**Record of Processing Activities**

**Data Controller:**THE SCOTTISH QUALIFICATIONS AUTHORITY

**Address:**

THE OPTIMA BUILDING
58 ROBERTSON STREET
GLASGOW
G2 8DQ.

Lowden
24 Wester Shawfair
Dalkeith
Midlothian
EH22 1FD

**Data Protection Officer:**

Kirsty Hurt

THE OPTIMA BUILDING
58 ROBERTSON STREET
GLASGOW
G2 8DQ

data.protection@sqa.org.uk

**Organisational and technical security measures …. (Article 32 (1))**

The following measures are applicable for all processing purposes unless otherwise specifically stated:

Technical measures -

* Access control
* User identification and authentication
* Back-up copies taken
* Business continuity planning
* Data transfers secured
* Patching policy implemented
* Firewalls and anti-virus current and up to date
* Encryption of storage media

Organisational measures –

* Secure premises including server rooms and physical storage
* Security and data protection policies, processes and training
* Application of retention schedule

Transfers to a third country or international organisation …… (Article 49 (1))

Some service providers and third parties used by SQA in the delivery of our services, including cloud storage providers, are located outside of the UK. SQA also provides services to individuals, organisations, colleges and training centres that are not located in the UK. This means that personal data will, in these circumstances, be transferred outside of the UK.

The table below details where this applies and one of the following will be in place to ensure the protection of the personal data –

* UK adequacy regulations will apply to the country or territory to which personal data is transferred;
* Legal agreement or administrative arrangement between public authorities or bodies;
* Standard Contractual Clauses (SCCs);
* Contractual clauses authorised by the ICO;
* exceptions set out in Article 49 of the UK GDPR will apply.

