



Procedure for the transfer to External Examiners of students' assessed work (exam scripts, coursework and research theses).

1. Purpose

This procedure is designed in response to operational timeframes that may result from the following College decisions:

- i. the revision of the [External Examiner Policy](#) in April 2018 to incorporate remote attendance by external examiners at supplemental Courts of Examiners and on an exceptional basis with the approval of the Senior Lecturer or Dean of Graduate Studies at the annual Courts of Examiner session;
- ii. changes to the [Academic Year Structure](#) that allow for two weeks at the start of the academic year from 2018/19, for reassessment and marking and results to include external examination.

2. Scope

The scope of this procedure is for:

- i. the transfer of student exam scripts and coursework for review by external examiners in preparation for attendance at subject, discipline Courts of Examiners prior to the arrival of the external examiner on-site at Trinity.
- ii. the transfer of Research Theses to an External Examiner prior to the conduct of a viva-voce, the retention of a Research Thesis by an External Examiner for annotation to inform thesis corrections by a Doctoral student; and



retention of a Research Thesis by an External Examiner following completion of the theses examination process.

- iii. All External Examiners after May 2018, whether they be domiciled in the EU or outside the EU are expected to adopt the standard outlined by College in this procedure and in the '[Advisory on European General Data Protection Regulation](#)'.
- iv. This procedure applies to all staff (academic and administrative) who are responsible for the administration of assessment and arrangements of Courts of Examiners.

Linked providers are responsible for the design and external assurance of their procedures under European General Data Protection Regulation (GDPR) as a procedure with a statutory basis.

3. Principles

- 3.1. Student assessed work (exam scripts, coursework and research theses) is regarded as 'personal data' under the European General Data Protection Regulation (GDPR) that came into effect on 25th May 2018.
- 3.2. The external examiner, in order to allow for appropriate preparation, will receive all documents required for the effective conduct of their role in advance of their attendance (physical or remote), at the Court of Examiners or viva -voce.
- 3.3. Students should be informed if their assessed work is being sent outside of the EU for the purposes of external examination.
- 3.4. On submission of their PhD Thesis, a student's written consent should be sought to the examiner retaining a copy of the thesis beyond the examining period, should they so wish.



4. Procedure

- 4.1. Where hard copy documentation (scripts, coursework or research theses) are transferred to external examiners they should be sent by secure registered mail or courier service, where arrangements are confirmed with the external examiner of their availability to receive and sign for the documentation at the point of delivery.
- 4.2. Where students assessed work is to be transferred electronically the files should be encrypted and a secure data transfer mechanism should be used. Recommended transfer mechanisms supported by College include the following:

Platform	Description and where to access more information
Secure File Transfer Protocol	<p>SFTP is a secure data transfer mechanism which is suitable for use for the transfer of exam script data.</p> <p>Note: A secure username and password must be used and must be communicated to the external examiner in a secure manner. File size limits are determined by the system administrator and are potentially unlimited</p> <p>For more information please refer to the IT Services webpage on SFTP</p>
HEAnet FileSender Service	<p>The HEAnet FileSender service is a secure file transfer mechanism which is suitable for use for the transfer of exam script data.</p> <p>Note: Where this transfer mechanism is being used the encryption option must be selected. Maximum File-sender size in HEAnet is 1.95GB (single file or multiple files zipped).</p> <p>For more information please refer to https://www.heanet.ie/services/hosting/filesender</p>
Microsoft OneDrive	<p>Microsoft OneDrive is a secure file storage and sharing service supported by IT Services and which is suitable for the transfer of exam script data.</p> <p>Note: Where this service is being used it is essential to ensure that data are shared carefully with the correct email address, (take care not to auto-</p>



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	<p>select email addresses from your saved favourites cache as it may contain emails for staff/students within College with the same name as the External Examiner).</p> <p>The 'require login' option should always be selected and data must not be shared using an anonymous link. The maximum file sender size in OneDrive - 10GB</p> <p>For more information please refer to https://www.tcd.ie/itservices/our-services/microsoft-onedrive/</p>
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4.3. Transfer options not recommended or supported by College include any service:

- i. not supported by IT Services; and/or
- ii. where a service contract is not in place; and/or
- iii. where data is not stored in the EU; and/or
- iv. where the data is not encrypted in transit

Services that are not recommended include but are not limited to the following:

Platform	Rationale
Dropbox	Is not suitable as Dropbox is a public cloud service
Googledocs	Is not suitable as Googledocs is a public cloud service

4.4. Where files are encrypted Schools should provide the External Examiner any passwords needed to access the data, taking care not to communicate the encryption password using the same medium as the encrypted files. The password should be stored in a secure place, disposed of after successfully accessing the files or at the latest on completion of their examination duties.



- 4.5. Schools are requested to provide the '[Advisory on European General Data Protection Regulation](#)' on the College External Examiner website (refer 5.6 below) to new and continuing External Examiners' to mitigate the potential of a breach to GDPR in the performance of their external examination duties.
- 4.6. External Examiners are encouraged to take appropriate measures to protect electronic files in their possession by:
- i. use of file or disc encryption on the computer where files are stored;
 - ii. back-up of the hard drive if the files are stored locally on one computer, as locally stored data may be irretrievable in the event of a technical issue or the loss or theft of a device.
 - iii. not downloading files to any other Internet Services such as Dropbox or Googedocs;
 - iv. updating software to the latest most secure versions available;
 - v. protecting their computer by using anti-virus software;
 - vi. protecting their computer through the use of strong passwords.
 - vii. storing the files only for the required period and permanently deleting electronic files on completion of their examination duties.
- 4.7. If the External Examiners is permitted to make copies/print out the data, they should ensure they are stored securely while in their possession; disposed of upon completion of their external examining duties; or returned to the School at the time of the Courts of Examiners for safe disposal.
- 4.8. Schools are asked to note if the External Examiners has certified in writing on the Annual External Examiner Report that they have securely disposed of and/or permanently deleted hard or soft copy files in their possession or returned documentation to the School upon completion of their external examining duties.



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- 4.9. Students' consent for retention of the research thesis by an examiner is sought and documented as part of the required declarations on submission of the research thesis. Where consent is not given, the research thesis must be returned to the possession of the author on completion of the examination process.
- 4.10. Schools should provide instructions to the external examiner on who to inform if the external examiner suspects that the exam script and coursework data has been accessed/breached by any other individual while in his/her possession. Schools should note that under GDPR the University has a legal requirement to report data breaches to the Data Protection Authority within 72 hours.

5. Resources available to Schools

- 5.1 Secure your Devices' can be found at
<https://www.tcd.ie/cybersecurity/gdpr/it-checklist/>
- 5.2 <https://www.tcd.ie/cybersecurity/>
- 5.3 Email dataprotection@tcd.ie
- 5.4 GDPR Online Training on Blackboard <https://www.tcd.ie/itservices/vle/kb/overview-GDPRtraining.php>
- 5.5 <https://www.tcd.ie/itservices/kb/staff-email/faq.php>
- 5.6 <http://www.tcd.ie/teaching-learning/Education/Ext.Examiners/>
- 5.6 [Thesis Submission Guidelines](#)

5.7. Responsibility

Responsibility for local implementation of this procedure rests with the Director of Teaching & Learning Undergraduate and Postgraduate or their delegate(s), e.g. module/subject coordinator or programme Director and associated administrative staff responsible for the assessment of examination and arrangements for Courts of Examiners.



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5.8. Document control

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