

# DATA PROTECTION POLICY (Exams) 2024/25

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Senior Leadership Team	
Date of next review	31/10/2025

## Key staff involved in the policy

Role	Name(s)
Head of centre	Patrick Earnshaw
Exams officer	Rosie Knös
Senior leader(s)	Mathew Downs
IT manager	Harry Glyde
Data manager	Carla Lill

### DATA PROTECTION POLICY (Exams) TEMPLATE

**Delete this text box when the information contained below is understood**

Changes made to the contents of this template since the previous (**2023/24**) version are **highlighted** for easy identification. A change may not always signify a regulation change/update, but rather to provide clarity.

This template has been provided as an example **only** and is intended to provide a starting point/framework on which to build a policy for exams-related information.

([GR](#), section 5.3) It is the responsibility of the **head of centre** to ensure that their centre: ...has in place the following policies for inspection that must be reviewed and updated annually... a written data protection policy

To ensure compliance, an organisation needs to identify and record:

- the information it holds on an individual
- the personal/sensitive data on an individual this information contains
- how the information is managed, stored and protected
- how the information can be accessed by an individual and third parties
- how and when the information is disposed of
- how any security breaches will be dealt with

This template only provides a suggestion of how the above could be achieved in a centre and refers to information relating to the external examination process (You may also wish to include information relating to the internal examination process where/if relevant). Ideally you should liaise with the person in your centre assigned the role of Data Protection Officer to ensure compliance (in relation to exams-related information) is achieved.

The table (in Section 3) provides suggestions **only** in relation to hardware and software; add to the list or delete items as relevant to your centre.

In the table (Section 8) the list of information types provided **is not exhaustive** and has been taken from the table of record types (which may contain information relating to an individual) detailed in the example EXAMS ARCHIVING POLICY TEMPLATE. If your centre has made use of this template and added/deleted any record types, then remember to match the information types in this table.

***The premise behind the publication of this template is to promote good practice in the handling of data - even that which does not come under any data protection regulations.***

Grey font provides example suggestions as illustration of how the tables could be completed – keep or edit this information accordingly; change the font colour to automatic.

[Insert...] fields are in coloured font to highlight them – this is to ensure the need to insert relevant centre-specific details stands out and is not overlooked – change colour to 'automatic' when inserted.

**Customise** the template to reflect ways of working and types of information held and managed in your centre in line with any centre-wide Data Protection Policy.

For more information and guidance consult the [Information Commissioner's Office](https://ico.org.uk/for-the-public/schools/) (or <https://ico.org.uk/for-the-public/schools/>)

## Contents

Key staff involved in the policy .....	2
Purpose of the policy .....	4
Section 1 – Exams-related information .....	4
Section 2 – Informing candidates of the information held .....	5
Section 3 – Hardware and software .....	5
Section 4 – Dealing with data breaches .....	6
Section 5 – Candidate information, audit and protection measures .....	7
Section 6 – Data retention periods.....	7
Section 7 – Access to information .....	7
Section 8 – Table recording candidate exams-related information held .....	10

## Purpose of the policy

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

The delivery of examinations and assessments involve centres and awarding bodies processing a significant amount of personal data (i.e. information from which a living individual might be identified). It is important that both centres and awarding bodies comply with the requirements of the UK General Data Protection Regulation and the Data Protection Act 2018 or law relating to personal data in any jurisdiction in which the awarding body or centre are operating.

In JCQ's [General Regulations for Approved Centres](#) (section 6.1) reference is made to 'data protection legislation'. This is intended to refer to UK GDPR, the Data Protection Act 2018 and any statutory codes of practice issued by the Information Commissioner in relation to such legislation.

It is the responsibility of the centre to inform candidates of the processing that the centre undertakes. For example, that the centre will provide relevant personal data including name, date of birth, gender to the awarding bodies for the purpose of examining and awarding qualifications.

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

To ensure that the centre meets the requirements of the DPA 2018 and UK 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 below.

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

- Awarding bodies
- Joint Council for Qualifications (JCQ)
- Department for Education
- Local Authority
- HISP Multi Academy Trust

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

- hard copy
- email
- secure extranet site(s) – AQA Centre Services; OCR Interchange; Pearson Edexcel Online; WJEC Portal; Cambridge International Digital File Despatch [
- a Management Information System (MIS) provided by Integris/Arbor sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/abouta2c>) to/from awarding body processing systems
- This data may relate to exam entries, access arrangements, the conduct of exams and non-examination assessments including controlled assessments and coursework, special consideration requests and exam results/post-results/certificate information.

