



Purpose of the policy

This policy details how [insert centre name], in relation to exams management and administration, ensures compliance with the regulations as set out by the Data Protection Act 2018 (DPA 2018) and General Data Protection Regulation (GDPR).

At the date of reviewing these regulations, although the UK has left the European Union the General Data Protection Regulation still has a direct effect within the UK (JCQ's General Regulations for Approved Centres (GR, section 6.1) Personal data)

Students are given the right to find out what information the centre holds about them, how this is protected, how this can be accessed and how data breaches are dealt with.

All exams office staff responsible for collecting and sharing candidates' data are required to follow strict rules called 'data protection principles' ensuring the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

To ensure that the centre meets the requirements of the DPA 2018 and GDPR, all candidates' exam information – even that which is not classified as personal or sensitive – is covered under this policy.

Section 1 – Exams-related information

There is a requirement for the exams office(r) to hold exams-related information on candidates taking external examinations. For further details on the type of information held please refer to *Section 5 – Candidate information, audit and protection measures*.

Candidates' exams-related data may be shared with the following organisations:

- Awarding bodies
- Joint Council for Qualifications
- Department for Education
- Local Authority
- the Press

This data may be shared via one or more of the following methods:

- hard copy
- email
- secure extranet site(s) – eAQA, OCR Interchange, Pearson Edexcel Online, WJEC Secure services
- a Management Information System (MIS) provided by Capita SIMS, sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems

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This data may relate to exam entries, access arrangements, the conduct of exams and non-examination assessments, special consideration requests and exam results/post-results/certificate information.

Section 2 – Informing candidates of the information held

Ifield Community College ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via hard copies of the statement being given out during mentor periods with a record of when this is received signed and dated by the candidate
- given access to this policy via a hard copy and the school intranet (Central Resource Library)

Candidates are made aware of the above at the start of their course of study leading to an externally accredited qualification.

At this point, the centre also brings to the attention of candidates the annually updated JCQ document Information for candidates – Privacy Notice which explains how the JCQ awarding bodies process their personal data in accordance with the DPA 2018 and GDPR.

Candidates eligible for access arrangements are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent form (Personal data consent, Privacy Notice (AAO) and Data Protection confirmation) before access arrangements approval applications can be processed online

Section 3 – Hardware and software

The table below confirms how IT hardware, software and access to online systems is protected in line with DPA & GDPR requirements.

Hardware	Date of purchase and protection measures
Desktop	<ul style="list-style-type: none">• hardware is checked by centre IT and network support department through hard drive scans• antivirus protection provided by

Software/online system	Protection measure(s)
MIS	<ul style="list-style-type: none">• protected usernames and passwords• passwords use of a mix of upper/lower cases letters, numbers and special characters• 3-month password changing• centre administrator has to approve the creation of new user accounts and determine access rights• regular checks to Firewall/Antivirus software
Intranet	<ul style="list-style-type: none">• protected usernames and passwords• passwords use of a mix of upper/lower cases letters, numbers and special characters• 3-month password changing• regular checks to Firewall/Antivirus software
Awarding body secure extranet site(s) (i.e. eAQA, OCR)	<ul style="list-style-type: none">• protected usernames and passwords

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Interchange, Person Edexcel Online, WJEC Secure services	<ul style="list-style-type: none"> • passwords use of a mix of upper/lower cases letters, numbers and special characters • 3-month password changing • centre administrator has to approve the creation of new user accounts and determine access rights • regular checks to Firewall/Antivirus software
A2C	<ul style="list-style-type: none"> • protected usernames and passwords • passwords use of a mix of upper/lower cases letters, numbers and special characters • 3-month password changing • regular checks to Firewall/Antivirus software • access limited to exams staff

Section 4 – Dealing with data breaches

Although data is handled in line with DPA/GDPR regulations, a data breach may occur for any of the following reasons:

- loss or theft of data or equipment on which data is stored
- inappropriate access controls allowing unauthorised use
- equipment failure
- human error
- unforeseen circumstances such as a fire or flood
- hacking attack
- ‘blagging’ offences where information is obtained by deceiving the organisation who holds it

If a data protection breach is identified, the following steps will be taken:

1. Containment and recovery

The Data Protection Officer will lead on investigating the breach. It will be established:

