

# Data Protection Policy (Exams)

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## At Woodhey High School our vision is:

To be a centre of excellence, where students, staff and the community are proud to work together to broaden our horizons, exceed our aspirations and where everyone achieves their full potential.

### **#TeamWoodhey**

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*At Woodhey High School, we have two key values that drive our actions, our choices, and our decisions.*

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These are:

#### **Respect**

We treat everyone as we wish to be treated ourselves; we are all part of the same team

#### **Excellence**

We strive to be the best we can be at all times; nothing but the best is good enough for us

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*Underpinning our values are two clear expectations.*

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These are:

Respect every member of staff and student in our community, following all instructions without answering back

Being excellent by being prepared for, and completing all work to the best of our ability without distracting others

We are a team made up of our staff, our students, our parents and carers, and our wider community. Our vision, values and expectations apply to all of our community.

Teamwork is the secret that makes common people achieve uncommon results (Ifeyanyi Enoch Onuoha)

### **#TeamWoodhey**



## Data Protection Policy (Exams) 2025-26

### Key staff involved in the policy

Role	Name(s)
Head of Centre	Dean Watson
Data and Exams Officer	Alison Abbott
Exams Officer	Alison Abbott
Senior Leader(s)	Gary Holden
Strategic Operations Manager	Carol Hill
IT Technician	David Burdaky Chris Greenwood
Data Protection Officer (Shaw Education Trust)	Peter Potts
Data Protection Officer (Woodhey High School)	Alison Abbott

### Purpose of the Policy

This policy details how Woodhey 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 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.

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.

### Exams Related Information

There is a requirement for the Exams Officer to hold exams-related information on candidates taking external examinations. For further details on the type of information held please refer to the section found later in the policy: 'Candidate Information, Audit and Protection Measures.'

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

- Awarding bodies
- Joint Council for Qualifications (JCQ)
- Department for Education
- Local Authority
- SET (Shaw Education Trust)
- The Press

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

- hard copy
- email
- secure extranet site(s) – e.g. AQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure Website; etc.
- Arbor Management Information System (MIS) 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, Unique Learner Numbers (ULN), the conduct of exams and non-examination assessments, special consideration requests and exam results/post-results/certificate information.

### Informing Candidates of the Information Held

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

All candidates are:

- Informed via a centre letters and school assemblies
- Given access to this policy via written request

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

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

### Hardware and Software

The table below confirms how IT hardware, software and access to online systems is protected in line with DPA 2018 and GDPR requirements.

Hardware	Date of purchase and protection measures	Warranty expiry
Desktop computer/iPad	Antivirus protection is up to date. Updated weekly and scans completed daily.  Computers/hardware is password protected.  The computer in the Exams Office is for the sole use of the Exams Officer.  Operating systems are updated regularly.	Not applicable
Pen Drives/CD-ROM/DVD (used to send Non-Examined Assessments to awarding body for marking and moderation)	Password protection used when directed by the awarding body.  When utilised to download exam material on exam days, this is kept secure in exams safe when not in use.  When utilised to download word processed scripts to enable printing when necessary, pen drives are cleared once documents are successfully printed.	Not applicable

Software/online system	Protection measure(s)
Internet	All sites accessed via the internet are subject to up to date firewall and antivirus checks
Arbor	Username and password protected
Intranet	Username and password protected
Awarding body secure extranet site	Accessed by awarding body specific username and passwords. As centre administrator, the Exams Officer approves the creation of new user accounts and access rights
A2C	An electronic data interchange that allows the secure transfer of data between exam centres and awarding bodies
S2S	Username and password protected
Learner Record Service (LRS)	Username and password protected
Government Tables Checking Secure Site	Username and password protected, with Multi-Factor Authentication (MFA)

### Dealing with Data Breaches

Although data is handled in line with DPA 2018 and 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**

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

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

### **2. Assessment of ongoing risk**

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

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

### 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 2018 or GDPR – will be handled in line with DPA 2018 and GDPR guidelines.

