SP22

SQA: Data Protection Policy

(to be used in conjunction with FuturU Data Protection policy)

Policy owner	Head of Quality & Compliance
Policy approved by	Head of Quality & Compliance
Date policy update approved	April 2025
Next review date	April 2026
Version number	1.1
Classification	External

Scope of the policy

This policy must be used in conjunction with the FuturU Data Protection Policy. The details below are specific to the Scottish Qualification Authority (SQA).

Who needs to know about the policy?

Customer and staff who work within the FuturU SQA provision.

Obtaining copies of the policy

Customers can download copies of the policy from our platform or request copies from our FuturU EPA Team or qualification centre.

Reviewing the policy

We will review this policy yearly and where otherwise necessary and may revise it as required in response to the findings of any review.

Complaint

Customers have the right to express their dissatisfaction regarding our actions, products or services. Our Complaints Policy in particular outlines when we will and will not accept a complaint, and when our decisions are final. Please see our Complaints Procedure for more information.

Data Protection

Obtaining personal information from candidates

Personal information that will need to be obtained from candidates will include the following:

- Full name
- Date of birth*
- Gender
- Home address
- Scottish Candidate Number (if known by the candidate)

*If centres have candidates under the age of 16 they will need to contact their regional manager.

Personal information will be obtained from candidates through the completion of a Candidate Registration form.

This can be completed by hand or online. Candidates will be informed at induction that they must inform FuturU of any changes to their personal details immediately.

If a candidate does not know their Scottish Candidate Number, FuturU will look it up on SQA Connect and update their personal details where necessary.

Candidate data protection

Candidates must be informed that their personal data will be sent to SQA for the purpose of entering them for a SQA qualification, certification and maintenance of their record of attainment. Candidates will be provided with SQA's Privacy statement so that they are aware of how SQA will use their information. Consent does not need to be obtained for this process.

Checking Scottish Candidate Number (SCNs)

Candidates will already have a SCN if they have attended a school, college or training provider in Scotland where they undertook a SQA qualification. If a candidate knows their SCN they should provide this to FuturU during the registration process. If their SCN is unknown an existing one can be checked for on Connect using the candidate's personal details.

If a candidate does not have a SCN, one can be allocated via SQA Connect.

During the registration process SQA's system will automatically check for duplicate candidates and will notify FuturU if a match is found. FuturU will then look into whether or not it is the same person.

Registration of new candidates with SQA

Candidates that have never previously been registered with the SQA should be registered via SQA Connect.

As soon as candidates have been registered and have enrolled on their programme of study, we will notify SQA.

This will ensure that;

- results corresponding to the entries can be submitted, and candidates are certificated accurately
- SQA can plan its qualification verification selection and activities effectively
- learners undertaking SQA qualifications are entered as SQA candidates, with the associated responsibilities and entitlements

We will keep all entry information up to date, to ensure that certification is carried out at the correct time for the candidate.

We will only offer the SQA qualifications that we are qualified and approved to provide.

Unit and group award entries

Completion dates for units can be up to two years from the date of entry but cannot go beyond SQA's finish date of the qualification.

Completion dates for an SVQ can be up to five years from the date of entry but cannot go beyond SQA's finish date of the qualification.

Requirements of SQA:

- Entries to be submitted as soon as possible after the start of the programme
- The SVQ 10-week rule (SVQ awards and units, Workplace Core Skills units and assessor and

verifier units cannot be certificated within 10 weeks of the entry date of the qualification).

Record retention

FuturU must retain records for one calendar year following completion of SQA qualifications. If delivering Ofqual or Qualifications Wales regulated qualifications must retain records of candidate assessment for at least six years. All electronic copies of personal data should be stored securely using passwords and bcrypt or SHA1 data encryption;

All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;

All personal data stored electronically should be backed up every day with backups stored onsite and online. All backups should be encrypted using AES256;

No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise without the formal written approval of the Interim Chief Technology Officer and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary; and

No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

Records that must be kept, include the following:

- a list of candidates registered with SQA for each qualification offered in the centre
- details of candidate assessment, including the name of the assessor, location, date and outcome
- internal verification activity
- certificates claimed

In the case of an appeal against an internal assessment result, FuturU will retain records, including all materials and evidence, until the appeal has been resolved. For appeals to SQA against an internal assessment result in a regulated qualification — assessment and internal verification records for appeals cases will be retained for six years thereafter, unless there is a legitimate reason to retain records for a further period.

Where an investigation of suspected malpractice is carried out, the FuturU must retain related records and documentation for three years for non-regulated and six years for regulated qualifications. In the case of an appeal to SQA against the outcome of a malpractice investigation, assessment records must be retained for six years. In an investigation involving a potential criminal prosecution or civil claim, records and documentation should be retained for six years after the case and any appeal has been heard. If the centre is any doubt about whether criminal or civil proceedings will take place, it should keep records for the full six-year period.

Retention of candidate evidence

All candidate evidence will be returned to candidates *three weeks after the official completion date notified to SQA, unless a SQA Qualification Verifier, has given notification for evidence relating to selected Units to be made available for sampling during a forthcoming Qualification Verification Visit/Event. In this case, the evidence will be retained until the visit/event has passed, whereupon certificated evidence will be returned to candidates.

Revision History

Revision date	Version	Author	Revision Summary
April 2025	1.1	HoQ&C	Changed to a new format. Made reference to central Data Protection Policy