**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

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58 ROBERTSON STREET   
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G2 8DQ

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**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 appeals | Candidates  (schools) | Personal details[[1]](#footnote-1)  Scottish Candidate Number (SCN)  Centre details  Attainment details | Candidates  Centres  Local authorities – Director of Education  UCAS  Scottish Government – Education Analytical Services Division | N/A | Permanent | As above |
| Certification of candidates (colleges/training providers) | Candidates (colleges/training providers) | Personal details  Scottish Candidate Number (SCN)  Centre details  Attainment details | Candidates  Centres  Skills 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 details  Phone number  Email address | Candidates (schools) | N/A | Completion of notification | As above. |
| Marking of examination scripts | Candidates | Personal details  Scottish Candidate Number (SCN)  Examination scripts | SQA employees  Appointees | Ireland - where examination scripts are processed within SQA’s e-marking system. | 5 months after certification where no post-results services are requested. See above for applicable retention period. | As above. |
| Arranging external examinations including alternative venues and managing co-incident exams | Candidates  Appointees[[3]](#footnote-3) | Personal details  Scottish Candidate Number (SCN)  Indication of need for alternative venue – where applicable | SQA employees  Appointees | Yes – if the alternative venue is located outside of the UK | 1 year after examination diet | As above. |
| Submission of appeals requests | Candidates Candidate representative | Personal details  Scottish Candidate Number (SCN) Email address Candidate representative name and email address  Assessment evidence/materials | SQA employees Centres | US – name and email address where candidate/candidate representative has requested notification emails | 18 months after certification  Name and email address transferred to US – 7 days after sending of email | As above. |
| Review of candidate assessment evidence for appeals | Candidates | Personal details  Scottish Candidate Number (SCN)  Attainment details  Assessment evidence/materials | SQA employees  Appointees | N/A | 18 months after certification | As above. |
| Review of candidate assessment evidence for exceptional circumstances | Candidates | Personal details  Scottish Candidate Number (SCN)  Attainment details  Examination scripts  Assessment evidence/materials | SQA employees  Appointees | N/A | 18 months after certification | As above. |
| Assessment arrangement requests (including temporary disabilities) | Candidates | Personal details  Scottish Candidate Number (SCN)  Indication of disability/condition  Special arrangement requirements | SQA employees  Centres | EU – where communication is sent via email | 1 year after examination diet | As above. |
| Replacement certificate requests | Candidates | Personal details  Contact details  Payment card details  Qualifications achieved  Copy of ID | SQA employees | N/A | 1 year after completion of request | As above. |
| Return of externally assessed materials | Candidates | Personal details  Contact details  Centre  Bank details/payment card details | SQA employees | N/A | 2 years after materials returned | As above. |
| Managing child and adult protection concerns | Candidates | Personal details  Scottish Candidate Number (SCN)  Indication of concern – this may include information about mental or physical health  Examination scripts – where relevant to concern  Assessment evidence/materials – where relevant to concern | SQA employees  Centres | N/A | 1 year after examination diet | As above. |
| MySQA account creation | Candidates | Personal details  Scottish Candidate Number (SCN)  Centre details  Attainment 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 details  Contact details  Qualification 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 | 3 years after current year | As above. |
| System approval and verification | Candidates  Centre employees | Personal details  Contact details  Qualification details  Centre 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 details  Contact details  Qualification details  Centre 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 | 2 years after current year | As above. |
| Accreditation of awarding bodies | Awarding body employees  Sector skills council employees | Personal details  Contact details | SQA Accreditation employees | EU – where communication is sent via email | 6 years after accreditation | As above. |
| Accreditation of qualifications | Awarding body employees  Sector skills council employees | Personal details  Contact details | SQA Accreditation employees | EU – where communication is sent via email | Until superseded | As above. |
| Awarding body monitoring | Candidates  Awarding body employees | Personal details  Contact details  Scottish Candidate Number (SCN)  Qualification entries | SQA Accreditation employees | EU – where communication is sent via email | 6 years | As above. |
| Assessment standards monitoring | Candidates | Personal details  Examination scripts/Assessment materials | SQA employees | N/A | 5 after current year  Scripts and assessment materials are anonymised following completion of analysis and retained permanently. | As above and in addition:  Anonymisation |
