



# **DATA PROTECTION POLICY**

## **(Exams)**

### **2025/26**

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Date of next review	

## Key staff involved in the policy

Role	Name(s)
Head of centre	Mrs Clare Batson
Exams officer	Mrs Sarah Adamson
Senior leader(s)	Mr Jonny Galbraith
IT	Mr Alan Dowsing

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## Purpose of the policy

This policy details how Parklands 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
- Local Authority
- Multi Academy Trust
- Another school within the local authority should a child be moved to sit their exams there

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, Cambridge OCR Interchange, Pearson Edexcel Online, WJEC Portal or the NCFE Portal
- A Management Information System (MIS) provided by 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**

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

All candidates are:

- informed via electronic communication
- given access to this policy via the school website

Candidates are made aware of the above at the start of a course or when the registrations/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 Parklands 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
Desktop/Laptop computers	Purchased between 2019/2023 All devices are protected by Sophos Endpoint Protection Software. Admin access is restricted to the IT Support Team	Warranties vary based upon purchase date, Anytime up until 2028
Servers	Purchased between 2020/2021 are only accessible with Admin user rights. Data is backed up onsite and off site nightly. Servers are protected by Sophos Intercept X advanced protection software	Server warranties are covered until at least 2026
Firewall	Purchased 2019 and then upgraded in 2023. Internal firewall in place to protect all web traffic flowing in/out of the school network	

Software/online system	Protection measure(s)
SIMS (MIS Software)	Access is controlled by username/password. Staff have different access rights based on their job role. SIMS is kept up to date with regular roll outs from ESS
Windows update	All machines in school are kept up to date via Microsoft Windows updates. This includes the security patches
Web Filter	All internet browsing runs through the Web filter. Filtering is provided by Sophos who have to confirm they have met the statutory guidance from the DfE in regards to internet filtering in schools.

## 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

Mrs Roxy Charmer 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.

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 on an ongoing basis (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 Exams Archiving Policy which is available/accessible from the school website.

## 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 Mrs Adamson, the Examinations Officer in writing via email. Photo ID will need to be confirmed for all requests.

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 the 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 20 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 20 days 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 and appropriate evidence to verify the ID of both parties is 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.

## 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) (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](http://www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers)

## Publishing exam results

Parklands High School will publish exam results 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 Parklands 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 Mrs Batson, Head of Centre, 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	List of candidates and the reasonable adjustments including rooming	Candidate name Exam Number Rooming and seat Reason for access arrangement, ie diabetes	MIS  In Exam Officers secure office  In Invigilator folders within each exam room	In Locked office	1 Year from the end of exams
Alternative site arrangements	For students who are unable to sit exams on the school site	Candidate name Exam Number Candidate address Reason for alternative site	JCQ Alternative Site form on CAP Portal  Paper copy in the Exams Officer secure room	In Locked Office	1 Year from the end of exams
Attendance registers copies	All copies of awarding body and schools internal registers	Candidate name Candidate Exam number Whether candidate attended exam Y/N	In locked cabinet in Exam Officers secure room	In Locked office	1 Year from the end of exams
Candidates' scripts		Candidates name Candidates work Candidates Exam number	Completed scripts are packed and stored in awarding bodies secure bags and locked in the secure safe until collected by the courier  Any spare scripts are locked in the Exam officers secure room until 24 hours after the	In locked safe and/or Exam officers secure room	Completed scripts until collected by the courier and for unused scripts 24 hours after the awarding bodies published end time

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
			published end time of the exam.		
Centre consortium arrangements for centre assessed work					
Certificates	GCSE and any other certificates	Candidates name	In Exams Officers secure room until collected  Any uncollected certificates are kept in a locked cabinet in the exams officers secure room	Locked away in secure room	5 years
Certificate destruction information		Candidates name Candidates exam number Date of destruction	I locked cabinet in exam officers secure room	Locked away in secure room	
Certificate issue information		Candidates Name Candidates exam number Candidates signature	In a locked cabinet in the exams officers secure room	Locked away in secure room	
Conflicts of interest records		Staff conflict of interest in file stored in the exam officers secure room  Staff Name Candidates name and exam number	In exam officers secure room	Locked away in secure room	
Entry information		In Entry and amendments file in exam officers secure room  Candidates name Candidates exam no	In exam officers secure room	Locked away in secure room	1 year after exam season is complete

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		In locked cabinet in exams officers secure room Invigilators name and signature Candidates name Candidates exam no Description of incident	In exam officers secure room	Locked away in secure room	1 year after exam season is complete
Invigilator and facilitator training records		Invigilators name Invigilators email address Invigilators signature	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Post-results services: confirmation of candidate consent information		Candidates name Candidates exam no Candidates signature	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Post-results services: requests/outcome information		Candidates name Candidates exam no Candidates grade Candidates signature EO Signature	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Post-results services: scripts provided by ATS service		Candidates name Candidates exam no	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Post-results services: tracking logs		Candidates name Candidates exam no Initial grade Revised Grade if applicable	In exams officer secure room	Locked away in secure room	1 year after exam season is complete

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		Candidate name Candidate exam no	Stored in a locked cabinet by relevant curriculum leader	Locked away	1 year after exam season is complete
Resolving timetable clashes information		Candidate name Candidate exam no	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Results information		Candidate name Candidate exam no Candidate results	In exams officer secure room and on schools secure MIS system (SIMs)	Locked away in secure room  Online within secure MIS system	1 year after exam season is complete for paper copies and indefinitely on MIS system
Seating plans		Candidate name Candidate exam no	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Special consideration information		Candidate name Candidate exam no Reason for special consideration	In exams officer secure room	Locked away in secure room	1 year after exam season is complete
Suspected malpractice reports/outcomes		Candidate name Candidate exam no Reason for suspected malpractice Invigilator and student statements Head of Centre name and signature EO name and signature	In exams officer secure room  On awarding body/JCQ secure intranet	Locked away in secure room  Secure intranet	1 year after exam season is complete
Transferred candidate arrangements		Candidate name Candidate exam no Reason for transfer	In exams officer secure room	Locked away in secure room	1 year after exam season is complete

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 access arrangement requirements			
Very late arrival reports/outcomes		Candidate name Candidate exam no Reason for very late arrival	In exams officer secure room	Locked away in secure room	1 year after exam season is complete