



Operational Records of Processing Schedule

Records of Processing Activities (UK GDPR, Article 30)

Higher Education · Performing Arts
Validated by the University of West London

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Document Control

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Contents

1. Purpose of this Document

1.1 This Operational Records of Processing Schedule (the “Schedule”) is the operational annex to the Records Management and Data Retention Policy of GAMTA (the “College”). It records the personal data processing activities undertaken by the College, by department, in accordance with Article 30 of the UK General Data Protection Regulation.

1.2 Article 30 of the UK GDPR requires controllers to maintain a record of their processing activities, including the purposes of the processing, the categories of data subjects and personal data, the categories of recipients, retention periods where possible, and a general description of technical and organisational security measures. This Schedule supports the College’s compliance with that requirement.

1.3 This Schedule is operational and supplementary in nature. It does not replace, supersede, or extend the Records Management and Data Retention Policy or any other policy of the College. Where any apparent inconsistency arises between this Schedule and the Records Management and Data Retention Policy, the Records Management and Data Retention Policy and the wider legal and regulatory framework shall prevail, and the Schedule shall be updated to align.

1.4 This Schedule shall be reviewed and updated annually, or earlier where required by legislative, regulatory, operational, or validating partner changes.

2. How to Read this Schedule

2.1 The Schedule is organised by department. Within each department, the Schedule sets out the purpose of processing, the categories of personal data collected, and the retention period applied.

2.2 Retention periods in this Schedule have been derived from, and shall be operated consistently with, Appendix B of the Records Management and Data Retention Policy (the Indicative Records Retention Schedule), applicable Scottish and UK law, UKVI Student Sponsor Licence duties, validating partner expectations, and the requirements of relevant Scottish awarding bodies.

2.3 Where a retention period is expressed as “End of Registration plus N years” or similar, “End of Registration” means the date on which the student ceases to be enrolled at the College, whether by award, withdrawal, termination, or otherwise.

2.4 All processing activities recorded in this Schedule are undertaken under one or more lawful bases set out in Article 6 of the UK GDPR and, where applicable, one or more conditions set out in Article 9 of the UK GDPR for Special Category Data. The applicable lawful bases and conditions shall be recorded in the College’s wider information governance documentation, including Privacy Notices.

2.5 This Schedule shall be read in conjunction with the College’s Data Protection Policy, Information Security Policy, CCTV Policy, Acceptable Use of IT Policy, Privacy Notices, and the Records Management and Data Retention Policy.

3. Departmental Records of Processing

3.1 Admissions

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Admissions	To receive and process applications, including UCAS and direct	Applicant personal and contact details, date of birth, prior qualifications,	Unsuccessful applicants: 12 months from end of admissions cycle.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
	applications, for entry to programmes of study.	personal statement, references, equality monitoring data.	Successful applicants: incorporated into student record and retained for End of Registration plus 6 years.
Admissions	To organise and assess auditions and interviews for performance-based programmes (dance, singing, acting, musical theatre).	Applicant personal details, audition pieces, repertoire information, audition panel notes, recorded audition material (where consented), accessibility information.	Audition records: 12 months from decision (unsuccessful); duration of studies plus 3 years (successful). Audition recordings: 12 months.
Admissions	To support widening access and outreach engagement with schools, colleges, and youth arts providers.	Name, contact details, school or organisation, year group, expressions of interest.	3 years from last interaction.
Admissions	To process applications from international applicants and support UKVI compliance prior to enrolment.	Passport details, visa documentation, English language evidence, financial evidence, sponsorship documentation.	Unsuccessful: End of admissions cycle plus 1 year. Successful: retained in UKVI compliance record (see 3.11).
Admissions	To process applications from applicants under the age of 18, with appropriate safeguarding considerations.	Applicant personal details, parental or guardian contact details, safeguarding-related information.	Unsuccessful: 12 months from end of cycle. Successful: incorporated into student record (with safeguarding record as required).
Admissions	To consider declarations of disability, learning differences, mental health, or additional support needs and arrange appropriate consideration during admission.	Disability and support needs disclosures, supporting evidence where provided.	Unsuccessful: 12 months from end of cycle. Successful: retained as part of reasonable adjustments record (see Student Support Services).
Admissions	To consider declarations of criminal convictions where required by the programme of study or by safeguarding obligations.	Self-declarations, Disclosure Scotland PVG / Basic Disclosure information where applicable.	Unsuccessful: 12 months. Successful: retained in Strictly Confidential safeguarding record per applicable retention period.
Admissions	To communicate with prospective applicants, applicants, and offer-holders.	Name, contact details, programme of interest.	Prospective enquiries: 3 years from last contact. Applicants: 18 months after relevant application cycle.

