

## Merton College RoPA - Non-Academic Staff

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 Grounds	Criminal conviction grounds (further information)
1	Dietary information	We obtain this data from you	To ensure that you are provided with foods meeting your personal, philosophical and health requirements.	We request this information in order to ensure you are provided with foods meeting your personal requirements. This information is deleted immediately upon termination of your employment.	Processing is necessary for performance of our contract with you  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	Processing is necessary for compliance with food safety and food standards law. We, and you, also have a legitimate interest in ensuring that you receive appropriate service on an ongoing basis.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data in relation to your dietary requirements, the College does so in pursuit of its compliance with consumer protection, health and safety and equality legislation. It processes the data for the purposes of preventing an unlawful breach of such legislation and/or the exercise of functions pursuant to its legal obligations.	N/A	
2	Recruitment records: your personal contact details, application paperwork, evidence of qualifications, references, requests for special arrangements or waiver of eligibility criteria, and selection committee reports. (Not including criminal conviction data, if applicable).	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you	To enable us to consider whether to enter into a contract of employment with you. Certain parts of the record are also held as part of College compliance with immigration law, and/or entered into the College archive after 6 years.	Unsuccessful applicant data is erased after 6 months has passed, except:  1. to the extent that details are recorded in College administrative records, such as Governing Body paper and minutes, such documents are stored in the College archive permanently;  2. where the successful applicant is a Tier 2 or Tier 5 visa applicant, sponsored by the College, copies of the following recruitment records (for all shortlisted applicants in the relevant recruitment process) will be kept by the College for the time periods required under UK Visas and Immigration guidance, as amended from time to time:  (1) All applications shortlisted for final interview in the medium in which they were received (e.g. emails, application form, cv). (2) The names and total number of applicants short-listed for final interview (3) Notes from the final interviews conducted (4) Documented reasons why each rejected EEA national who attended a final interview was not employed. Reasons must directly relate to the essential selection criteria for the post.	Processing is necessary in order to take steps at your request prior to entering a contract  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 maintaining a record of its recruitment activities, and holding appropriate management and administration records.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	N/A		
3	Passport, right to work and visa information.	We obtain this data from the University of Oxford We obtain this data from you	To enable us to assess your right to work in the United Kingdom and take steps to meet immigration requirements where necessary.	These records must be kept for the duration of employment and for a further two years after the University ceases to sponsor the visa holder [Home Office and UK Visas and Immigration retention requirement].	Processing is necessary in order to take steps at your request prior to entering a contract.  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.	Processing is necessary for compliance with immigration and employment law.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	N/A		
4	Appointment records: criminal conviction and Disclosure and Barring Service information.	We obtain this data from you Third party	As part of the application process to assist us in making recruitment decisions.	DBS certificate information will be retained for 6 months from the date of your appointment. However, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.	Processing is necessary in order to take steps at your request prior to entering a contract.  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	To the extent that a role will involve working with minors, processing is necessary for compliance with safeguarding law.	N/A	The processing meets a condition in Parts 1-2 of Schedule 1 to the Data Protection Act 2018	Processing is necessary for the purpose of performing or exercising obligations or rights imposed or conferred by law in connection with employment, in circumstances where the College has an appropriate policy document in place.  Processing is necessary for the protection of the public against dishonesty, unfitness or incompetence.	