- who needs to be made aware of the breach and inform them of what they are expected to do to assist in the containment exercise. This may include isolating or closing a compromised section of the network, finding a lost piece of equipment and/or changing the access codes
- whether there is anything that can be done to recover any losses and limit the damage the breach can cause. As well as the physical recovery of equipment, this could involve the use of back-up hardware to restore lost or damaged data or ensuring that staff recognise when someone tries to use stolen data to access accounts
- which authorities, if relevant, need to be informed

2. Assessment of ongoing risk

The following points will be considered in assessing the ongoing risk of the data breach:

- what type of data is involved?
- how sensitive is it?
- if data has been lost or stolen, are there any protections in place such as encryption?
- what has happened to the data? If data has been stolen, it could be used for purposes which are harmful to the individuals to whom the data relates; if it has been damaged, this poses a different type and level of risk
- regardless of what has happened to the data, what could the data tell a third party about the individual?
- how many individuals’ personal data are affected by the breach?
- who are the individuals whose data has been breached?

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- what harm can come to those individuals?
- are there wider consequences to consider such as a loss of public confidence in an important service we provide?

3. Notification of breach

Notification will take place to enable individuals who may have been affected to take steps to protect themselves or to allow the appropriate regulatory bodies to perform their functions, provide advice and deal with complaints.

4. Evaluation and response

Once a data breach has been resolved, a full investigation of the incident will take place. This will include:

- reviewing what data is held and where and how it is stored
- identifying where risks and weak points in security measures lie (for example, use of portable storage devices or access to public networks)
- reviewing methods of data sharing and transmission
- increasing staff awareness of data security and filling gaps through training or tailored advice
- reviewing contingency plans

Section 5 – Candidate information, audit and protection measures

For the purposes of this policy, all candidates' exam-related information – even that not considered personal or sensitive under the DPA/GDPR – will be handled in line with DPA/GDPR guidelines.

An information audit is conducted [detail the regularity].

The table below details the type of candidate exams-related information held, and how it is managed, stored and protected

Protection measures may include:

- password protected area on the centre's intranet
- secure drive accessible only to selected staff
- information held in secure area
- updates undertaken every 12 months (this may include updating antivirus software, firewalls, internet browsers etc.)

Section 6 – Data retention periods

Details of retention periods, the actions taken at the end of the retention period and method of disposal are contained in the centre's [insert e.g. Exams archiving policy] which is available/accessible from [insert who and/or where].

Section 7 – Access to information

(with reference to ICO information <https://ico.org.uk/your-data-matters/schools/exam-results/>)

The GDPR gives individuals the right to see information held about them. This means individuals can request information about them and their exam results, including:

- their mark
- comments written by the examiner
- minutes of any examination appeals panels

This does not however give individuals the right to copies of their answers to exam questions.

Requesting exam information

Requests for exam information can be made to the Data Protection Officer in writing or through email. Where requests are made for former candidates who are unknown to current staff, a recognised form of government issued photographic ID (Passport or driving licence) which confirms the former candidate's date of birth and name, must be provided to allow for the centre to confirm the ID of the former candidate before issuing this information.

A decision will be made by head of centre as to whether the student is mature enough to understand the request they are making, with requests considered on a case by case basis.

Responding to requests

If a request is made for exam information before results have been announced, a request will be responded to:

- within five months of the date of the request, or
- within 40 days from when the results are published (whichever is earlier).

If a request is made once exam results have been published, the individual will receive a response within one month of their request.

Third party access

Permission should be obtained before requesting personal information on another individual from a third-party organisation.

Candidates' personal data will not be shared with a third party unless a request is accompanied with written permission from the candidate, which is both signed and dated by the candidate, accompanied by appropriate evidence (where relevant) to verify the ID of both parties.

In the case of looked-after children or those in care, agreements may already be in place for information to be shared with the relevant authorities (for example, the Local Authority). The centre's Data Protection Officer will confirm the status of these agreements and approve/reject any requests.