3.2 College Registry

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
College Registry	To enrol students and manage academic progression through to award.	Student personal and contact details (name, date of birth, address, next of kin, emergency	End of Registration plus 6 years.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
		contact), programme details, academic record.	
College Registry	To maintain the College's record of awards conferred.	Student name, date of birth, student identification number, programme, classification, award details, academic transcript.	Permanent (summary record of award).
College Registry	To provide data for statutory and regulatory submissions (including, where applicable, HESA, SAAS, the validating partner, and relevant Scottish awarding bodies).	Student personal and contact details, academic record, ethnicity, disability, and other equality monitoring data (optionally provided).	End of Registration plus 6 years.
College Registry	To process requests for mitigation, extension, and other casework under the Extensions, Mitigation, Deferral and Withdrawal Policy.	Student personal details, programme details, reasons for the request (which may include Special Category Data such as medical evidence).	End of Registration plus 6 years.
College Registry	To process academic misconduct cases (including plagiarism, cheating, collusion, contract cheating, unauthorised use of artificial intelligence).	Student personal details, programme details, details of the alleged offence, investigation and outcome records.	End of Registration plus 6 years.
College Registry	To process academic appeals under the Academic Appeals Regulations.	Student personal details, programme details, grounds of appeal, supporting evidence, outcome.	6 years from final outcome.
College Registry	To process Fitness to Study referrals where this falls to Registry administration.	Student personal details, programme details, details of the matter being considered (which may include Special Category Data).	End of Registration plus 6 years (Strictly Confidential).
College Registry	To process student conduct and disciplinary matters under the Student Code of Conduct and Disciplinary Regulations.	Student personal details, programme details, details of the alleged conduct, investigation records, outcomes, and sanctions.	End of Registration plus 6 years (Strictly Confidential).
College Registry	To process Disclosure Scotland PVG or other criminal record check information required for placements, productions, or programme participation.	Student personal details, programme details, criminal conviction data, PVG or other check details.	End of Registration plus 6 years, or as required by the relevant scheme.
College Registry	To maintain attendance and engagement records, including for UKVI-sponsored students.	Student personal details, attendance and engagement data.	End of Registration plus 6 years.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
College Registry	To respond to requests for confirmation of study, references, transcript reissues, and confirmation of award.	Student personal details, programme details, results, and award data.	Requests: 1 year. Underlying academic record: per applicable retention period.
College Registry	To process minutes and paperwork of academic boards, examination boards, and assessment boards.	Names of board members, student academic and progression data, where relevant decisions are recorded.	End of Registration plus 6 years (operational records); minutes retained in line with governance retention (see 3.13).
College Registry	To process personal data for the purposes of conferring an award or prize.	Student personal details, programme details, results, graduation ceremony attendance data.	Graduation planning data: 1 year after ceremony. Award data: permanent (summary).

3.3 Student Support Services (including Student Welfare, Counselling, Wellbeing, Reasonable Adjustments, and Pastoral Support)

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Student Support Services	To provide guidance, support, and signposting to current and prospective students in response to enquiries.	Student personal details, contact details, nature of enquiry, brief notes (which may include Special Category Data).	End of Registration plus 6 years.
Student Support Services	To assess and administer hardship fund applications and emergency financial support.	Student personal details, financial evidence (bank statements, payslips, debt letters, eviction notices, tenancy agreements), supporting documentation including, where provided, evidence of dependants.	End of Registration plus 6 years.
Student Support Services	To assess and administer scholarship and bursary applications.	Student personal details, financial evidence, SAAS award information, supporting documentation.	End of Registration plus 6 years.
Student Support Services	To provide welfare advice and support, including in relation to housing, finance, family, mental health, and life circumstances.	Student personal details, welfare records (which may include Special Category Data).	End of Registration plus 6 years (Strictly Confidential).
Student Support Services	To provide counselling and mental health support services.	Student personal details, counselling case records (Special Category Data).	End of Registration plus 6 years, in accordance with applicable professional body guidance (Strictly Confidential).
Student Support Services	To assess reasonable adjustments and inclusive learning support arrangements under the Reasonable Adjustments and Inclusive Learning Support Policy.	Student personal details, disability and additional support needs evidence, support plans, communications with academic staff regarding adjustments.	Duration of studies plus 3 years (Strictly Confidential).