The sections below detail 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
- Regular updates undertaken (including updating antivirus software, firewalls, internet browsers etc.)

### 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 Exams Officer.

### 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 Exams Officer in writing, including by email. If the current or former candidate is unknown to current staff they must provide identification both before their request is processed and on collection. Suitable ID will be a birth certificate, passport or driving licence plus a document such as a bank statement or utility bill, which confirms their current address.

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 13 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 and appropriate evidence (where relevant), to verify the identification 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 and carers

A student's personal entry information, exam timetables and JCQ privacy notice are shared with parents and carers once entries have been made. This is to ensure student's personal data, such as their legal name and date of birth are correct for certification purposes.

Information is shared to ensure parents and carers understand how personal data relating to their child is held and processed.

The candidate is asked to sign any post results request documentation prior to a request being processed. This is to ensure the student has complete understanding of any potential negative consequence of requesting a post results service.

Woodhey High School will take into account any other legislation and guidance regarding sharing information with parents (including non-resident parents), as example guidance from the Department for Education (DfE) regarding parental responsibility and school reports on student performance.

### Publishing exam results

When considering publishing exam results, Woodhey High School will refer to the Information Commissioner's Office (ICO). Publishing examination results is a common and accepted practice. Many students enjoy seeing their name in print, particularly in the local press and the GDPR does not stop this happening. However, under the GDPR schools have to act fairly when publishing results, and where people have concerns about their or their child's information being published, schools must take those concerns seriously.



Woodhey High School will publish exam results to the media or within the centre in line with the following principles:

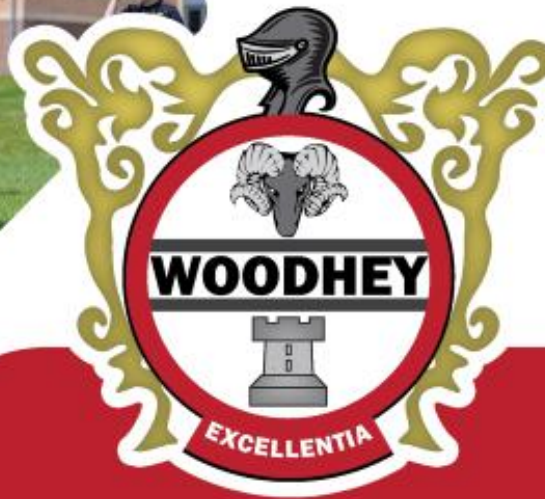
- Refer to guidelines as published by the Joint Council for Qualifications
- Act fairly when publishing results, and where people have concerns about their or their child's information being published, taking those concerns seriously
- Ensure that all candidates and their parents/carers are aware as 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 Woodhey High School will have a legitimate reason for publishing examination results, consent is not required from students or their parents or 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 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.





Table recording candidate exams-related information held



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 (approval/assessment)	<p>This information is held to ensure candidates receive their appropriate approved access arrangements. It also has to be made available for JCQ inspection purposes</p> <p>The information is shared electronically with the awarding bodies via secure websites</p>	<p>Candidate name Candidate date of birth Gender Data protection notice (candidate signature) Diagnostic testing outcome(s) Specialist report(s) which may also include candidate's address Evidence of normal way of working</p>	Access Arrangements Online (AAO) Management Information System (MIS)	<p>Secure username and password In secure area solely assigned to SENDCo</p>	In line with JCQ requirements
Access arrangements information (implementation)	<p>This information is held to ensure the candidates access arrangements are implemented consistently and correctly</p> <p>The information is shared with Curriculum Support staff, invigilators and other relevant school staff</p>	<p>Candidate name Details of access arrangement (e.g. scribe, reader, extra time, etc.)</p>	<p>Exams office Main exams room (during exams season) School intranet/Exam Officer's computer</p>	<p>Secure locked office with restricted key holders Lockable metal cupboard/filing cabinet Secure username and password</p>	<p>The end of the candidate's final exam series and the resolution of any enquiries/appeals</p> <p>Main exam room copies confidentially destroyed following the completion of the exam series</p>
Access arrangement feedback forms	The feedback forms provide evidence of	Candidate name	<p>SENDCo's office School intranet</p>	Secure locked office	One year after leaving Woodhey High School



