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Imperial College London REF 2029 non-staff privacy notice

What is the purpose of this privacy notice?

Imperial College of Science, Technology and Medicine (“Imperial”) is committed to protecting the privacy and security of your personal data.

This privacy notice explains how Imperial processes personal data collected for the purpose of the University’s submission to the REF (Research Excellence Framework) 2029, and your rights in relation to the personal data we hold. It applies to external parties providing data and textual information about the University’s research activity and its impact for this specific purpose.

What is REF 2029?

The REF is the UK’s system for assessing the quality of research in UK higher education institutions (HEIs). Its outcomes are used to inform the selective allocation of around £2 billion per annum of public funding for research. Research England, a part of UK Research and Innovation (UKRI), manages the REF on behalf of the four UK higher education funding bodies.

The REF is a process of expert review, carried out by expert panels for each of the 34 subject-based units of assessment (UoAs). For each submission made into a UoA by an HEI, three distinct elements are assessed:

- Contribution to knowledge and understanding
- Engagement and impact
- Strategy, people and research environment

HEIs must submit data and narrative statements evidencing the quality of their research activity across these three elements. Contribution to knowledge and understanding is assessed through the outputs of research (such as publications, exhibitions or performances). Impact is assessed through the submission of impact case studies describing specific examples of impact outside academia that have been underpinned by research produced in the submitting HEI. The research environment is assessed through the submission of aggregated data and unit-level and institutional-level narrative statements.

How is your personal data collected?

You may have voluntarily provided factual data or textual information evidencing or corroborating statements made in one or more impact case studies or narrative statements as part of Imperial’s REF 2029 submission.

What sort of data is collected?

These documents may include your personal data – that is, details or information that could directly or indirectly identify you, such as your name, job title and organisational affiliation. Further information about the kinds of data collected for REF is available at www.ref.ac.uk. Detailed guidance on the kinds of information typically provided in testimonies for impact case studies is available from the most recent REF exercise (REF 2021), at

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<https://2021.ref.ac.uk/guidance-and-criteria-on-submissions/guidance/additional-guidance/index.html>. No [special category data](#) are collected for this purpose.

How we will use personal data about you and the legal basis for processing your personal data under the GDPR

For the purposes of the EU General Data Protection Regulation 2016/679 (GDPR), the UK General Data Protection Regulation and the Data Protection Act 2018, Imperial is the data controller of your personal data.

We will only use your personal data when the law allows. The lawful basis on which Imperial relies to process your personal data for the purposes described above is article 6(1)(e) of the [UK GDPR](#), which allows us to process personal data where it is necessary for the performance of our public benefit task (to advance training, education, research and scholarship in science, technology and medicine).

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows Imperial to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data sharing

Subject to confidentiality and/or security conditions, your data may be shared with Imperial employees who need to view it in order to prepare and submit the documentation required for the REF 2029 assessment. These may include staff in the University's faculties and departments responsible for the management and oversight of REF 2029 submissions at the UoA and Main Panel level; staff responsible for REF 2029 project management within the University's Planning and Insight Division; and senior University leaders with overall responsibility and accountability for Imperial's REF 2029 submission.

Impact case studies and other narrative elements of the submission may be shared with external reviewers for feedback during the process of submission development. This may include transfer of information to, and storage at, countries outside the UK. In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. data transfer assessments and standard data protection contract clauses adopted by the European Commission and UK Government respectively).
- a UK adequacy decision has been awarded for that country or territory which has determined the destination country has adequate levels of protection in place; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent or an exception applies).

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In processing your personal data Imperial will always comply with specific confidentiality conditions, with our robust information security standards, and with the [key principles of UK GDPR](#).

In due course, any data or testimonials you provide may – subject to confidentiality and/or security provisions under which you have provided them (see below, **Publication and confidentiality arrangements for REF 2029**) – be sent by Imperial to UKRI for the purpose of the REF 2029 assessment. UKRI has the role of data controller for personal data submitted to the REF. Until relevant REF 2029 guidance is published, for detailed information on how UKRI will collect, store and process information submitted to the REF reference should be made to the data management guidance published by UKRI via Research England for the most recent REF exercise: <https://2021.ref.ac.uk/guidance-and-criteria-on-submissions/guidance/data-management-guidance/index.html>.

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 may be passed to REF panels for the purpose of corroborating claims made in impact case studies. All REF panel members are bound by confidentiality arrangements (see below, **Publication and confidentiality arrangements for REF 2029**).

Data security

In accordance with Imperial's [Information Security Policy](#), we have put in place appropriate security measures to ensure the integrity and confidentiality of your data, including protection against unauthorised or unlawful processing and against accidental loss, and strict limitations on access in accordance with key data protection principles.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where necessary.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different records Imperial holds are available in our retention policy which is available via the [following URL](#).

For REF 2029, this means that we will retain your data to enable Imperial's REF 2029 submission and until completion of the REF 2029 audit process (expected to be early 2030). In order to support future REF submissions, we will retain a copy of the submission for 20 years after submission.

Publication and confidentiality arrangements for REF 2029

Impact case studies and narrative statements on strategy, people and research environment will be published by UKRI on behalf of the four UK higher education funding bodies, and will be made available online. Unless redacted, this published information may include textual information in which you are referenced. Your name and job title may be included in this textual information. Other personal details will normally be removed.

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REF 2029 guidance, processes and systems are still under development. Confidentiality and information security provisions are likely to align with those used for REF 2021. These are described in detail in guidance published at <https://2021.ref.ac.uk/> and <https://2029.ref.ac.uk/>. Key provisions cover:

- Confidentiality agreements for panel members and assessors.
- Non-publication of corroborating evidence for impact case studies (ICS).
- Provisions for excluding parts of the submission from publication by identifying them as “not for publication” or requiring redaction.
- Limitations on sharing ICS containing material identified as confidential (shared only with the REF team at Research England and with those involved in assessment).
- Provisions for HEIs (and external parties via HEIs) and assessment panel chairs to identify panel members/assessors who would have a conflict of interest in assessing specific ICS, or who should not have access to, or have access only to the redacted version of, specific ICS that include commercially sensitive information.
- Provisions for the submission and assessment of ICS which include security classified material.
- Data security measures and deletion schedules.

Your rights under the Data Protection Legislation

- Under data protection legislation you have the following rights:
 - to obtain access to, and copies of, the personal data we hold about you.
 - to require that we cease processing your personal data if the processing is causing you damage or distress.
 - to require us not to send you marketing communications.
 - to request that we erase your personal data.
 - to request that we restrict our data processing activities in relation to your personal data.
 - to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
 - to require us to correct the personal data we hold about you if incorrect.

For more information about the above rights please view the following URL.

<https://www.imperial.ac.uk/admin-services/governance/policies-and-guidance/guidance/guide-12---individual-rights/>

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any questions about these rights or how your personal data is used by us, you can contact the Data Protection Officer using the following details:

- Post – Data Protection Officer - Imperial College of Science, Technology and Medicine, The MediaWorks, 191 Wood Lane, London, W12 7FP.
- Email – DPO@imperial.ac.uk.

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If you are not satisfied with how your personal data is used by Imperial, you can make a complaint to the Information Commissioner (www.ico.org.uk).

Changes to this privacy notice

Submission requirements, processes and systems for REF 2029 are still under development: see www.ref.ac.uk for the current status. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Document last updated in (September 2026)

Version (1.1)