**GDPR Article 30 RECORD of PROCESSING Activities (ROPA)**

**RESEARCH Projects – Joint Control**

**Instructions:**

**Please complete all applicable boxes or note N/A**

**Items in blue are for guidance.**

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| **Name and Contact details of Controller, Joint Controller and DPOs (Art. 30 (a))** | |
| Joint Controllers  (List all organisations involved in the design of the research project) |  |
| List DPO contacts for each Joint Controller |  |
| Lead Controller for the research project. (Please elect one)  This should be the contact point for Data Subjects (i.e., organisation with master key) |  |
| Principal Investigator name and contact details for each organisation |  |
| **Purpose of the Research Project (Art. 30 (b))** | |
| Full name of research project and background to purpose  (Brief description – no more than 150 words) |  |
| **Types and categories of personal data and / or sensitive personal data (Art. 30 (c))** | |
| Specify the number of data subjects (or anticipated number) |  |
| Specify the type of data subject.  (Children (anyone under 18 years of age), patients, employees or students and any other group that could be considered vulnerable[[1]](#footnote-2)) |  |
| Specify the type of [personal data](https://www.dataprotection.ie/en/dpc-guidance/what-is-personal-data) or [special category data](https://www.dataprotection.ie/en/organisations/know-your-obligations/lawful-processing/special-category-data)  (Contact details, name, MRN, gender, sex, age, date of birth, ethnicity, health data, genetic data etc.) |  |
| Legal basis for processing under Article 6  This should be Article 6 (1) (e) unless you are collaborating with a commercial organisation |  |
| Article 9 condition  This should be Article 9 (2) (J) unless you are collaborating with a commercial organisation |  |
| Detail when explicit consent was / will be obtained and/or HRCDC waiver: |  |
| If relying on HRCDC waiver:  Provide details as to what stage of application you are at.  Provide copy of HRCDC approval, and any other communication from the HRCDC if applicable.  If you have not yet applied, please submit application for review and sign off by TCD Secretary. (Please note we need one month to review and respond to these requests) |  |
| **Samples (Article 30 (c)) (where applicable)** | |
| List any samples which will be required for this research project. |  |
| Are the samples retrospective or prospective? |  |
| If retrospective, please include original Information leaflet and consent form with this ROPA.  If prospective, please include draft participant information leaflet and consent form for review. |  |
| Is any genetic or genomic research taking place on the samples? If yes, please detail. |  |
| Do any significant findings need to be notified to the data subject? If yes by whom? |  |
| **Transfer of Data/Samples (Art. 30 (d) and (e))** | |
| Is there any envisaged transfer to third parties, including any service providers?  If yes, what due diligence have you carried out on that third party? |  |
| Is there any transfer outside of EEA to a third country or an international organisation? |  |
| If yes, please identify that third country or international organisation.  If yes, what due diligence has been carried out?  What safeguards will be put in place?  What mechanism will be relied upon under Chapter V of the GDPR? |  |
| **Publication requirements (Art. 30 (d) and (e))** |  |
| Are there any publication requirements?  Please detail:  For example, acknowledgement of the source of the data/samples etc?  Open sharing of the results to a repository? |  |
| **Duration of processing: (Art. 30 (f))** | |
| Specify the retention period for the personal data (and if no retention period specify, how will you determine the length of time you will retain the data in pseudonymised format?) |  |
| Will the data (and samples if applicable) be returned to the provider, deleted, or anonymised on completion of the research project?  If the project is longitudinal – please state this. |  |
| What are the requirements for return or deletion of samples (if applicable) |  |
| **Technical and Organisational Measures (Art. 30 (g))** | |
| Which organisation holds the master key to link back to the individuals? |  |
| List all researchers within each organization who will process the data, and for what purpose. |  |
| Will the dataset be linked with any other data set? If yes, please detail what dataset you will be linking to. |  |
| What technical (data security measures) and organisational (training/policies) are to be implemented for access, transfer, and storage of the personal data? |  |
| Date of DPIA submission (if applicable)  Please detail where the DPIA was submitted to.  Please note that a copy of the most recent DPIA and advice from Lead DPO must be provided with this ROPA. |  |
| Date of ethical approval for this research project (or date of submission of ethical approval, and name of committee)  Please provide copy of approval if obtained. |  |
| **Data Subject Requests (Article 26 and Chapter III)** | |
| Do you have a withdrawal policy or standard operating procedure for dealing with withdrawal by a participant?  Who will lead on this? |  |
| How will other data subject requests be managed? (Access, rectification, erasure etc.) |  |
| **Data Breaches (Article 26 and Chapter III)** | |
| Who is responsible for managing potential data breaches?  What is your procedure for notification to the Controllers?  Which DPO will you notify first? |  |
| I declare the information to be accurate to the best of my knowledge. |  |
| Signature of PI: |  |
| Date: |  |
| Reviewed by Lead Controller DPO: |  |
| Date: |  |

**Version Control**

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| --- | --- | --- |
| Version Number | Date | Created by: |
| 1.0 | 28.09.2020 | Evelyn Fox RDPO TCD |
| 2.0 | 23.05.2024 | Evelyn Fox, RDPO, TCD. |

1. * asylum seekers, those who have or have had mental illness, those with learning difficulties, limited capacity etc.

   [↑](#footnote-ref-2)