5	Recruitment records: equality monitoring data. This may consist of data concerning health, sexuality, ethnicity or religious beliefs.	We obtain this data from you	For equality or monitoring purposes.	This information will only be held and processed in anonymised form. This information will be kept in perpetuity in an anonymised form for College records and monitoring purposes.	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	Processing is necessary for compliance with equality law.	Substantial public interest under the UK Data Protection Act 2018	The processing is of data concerning health, sexuality, ethnicity or religious beliefs and is necessary for equality of opportunity of treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	
6	Recruitment records: communications regarding our decisions (rejections, shortlists, interview invitations, offers)	We obtain this data from the University of Oxford We generate this data about you	To document the process under which applicants are considered for positions, and successful applicants are engaged as employees or office-holders at the College.	Recruitment records of successful applicants will be retained for 7 years from the date of the end of your contract of employment.  Recruitment records for unsuccessful applicants will be destroyed six months from the date of completion of the recruitment process.	Processing is necessary in order to take steps at your request prior to entering a contract.  Processing is necessary for compliance with a legal obligation	The College stores various records in compliance with immigration law requirements.	N/A		N/A	
7	Appointment records: role details, negotiations, probation period and contract details.	We obtain this data from the University of Oxford We generate this data about you	To record the terms under which staff and office-holders are engaged by the College.	Appointment records will be retained for 7 years from the date of termination of your employment. This is in order to maintain complete and accurate records of your employment contract.	Processing is necessary for performance of our contract with you		N/A		N/A	
8	Appointment records: Equality monitoring data	We obtain this data from you	For equality or monitoring purposes.	This information will only be held and processed in anonymised form. This information will be kept permanently in an anonymised form for College records and monitoring purposes.	Processing is necessary for performance of our contract with you  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	Processing is necessary for compliance with our obligations under equality law, employment law and laws specific to the higher education sector.	Substantial public interest under the UK Data Protection Act 2018	The processing is of data concerning health, sexuality, ethnicity or religious beliefs and is necessary for equality of opportunity of treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality. In relation to College archives, the College has a legitimate interest in holding a record of its equality information over time.	N/A	
9	Recruitment records: medical/health and disability information	We obtain this data from you	To enable us to make appropriate adjustments during the recruitment process	Six months from the time a decision is made on the application.	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A	
10	Appointment records: medical/health and disability information	We obtain this data from you	To enable us to make reasonable adjustments on commencement of your employment by the College.	This information will be held for six months from the date of the end of your employment.	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A	
11	Photographs (formal)	We generate this data about you	To enable visual identification of staff and office-holders for security purposes. To publish images of staff and office-holders to enable identification by students, colleagues and third parties.	Permanently. This data will be held as part of the skeleton record of your employment for the purposes of College records and archives.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in ensuring the security of our premises and the exclusion of non-authorised individuals. We, your colleagues, students and others also have a legitimate interest in being able to identify you. In relation to College archives, the College has a legitimate interest in holding a visual record of employees and office-holders over time.	N/A		N/A	
12	Bank account, sort code and personal card details, expense allowances and expense claims.	We obtain this data from you	To enable us to monitor expense claims made and make necessary payments.	Data relating to expenses allowances and expense claims will be retained for 7 years from termination of your employment.	Processing is necessary for performance of our contract with you.  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in operating and ensuring appropriate use of the College expenses system.	N/A		N/A	
13	Bank account, sort code, BACS ID, National Insurance number, salary details, payslips, bonus details, tax forms, tax codes and payments information.	We obtain this data from you We generate this data about you Third party	Processing is necessary for the operation of the College payroll and benefits system.	PAYE and payroll data will be retained for 7 years from termination of your employment for the purposes of reporting to HMRC.	Processing is necessary for performance of our contract with you		N/A		N/A	

14	Security records, including CCTV, access control records and access logs. Security incidents, accident reports and health and safety records.	We generate this data about you	To monitor the attendance of people on College premises, as part of the College's safety and security arrangements.	CCTV records are retained for 28 days, access control and access logs are retained for 1 year. Security incidents, accident reports, and health and safety records are retained for 6 years from creation. If such incidents are mentioned during governing body sessions, the minutes will be retained in the College archive in perpetuity.	Processing is necessary for performance of our contract with you.  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and residents of the College, have a legitimate interest in restricting access to College property to authorised persons, maintaining a record of access and maintaining a record of incidents occurring on College property.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws.	The College also processes special category information in pursuit of a substantial public interest under the Data Protection Act 2018: exercising our functions and/or detecting or preventing unlawful acts under Health and Safety and similar legislation.	The processing is necessary in connection with legal proceedings (including prospective legal proceedings), obtaining legal advice or is otherwise necessary for establishing, exercising or defending legal rights.  The processing meets a condition in Parts 1-3 of Schedule 1 to the Data Protection Act 2018.	Where data is recorded concerning criminal offences/allegations relating to you.
