



Wallington High School for Girls

Data Protection Policy (Exams)

Centre No. 14741

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

This policy is reviewed annually to ensure compliance with current regulations

REVIEW

Last reviewed:

January 2023

To be reviewed:

January 2024

1. Purpose of the policy

This policy details how Wallington High School for Girls 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). This policy should be read in conjunction with the Girl's Learning Trust GDPR Data Protection & Freedom of Information Policy.

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.

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

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.

2. Exams-related information

There is a requirement for the exams office 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 third parties for the following purposes:

- to publish the results of public examinations or destination data
- to provide information to another educational establishment to which a student is transferring
- to provide information to an examination authority as part of the examinations process (e.g. JCQ, Awarding Bodies, DfE)
- to provide education and/or curriculum related on-line and IT services through third parties (such as 'MyMaths' on-line teaching tools, Mint Class)

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

- hard copy
- email
- secure extranet site(s) – e.g. AQA Centre Services; OCR Interchange; Pearson Edexcel Online, or similar services.
- SIMS
- sending/receiving information via electronic data interchange (EDI) using A2C to/from awarding body processing systems; etc.

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.

3. Informing candidates of the information held

Wallington High School for Girls ensures that candidates are aware of the examinations related information and data held.

All candidates are:

- informed via statement of entry and statement of results
- given access to this policy on written request to the Exams Office

Candidates are made aware of the above when the entries are submitted to awarding bodies for processing and on results days.

At the point of entry for examinations, 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 UK GDPR (or law relating to personal data in any jurisdiction in which the awarding body or centre are operating).

Candidates eligible for access arrangements 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.

4. Hardware and software

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

Hardware

Use of desktop computers (in school): hardware has up to date anti-virus software, is password-protected, timed log-out after period of inactivity, prompts given by IT to regularly change password

Use of home IT hardware (i.e. Examinations Officer working from home): student data will only be accessed using remote log-in which gives all the same protections as working in school. No data to be saved on personal computers.

Software/Online systems

SIMS: login linked to staff profile log-in, so access level is appropriate to the member of staff logging in to the network.

Awarding Body secure extranet sites, e.g. Centre Admin Portal via Edexcel Online, AQA Centre Services, WJEC Secure Website, OCR Interchange: protected usernames and passwords shared only between Exams Offices, secure passwords set (mix of upper/lower case letters and numbers)

Internet based portals or portals, e.g. CIE Direct, JEC/Eduqas Surpass, Cambridge Admissions Testing, eAQA, UKMT: protected usernames and passwords shared only between Exams Offices, secure passwords set (mix of upper/lower case letters and numbers)

ParentPay: data accessed via GLT Finance Team

Microsoft Office: Files saved on the school server. Sensitive information to be in a password protected document.

5. 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, steps will be taken in line with the *GDPR Data Protection and Freedom of Information Policy (GLT Policy) Section 12*.

6. 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 annually.

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

Protection measures include:

- password protected area on the centre's shared area
- secure drive accessible only to selected staff
- information held in secure area

7. 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 Exams Archiving Procedure, Appendix to the Exams Policy which is available on the school website.

8. 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 Exams Officer by email.

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.

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

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.

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 Data protection notice (candidate signature) 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 (SENDCo)	
Alternative site arrangements					
Attendance registers copies					
Candidates' scripts					
Candidates' work					
Centre consortium arrangements for centre assessed work					
Certificates					
Certificate destruction information					
Certificate issue information					

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
Conflicts of interest records					
Entry information					
Exam room incident logs					
Invigilator and facilitator training records					
Overnight supervision information					
Post-results services: confirmation of candidate consent information					
Post-results services: requests/outcome information					
Post-results services: scripts provided by ATS service					
Post-results services: tracking logs					
Private candidate information					
Resolving timetable clashes information					
Results information					
Seating plans					

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
Special consideration information					
Suspected malpractice reports/outcomes					
Transferred candidate arrangements					
Very late arrival reports/outcomes					