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Student Support Services	To provide disability and mental health support, including signposting to external services and assistance with SAAS Disabled Students' Allowance applications.	Student personal details, disability and mental health evidence, SAAS DSA application data.	Duration of studies plus 3 years (Strictly Confidential).
Student Support Services	To process Fitness to Study cases under the Fitness to Study Policy.	Student personal details, programme details, details of the matter (including Special Category Data), support plan, outcome.	End of Registration plus 6 years (Strictly Confidential).
Student Support Services	To receive disclosures and reports under the Harassment and Sexual Misconduct Policy and provide trauma-informed support.	Reporting Party and Responding Party personal details, disclosure details (Special Category Data), support arrangements.	7 years from outcome; longer in serious cases (Strictly Confidential).
Student Support Services	To support the careers, employability, and placement preparation of students.	Student personal details, work and volunteering history, career interests, employer contacts.	End of Registration plus 3 years. CVs and job applications: 3 years.
Student Support Services	To provide immigration advice and support relating to visa applications and compliance for sponsored students.	Student personal details, passport, photographs, financial evidence, immigration documentation.	End of Registration plus 6 years.
Student Support Services	To record volunteering activity for inclusion on the Higher Education Achievement Report (or equivalent) where applicable.	Student personal details, volunteering history.	End of Registration plus 6 years.

3.4 Academic Quality

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Academic Quality	To engage External Examiners for validated higher education programmes (in accordance with the validating partner) and HNC/HND programmes (in accordance with relevant Scottish awarding bodies).	External Examiner personal details, financial details for payment, passport or right-to-work documentation, equality monitoring data.	End of contract for personal and payment details. External Examiner reports: 6 years (in line with validating partner expectations).
Academic Quality	To undertake programme approval, monitoring, review, and re-approval activities.	Names of staff, student representatives, External Examiners; references to student data in monitoring papers.	10 years (programme approval and re-approval records).
Academic Quality	To manage relationships with the validating partner and relevant Scottish	Staff and student personal details where referenced; partner correspondence.	End of partnership plus 6 years.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
	awarding bodies, including correspondence, reports, and audit material.		
Academic Quality	To process academic appeals at the validating partner stage where the appeal proceeds beyond the College's internal procedure.	Student personal details, appeal documentation, validating partner correspondence.	6 years from final outcome.
Academic Quality	To support audit and quality assurance activity, including QAA review where applicable.	Staff and student personal details where referenced.	10 years.

3.5 Production (Studio, Rehearsal, Performance, and Technical Activity)

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Production	To plan, schedule, and manage rehearsals, studio time, technical rehearsals, and production activity.	Student names, programme details, attendance information, rehearsal schedules, casting information.	End of programme cycle plus 1 year.
Production	To document casting decisions for productions and performance opportunities.	Student personal details, audition outcomes, casting decisions, performance role allocation.	End of Registration plus 3 years.
Production	To record performance recordings used for assessment purposes.	Audio-visual recordings of student performances (which may include Special Category Data where the performance discloses such data).	As required by the validating partner or relevant awarding body, normally up to 6 years.
Production	To retain production records, scripts, choreography notation, designs, costume records, and lighting and sound plots for archive and future-production reference.	Student names where credited; staff and freelance practitioner details; production materials.	5 years from production. Archive material may be retained longer where appropriate.
Production	To manage health, safety, and risk assessment in performance, studio, technical, and production environments.	Names of those involved, risk assessment information, incident records where applicable.	6 years; longer in serious cases.
Production	To obtain and manage consent for the use of student images, audio, and video in publicity, marketing, and archive material.	Student personal details, signed consent forms, photographs, audio and video material.	Duration of consent; consent may be withdrawn at any time.
Production	To engage intimacy coordinators, fight directors, dialect coaches,	Practitioner personal details, contract details, session records.	End of contract plus 6 years.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
	and other specialist practitioners where required.		
Production	To manage placement, internship, and industry engagement opportunities through partnerships with employers and external producers.	Student personal details, employer contact details, placement records, evaluation.	End of Registration plus 3 years.