## Section 2 – Informing candidates of the information held

Highcliffe School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via [GCSE information Evening and by email to all year 11 students](#)
- given access to this policy via the school website

Candidates are made aware of the above [at the year 10 and year 11 exams assemblies](#).

Materials which are submitted by candidates for assessment may include any form of written work, audio and visual materials, computer programmes and data ("Student Materials"). Candidates will be directed to the relevant awarding body's privacy notice if they require further information about how their Student Materials may be used by the awarding body.

Candidates eligible for access arrangements/reasonable adjustments which require awarding body approval using *Access arrangements online* are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent form before 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	Protection measure(s)
IT System	School adheres to Cyber Essentials and therefore backup and cyber security meets these requirements.

Software/online system	Protection measure(s)
Arbor and Integris	Individual usernames and passwords, with cyber essentials compliant password policy in place. ARBOR: These usernames and passwords are managed through Microsoft Azure and provide a single sign on facilitate for Arbor. ARBOR: MFA is also in place for all staff accounts when they are not working on site at Thornden School.
Awarding body secure extranet site(s)	Individual usernames and passwords. Exams Officer has to approve the creation of new user accounts and determine access rights
A2C	Exams Officer and Deputy Headteacher for Exams only have access
ALPS and SISRA	Data Manager & Deputy Head only have ADMIN rights. SLT have access rights to all students and classes. All teachers have read access rights.
ExamWritePad	Software used by students with word processing access arrangements.

	<p>Software performs an auto-save every 5 minutes and keeps version history of work.</p> <p>Provides exam complaint word processing environment (no spell or grammar check, no auto-correct, etc)</p>
Secure Network Location	<p>Student work relocated to a secure network share automatically</p> <p>Access to this location limited to IT Admin and Head of School</p> <p>Protected by NTFS permission ACLs</p>

## 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
- cyber-attacks involving ransomware infections

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

### 1. Containment and recovery

Mathew Downs, Deputy Head will alert Global Policing who will advise and 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?
- 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 yearly by Global Policing.

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 automatically including Operation System updates and Antivirus.
- 

### **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 at the end of this policy.

### **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 performance, 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 school office for the attention of Mr Downs, Deputy Headteacher.

The GDPR does not specify an age when a child can request their exam results or request that they aren't published. When a child makes a request, those responsible for responding should take into account whether:

- the child wants their parent (or someone with parental responsibility for them) to be involved; and
- the child properly understands what is involved.

The ability of young people to understand and exercise their rights is likely to develop or become more sophisticated as they get older. As a general guide, a child of 12 or older is expected to be mature enough to understand the request they are making. A child may, of course, be mature enough at an earlier age or may lack sufficient maturity until a later age, and so requests should be considered on a case by case basis.

A decision will be made by Headteacher/Deputy Headteacher 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 exam results have been published, 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.

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 and a local authority (the 'corporate parent'), 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](http://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility)  
(Updated 24 August 2023 to include guidance on the role of the 'corporate parent', releasing GCSE results to a parent and notifying separated parents about a child moving school)
- School reports on pupil performance  
[www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers](http://www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers)

### **Publishing exam results**

Highcliffe School will publish exam results to the media or within the centre 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
- Explain how the information will be published. For example, if results will be listed alphabetically, or in grade order

As Highcliffe School will have a legitimate reason for publishing examination results, consent is not required from students or their parents/carers for publication. However, if a student or their parents/carers have a specific concern about publication of their results, they have the right to object. This objection must be made in writing to Mathew Downs [\[insert name/role of individual\]](#),