| Enrolment of candidates  (Dangerous Goods Driver Training, Dangerous Goods Safety Adviser and Petroleum Driver Passport qualifications and the Marine and Coastguard Agency Certificates of Competency) | Candidates | Personal details[[4]](#footnote-4)  Centre details  Attainment details | SQA employees  Centres | Yes – if candidate is based outside of the UK  EU – where communication is sent via email | Examination date plus 1 year | As above. |
| Certification of candidates  (Dangerous Goods Driver Training, Dangerous Goods Safety Adviser and Petroleum Driver Passport qualifications and the Marine and Coastguard Agency Certificates of Competency) | Candidates | Personal details | Candidates  Centres  Regulators  The following recipients only receive personal data for which they are the joint data controller:  Marine and Coastguard Agency  Department for Transport | Yes – if candidate is based outside of the UK  EU – where communication is sent via email | Termination of contract with client plus 1 year | As above. |
| Production of licence/authorisation cards  (StreetWorks and Dangerous Goods Driver Qualifications) | Candidates | Personal details  Photographs  Attainment details | Candidates  Centres | N/A | SWQR – 7 years after licence expiry  DGSA – Termination of contract plus 1 year | As above. |
| Marking of examination scripts  (Dangerous Goods Driver Training, Dangerous Goods Safety Adviser and Petroleum Driver Passport qualifications and the Marine and Coastguard Agency Certificates of Competency) | Candidates | Personal details  Scottish Candidate Number (SCN)  Examination scripts | SQA employees  Appointees | N/A | 12 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 | Candidates  Centre employees | Personal details  Qualification details | SQA employees  (research outcomes are published anonymously) | N/A | Until superseded | As above. |
| Adapted question paper production/distribution | Candidates | Personal details  Adaption required | SQA employees | N/A | 2 months after exam diet | As above. |
| Question paper distribution (inc. to alternative venues) | Candidates  Appointees  Invigilators | Personal details  Contact details | SQA employees  Invigilators | N/A | 2 months after exam diet | As above. |
| Investigation of instances of malpractice | Candidates  Centre employees | Personal details  Examination scripts/assessment materials | SQA employees  SPSO | EU – where communication is sent via email | 3 years after conclusion of investigation (5 years for cases with possible criminal/civil prosecution) | As above. |
| Investigation of complaints | Candidates  Centre employees | Personal details  Examination scripts/assessment materials | SQA employees  SPSO | EU – where communication is sent via email | 3 years after conclusion of complaint | As above. |
| Regulatory audits | SQA employees  Centre employees | Personal details  Contact details | SQA employees  Regulators - SQA Accreditation, Ofqual, Qualification Wales | N/A | Awarding body/provider audits - 6 years after report finalised  Regulated qualification audits - 6 years after closure of any action by Regulator | As above. |
| Recruitment | Applicants | Personal details  Employment history  Educational history  Equal opportunities details  Proof of right to work in the UK  Unspent criminal conviction details  Enhanced background checks including Disclosure Scotland and Counter Terrorism Checks (CTC) - only where appropriate to role. | SQA employees  Appointees  Disclosure Scotland  Experian  United Kingdom Security Vetting (UKSV) | N/A | 2 years after appointment for unsuccessful applicants | As above. |
| Employee management | SQA employees | Personal details  Employment history  Educational history  Proof of right to work in the UK  Attendance and leave details  Contracts  Working arrangements  Maternity/Paternity leave details  Medical/occupational health details  Disciplinary details | SQA employees SQA’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 | Training requests – 1 year after completion of training  Performance Management Review/Personal Development Plan – 6 years after termination of contract | As above. |
| Issuing of staff satisfaction survey | SQA employees | Name SQA email address | SQA Employees | N/A | Completion of survey | As above. |
| Appointee management | Appointees | Personal details Gender Employment details  Qualification details  Training/development requirements | SQA Employees | EU – where communication is sent via email  US – appointee name and email address to send notification emails regarding their appointee portal account | 1 year after current year  Name and email address transferred to US – 7 days after sending of email | As above. |
| Pension scheme enrolment | SQA employees  Appointees | Personal details  Salary details  Medical health details | SQA employees  Pension 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) | SQA  employees | 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 employees  Appointee  Contractors  Suppliers | Personal details  Bank details  Tax details  Deductions | SQA employees HMRC | N/A | 6 years after end of financial year | As above. |