15	Allocation of key fobs/access cards.	We generate this data about you	To enable you to access College facilities while maintaining the security of the College	This information will be retained for one year after termination of your employment.	Processing is necessary for performance of our contract with you		N/A		N/A	
16	Housing applications, information, decisions and arrangements: tenancy applications, related correspondence, tenancy agreements, rents, deposits and fee details.	We obtain this data from you We generate this data about you	For the management of College-owned housing used for employee and office-holder occupation.	Records relating to housing applications will be retained for 7 years from the date on which the tenancy ends [HMRC retention requirement].	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract Processing is necessary for compliance with a legal obligation	We are required by law to place deposits in certain deposit schemes, and hold appropriate records in relation to the same.	N/A		N/A	
17	Housing applications, information, decisions and arrangements: details of College-owned residential property occupants, including names, ages, disability details, nationality and immigration status data.	We obtain this data from you	For the proper management of College-owned housing used for employee and office-holder occupation.	These records will be retained for one year from the date on which the tenancy ends, or until superseded by a follow-up check [Home Office retention requirements].	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract 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	We are required by law to confirm and hold appropriate records regarding the immigration status of tenants. We also have a legitimate interest in knowing who the occupants of College properties are.	Explicit consent		N/A	
18	Photographs (informal)	We obtain this data from the University of Oxford We generate this data about you Third party	Photographic records of College life, including attendance at events and society memberships, are created on an ongoing basis. The College archives collect and store copies of such materials.	In perpetuity.	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 creating a historical archive recording College life.	N/A		N/A	
19	Pension membership data including identification numbers, quotes and projections, terms, opt-in and opt-out notices, benefits and contributions.	Third party	In order to enable your enrolment in to your pension scheme and to make our contribution.	Most records relating to your pension will be retained for up to 7 years following the end of your employment. After that time, only a skeleton record will be held, setting out the name of the provider, the date the employee joined the pension scheme and (where applicable) the date of retirement.  It is expected that former staff will be able to obtain all relevant data on their pension from the relevant pension provider, in perpetuity.	Processing is necessary for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and you, have a legitimate interest in being able to request this data from the pensions provider at your request, and discussing it with you, including any implications of adjustments.	N/A		N/A	

20	Other data relating to your occupational pension scheme, including: (a) death in service benefit nominations;  (b) health information about you (as a result of incapacity retirement benefit);  (c) information about your spousal or other relationships which might identify your sexuality;  (d) absence information, which might allow the reverse engineering of trade union affiliation in the case of strike absences.	We obtain this data from you We generate this data about you	In order to be able to provide required information to your occupational pension scheme provider.	Most records relating to your pension will be retained for up to 7 years following the end of your employment. After that time, only a skeleton record will be held, setting out the name of the provider, the date the employee joined the pension scheme and (where applicable) the date of retirement.  It is expected that former staff will be able to obtain all relevant data on their pension from the relevant pension provider, in perpetuity.	Processing is necessary for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and you, have a legitimate interest in being able to provide this information to your occupational pension scheme provider, to enable the provider to operate the pension in accordance with the scheme and your and their respective rights and obligations.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws			
21	Details of your attendance at, and participation in, College administrative meetings, including Governing Body, sub-committees and working groups.	We generate this data about you	As a formal record of matters relating to the administration and management of College business. Copies of the records are also provided to and stored by the College Archives.	In perpetuity.	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	To the extent that the business of the relevant bodies forms an integral part of the provision of University education or publicly-funded research carried out in the public interest, the processing is necessary for the performance of the College's public task.  As regards other aspects of such records, we have a legitimate interest in compiling a record of administrative and managerial matters, including details of those involved, decisions made and outcomes. The College also has a legitimate interest in the addition of such records to the College archives.	N/A		N/A	
22	Conflict of interest declarations	We obtain this data from you	To enable us to identify when your personal or family interests and/or loyalties conflict with those of the College.	These records will be kept for 6 years from the termination of employment. If declarations are mentioned during governing body sessions, the minutes will be retained in the College archive in perpetuity.	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	We have a legitimate interest in understanding when your interests may conflict with those of the College, and when you will be unable to contribute to College management and/or decisions. In certain circumstances we may also have a legal obligation to process this data.	N/A		N/A	