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	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Access arrangements information		Candidate name Candidate DOB Gender Signed candidate personal data consent form Diagnostic testing outcome(s) Specialist report(s) (may also include candidate address) Evidence of normal way of working	Access Arrangements Online MIS Lockable metal filing cabinet	Secure user name and password In secure office (SENCo)	7 years from when the student would be expected to leave Y13.  Electronic copies deleted, paper destroyed by shredding as confidential waste
Alternative site arrangements		Address Reason for moving exam to an alternative site	Access Arrangements Online MIS Exams Office	Secure user name and password Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Attendance registers copies		Candidate name Candidate Number	Filing Cabinet in Exams Office	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed.  Paper destroyed by shredding as confidential waste.
Candidates' scripts		Candidate name Candidate number	Exams Office / Secure cupboard / Reception	Locked cupboard	Until collected by courier.
Candidates' work		Candidate name Candidate number	Relevant Department	Locked cupboard	Until appeal, malpractice or other results enquiry has been completed.  Returned to student or destroyed by shredding as confidential waste.
Certificates		Candidate name Candidate number Candidate DOB	Exams Office / Reception	Locked office / locked cupboard	1 year after receiving certificates. Securely destroyed on site, list of destroyed certificates retained for 7 years.

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Certificate destruction information		Candidate name Candidate number	Computer / Exams Office	Secure username and password / Locked room	7 years from when the student would be expected to leave Y13.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Certificate issue information		Candidate name Candidate number	Exams Office / Reception	Locked room / locked cupboard	7 years from when the student would be expected to leave Y13.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Conflicts of interest records		Candidate name	Computer	Secure username and password	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
					Electronic copies deleted, paper destroyed by shredding as confidential waste
Entry information		Candidate name Candidate number Candidate DOB Gender	MIS – electronic copies Exams Office – paper copies	Secure username and password Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Exam room incident logs		Candidate name Candidate number	Exams Office	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed.  Destroyed by shredding as confidential waste.

Information type	Information description (where required)	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		Name	Computer Exams Office	Secure username and password  Locked Exams Office	Electronic copies - until the end of their employment or 7 years, whichever is longest.  Paper copies - until the end of their employment.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Overnight supervision information		Candidate name	Computer Exams Office	Secure username and password  Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Post-results services: confirmation of candidate consent information		Candidate name Candidate number	Exams Office	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed.  Paper destroyed by shredding as confidential waste.
Post-results services: requests/outcome information		Candidate name Candidate number	Computer Exams Office	Secure username and password  Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Post-results services: scripts provided by ATS service		Candidate name Candidate number	Computer	Secure username and password	Electronic copies - 7 years from when the student would be expected to leave Y13.

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
					Electronic copies deleted.
Post-results services: tracking logs		Candidate name Candidate number	Computer	Secure username and password	Electronic copies - 7 years from when the student would be expected to leave Y13.  Electronic copies deleted.
Private candidate information		Candidate name Candidate number Candidate DOB Gender	Computer Exams Office	Secure username and password  Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Resilience arrangements: Evidence of candidate performance	Evidence of mock exam results and scripts	Candidate name Candidate number	Computer Exams Office  Script held securely in departments	Secure username and password  Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.



Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
				Locked cupboard in Departments	Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Resolving timetable clashes information		Candidate name Candidate number	MIS Exams Office	Secure username and password Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Results information		Candidate name Candidate number Candidate DOB Gender	MIS SISRA Exams Office	Secure username and password Locked Exams Office	Electronic copies - 7 years from when the student would

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Candidate photo			be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Seating plans		Candidate name Candidate number Access arrangements	MIS Exams Office	Secure username and password Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Special consideration information		Candidate name Candidate number	Computer Exams Office	Secure username and password	Electronic copies - 7 years from when the

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
				Locked Exams Office	student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Suspected malpractice reports/outcomes		Candidate name Candidate number	Computer Exams Office	Secure username and password  Locked Exams Office	Electronic copies - 7 years from when the student would be expected to leave Y13.  Paper copies - until appeal, malpractice or other results enquiry has been completed.  Electronic copies deleted, paper destroyed by shredding as confidential waste.
Transferred candidate arrangements		Candidate name	Computer	Secure username and password	Electronic copies - 7 years from

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Candidate number	Exams Office	Locked Exams Office	<p>when the student would be expected to leave Y13.</p> <p>Paper copies - until appeal, malpractice or other results enquiry has been completed.</p> <p>Electronic copies deleted, paper destroyed by shredding as confidential waste.</p>
Very late arrival reports/outcomes		Candidate name Candidate number	Computer Exams Office	Secure username and password Locked Exams Office	<p>Electronic copies - 7 years from when the student would be expected to leave Y13.</p> <p>Paper copies - until appeal, malpractice or other results enquiry has been completed.</p> <p>Electronic copies deleted, paper destroyed by shredding as confidential waste.</p>

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period