



Institute
and Faculty
of Actuaries

Examinations Data Retention Policy

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Date	New version	Author	Description	Details
Mar 2017	v1	Clifford Campbell	Policy issued	New policy
Sep 2018	v2	David Hood	Revision	Update following new Data Protection Act (2018)
May 2020	v3	David Hood	Revision	Updated to reflect new ICO guidance on calculating due dates for Subject Access Requests

Examinations Data Retention Policy

1. Introduction

The Institute and Faculty of Actuaries (IFoA) offers a range of qualifications to individuals worldwide who wish to pursue an actuarial career. By necessity the recording, storage and transmission of personal data is undertaken in the delivery of these qualifications.

2. Purpose

This policy describes the IFoA approach to the retention and disposal of personal data created in the process of examination and assessment of candidates for IFoA qualifications.

3. Scope and jurisdiction

This policy applies to all personal data generated in the assessment of candidates for qualifications offered by the IFoA.

The IFoA is a Data Controller with its central place of administration (main establishment) in the United Kingdom (UK). UK law governs both our relationship with our members and our approach to information privacy and compliance. Data protection in the UK is regulated by the Information Commissioner's Office (ICO).

4. Definitions

Personal data:

- Personal data is information connected to an identified or identifiable individual in line with the definitions set out in the UK Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

Examinations data:

- Marks, and/or overall result(s) awarded to individual candidates agreed by the Examiners or Assessors relating to any written examination, or any piece of work submitted for assessment;
- Interim, provisional or transitional marks allocated by individual Examiners and Assessors for those same pieces of work;
- Any comments made by individual Examiners or Assessors on a piece of work submitted for assessment; and/or
- Notes or remarks made about individual candidates' exam scripts or work submitted for assessment in minutes of Examiners' meetings.

Examinations data is considered to be personal data under the DPA. This means that, by law, candidates have the right to ask for copies of this information if it is held by the IFoA: this is called a 'Subject Access Request' (SAR). These rights of access are set out in the IFoA ['Data subject rights'](#) policy.

Upon receipt of a SAR, the deadlines for provision of the information are:

- Where examination results have not yet been published: forty days from their date of publication or five months from the date of the request (whichever is earlier)
- Where examination results have been published: one month from the receipt of the request.

The IFoA adhere to the ICO guidance on the calculation of due dates for SARs, the due date is one month from the day a request is made.

Subject Access Requests should be submitted to data.protection@actuaries.org.uk or by post to: Data Protection Officer, Institute and Faculty of Actuaries, Level 2, Exchange Crescent, 7 Conference Square, Edinburgh, EH3 8RA. Please quote your full name and Actuarial Reference Number on any correspondence.

5. Exemptions from Subject Access rights

Examination scripts, including those submitted electronically, are exempt from the subject access rights outlined in the DPA and the GDPR. This means they will not be supplied in response to a Subject Access Request.

6. Members of other Associations

Where local privacy laws allow the same or similar rights of access to personal data generated in the assessment process members of other actuarial associations sitting IFoA examinations should contact their own membership body directly with any request for data.

7. Release, retention and disposal of examination data

The IFoA is required to provide all candidates with a formal transcript of their examination performance. All candidates will be provided with an indication of whether the result was a pass or fail and the total mark awarded.

In line with the storage limitation principles of the DPA and the GDPR, and the position of the IFoA as a Chartered professional body, the following table outlines the IFoA approach to the retention and disposal of examination related data:

Data type	Retention period
Examination paper	Indefinitely
Examination scripts	Sixteen weeks after publication of examination results
Marks for individual questions	Sixteen weeks after publication of examination results
Examiners' comments	Sixteen weeks after publication of examination results
Minutes of examiners' meetings	Indefinitely
Candidate's total awarded mark for an examination	Indefinitely
Mitigating circumstances submissions	Sixteen weeks after publication of examination results
Examiners' report	Indefinitely
Prizes awarded	Indefinitely
Qualification awarded	Indefinitely

At the end of the retention period data is either destroyed or anonymised and used for statistical analysis. The data generated in responding to Subject Access Requests for examination data is securely destroyed seven months after the response has been sent.

8. Review and approval

This policy and all related policies and procedures will be:

- reviewed by the Head of Quality and Assessment on an annual basis; and
- approved by the Chief Executive Officer whenever a material change has been made in order to comply with our Governance Manual.