| Statutory financial reporting | SQA employees  Appointee  Contractors  Suppliers | Personal details  Tax details  Deductions | SQA employees  HMRC  Pension 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 employees  Centres | 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 CVs  Contact details | SQA employees | N/A | Successful:  6 years after contact end  Unsuccessful:  1 year after contract start date | As above. |
| Auditing | SQA employees  Appointees Contractors  Suppliers | Personal details | SQA employees  SQA internal auditors  Audit Scotland | N/A | 6 years after completion of audit  Retention periods will be set separately by any external auditors such as Audit Scotland. | As above. |
| Contract bid development | SQA employees  Consultants | Personal details  Contact details  Qualification details  Employment details | SQA employees  Contracting bodies | Yes – if bid is being made to an organisation based outside of the UK  EU – where communication is sent via email | Until completion of lessons learned following bid outcome | As above. |
| Travel and accommodation booking | SQA employees  Appointees | Personal details  Contact details  Travel details inc. passport number | SQA employees  Travel provider - Redfern | Yes – if travel is outside the UK  EU – 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 employees  Appointees | Personal details  Contact details  Travel details inc. passport number  Family details i.e. spouse’s name | SQA employees  Embassy/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 details  Contact details  Access/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 details  Request Details  Qualification details  Post result services/exceptional circumstances requests and outcomes  Script cover sheets  SQA employment/appointment records | SQA employees  Requestors | Yes – if requestor is based outside of the UK  EU – 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 details  Request Details  Personal data relevant to request | SQA employees | Yes – if requestor is based outside of the UK  EU – where communication is sent via email | 3 years after end of calendar year | As above. |
| Responding to FOI requests | Requestors | Personal details  Request Details | SQA employees | Yes – if requestor is based outside of the UK  EU – where communication is sent via email | 3 years after end of calendar year | As above. |
| Responding to enquiries | Requestors | Personal details  Contact 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 | Appointees  Local Authority/College/Training provider employees  Awarding body employees  Regulator employees  Scottish Government employees  SDS employees  Council for the Curriculum, Examinations and Assessment employees  Sector Skills Council employees | Personal details  Contact details | SQA employees | EU – where communication is sent via email | Until superseded and/or unsubscribe | As above. |
| Marketing | Colleges and training providers employees  Consultants  General Public  Candidates | Personal details  Contact details  Browsing activity – collected via website cookies | SQA employees  Marketo | N/A | Until superseded and/or unsubscribe | As above. |
| Recording and publication of video/photographic content | Candidates  SQA employees  Centre employees SQA event attendees | Images | SQA employees  Appointees  General 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 details  Contact details | SQA employees | EU – where communication is sent via email | Incident Management and Executive Management Team Plans and supporting documents: Until superseded  Business Area Recovery Plans: 3 years after plan superseded | As above. |
| System access management | SQA employees  Centre employees  Appointees  Candidates | Personal details  Contact details  System credentials | SQA employees | N/A | 1 year after account expiry | As above. |
| Health and safety management | SQA Employees | Personal details  Medical/physical health details  Driving licence number/vehicle details | SQA Employees | EU – where communication is sent via email | Risk assessments: Inspection plus 5 years  Accident reports: Date of accident plus 7 years or 25 years if incident involves a minor  Driver assessments: Date of assessment plus 2 years | As above. |
| CCTV image recording (within SQA premises) | SQA Employees  Appointee  Visitors to SQA premises | Images | SQA employees | N/A | 14 days | As above. |
| Data back up | SQA Employees  Candidates  Appointees  Local Authority employees  Centre employees  Awarding body employees  Regulator employees  Scottish Government employees  SDS employees  Council for the Curriculum, Examinations and Assessment employees  Sector Skills Council employees  Consultants  General public | All personal data as described above | SQA employees | N/A | Daily back-ups: End of each day plus 1 week  Weekly back-ups: End of each working week plus 1 month  Monthly disc back-ups: End of each month plus 3 months  Monthly tape back-ups: End of each month plus 1 year | As above and in addition:  Secure servers |
| Management of online assessment services (SOLAR) | Candidates  Appointees Centre employees | Personal details  Assessment details inc. results  System login details | SQA employees  Centre employees | N/A | TBC | As above |
| Management of training and learning services (SQA Academy) | SQA employees  Appointees Centre employees Contracting body employees | Personal details Training details inc. results System login details | SQA employees Contracting bodies – where applicable Learning 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)