

## UCL students processing personal data overseas – guidance

### *Introduction*

Following the impact of the global Coronavirus pandemic, many of UCL's students will at least start their teaching in Academic Year 2020/21 from outside the UK – and many of those from outside the EU.

As part of their course, many students need to process personal data – e.g., by research methods involving surveys or manipulating data which is already held by UCL.

Here, we outline how UCL students can access personal data overseas in accordance with the law.

UCL still has a legal obligation to protect personal data in accordance with data protection law when students are processing personal data outside the EEA. There are particular data security risks when personal data is processed overseas and a UCL system is not used. For example, if data is stored elsewhere than on a UCL system, UCL cannot guarantee that personal data won't be accessed, altered, disclosed or deleted only by those it has authorised to do so; that the data is accurate and complete in relation to why it is being processed; and that the data remains accessible and usable.

For these reasons, we recommend that as far as possible when data is accessed by students overseas then such access is via Desktop@UCL. The main advantage of this system is that any data processing can take place on UCL systems and is covered by UCL's data security. Where Desktop@UCL is not available, students should look to access the data via the VPN.

However, there may be situations in which personal data needs to be accessed by other means. An example of this is if students simply do not have access to Desktop@UCL or the VPN due to load issues, or the nature of their internet connection means that it is too unstable to complete the work online and data must be downloaded locally to enable the student to carry out their research. Such access should only be on an exceptional basis, and should be approved by the student's supervisor. Supervisors can approve access outside Desktop@UCL / the VPN when:

- It is impossible/highly impractical for students to access the VPN/Desktop@UCL;
- The personal data has been pseudonymised as far as possible (ie, all personal identifiers have been removed) before the data is sent to the student; and
- The supervisor has explored with the student whether data analysis can be conducted within a UCL system, such as Opinio or Redcap and concluded it would not be possible to do so.

If students are processing personal data outside of the VPN/Desktop@UCL, they must comply with UCL's [Bring Your Own Device \(BYOD\) Policy](#). In particular, students must make sure they follow the guidance in the [data protection training](#) regarding handling, storage and retention of data. Personal data should only be sent via Office365 ( UCL email, sharepoint, OneDrive etc.), or via one of UCL's many file-storage options such as Data Safe Haven, RDS, S drive etc.. Students should ensure that any systems they use have up to date virus protection, are encrypted where possible and are never left unlocked. To the extent possible, students should ensure they only process personal data on a machine only they have access to – not, for example a shared computer. If a shared computer is used then students should ensure they set up a separate account on the computer, to which only they have the password for access. In addition, once the student has finished using the data, it must be deleted.

### *Conclusion*

Students are permitted to access personal data outside the EEA. Such access should be via Desktop@UCL where possible. If such access cannot take place via Desktop@UCL or a VPN, then supervisor's approval is required and appropriate security measures should be taken.

### *Resources*

For guidance on the tools above:

Desktop@ucl

<https://www.ucl.ac.uk/isd/services/computers/remote-access/desktopucl-anywhere>

VPN

<https://www.ucl.ac.uk/isd/services/get-connected/ucl-virtual-private-network-vpn>

Outlook UCL email

<https://www.ucl.ac.uk/isd/services/email-calendar>

UCL storage

<https://www.ucl.ac.uk/isd/services/file-storage-sharing>

If you encounter difficulties, contact ISD service desk help

<https://www.ucl.ac.uk/isd/help-support>