


Data Protection Policy (Exams)

2025/26

This procedure is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
 J Bates	
Date of next review	December 2026

Key staff involved in the policy

Role	Name(s)
Head of centre	J Bates
Exams officer	C Markham
Senior leader(s)	N Robertson A Smith L Parkinson M Balal
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Data manager	C Markham

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Purpose of the policy

This policy details how **West Craven High 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) 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 and 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; Lancashire County Council; Pendle Education Trust; the Press; colleges etc.

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

- hard copy
- email
- secure extranet site(s) – AQA Centre Services; Pearson Edexcel Online; WJEC Portal; NCFE Admin Portal
- SIMS sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) 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

West Craven High School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via information pack given once entries are made and finalised and the exams noticeboard
- given access to this policy via written request

Candidates are made aware of the above once entries are submitted to awarding bodies for processing.

Materials which are submitted by candidates for assessment may include any form of written work, audio and visual materials, computer programs 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 will be informed that an application for access arrangements will be processed using *Access arrangements online*, complying with the UK GDPR and the Data Protection Act 2018.

Candidates involved in suspected or alleged malpractice will be informed that their personal data will be provided to the awarding body (or bodies) whose examinations/assessments are involved, and that personal data about them may also be shared with other awarding bodies, the qualifications regulator or professional bodies, in accordance with the JCQ document *Suspected Malpractice – Policies and Procedures*.

Candidates will be informed:

- that awarding bodies may be required to provide a candidate’s personal data to educational agencies, such as DfE, Welsh Government, Department of Education (Northern Ireland), ESFA, regulators, HESA, UCAS, Local Authorities and the Learning Records Service (LRS)
- that their personal data may be provided to a central record of qualifications approved by the awarding bodies for statistical and policy development purposes
- of the processing that the centre undertakes, for example, that the centre will provide relevant personal data, including name, date of birth and gender, to the awarding bodies for the purpose of examining and awarding qualifications

Candidates may obtain access to their personal data, such as examination results by applying to the appropriate awarding body’s data protection officer.

Candidates are also referred to the centre’s privacy notice which explains:

- why West Craven High School needs to collect personal data
- what it plans to do with it
- how long it will keep it
- whether it will be sharing it with any other organisation

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	Warranty expiry
Desktops & Laptops	<p>Admin access limited to IT staff only</p> <p>Security updates are done regularly with critical security updates being applied within 14 days of release</p> <p>Anti-virus and firewall is in place</p> <p>Software has to go through an approval process where date is shared a DPIA or GDPR form is undertaken by IT & approved via SLT.</p> <p>Devices are purchased with a LifeCycle programme in mind ensuring that the hardware keeps to current standards</p>	<p>Devices come with a standard 3 year warranty in most cases this is not extended but on-site IT support & repair where possible.</p>

	and security - devices are life-cycled on a rolling process roughly every 5 years.	
Servers	<p>Systems host key business software applications that support the academic operation.</p> <p>Virtual servers are used for management, scaling of resources and back-up.</p> <p>These systems have restricted administrator access, full back-up using Cloud Backup and a local on-site back-up.</p> <p>User access to data is controlled by full AD authentication. Full event logging is in place.</p> <p>Our broadband supplier LEDS provide URL filtering & firewall protection at a global level.</p> <p>SSL filtering is enabled where possible on all devices.</p> <p>Administrator accounts regularly reviewed and monitored.</p> <p>Access requests go through an approval process.</p> <p>Inactive user accounts are disabled when a user has left with all security groups removed</p> <p>Date is removed in line with retention periods.</p> <p>Applications monitored and logged using Impero and Netsweeper filtering reports being done daily. Live changes are captured in Impero Education.</p> <p>Server systems are patched regularly and any critical updates are done within 14 days as advised by Cyber Security standard.</p>	<p>Full warranty support and 24x7 maintenance held for critical systems.</p> <p>Covers Breakdown and serviceable parts.</p> <p>3rd party support contract in place for multi-level support</p>

Software/online system	Protection measure(s)
Hosted Capita SIMs	<p>SIMs is hosted by Capita - all measures of protection are in place - access for the school log-ins are defined by permissions set by the school IT team with approval from the Senior Leadership Team or Data Manager for raising permissions.</p> <p>Access is via a secure RDP platform based on the Azure platform - https://www.capita-sims.co.uk/sites/default/files/2017-11/Hosted SIMS Factsheet FINAL WEB.pdf</p>

Office 365	Administrators limited to IT team Multi-Factor Authentication for all admin & staff accounts Security policies are in place following Cyber Essentials guidance & NCSC best methodology where possible Groups are set for limited access to only requested users, this undergoes an approval policy with the IT team using a Help Desk system so all requests are logged.
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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

Clare Bell and/or Val Townsend, Data Protection Officers for West Craven High School 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?
- 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 annually.