| **Processing purpose** | **Categories of data subjects** | **Categories of personal data** | **Recipients (inc. third countries or international organisations)** | **Transfers to a third country or international organisation ……** (Article 49 (1)) | **Retention period (given where practicable o/w see SQA retention schedule)** | **Organisational and technical security measures** …. (Article 32 (1)) |
| --- | --- | --- | --- | --- | --- | --- |
| Certification of candidates (schools) including re-certification following the  | Candidates (schools) | Personal details[[1]](#footnote-1)Scottish Candidate Number (SCN)Centre detailsAttainment details | CandidatesCentresLocal authorities – Director of EducationUCASScottish Government – Education Analytical Services Division | N/A | Permanent | As above |
| Certification of candidates (colleges/training providers) | Candidates (colleges/training providers) | Personal detailsScottish Candidate Number (SCN)Centre detailsAttainment details | CandidatesCentresSkills Development Scotland (SDS) UCAS  | Yes – if the candidate resides outside of the UK | Permanent | As above |
| Notification of exam results to candidates via text and/or email | Candidates(schools) | Personal details[[2]](#footnote-2)Scottish Candidate Number (SCN)Attainment detailsPhone numberEmail address | Candidates (schools) | N/A | Completion of notification | As above. |
| Marking of examination scripts | Candidates | Personal detailsScottish Candidate Number (SCN)Examination scripts | SQA employeesAppointees | Ireland - where examination scripts are processed within SQA’s e-marking system. | 5 months after certification where no post-results services are requested. See below for applicable retention period.  | As above.  |
| Arranging external examinations including alternative venues and managing co-incident exams  | CandidatesAppointees[[3]](#footnote-3) | Personal detailsScottish Candidate Number (SCN)Indication of need for alternative venue – where applicable | SQA employeesAppointees | Yes – if the alternative venue is located outside of the UK | 1 year after examination diet | As above.  |
| Submission of appeals requests | CandidatesCandidate representative | Personal detailsScottish Candidate Number (SCN)Email addressCandidate representative name and email addressAssessment evidence/materials | SQA employeesCentres | US – name and email address where candidate/candidate representative has requested notification emails | 18 months after certificationName and email address transferred to US – 7 days after sending of email | As above. |
| Review of candidate assessment evidence for appeals  | Candidates | Personal detailsScottish Candidate Number (SCN)Attainment detailsAssessment evidence/materials | SQA employeesAppointees | N/A | 18 months after certification | As above.  |
| Review of candidate assessment evidence for exceptional circumstances | Candidates | Personal detailsScottish Candidate Number (SCN)Attainment detailsExamination scriptsAssessment evidence/materials | SQA employeesAppointees | N/A | 18 months after certification | As above.  |
| Assessment arrangement requests (including temporary disabilities) | Candidates | Personal details Scottish Candidate Number (SCN)Indication of disability/conditionSpecial arrangement requirements | SQA employeesCentres | EU – where communication is sent via email | 2 years after examination diet | As above.  |
| Replacement certificate requests | Candidates | Personal detailsContact detailsPayment card detailsQualifications achievedCopy of ID | SQA employees | N/A | 1 year after completion of request | As above.  |
| Return of externally assessed materials | Candidates | Personal detailsContact detailsCentreBank details/payment card details | SQA employees  | N/A | 1 year after materials returned | As above.  |
| Managing child and adult protection concerns | Candidates | Personal detailsScottish Candidate Number (SCN)Indication of concern – this may include information about mental or physical health Examination scripts – where relevant to concernAssessment evidence/materials – where relevant to concern | SQA employeesCentres | N/A | 1 year after examination diet | As above. |
| MySQA account creation and management | Candidates | Personal detailsScottish Candidate Number (SCN)Centre detailsAttainment details | Candidates | Yes – if candidate resides outside of the UK | Permanent –candidate can request account is de-activated | As above. |
| Qualification approval and verification | Candidates | Personal detailsContact detailsQualification details | SQA employees | Yes – if centre is based outside of the UK. Transfer will be to centre location.EU – where communication is sent via email | 5 years after current year | As above.  |
| System approval and verification | CandidatesCentre employees | Personal detailsContact details Qualification detailsCentre financial details including credit referencing  | SQA employees | Yes – if centre is based outside of the UK. Transfer will be to centre location. EU – where communication is sent via email | 5 years after current year | As above.  |
| Centre approval | Centre employees | Personal detailsContact details Qualification detailsCentre financial details including credit referencing – this will be personal data where it relates to sole traders or partnerships | SQA employees | Yes – if centre is based outside of the UK. Transfer will be to centre location. EU – where communication is sent via email | 3 years after current year Once approved record of centre retained indefinitely | As above.  |
| Accreditation of awarding bodies | Awarding body employeesSector skills council employees | Personal detailsContact details  | SQA Accreditation employees | EU – where communication is sent via email | 6 years after accreditation | As above.  |
| Accreditation of qualifications  | Awarding body employeesSector skills council employees | Personal detailsContact details  | SQA Accreditation employees | EU – where communication is sent via email | Until superseded | As above.  |
| Awarding body monitoring | CandidatesAwarding body employees | Personal detailsContact detailsScottish Candidate Number (SCN)Qualification entries | SQA Accreditation employees | EU – where communication is sent via email | 6 years | As above.  |
| Assessment standards monitoring | Candidates | Personal detailsExamination scripts/Assessment materials | SQA employees | N/A | 7 years after current year | As above and in addition:Anonymisation |