23	Next of kin/emergency contact data	We obtain this data from you	To enable us to contact appropriate individuals in the event that you are injured, become unwell, or there other relevant cause for concern regarding your well-being.	This data will be destroyed within three months of the date of termination of your employment.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	It is in you, and our, legitimate interests for us to have the means to contact a family member or other designated representative in a situation where there is significant concern for your welfare.	N/A		N/A	
24	Health and Safety Assessments	We obtain this data from you	To enable us to make appropriate adjustments to your working environment and duties to accommodate changes in your physical and/or mental condition.	This data will be retained for 7 years from the date of termination of your employment, unless the assessment relates to the conduct and results of risk assessments of work which exposes employees to asbestos where records of assessments will be retained for 40 years.	Processing is necessary for compliance with a legal obligation	Processing is necessary to comply with Health and Safety law	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A	
25	Staff rotas, flexible and part-time working arrangements, time sheets, casual work claim forms, and attendance records	We generate this data about you	For payroll administration and employee performance monitoring.	This data will be retained for 7 years.	Processing is necessary for performance of our contract with you		N/A		N/A	
26	Probation period records, including dates, duration, feedback and evaluations, and materials relating to any decisions made.	We obtain this data from the University of Oxford We generate this data about you	To manage the probationary period in line with your contract with the College and College procedures.	This data will be retained for 7 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you		N/A		N/A	
27	Learning and development records, including your attendance, completions, and certifications.	We obtain this data from you We generate this data about you Third party	As part of an accurate and up to date record of your employment by the College.	This data will be held for 7 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you.  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	Processing in some instances is necessary to comply with our legal obligations in relation to the mandatory provision of training on specific issues to employees and office holders.  We, and you, also have a legitimate interest in our holding an up to date record of your learning and development achievements, for workforce planning and recognition.  We also have a legitimate interest in holding this data in the College Archive as part of our record of College life.	N/A		N/A	

28	Promotion and progression materials including applications, references and supporting materials, records of deliberations, decision notifications, feedback and awards; long service awards.	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party	For the proper functioning of the promotion application and award process. relevant personal data may also be placed in the College archives as part of the record of College committee discussions.	This data will be retained for a period of 7 years from termination of your employment. Data which is of particular public, scientific or historical interest will be retained in perpetuity as part of the College archives.	Processing is necessary for performance of our contract with you.  Processing is necessary in order to take steps at your request prior to entering a contract.  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	In relation to College archives, the College has a legitimate interest in holding records about employee and office-holder advancement.	N/A		N/A	
29	Room bookings	We obtain this data from you We generate this data about you	As part of the administration and management of College property.	This data will be retained for one year from the end of the relevant academic year.	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 the proper management of College facilities, in maintaining the security of College premises, in understanding the purposes for which facilities have been reserved, and in recording the identities of those booking College facilities.	N/A		N/A	
30	Contact details (name, addresses, telephone numbers), as amended from time to time.	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you	In order to be able to contact you in your role as an employee or office holder at the College, and (where applicable) to comply with immigration law. These details will also appear on documents and materials held in the College archive.	Your contact details will be retained for a period of 6 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you.  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		N/A		N/A	
31	Medical questionnaires, notes and occupational health reports, including specifics of health issues, records of consequent adjustments, and communications relating thereto.	We obtain this data from you We generate this data about you Third party	For Occupational Health purposes and in compliance with our obligations under equality legislation.	Records relating to occupational health will be retained for 7 years from the termination of employment. Medical records relating to the Control of Asbestos at Work Regulations or Control of Substances Hazardous to Health Regulations will be retained for 40 years.	Processing is necessary for performance of our contract with you Processing is necessary for compliance with a legal obligation		Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A	
32	Absence records (including but not limited to vacation, maternity/paternity/shared parental leave, time off for dependants, career breaks, etc.)	We obtain this data from you We generate this data about you	To record, monitor, plan for and respond to absences.	Records relating to vacation/maternity/paternity/shared parental leave, time off for dependants, and career breaks will be retained for 7 years from the date of the absence.	Processing is necessary for performance of our contract with you		Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	To the extent that absences are due to ill health or reasons linked to 'special category' information as defined under GDPR.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	To the extent that absences are due to allegations of criminal behaviour or criminal convictions.