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 month (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 Data Information Policy including data retention schedule which is available/accessible from the school office.

Section 7 – Access to information

(With reference to ICO information <https://ico.org.uk/for-the-public/schools/exam-results/>)

The UK 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 Examinations Officer in writing/email. Photographic ID will be required if a former candidate is unknown to current staff.

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 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 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 party unless a request is accompanied with permission from the candidate.

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 (Last 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

Publishing exam results

When considering publishing exam results, West Craven High School will make reference to the ICO (Information Commissioner's Office) <https://ico.org.uk/for-the-public/schools/exam-results/>
Can schools give my exam results to the media for publication?

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

As West Craven High 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 the Principal, 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	Information collected by ALS coordinator to process access arrangements	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 (SENCo) Secure user name and password in secure area solely assigned to members of staff Only accessible to Exams staff	Retained as long as pupil records are as defined in the CEG Retention Policy
Alternative site arrangements	Documents confirming the arrangements for exams being conducted at alternative site	Person of Contact name and number at alternative site.	Lockable metal cabinet	Only accessible by EO staff and SLT	To be retained until the deadline for EARs or the resolution of any outstanding enquiries/appeals
Attendance registers copies	Registers record attendance at each written exam, are kept with seating plan and exam room incident log	Candidate name Candidate number Presence at exam	Lockable metal cabinet	Only accessible by EO staff	To be retained until the deadline for EARs or the resolution of any outstanding enquiries/appeals for the relevant exam series

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
Candidates' work	Controlled assessments, coursework and nonexamination assessments	Candidate name Candidate number Candidate marks and grades	Secure storage	Only accessible by EO staff and relevant HODs	Retained until the post-results period has been completed for that exam series
Certificates	Record of achievement	Candidate name Candidate number UCI number Candidate ODB Candidate marks and grades	Lockable metal cabinet	Only accessible by EO staff	Retained securely for a minimum of 12 months from date of issue.
Certificate destruction information	A record of unclaimed certificates that have been destroyed.	Candidate name Candidate number UCI number Candidate ODB Candidate marks and grades	In Examinations SharePoint: EXAMS	Only accessible by EO staff	To be retained for 4 years from the date of certificate destruction.
Certificate issue information	A record of certificates that have been issued to candidates.	Candidate name Candidate number Candidate qualifications	Certificate collection file in lockable metal cabinet. Copies of post receipts or students sign-out in person.	Only accessible by EO staff	Indefinite
Conflicts of interest records	A record of any conflict of Interest between staff and students	Name of staff Name of Student	Lockable metal cabinet and log on Examinations SharePoint: EXAMS	Only accessible by EO staff	Retained until the post-results period has been completed for that exam series
Entry information	A record of which qualifications candidates have been entered for.	Candidate name, number, CEG number, preferred name, personal tutor, programme of study, qualification information	MIS Lockable metal cabinet	Only accessible by EO staff and emailed to Head of Centre and SLT	Retained until the post-results period has been completed for that exam series

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
Exam room incident logs	Logs detailing the chronological activity happening in exam rooms from start to finish	Candidate name Candidate number Candidate toilet breaks	With the corresponding attendance register and seating plan in lockable metal cabinet	Only accessible by EO staff	To be retained until the deadline for EARs or the resolution of any outstanding enquiries/appeals for the relevant exams series.
Invigilator and facilitator training records	Log of training completed by Invigilators	Invigilator name Invigilator Date of Birth	Lockable metal cabinet	Only accessible by EO staff	To be retained until the deadline for EARs or the resolution of any outstanding enquiries/appeals for the relevant exams series.
Overnight supervision information	Copy of JCQ form Timetable variation and confidentiality declaration for overnight supervision for any candidate eligible for these arrangements.	Candidate name Candidate number Candidate address	Lockable metal cabinet	Only accessible by EO staff	JCQ Inspection Purposes
Post-results services: confirmation of candidate consent information	Hard copy or email record of candidate consent for an EAR or ATS request to be submitted to an awarding body	Candidate name Candidate number Candidate results information	Post-results services file for relevant academic year	Only accessible by EO staff. Only shared with HOD and Head of Centre.	EAR consent to be retained for at least six months following the outcome of the enquiry or any subsequent appeal. ATS consent to be retained for at

