRI may pass your data, or parts of it, to any of the following organisations that need it to inform the selective distribution of public funds for research and to carry out their statutory functions connected with funding higher education:

- Department for the Economy, Northern Ireland (DfE)
- Higher Education Funding Council for Wales (HEFCW)
- Scottish Funding Council (SFC).

UKRI and the organisations listed above will use the information to analyse and monitor the REF2021. This may result in information being released to other users including academic researchers or consultants (commissioned by the funding bodies), to carry out research or analysis, in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). Where information not previously published is released to third parties, this will be anonymised where practicable.

UKRI will require that anyone who has access to your data, held in UKRI's records, paper or electronic, will respect its confidentiality and will only process it in accordance with instructions issued for the purposes specified by UKRI.

Parts of your data will be passed to the REF expert panels and the Equality and Diversity Advisory Panel (whose members are independent of UKRI) for the purpose of conducting a systematic evaluation of submissions, in accordance with predetermined criteria and methods. Panels will make judgments about the material contained in submissions and will not form quality judgments about individuals. All panel members are bound by confidentiality arrangements.

How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it.

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

You and your data

You have a number of rights in relation to the processing of your personal data by the College:

- Access: You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- Correction: You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.

- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the College processes your personal data; for example, to confirm its accuracy or the College's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the College's processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that the College transfers](#) a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) in relation to how the College processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at dataprotection@royalholloway.ac.uk.

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – www.ico.org.uk

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