3.6 Library and Learning Resources

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Library and Learning Resources	To register users, manage borrowing, and provide library services.	Name, student or staff identification number, contact details, history of items borrowed.	Current registration plus 3 years.
Library and Learning Resources	To record library charges, fines, and related financial data.	Name, student or staff identification, charges and transaction data.	Current registration plus 6 years.
Library and Learning Resources	To handle requests from third parties to use material in which the College owns the copyright.	Name, address, email, request details.	Last action on request plus 5 years.
Library and Learning Resources	To manage communications with suppliers, including licences, contracts, and notes of meetings.	Supplier contact details, contract documentation.	Current contract plus 6 years.
Library and Learning Resources	To provide alternative-format materials to students with reasonable adjustments under the Reasonable Adjustments and Inclusive Learning Support Policy.	Student name, student number, programme details, contact details, requested materials.	Length of programme of study.
Library and Learning Resources	To record attendance at library inductions and academic skills sessions.	Student name, student number, programme details.	One academic year.
Library and Learning Resources	To record correspondence between students and Academic Support Librarians or equivalent staff.	Student name, email address, programme details, enquiry content.	Length of semester.
Library and Learning Resources	To register external visitors and provide library services to non-members of the College.	Name, address, email.	Current registration plus 3 years.
Library and Learning Resources	To manage inter-library loan requests.	Name, email, student or staff identification, borrower identification.	Last action plus 6 years (articles); last action plus 6 months (books).

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Library and Learning Resources	To manage digitisation requests by staff.	Staff name, email, phone number, department, programme details.	12 months.

3.7 Human Resources

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Human Resources	To manage the employment lifecycle, including contracts of employment, terms and conditions, and termination.	Staff personal files including personal details, contract, sick certificates, medical records relating to adjustments or injury at work, paid leave, lifecycle data, termination details, settlement agreements.	6 years after employment ends (settlement agreements and agreed references retained indefinitely).
Human Resources / Payroll	To administer contractual pay (current bank details).	Current bank details.	No longer than necessary; paper copies destroyed once details are uploaded to the payroll system.
Human Resources	To manage Occupational Health referrals.	Occupational Health forms and reports (Special Category Data).	6 years after employment ends.
Human Resources	To manage recruitment, including unsuccessful applications.	Application forms, interview notes for unsuccessful candidates.	6 months from end of recruitment (longer where UKVI sponsorship considerations apply).
Human Resources	To process contractual pay, including wages, salaries, overtime, bonuses, and expenses.	Wage and salary records.	6 years after employment ends.
Human Resources	To process Maternity, Paternity, and Adoption Pay.	Statutory and contractual pay records, calculations, certificates (Mat B1s), other evidence.	6 years after employment ends.
Human Resources	To process Statutory Sick Pay and related records.	Sick pay records, calculations, certificates, self-certificates, fit notes, information relating to adjustments and injury at work.	6 years after employment ends.
Human Resources	To process unpaid parental leave.	Parental leave records.	18 years from birth or adoption of the child.
Human Resources	To comply with equality, diversity, and inclusion duties (Equality Act 2010 and Public Sector Equality Duty where applicable).	Equality monitoring data.	While processed and 6 years after.
Human Resources	To comply with Disclosure Scotland PVG, Basic Disclosure, and rehabilitation of offenders requirements.	Disclosure checks, criminal records, risk assessments.	Check itself: no longer than 6 months. Record of check: 5 years (then re-checked). Risk assessment: 6 years after employment ends.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Human Resources	To comply with UKVI immigration requirements for staff.	Immigration checks, right-to-work documentation.	2 years after employment ends (or as required by UKVI guidance).
Human Resources	To comply with legislation requiring training records (e.g. first aid), and to support continuing professional development.	Training records.	6 years after employment ends.
Human Resources	To maintain a record of management processes and to defend potential claims.	Casework records, including disciplinary, grievance, and performance management records (investigations, notes of meetings, correspondence, outcome letters, settlement agreements, legal advice).	6 years after employment ends.
Human Resources	To record employee performance, objectives, and developmental needs.	Appraisal records.	6 years after employment ends.