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
					least six months from the date consent given.
Post-results services: requests/outcome information	Any hard or digital copies of information relating to a post-results service request (EARs, appeals, ATS) submitted to an awarding body for a candidate and outcome information from the awarding body.	Candidate name Candidate number Candidate results information	Post-results services file for relevant academic year	Only accessible by EO staff. Only shared with HOD and Head of Centre.	EAR consent to be retained for at least six months following the outcome of the enquiry or any subsequent appeal. ATS consent to be retained for at least six months from the date consent given
Post-results services: scripts provided by ATS service	Copy, digital or original exam scripts returned to the centre by the awarding body.	Candidate name Candidate number Candidate results information	Where scripts are retained by the centre, they are securely stored (including any electronic versions) and not edited in any way or disposed of until after the awarding body deadline.	Only accessible by EO staff	n/a returned to the requester after the post results period is complete
Post-results services: tracking logs	A log tracking to resolution all post-results service requests submitted to awarding bodies.	Candidate name Candidate number Candidate results information	Post-results services file for relevant academic year	Only accessible by EO staff.	Retained for at least six months following the outcome of the enquiry or any subsequent appeal

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
Resilience arrangements: Evidence of candidate performance	Original mock scripts from Spring mocks is returned to EO for secure storage. Results from Spring mocks recorded on SIMS	Candidate name, candidate number	Secure Store, SIMS	Only accessible by Centre staff	Retained for at least six months following the outcome of the enquiry or any subsequent appeal
Resolving timetable clashes information	Any information relating to the resolution of a candidate's clash of exam papers or a timetable variation.	Candidate name, candidate number	In Examinations SharePoint: EXAMS	Only accessible by EO staff.	To be retained until the deadline for EARs or the resolution of any outstanding enquiries/appeals for the relevant exams series.
Results information	Broadsheets of results summarising candidate	Candidate name, candidate number, DOB, gender, result information	In Examinations SharePoint: EXAMS	Only accessible by EO staff.	Records for current year plus previous 6 years to be retained as a minimum
Seating plans	Plans showing the seating arrangements of all candidates for every exam taken	Candidate name Candidate number Candidate toilet breaks	With the corresponding attendance register and incident log in lockable metal cabinet	Only accessible by EO staff	To be kept until the deadline for EARs and the resolution of any outstanding enquiries/appeals for the relevant exams series.
Special consideration information	Any hard or digital copies of information relating to a special consideration request and supporting	Candidate name Candidate number Candidate date of birth Candidate medical information	Lockable metal cabinet	Only accessible by EO staff	To be kept until the deadline for EARs and the resolution of any outstanding

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
	evidence submitted to an awarding body for a candidate				enquiries/appeals for the relevant exams series.
Suspected malpractice reports/outcomes	Any hard or digital copies of information relating to a suspected malpractice investigation/report submitted to an awarding body and outcome information from the awarding body.	Candidate name Candidate number	In Examinations SharePoint: EXAMS	Only accessible by EO staff and Head of Centre	To be kept until the deadline for EARs and the resolution of any outstanding enquiries/appeals for the relevant exams series.
Transferred candidate arrangements	Any hard or digital copies of information relating to an application for a transferred candidate arrangement submitted to an awarding body for a candidate.	Candidate name Candidate number Candidate UCI	In Examinations SharePoint: EXAMS	Only accessible by EO staff and Head of Centre	To be retained until the transfer arrangements are confirmed by the awarding body.
Very late arrival reports/outcomes	Any hard or digital copies of information relating to a very late arrival report submitted to an awarding body for a candidate and outcome information from the awarding body.	Candidate name Candidate number	In Examinations SharePoint: EXAMS	Only accessible by EO staff and Head of Centre	To be kept until the deadline for EARs and the resolution of any outstanding enquiries/appeals for the relevant exams series.