| Development of Understanding Standards exemplar/training materials  | Candidates | Personal detailsExamination scripts/Assessment materials | SQA employeesCentres | N/A | 3 years after being superseded | As above and in addition:Anonymisation where possibleRestricted access to the training materials is provided via access-controlled website |
| Enrolment of candidates - Petroleum Driver Passport qualifications | Candidates | Personal details[[4]](#footnote-4)Centre detailsAttainment details | SQA employeesCentres | Yes – if candidate is based outside of the UKEU – where communication is sent via email | Expiry of entitlement plus 2.5 years | As above. |
| Certification of candidates - Petroleum Driver Passport qualifications | Candidates | Personal details | CandidatesCentresRegulatorsDownstream Fuel Distribution Forum (DFDF)DVSA | Yes – if candidate is based outside of the UKEU – where communication is sent via email | Expiry of entitlement plus 2.5 years | As above. |
| Marking of examination scripts - Petroleum Driver Passport qualifications  | Candidates | Personal detailsScottish Candidate Number (SCN)Examination scripts | SQA employeesAppointees | N/A | 3 months after examination date | As above. |
| Statistical analysis | Candidates | Personal details Attainment details | SQA employees | N/A | Qualification and NQ awarding statistics – Permanent | As above.  |
| Research including recruitment of participants | CandidatesCentre employeesParentsCarers  | Personal details Qualification details | SQA employees(research outcomes are published anonymously) | N/A | Until superseded | As above.  |
| Operational reporting | CandidatesAppointeesEmployees | Personal detailsQualification details | SQA employees | N/A | Until superseded  | As above. |
| Adapted question paper production/distribution | Candidates | Personal detailsAdaption required | SQA employees | N/A | 2 months after exam diet | As above.  |
| Question paper distribution (inc. to alternative venues) | CandidatesAppointeesInvigilators | Personal detailsContact details | SQA employeesInvigilators | N/A | 2 months after exam diet | As above.  |
| Investigation of instances of malpractice | CandidatesCentre employees | Personal detailsExamination scripts/assessment materials | SQA employeesSPSO | EU – where communication is sent via email | 3 years after conclusion of investigation (6 years for regulated qualifications and for cases with possible criminal/civil prosecution)  | As above.  |
| Investigation of complaints | CandidatesCentre employees | Personal detailsExamination scripts/assessment materials | SQA employeesSPSO |  EU – where communication is sent via email | 3 years after conclusion of complaint | As above.  |
| Regulatory audits | SQA employeesCentre employees | Personal detailsContact details | SQA employeesRegulators - SQA Accreditation, Ofqual, Qualification Wales | N/A | Awarding body/provider audits - 6 years after report finalisedRegulated qualification audits - 6 years after closure of any action by Regulator  | As above.  |
| Appointment of board members | Board members | Personal detailsContact details | SQA employees | N/A | Contact details kept permanently | As above. |
| Recruitment | Applicants | Personal detailsEmployment historyEducational historyEqual opportunities detailsProof of right to work in the UKUnspent criminal conviction detailsEnhanced background checks including Disclosure Scotland and Counter Terrorism Checks (CTC) - only where appropriate to role.  | SQA employeesAppointeesDisclosure ScotlandSpotliteUnited Kingdom Security Vetting (UKSV) | N/A | 2 years after appointment for unsuccessful applicantsInformation about successful applicants forms part of their employee record | As above.  |
| Employee management | SQA employees | Personal detailsEmployment historyEducational historyProof of right to work in the UKAttendance and leave detailsContractsWorking arrangementsMaternity/Paternity leave detailsMedical/occupational health detailsReasonable adjustmentsDisciplinary details | SQA employeesSQA’s occupational health provider | EU – where communication is sent via email | 6 years after termination of contract | As above.  |
| Equality monitoring | SQA employees | Equal opportunities details | SQA employees | N/A | 6 years after termination of contract | As above.  |
| Employee training | SQA employees | Personal details Training/development requirements | Training providers | N/A | 6 years after termination of contract | As above.  |
| Issuing of staff survey | SQA employees | NameSQA email address | SQA EmployeesResearch company engaged to undertake survey | N/A | Completion of survey | As above. |
| Appointee management | Appointees | Personal detailsGenderEmployment detailsQualification detailsTraining/development requirements | SQA Employees | EU – where communication is sent via emailUS – appointee name and email address to send notification emails regarding their appointee portal account | 6 years after current yearName and email address transferred to US – 7 days after sending of email | As above.  |
| Pension scheme enrolment | SQA employeesAppointees | Personal detailsSalary details Medical health details  | SQA employeesPension scheme providers – Strathclyde Pension Fund, Scottish Public Pensions Agency | N/A | 6 years after end of financial year | As above.  |
| Workforce management (cost allocation and resource/capacity planning) | SQAemployees | Time recording – time spent on work related activities | SQA employees | N/A | 6 years after termination of contract or after data review undertaken every 7 years – whichever is later | As above. |
| Payment of employees/appointees/contractors/suppliers | SQA employeesAppointeeContractorsSuppliers | Personal detailsBank detailsTax detailsDeductions | SQA employeesHMRC | N/A | 6 years after end of financial year | As above.  |
| Statutory financial reporting | SQA employeesAppointeeContractorsSuppliers | Personal detailsTax detailsDeductions | SQA employeesHMRCPension scheme providers – Strathclyde Pension Fund, Scottish Public Pensions Agency | N/A | 6 years after end of financial year | As above.  |
| Billing of colleges and overseas centres | Candidates | Personal details | SQA employeesCentres | Yes – where centre is based outside of the UK. Transfer will be to centre location. | 6 years after end of financial year | As above.  |
| Procurement including tendering, supplier and contract management | Supplier employees | Personal details including CVsContact details | SQA employees | N/A | Successful: 6 years after contact endUnsuccessful: 1 year after contract start date | As above.  |