33	Sickness records and related documentation, including sickness absence forms, employee 'Fit' notes, return to Work documentation.	We obtain this data from you We generate this data about you Third party	To comply with our obligations as an employer in the management of employees suffering ill health, to monitor reasons for absences, to consider relevant Health and Safety issues arising and to assist in scheduling of employee time.	Sickness records including Medical and Self Certificates will ordinarily be held for 7 years.  Where records are known to be those of employees exposed to a substance hazardous to health (i.e. those who have been diagnosed with an asbestos-related illness, or where the College is aware that the employee has been exposed to an actionable levels of asbestos as set out in the Control of Asbestos at Work Regulations 2002; those who have been exposed to lead in accordance with the Lead (Control of Lead at Work Regulations 1980) or those exposed to radiations in accordance with the (Ionising Radiation Regulations 1985)), those records will be retained for 40 years from the termination of employment.	Processing is necessary for performance of our contract with you.  Processing is necessary for compliance with a legal obligation	Processing is necessary to meet our employment law, and Health and Safety obligations.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A	

34	End of employment records, including details of exit interviews, relevant correspondence, and redundancy records (redundancy details, calculations of payments, refunds, notification to the Secretary of State) or termination records.	We obtain this data from you We generate this data about you	To understand the reasons that employees and office holders leave, to identify trends and issues, and to enable us to make improvements going forward. Where employees have left due to redundancy or their contracts have been terminated, we keep records to ensure we can respond appropriately to any ongoing queries.	These records will be retained for 7 years from the date of termination of your employment.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and other members of the College, have a legitimate interest in understanding the reasons that employees and office holders leave. We also have a legitimate interest in holding appropriate records relating to potentially contentious decisions.	Explicit consent		You have consented to the processing.  The processing relates to personal data that you have manifestly made public.  The processing is necessary in connection with legal proceedings (including prospective legal proceedings) The processing is necessary for the purpose of obtaining legal advice.	Where allegations of, or convictions for, criminal offences are held as part of leaver records, this data will usually be either public information, held for the purpose of obtaining legal advice in connection with legal proceedings, be necessary for the exercise of a function conferred on the College by an enactment or the rule of law, or held in the public interest for the purpose of protecting the public against unfit, improper conduct or similar.  Where no such grounds for processing this data apply, it will be held and processing only based on your consent.
35	Employee and office-holder benefits scheme membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare providers used, healthcare interest free loans and travel passes.	We obtain this data from you We generate this data about you Third party	As part of the proper functioning of the employee and office holder benefits system.	These records will be retained for 7 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you		N/A		N/A	
36	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	We generate this data about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	This data will be retained for a period of 7 years from the termination of your employment, unless there is compelling justification for the data to be retained for a longer period eg in connection with legal advice, or in relation to auditing obligations.	Processing is necessary for compliance with a legal obligation		Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.