

Register of Processing

Student Bursaries	
Purpose of Activity	Assessment and payment of Student Bursaries including Young Students' Bursary (YSB), Independent Students' Bursary (ISB) and Care Experienced Bursary
Categories of Data Subject	Students, relatives and guardians
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	2(g) - processing is necessary for reasons of substantial public interest,
Statutory Provision	Student Allowances (Scotland) Regulations 2007, reg 5(3)(c)

Tuition Fees	
Purpose of Activity	Assessment and payment of Tuition Fees
Categories of Data Subject	Students
Personal Data Category	Personal, education and employment data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public

	interest or in the exercise of official authority vested in the controller
Article 9	None
Statutory Provision	Education (Student Loans for Tuition Fees) (Scotland) Regulations 2006, reg 8(1)

Living Cost Loans	
Purpose of Activity	Assessment of Living Cost Loans
Categories of Data Subject	Students, relatives and guardians
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	2(g) - processing is necessary for reasons of substantial public interest,
Statutory Provision	Education (Student Loans)(Scotland) Regulations, regulation 9(1)

Grants	
Purpose of Activity	Assessment and payment of Lone parent grant, living-cost grant, dependants grant, accommodation grant
Categories of Data Subject	Students and relatives
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	

Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	2(g) - processing is necessary for reasons of substantial public interest,
Statutory Provision	Student Allowances (Scotland) Regulations 2007, reg 5(3)(c)

Nursing and Midwifery Bursaries

Purpose of Activity	Assessment and payment of Nursing and Midwifery Bursaries (for Nursing, Midwifery and Allied Health Professions)
Categories of Data Subject	Students
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	No
Statutory Provision	Nursing and Midwifery Student Allowances (Scotland) Regulations, reg 5(3)(c)

Part-time Fee Grant

Purpose of Activity	Assessment and payment of Part-time Fee Grant
Categories of Data Subject	Students
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	No

Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	No
Statutory Provision	Student Allowances (Scotland) Regulations 2007, reg 5(3)(c)

Disabled Student Allowance	
Purpose of Activity	Administration and payment of Disabled Students' Allowance
Categories of Data Subject	Students
Personal Data Category	Personal, education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	Section 2(g) - substantial public interest
Statutory Provision	

Dental Bursary Scheme	
Purpose of Activity	Administration and payment of Dental Bursary Scheme
Categories of Data Subject	Students
Personal Data Category	Personal, education, employment data
Special Categories of Personal Data (sensitive)	

Lawful Basis for Processing	
Article 6	Section 1(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	National Health Services (Scotland) Act 1978 reg 1(A)

Civil Recoveries	
Purpose of Activity	Administration and recoveries of money
Categories of Data Subject	Debtor
Personal Data Category	Personal, education and financial data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	No
Statutory Provision	Student Allowances (Scotland) Regulations 2007 and Nursing and Midwifery Student Allowances (Scotland) Regulations 2007

Counter-Fraud	
Purpose of Activity	Proactive and reactive investigations into criminal activities including fraud for the purpose of recovering public funds and pursuing criminal prosecution.
Law Enforcement Purpose	Prevention, Detection and Investigation of crime
Data Subject Categories	Suspects/witnesses/relatives
Data Category	Personal, education, employment and financial data

Special Category of Personal Data	Yes
Lawful Basis for Processing under GDPR	
Article 6	Section (1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	Section 2(g) - substantial public interest
Lawful Basis for Processing for the Law Enforcement purpose	
DPA section 35	Section 2(b) Performance of a task
DPA Schedule 8	Section 1 - Statutory purpose
Statutory Provision	Student Allowances (Scotland) Regulations 2007, reg 5(3)(c), Nursing and Midwifery Student Allowances (Scotland) Regulations, reg 5(3)(c)

Complaints and Appeals	
Purpose of Activity	Processing of complaints and appeals
Categories of Data Subject	Complainants correspondence, students, guardians, relatives, legal representative
Personal Data Category	Personal , education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or official functions
Article 9	2(g) - processing is necessary for reasons of substantial public interest,
Statutory Provision	

Statistics and Analysis	
Purpose of Activity	Performance management and forward planning
Categories of Data Subject	Students/relatives/guardians
Personal Data Category	Personal , education, employment and financial data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or official functions
Article 9	2(g) - processing is necessary for reasons of substantial public interest
Statutory Provision	

Processing Activities – Data Shared with External Partners

Student Status Information – Scottish Universities, Colleges and Learning Providers (including Private)	
Purpose of Sharing	Gathering student status information directly from colleges, universities and learning providers (including private) for the purpose of capturing enrolment confirmation and ‘on-going’ student attendance as well as change of circumstance notifications from colleges and universities to ensure students remain eligible for funding.
Category of Recipient	Universities, colleges and learning providers (including private)
Categories of Data Subject	Students
Personal Data Category	Personal
Special Category of	No

Personal Data (sensitive)	
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	Student Allowances (Scotland) Regulations 2007, Nursing and Midwifery Student Allowances (Scotland) Regulations
Data Sharing Agreement	Data Sharing Framework