| Auditing | SQA employeesAppointees ContractorsSuppliers | Personal details | SQA employeesSQA internal auditors Audit Scotland  | N/A | 6 years after completion of auditRetention periods will be set separately by any external auditors such as Audit Scotland.  | As above. |
| Contract bid development  | SQA employees Consultants | Personal detailsContact detailsQualification detailsEmployment details | SQA employeesContracting bodies | Yes – if bid is being made to an organisation based outside of the UKEU – where communication is sent via email | Until completion of lessons learned following bid outcome | As above.  |
| Travel and accommodation booking | SQA employeesAppointees | Personal detailsContact detailsTravel details inc. passport number | SQA employeesTravel provider - CTM | Yes – if travel is outside the UKEU – where communication is sent via email | 1 year following date of booking Regular traveller profiles: Until termination of employee/appointee contract  | As above.  |
| Application for travel visas | SQA employeesAppointees | Personal detailsContact detailsTravel details inc. passport number Family details i.e. spouse’s name | SQA employeesEmbassy/government department issuing visa | Yes – where visa application is for a country outside of the UK. | Until visa expiration  | As above.  |
| Events administration | Event delegates – centre employees/appointees | Personal detailsContact detailsAccess/dietary requirements | SQA employees | N/A | 3 years after conclusion of event | As above.  |
| Responding to subject access requests | Requestors (Candidates,SQA Employees,Appointees) | Personal detailsRequest DetailsQualification detailsPost result services/exceptional circumstances requests and outcomesScript cover sheetsSQA employment/appointment records  | SQA employeesRequestors | Yes – if requestor is based outside of the UKEU – where communication is sent via email | 3 years after end of calendar year | As above.  |
| Responding to data subject rights requests  | Requestors (Candidates,SQA Employees,Appointees) | Personal detailsRequest DetailsPersonal data relevant to request | SQA employees | Yes – if requestor is based outside of the UKEU – where communication is sent via email | 3 years after end of calendar year | As above.  |
| Responding to FOI/EIR requests | Requestors  | Personal detailsRequest Details | SQA employees | Yes – if requestor is based outside of the UKEU – where communication is sent via email | 3 years after end of calendar year | As above.  |
| Responding to enquiries  | Requestors | Personal detailsContact details | SQA employees | Yes – if requestor is based outside of the UK EU – where communication is sent via email | 2 years after end of calendar year | As above.  |
| Stakeholder communication | AppointeesLocal Authority/College/Training provider employeesAwarding body employeesRegulator employeesScottish Government employeesSDS employeesCouncil for the Curriculum, Examinations and Assessment employeesSector Skills Council employees | Personal detailsContact details | SQA employees | EU – where communication is sent via email | Until superseded and/or unsubscribe  | As above.  |
| Marketing | Colleges and training providers employeesConsultantsGeneral PublicCandidates | Personal detailsContact detailsBrowsing activity – collected via website cookies | SQA employeese-shot (digital marketing platform) | N/A | Until superseded and/or unsubscribe  | As above.  |
| Recording and publication of video/photographic content | CandidatesSQA employeesCentre employeesSQA event attendees | Images | SQA employeesAppointeesGeneral public | Images may be utilised in publicity material for the international market. | Until the content is no longer required or consent is withdrawn | As above.  |
| Security incident management | SQA employees | Personal details Contact details | SQA employees | EU – where communication is sent via email | 5 years after conclusion of investigation | As above.  |
| Business continuity planning | SQA employees | Personal detailsContact details | SQA employees | EU – where communication is sent via email | Incident Management and Executive Management Team Plans and supporting documents: Until supersededBusiness Area Recovery Plans: 3 years after plan superseded | As above.  |
| System access management | SQA employeesCentre employeesAppointeesCandidates | Personal detailsContact detailsSystem credentials | SQA employees | N/A | 1 year after account expiry | As above.  |
| Health and safety management | SQA Employees | Personal detailsMedical/physical health detailsDriving licence number/vehicle details | SQA Employees | EU – where communication is sent via email | Risk assessments: Inspection plus 5 yearsAccident reports: Date of accident plus 7 years or 25 years if incident involves a minorDriver assessments: Date of assessment plus 2 years | As above.  |
| CCTV image recording (within SQA premises) | SQA EmployeesAppointeeVisitors to SQA premises | Images | SQA employees | N/A | 14 days | As above. |
| Data back up  | SQA EmployeesCandidatesAppointeesLocal Authority employeesCentre employeesAwarding body employeesRegulator employeesScottish Government employeesSDS employeesCouncil for the Curriculum, Examinations and Assessment employeesSector Skills Council employeesConsultantsGeneral public | All personal data as described above | SQA employees | N/A  | Daily back-ups: End of each day plus 30 daysWeekly back-ups: End of each working week plus 30 daysMonthly disc back-ups: End of each month plus 365 days | As above and in addition:Secure servers |
| Management of online assessment services (SOLAR) | Candidates AppointeesCentre employees | Personal detailsAssessment details inc. resultsSystem login details | SQA employeesCentre employees | N/A | TBC | As above |
| Management of training and learning services (SQA Academy) | SQA employees AppointeesCentre employeesContracting body employees | Personal detailsTraining details inc. resultsSystem login details | SQA employeesContracting bodies – where applicableLearning platform provider – E-learn Design | N/A | 2 years after cessation of account activity  | As above |

1. Personal details can include name, age, date of birth, address [↑](#footnote-ref-1)
2. Personal details can include name, age, date of birth, address [↑](#footnote-ref-2)
3. Appointee roles are defined on SQA’s website <http://www.sqa.org.uk/sqa/35695.2299.html> [↑](#footnote-ref-3)
4. Personal details can include name, age, date of birth, address [↑](#footnote-ref-4)