This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the <u>Criteria for an acceptable DPIA</u> set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

#### Submitting controller details

Name of controller	Young STEM Leader Project Team
Subject/title of DPO	Ian Woodley
Name of controller contact /DPO	Above
(delete as appropriate)	

### Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

To allow young people and the adults supporting them to maintain an online log of evidence to gain a Young STEM Leader Award.

Young STEM Leaders (YSLs) will complete an online assessment tool with (mainly) written answers to set questions. They are also able to upload small files which would support their written work. For example, a Young STEM Leader may have to answer questions on how they will do a safe Science activity and after answering these questions, they may upload a photograph of themselves safely completing that Science activity.

Adults supporting YSLs (Tutor Assessors) will use the platform to mark the assessments, as well as undertake cross-marking exercises with other Tutor Assessors.



### Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

### For Tutor Assessors (TAs)

We will collect and securely store only the following data:

- your name
- your email address
- the centre where you work
- confirmation that you are registered with Disclosure Scotland and a member of the PVG Scheme

In addition, it is standard practice of SSERC that a TA's email is added to a MICROSOFT Team. Their email will therefore be visible to fellow trained TAs. They can opt out of this before they are added or at any point by emailing youngstemleader@sserc.scot.

Any data we store can be updated or immediately, permanently deleted on your request by emailing youngstemleader@sserc.scot. The above data is the minimum which we require and therefore is the only data we will collect and store.

#### For Young STEM Leaders

We will collect and securely store only the following data:

- your name
- date of birth (DOB)
- contact email address (for online sign up only)
- parent email address or a covering letter for parents highlighting that the young person has been enrolled (if participant is under 13)
- the YSLP delivering centre you attend
- your Scottish Candidate Number (SCN) only if you are completing a formal level of YSLP

When submitted for certification, Tutor Assessors are asked to provide further information about YSLs that is stored securely

- Sex (Male, Female, Not Known, Not Applicable)
- SEED code of presenting centre

When completing assessments, YSLs may choose to upload additional files to the platform such as photos, videos or audio files. These will be stored with other assessment data and are only visible to the Tutor Assessor and SSERC.

All of this data will be deleted if the Young STEM Leader account gets removed by the Tutor Assessor.

We will also keep a record of all YSLP awardee names and the levels they have gained for the lifetime of the YSLP. This will allow future certification enquiries and reissuing of certificates to YSLs should they request this.

Any data we store can be updated or immediately, permanently deleted on your request by emailing youngstemleader@sserc.scot. The above data is the minimum which we require and therefore is the only data we will collect and store.

### **External Verification**

During the External Verification process, SSERC staff may ask to review assessment and verification documentation, including YSLs' written/media evidence. This data will only be used for the purposes of External Verification.

### Sharing of Data with Third Parties

We may share personal data with the third parties and only for the reasons outlined below:

### Collection of Insight tariff points – formal levels only

For secondary school based YSLs that have completed a formal award (YSL4, YSL5 or YSL6) the following data will be provided to the **Scottish Government Insight Team** to allow centres to gain Insight Tariff Points:

- SCN
- DOB
- Sex (Male/Female/Not known)
- SEED code

## Online platform

**Pogo Studio** are the web builders responsible for creating the YSLP online platform. For maintenance reasons they may access the secure admin section of the website where personal data is stored. Pogo have extensive experience of protecting online data and the YSLP online platform is built using UK-based servers for data storage. The website is fully secure using Microsoft Azure <u>https://cybersecurity.att.com/products/security</u>. More specific detail on the security of our online platform can be provided by Pogo.

Any third parties will be listed above and will be given an update version of this policy annually and must email the YSLP Programme Manager to confirm they have read and will follow the policy.

<u>Website</u>

Our contracted development partner, **JH Digital Design (JHDD)**, manages and administers our front facing website only and may access the TA details that have been entered to sign up for training sessions for reporting purposes. Note, JHDD does not have access to the online platform.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

See above.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Children will provide the data listed in step 2. These are young people who are storing evidence on an online (private, membership account, secure) website managed by a responsible adult such as a teacher or youth/community leader (who must hold a PVG certificate). The portal is overseen by SSERC. All people involved will be fully aware of what data will be collected and how it will be used. There are no prior concerns and we have sought, and acted on, advice from several professionals including Government, Education, Legal, IT and Health and Safety. **Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

To allow Tutors Assessors (trained adults) who are delivering the programme to electronically/remotely view the learner journey evidence that a Young STEM Leader enters in their online log and assess this evidence.

To increase equitable access to STEM by enabling young people to digitally collect and submit evidence in a format that they choose, removing barriers to participation through only the written word.

This online platform will also allow the Young STEM Leader Project Team at SSERC to remotely quality assure the delivery of the programme by a Tutor Assessor.

#### Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it is not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

When joining the Young STEM Leader Programme, all Tutor Assessors are given training on using the online platform. There is also Privacy and GDPR Compliance Policy which is provided to all Tutor Assessors and Young STEM Leaders. They may also view this DPIA on request. This DPIA will also be made available to Local Authorities on request.

### Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Anyone who enters evidence into the online platform is using a limited number of entry points with restricted word counts and clear guidance on the type of evidence that is to be written or uploaded by them. Individuals are given our Privacy and GDPR Compliance Policy.

Data that is uploaded is reviewed for suitability and assessment by TAs and SSERC verifiers.

In terms of data creep and minimization, see section 2. We only collect the minimum necessary data for TAs and YSLs to complete the programme. Based on the web forms which we use for registration to the programme, it is not possible to enter additional data (at the user end) other than that specified.

### Step 5: Identify and assess risks

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	Likelihood	Severity of	Overall
	of harm	harm	risk
<ol> <li>Personal data on young people or adults taking part in our programme is stolen from our website. This is mitigated by the enhanced security measures we have in place at all stages of data collection.</li> </ol>	Possible	Minimal	Low,

# Step 6: Identify measures to reduce risk

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
1.	1.1. Production of Privacy and GDPR Compliance Policy and ensuring this is available to all.			
	1.2 Website training delivered by the Project Team to Tutor Assessors supporting them to follow policy.	reduced	low	yes
	1.3 Use of highest security programme possible for website.	reduced	low	yes

# Step 7: Sign off and record outcomes

	Name/position/date	Notes
Measures approved by:	S Macnab, Programme Manager, January 2024	Send updated policy to Partner organisations
Residual risks approved by:	S Macnab, Programme Manager, January 2024	No high risks identified
DPO advice provided:	l Woodley	DPO should advise on compliance, measures and whether processing can proceed
Summary of DPO advice:		
be collected, which has beer who i) Makes the request or through a software update c	this project that only the minimum adhered to. Also, the project will ii) has not used the system in 2 ye lue in summer 2024). All partners olicy and their policies are in accord processing can continue.	delete any data held by anyone ars (this update will be enacted have been asked to confirm that
DPO advice accepted or overruled by:	Accepted in full.	If overruled, you must explain your reasons
Comments: NA. This will be		
Comments. INA. This will be	reviewed in 12 months.	
Consultation responses reviewed by:	NA	If your decision departs from individuals' views, you must explain your reasons
Consultation responses		individuals' views, you must