3.8 Finance

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Finance – Insurance	To process insurance claims.	Staff and student personal details, members of the public personal details, medical reports, solicitor details, correspondence.	Permanent (where required for ongoing claims and policy verification).
Finance – Purchase Ledger	To process supplier and student payments and invoices.	Student and company details, bank details, invoice information.	Current financial year plus 6 years.
Finance – Credit Control	To take fee payments from students and others.	Card details, cardholder name (handled in accordance with PCI-DSS).	Current plus 6 years (transaction records); card data minimisation in line with PCI-DSS.
Finance – Credit Control	To take payments by credit card.	Credit card details (handled in accordance with PCI-DSS).	Current plus 6 years (transaction records).
Finance – Purchase Ledger	To process procurement card transactions.	Staff personal details, transaction information.	Current plus 6 years.
Finance – Credit Control	To take online payments.	Student personal details, transaction information.	Current plus 6 years.
Finance – Credit Control	To issue short-term loans or emergency funds.	Student personal details, supporting documentation.	Current plus 6 years.
Finance – Credit Control	To assist in the collection of unpaid tuition fees or other debts.	Student personal details, account information, contact records.	6 years after the student has left.
Finance – Procurement	To manage tender processes.	Supplier details, terms of contract.	6 years after contract end date.
Finance – Procurement	To manage approved supplier lists.	Supplier name, address, bank details.	6 years.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Finance – Credit Control	To retrieve tuition fee payments where applicable.	Student personal details, payment information.	6 years.
Finance – Payroll	To process payroll for temporary and permanent employees.	Employee personal data including name, title, gender, date of birth, National Insurance number, bank details, home address, tax code, tax deductions, payroll deductions, sickness records, maternity and paternity data, ad-hoc payment claims, overpayment data.	Current plus 6 years (except 3 years for sickness and maternity / paternity data).
Finance – Payroll	To process payroll – sickness records.	Sickness records.	Current plus 6 years.
Finance – Payroll	To meet statutory requirements (tax purposes).	Real Time Information (RTI) data.	Current plus 6 years.
Finance – Payroll	To process BACS file processing.	Staff bank details.	Current plus 6 years.
Finance – Payroll	To process pension records and letters.	Pension records and correspondence.	Permanent.
Finance – Payroll	To process P11D Forms.	P11D data including name, National Insurance number, date of birth, taxable benefits.	Current plus 6 years.
Finance – Payroll	To process Pension Savings Annual Allowance (PSA) submissions.	PSA data including name, National Insurance number, date of birth, taxable benefits.	Current plus 6 years.
Finance – Payroll	To process childcare voucher arrangements.	Childcare voucher data.	Current plus 6 years.
Finance – Payroll	To retain historical payroll data.	Historical payroll records.	Current plus 6 years.
Finance – SAAS and SFC Reporting	To submit funding-related returns to SAAS and the Scottish Funding Council where applicable.	Student personal details, funding-related data.	6 years.

3.9 IT Services

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
IT Services	To track requests for IT support (helpdesk in normal hours).	Student and staff contact details (name, email, phone, IP address); occasionally third-party contact information where services are provided to them.	Last action plus 1 year.
IT Services	To track requests for IT support out of hours.	Student and staff contact details (name, email, phone, IP address).	Per data sharing agreement; no longer than necessary; nothing