Sharing information with parents

The centre will take into account any other legislation and guidance regarding sharing information with parents (including non-resident parents), as example guidance from the Department for Education (DfE) regarding parental responsibility and school reports on pupil performance:

- **Understanding and dealing with issues relating to parental responsibility**
www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility
- **School reports on pupil performance**
www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers

Publishing exam results

Ifield Community College will publish exam results to the media or within the centre (e.g. on an honours board) in line with the following principles:

- Refer to guidelines as published by the Joint Council for Qualifications
- Act fairly when publishing results, and where people have concerns about their or their child's information being published, taking those concerns seriously
- Ensure that all candidates and their parents/carers are aware as early as possible whether examinations results will be made public and how this will be done

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- Explain how the information will be published. For example, if results will be listed alphabetically, or in grade order

As Ifield Community College will have a legitimate reason for publishing examination results, consent is not required from students or their parents or guardians for publication. However, if a student or their parents or guardians have a specific concern about publication of their results, they have the right to object. This objection must be made in writing to [insert name/role of individual], who will consider the objection before making a decision to publish and reply with a good reason to reject the objection to publish the exam results.

Section 8 – Table recording candidate exams-related information held

For details of how to request access to information held, refer to section 7 of this policy (**Access to information**)

For further details of how long information is held, refer to section 6 of this policy (**Data retention periods**)

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Access arrangements information	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Gender • Candidate ULN/UCI/Registration number/Exam number • Candidate medical information • Data protection notice (candidate signature) • Diagnostic testing outcome(s) • Specialist report(s) (may also include candidate address) • Evidence of normal way of working 	<ul style="list-style-type: none"> • Access Arrangements Online • MIS • Go 4 Schools (cloud based online markbook system) • Awarding organisation extranet sites • Lockable metal filing cabinet • School staff only intranet • Onedrive 	<ul style="list-style-type: none"> • Secure user name and password • In an area solely assigned to inclusion and exams staff 	
Attendance registers copies	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Candidate ULN/UCI/Registration number/Exam number • Exams staff signature • Exams staff name 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe • Secure storage meets JCQ requirements • In area solely assigned to exams staff 	Unit end of review of results period for that exams series (Usually 3 - 5 months)
Candidates' scripts	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number • Declaration of authenticity (candidate signature) 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • Secure storage meets JCQ requirements • In an area solely assigned to exams staff 	Less than 24 hours – scripts passed to Parcelforce for delivery to awarding organisation
Candidates' work	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number • Declaration of authenticity (candidate signature) 	<ul style="list-style-type: none"> • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Lockable cabinet with limited access to the key 	3 years

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Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Certificates	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number • Candidate qualifications 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In an area solely assigned to exams staff 	12 months
Certificate destruction information	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate qualification • Candidate ULN/UCI/Registration number/Exam number 	<ul style="list-style-type: none"> • School 'staff only' intranet • Onedrive • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In an area solely assigned to exams staff 	4 years (based on awarding body guidelines)
Certificate issue information	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Candidate ULN/UCI/Registration number/Exam number • Candidate signature 	<ul style="list-style-type: none"> • Onedrive • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In an area solely assigned to exams staff 	3 years
Conflict of Interest records	<ul style="list-style-type: none"> • Staff name • Staff signature • Details of conflict of interest 	<ul style="list-style-type: none"> • Locked filing cabinet in Exams Office 	<ul style="list-style-type: none"> • Secure locked cabinet • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. 	3 years
Entry information	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Gender • Candidate ULN/UCI/Registration number/Exam number • Qualifications candidate is entered for 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) • MIS • Awarding organisation extranet site 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In an area solely assigned to exams staff 	12 months
Exam room incident logs	<ul style="list-style-type: none"> • Candidate name • Candidate ULN/UCI/Registration number/Exam number • Details of incidents in exam room • Exams staff name • Exams staff signature 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In an area solely assigned to exams staff 	12 months