Student Status Information - Universities, Colleges and Learning Providers (including Private) out-with Scotland but within the rest of the UK	
Purpose of Sharing	Gathering student status information directly from colleges, universities and learning providers (including private) for the purpose of capturing enrolment confirmation and 'on-going' attendance to ensure students remain eligible for funding where they attend universities and colleges outwith Scotland but within the rest of the UK.
Category of Recipient	The Student Loans Company
Categories of Data Subject	Students
Personal Data Category	Personal
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	Student Allowances (Scotland) Regulations 2007, Nursing and Midwifery Student Allowances (Scotland) Regulations, Education (Student Loans for Tuition Fees) (Scotland) Regulations 2006

Data Sharing Agreement	Data Sharing Framework
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Student Loans	
Purpose of Sharing	In order that SLC can pay loans to Scottish students who have been assessed for entitlement by SAAS. As part of the support and decision making process, SAAS share data with the SLC. They, in turn, carry out checks with the Identity and Passport Service and the Department for Work and Pensions and will work with HM Revenue and Customs to collect loan repayments.
Category of Recipient	The Student Loans Company (SLC)
Categories of Data Subject	Students
Personal Data Category	Personal
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	Education (Student Loans for Tuition Fees) (Scotland) Regulations 2006, Education (Student Loans)(Scotland) Regulations 2007, Repayment of Student Loans (Scotland) Regulations 2000
Data Sharing Agreement	In Principal

Tuition Fees	
Purpose of Sharing	Payment of Tuition Fees
Category of Recipient	Universities, colleges and learning providers (including private)
Categories of Data Subject	Students

Personal Data Category	Personal educational and financial data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	Education (Student Loans for Tuition Fees) (Scotland) Regulations 2006, Student Allowances (Scotland) Regulations 2007
Data Sharing Agreement	Data Sharing Framework

Disabled Students Allowance	
Purpose of Sharing	Assessment and payment of Disabled Students' Allowance
Category of Recipient	Disability Advisors/Disability Advisory Services/Disability Assessment Centres employed or used by learning providers (including private)
Categories of Data Subject	Students
Personal Data Category	Personal, educational data
Special Category of Personal Data (sensitive)	Yes
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	2(g) - processing is necessary for reasons of substantial public interest,
Statutory Provision	
Data Sharing Agreement	Data Sharing Framework

The Higher Education Discretionary and Childcare Funds	
Purpose of Sharing	Sharing Information to support the appropriate administration of the Higher Education Discretionary Fund and Childcare Funds
Category of Recipient	Scottish Universities and colleges
Categories of Data Subject	Students
Personal Data Category	Personal and financial data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Article 9	
Statutory Provision	
Data Sharing Agreement	Data Sharing Framework

Edinburgh University	
Purpose of Sharing	To support administration of internal bursaries
Category of Recipient	Universities
Categories of Data Subject	Students
Personal Data Category	Personal , educational and financial data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(f) – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

Article 9	
Statutory Provision	
Data Sharing Agreement	Data sharing agreement

Skills Development Scotland (SDS)	
Purpose of Sharing	Information is shared so that SDS can provide assistance to young people aged 15 and 25
Category of Recipient	Public bodies, local authorities
Categories of Data Subject	Students
Personal Data Category	Personal and educational data
Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(c) processing is necessary for compliance with a legal obligation to which the controller is subject;
Article 9	
Statutory Provision	Young People's Involvement in Education and Training Order (Provisions for Information) (Scotland) Order 2014
Data Sharing Agreement	Young People's Involvement in Education and Training Order (Provisions for Information) (Scotland) Order 2014

Audit Scotland	
Purpose of Sharing	SAAS provides sensitive personal information to Audit Scotland as part of the National Fraud Initiative for processing of data in a data matching exercise which is carried out with statutory authority.
Category of Recipient	Public body
Categories of Data Subject	Students
Personal Data Category	Personal , education, employment, financial data

Special Category of Personal Data (sensitive)	No
Lawful Basis for Processing	
Article 6	(1)(c) processing is necessary for compliance with a legal obligation to which the controller is subject;
Article 9	
Statutory Provision	Section 26A of the Public Finance and Accountability (Scotland) Act 2000 provides that Audit Scotland may carry out data matching exercises, or arrange for them to be carried out on its behalf. This power was added by Section 97 of the Criminal Justice and Licensing (Scotland) Act 2010.
Data Sharing Agreement	Code of Data Matching Practice

Fraud Prevention Agency	
Purpose of Activity	SAAS provides personal and sensitive personal information to Fraud Prevention Agencies as part of the application verification/validation process for the purposes of preventing and detecting crime.
Law Enforcement Purpose	Detection, investigation and report of crime
Data Subject Categories	Students
Data Category	Personal, education, employment and financial data
Special Category of Personal Data	No
Lawful Basis for Processing	
DPA section 35	Section 2(b) Performance of a task
DPA Schedule 8	
Other Legislation	Section 68 of the Serious Crimes Act 2007 provide public authorities with the ability to disclose personal information to members of a specified anti-fraud organisations (SAFO) and disclosure will not breach rights under the Data Protection Act, 2018.
Data Sharing Agreement	Yes