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
			retained after end of agreement.
IT Services	To manage Active Directory accounts and profile information.	Student and staff names, email addresses, College phone numbers, roles.	Closure of account plus 1 year.
IT Services	To manage Active Directory account information for affiliate students.	Affiliate student names, email addresses.	Closure of account plus 3 months.
IT Services	To synchronise Active Directory information with Microsoft Office 365.	Student and staff names, email addresses, phone numbers, role.	30 days after account deletion.
IT Services	To manage Microsoft Office 365 account and profile information.	Student and staff names, email addresses.	30 days after account deletion.
IT Services	To record IT and information security incidents.	Student and staff names, incident details.	Last action on incident plus 1 year.
IT Services	To maintain, manage, and support College IT systems.	Student and staff personal data and, where applicable, Special Category Data held within systems.	Per the retention period applicable to the underlying data within each system.
IT Services	To support staff management activities involving IT data (e.g. monitoring, appraisal evidence).	Staff appraisal data, copies of contracts, CVs, letters relating to employment, performance management correspondence, sickness absence correspondence, return-to-work forms, occupational health data, DSE assessments.	Per HR records retention schedule.
IT Services	To track Requests for Change (RFCs) and IT change management.	Staff names.	Decommissioning of system plus 5 years.
IT Services	To respond to subject access requests.	All categories of data necessary to respond.	Not retained after submission to the Information Governance / Data Protection function.
IT Services	To contact IT staff in an emergency.	Names, phone numbers, email addresses.	Removed at end of employment in IT.
IT Services	To contact IT staff generally.	Names, phone numbers, email addresses.	Annual refresh, with removal of unneeded data.
IT Services	To manage IT recruitment.	Names, contact information, CVs, application forms.	Transferred to HR or destroyed at end of recruitment process.
IT Services	To provide access to survey tools.	Name, email.	Removed when user account removed.
IT Services	To control access to College services and applications.	Name, email.	Closure of account plus 1 year.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
IT Services	To control access to College-issued mobile devices and to record usage.	Name, email, call data.	Per vendor contract.
IT Services	To manage end-of-life destruction of data on obsolete hardware.	Any data held on the device.	Data not retained after destruction; destruction certified.
IT Services	To manage backups of College systems.	All data held in systems backed up.	In accordance with the backup schedule.
IT Services	To manage system access logs.	Staff and student account access details.	12 months.
IT Services	To manage and respond to personal data breaches.	All data necessary to investigate and respond.	6 years from incident (Strictly Confidential).
IT Services	To manage printing arrangements and printing payments.	Student or staff identification.	At least 18 months from data of last transaction, as allowed and required by applicable law.

3.10 Marketing and Communications

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Marketing (Recruitment)	Communications with prospective students (pre-application).	Name, contact details, date of birth, subject of interest.	3 years from last contact.
Marketing (Recruitment)	Communications with applicants (application to enrolment).	Name, contact details, programme applied for.	18 months after relevant application cycle.
Marketing (Admissions)	To process admissions enquiries and conversion communications.	Applicant personal details as per application form.	Permanent for name and date of birth (summary); other data per admissions retention.
Marketing (Events)	To communicate with external stakeholders, including audiences, partner organisations, schools, and arts industry contacts.	Name, contact details, email address, place of work.	Reviewed annually; retained while relationship is current.
Marketing and Communications	To manage publicity, social media, and audience engagement for productions and public events.	Names and images of students and staff (with consent), audience contact details where opted in.	Duration of consent; audience contact data retained while opted in.

3.11 UKVI Compliance

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
UKVI Compliance	To manage the College's Student Sponsor Licence obligations and Confirmation of Acceptance for Studies	Sponsored student personal details, passport details, visa documentation, immigration history,	Following the end of sponsorship: 1 year (or as required by UKVI guidance) for retained sponsor licence records.

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
	(CAS) issuance for sponsored students.	academic qualifications, English language evidence, financial evidence.	
UKVI Compliance	To monitor attendance and engagement of sponsored students and to comply with UKVI sponsor licence reporting duties.	Sponsored student personal details, attendance and engagement records, contact details, change-of-circumstances notifications.	1 year following end of sponsorship (Strictly Confidential).
UKVI Compliance	To manage correspondence with UK Visas and Immigration in relation to sponsorship duties, licence renewals, and individual student matters.	Sponsored student personal details where referenced, sponsor licence documentation, UKVI correspondence.	6 years (Strictly Confidential).
UKVI Compliance	To make required notifications and reports to UK Visas and Immigration in respect of non-engagement, withdrawal, change of circumstances, or other reportable events.	Sponsored student personal details, details of reportable event, notification records.	6 years from notification.

3.12 Safeguarding (Designated Safeguarding Lead)

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Safeguarding	To receive, record, and respond to safeguarding concerns relating to students under the age of 18 or vulnerable adults.	Personal details of those involved, details of the concern (Special Category Data), action taken, external agency referrals.	75 years from last entry, or as required by Scottish safeguarding guidance (Strictly Confidential).
Safeguarding	To receive, record, and manage disclosures and reports under the Harassment and Sexual Misconduct Policy.	Reporting Party and Responding Party personal details, disclosure details (Special Category Data), investigation records, outcomes, support arrangements.	7 years from outcome; longer in serious cases (Strictly Confidential).
Safeguarding	To manage Disclosure Scotland PVG, Basic Disclosure, and equivalent checks relating to staff, volunteers, and placement arrangements involving children or vulnerable adults.	Personal details, PVG or Disclosure check details, risk assessments.	Per Disclosure Scotland guidance; risk assessments retained for 6 years post-engagement.
Safeguarding	To liaise with external agencies including Police Scotland, social work services, NHS services,	Personal details of those involved, details of the concern (Special Category Data), records of	75 years from last entry (Strictly Confidential).