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Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Invigilator and facilitator training records	<ul style="list-style-type: none"> • Exams staff name • Exams staff signature • Details of training (dates, times against Exams staff names) 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In area solely assigned to exams staff 	3 years
Post-results services: confirmation of candidate consent information	<ul style="list-style-type: none"> • Candidate name • Candidate ULN/UCI/Registration number/Exam number • Declaration of consent (candidate signature) 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In area solely assigned to exams staff 	12 months
Post-results services: requests/outcome information	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number 	<ul style="list-style-type: none"> • Go 4 Schools (cloud based online markbook system) • Awarding organisation extranet sites • Exams Office secure storage (safe) • School 'staff only' intranet • Onedrive • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. • In area solely assigned to exams staff 	3 years
Post-results services: scripts provided by ATS service	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number • Candidate signature 	<ul style="list-style-type: none"> • Awarding organisation extranet sites • School 'staff only' intranet • Onedrive • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Secure user name and password 	3 years
Post-results services: tracking logs	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks/grades • Candidate ULN/UCI/Registration number/Exam number 	<ul style="list-style-type: none"> • School 'staff only' intranet • Onedrive 	<ul style="list-style-type: none"> • Secure user name and password 	12 months
Private candidate information	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Gender • Candidate ULN/UCI/Registration number/Exam number • Candidate signature • Candidate address 	<ul style="list-style-type: none"> • Awarding organisation extranet sites • MIS • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • Secure user name and password • In area solely assigned to exams staff 	3 years

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Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Resolving timetable clashes information	<ul style="list-style-type: none"> • Candidate name • Candidate ULN/UCI/Registration number/Exam number 	<ul style="list-style-type: none"> • MIS • School staff only intranet 	<ul style="list-style-type: none"> • Secure user name and password 	Unit end of review of results period for that exams series (Usually 3 - 5 months)
Results information	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Gender • Candidate ULN/UCI/Registration number/Exam number • Candidate results/marks 	<ul style="list-style-type: none"> • Go 4 Schools (cloud based online markbook system) • Awarding organisation extranet sites • Exams Office secure storage (safe) • UCAS applications & references • School staff only intranet • Onedrive 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe. 	Due to organisational requirement – 20 years
Seating plans	<ul style="list-style-type: none"> • Candidate name • Candidate ULN/UCI/Registration number/Exam number • Candidate access arrangement 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) 	<ul style="list-style-type: none"> • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe • Secure storage meets JCQ requirements • In area solely assigned to exams staff 	Unit end of review of results period for that exams series (Usually 3 - 5 months)
Special consideration information	<ul style="list-style-type: none"> • Candidate name • Candidate ULN/UCI/Registration number/Exam number • Details of incident/personal details (may include candidate address and/or health record(s)) 	<ul style="list-style-type: none"> • Exams Office secure storage (safe) • Awarding organisation extranet sites 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe • Secure storage meets JCQ requirements • In area solely assigned to exams staff 	Unit end of review of results period for that exams series (Usually 3 - 5 months)
Suspected malpractice reports/outcomes	<ul style="list-style-type: none"> • Candidate name • Candidate results/marks • Candidate ULN/UCI/Registration number/Exam number • Staff name • Staff signature • Details of staff malpractice/disciplinary actions 	<ul style="list-style-type: none"> • Lockable metal filing cabinet 	<ul style="list-style-type: none"> • In area solely assigned to exams staff 	3 years

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Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Transferred candidate arrangements	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Gender • Candidate ULN/UCI/Registration number/Exam number • Qualifications candidate is entered for • Data protection notice (candidate signature) • Diagnostic testing outcome(s) • Specialist report(s) (may also include candidate address) • Evidence of normal way of working 	<ul style="list-style-type: none"> • Access Arrangements Online • MIS • Go 4 Schools (cloud based online markbook system) • Awarding organisation extranet sites • Lockable metal filing cabinet • School staff only intranet • Onedrive 	<ul style="list-style-type: none"> • Secure user name and password • Exams office is secured with a keycode and the safe is secured with a key which is kept in a key safe • Secure storage meets JCQ requirements • In area solely assigned to exams staff 	Unit end of review of results period for that exams series (Usually 3 - 5 months)
Very late arrival reports/outcomes	<ul style="list-style-type: none"> • Candidate name • Candidate DOB • Candidate ULN/UCI/Registration number/Exam number • Details of incident/personal details (may include candidate address and/or health record(s)) 	<ul style="list-style-type: none"> • Awarding organisation extranet sites • Common Admin Portal • Lockable metal filing cabinet • School staff only intranet • Onedrive 	<ul style="list-style-type: none"> • Secure user name and password • In area solely assigned to exams staff 	Unit end of review of results period for that exams series (Usually 3 - 5 months)