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
	and other safeguarding partners.	communications and decisions.	

3.13 Governance and Office of the Principal

Department	Purpose of Processing	Types of Personal Data Collected	Retention Period
Governance	To support the operation of the Unibridge Group Board and its committees.	Governor personal details, register of interests, board and committee minutes, decisions.	Minutes and decisions: permanent. Personal details: while serving plus 6 years.
Governance	To support the operation of the Academic Board and its sub-committees.	Member personal details, minutes, decisions.	Minutes and decisions: permanent. Personal details: while serving plus 6 years.
Governance	To manage Conflicts of Interest, Fit and Proper Persons Declarations, and related governance arrangements.	Personal details, declarations, supporting documentation.	While serving plus 6 years.
Governance	To manage approved Policies and Regulations of the College, including superseded versions.	Document content; staff and stakeholder consultation correspondence.	Current plus all superseded versions (in line with the Records Management and Data Retention Policy).
Office of the Principal	To manage correspondence and casework requiring Principal-level engagement.	Personal details of correspondents, case documentation.	6 years from final action.
Office of the Principal	To manage validating partner and awarding body relationships at institutional level.	Senior contact details, partner correspondence, partnership agreements.	End of partnership plus 6 years.
Office of the Principal	To manage CCTV records on College premises in accordance with the CCTV Policy.	Audio-visual recordings of identifiable individuals on College premises.	Normally 31 days, unless required to be retained longer for investigation or evidence.

4. Cross-Cutting Notes

4.1 Special Category Data. Where processing involves Special Category Data (as defined under Article 9 of the UK GDPR), one or more conditions in Article 9(2) and, where applicable, in Schedule 1 of the Data Protection Act 2018 shall be relied upon. Special Category Data shall normally be classified as Strictly Confidential.

4.2 Criminal Conviction Data. Where processing involves data relating to criminal convictions and offences, processing shall be undertaken in accordance with Article 10 of the UK GDPR and Schedule 1 of the Data Protection Act 2018. Such data shall normally be classified as Strictly Confidential.

4.3 Children and Persons under the Age of 18. Particular care shall be taken in the processing of personal data relating to applicants and students under the age of 18, in accordance with the Safeguarding Policy and applicable Scottish guidance.

4.4 Data Sharing. Where personal data is shared with the validating partner, relevant Scottish awarding bodies, placement providers, UK Visas and Immigration, SAAS, the Scottish Funding Council, regulatory bodies, or other authorised parties, sharing shall be undertaken in accordance with the College's Data Protection Policy and applicable data sharing arrangements.

4.5 International Transfers. Where personal data is transferred outside the United Kingdom, transfers shall be undertaken in accordance with Chapter V of the UK GDPR, including, where applicable, the use of adequacy decisions, the International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or other applicable safeguards.

4.6 Litigation Hold. Where records are subject to a litigation hold, regulatory request, investigation, freedom of information request, environmental information request, subject access request, or other ongoing matter requiring retention, disposal shall be suspended pending resolution.

4.7 Information Classification. All processing activities recorded in this Schedule are subject to the Information Classification framework set out at Appendix A of the Records Management and Data Retention Policy.

4.8 Records Owners. Records Owners for each class of records are set out at Appendix C of the Records Management and Data Retention Policy.

5. Review and Maintenance

5.1 This Schedule shall be maintained by the Information Governance Lead, working with departmental Records Owners and the Data Protection Officer where appointed.

5.2 This Schedule shall be reviewed annually, or earlier where required by legislative, regulatory, operational, or validating partner changes. New processing activities shall be added to this Schedule before processing commences, where reasonably practicable, and in any event without undue delay.

5.3 Significant changes to this Schedule shall be reported through the College's information governance reporting arrangements to the Academic Quality and Student Support Committee, the Academic Board, and the Unibridge Group Board as appropriate.

5.4 Historic versions of this Schedule shall be retained in accordance with the Records Management and Data Retention Policy.

END OF OPERATIONAL RECORDS OF PROCESSING SCHEDULE