	use and the effectiveness of the candidate's access arrangements. This information is shared with the Head of Centre, Deputy Headteacher (Quality of Education), SENDCo's line manager, SENDCo, Assistant Headteacher (Raising Standards)	Details of access arrangement(s) Details of how well the candidate used the arrangements and whether there are any concerns		Secure username and password	
Alternative site arrangements	To obtain permission to use any other building other than the school's premises for examinations	Candidates' addresses	Exams office	Secure locked office with restricted key holders	Following the resolution of any enquiries/appeals
Attendance registers (copies)	Provides a record of candidate attendance and evidence the exam script has been sent to the awarding body	Candidate's legal name Candidate number Exam number	Exams office	Secure locked office with restricted key holders	Following the resolution of any enquiries/appeals
Candidate card	Used to support the identification of candidates and to minimise errors made by candidates when completing the front cover of their exam paper	Candidate's legal name Candidate number Candidate's photograph Access arrangement(s)	Exams office/exams cupboard in the FB Hall	Secure locked office with restricted key holders/locked metal cupboard	End of the Year 11 examination series



Candidates' scripts	Candidates' completed exam scripts	Candidate's legal name Candidate number Candidate's signature Candidate's work	Secure storage until collected by Royal Mail in exam safe	Secure locked office with restricted key holders and secure safe storage	Normally within 24hours, unless exceptional circumstances where exam papers are not collected as expected
Candidates' work	Candidate's work that has been used to inform grades must be held until all enquiries about results have been completed	Candidate's legal name Candidate number Candidate's signature	Subject departments Exam safe (moderated work)	Locked cupboards and filing cabinets Moderated work locked in safe in secure locked office with restricted key holders	Until awarding body deadline for release to candidates
Candidates' work for teaching purposes	With candidate's permission, work can be obtained and retained for use in class	Candidate's legal name Candidate number Candidate's signature	Subject departments	Exam scripts purchased/obtained via the awarding body's access to scripts system are anonymised	Until the specification becomes obsolete
Centre consortium arrangements for centre assessed work	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Certificates	Legal exams results document	Candidate's legal name Date of Birth Exam grades	On initial receipt, stored in the exams safe When ready for distribution, in the office	Secure locked safe in a locked office with restricted key holders on initial receipt, then in a locked filing cabinet when ready for distribution	Uncollected certificates are kept securely and will be confidentially destructed five years after a student has left Woodhey, or for an external candidate, five years after issue
Certificate destruction information	Legal exam results document	Candidate's legal name Date of Birth Exam grades	If certificates are destroyed, the information will be kept in a register	Secure locked office with restricted key holders	We can confidentially destroy as long as we keep a record



Certificate issue information	Record kept of exam certificate collection	Candidate's name Signature of person who collected	Exams office	Secure locked office with restricted key holders	Permanent record
Conflicts of interest records	Annual record kept of the staff with conflicts of interest for that year's exam series	Children's names Name of school Candidate number Exam entry details	Exams office	Secure locked office with restricted key holders	The end of the candidate's final exam series and the resolution of any enquires/appeals
Entry information	Details required by the awarding body to enter a candidate for external exams	Candidate's legal name Date of Birth Gender Candidate number Unique Candidate Identifier (UCI) Unique Learner Number (ULN) Exam subject entry details	Exams office	Secure locked office with restricted key holders	Following the resolution of any enquiries/appeals
Exam room incident logs	Evidence for potential malpractice or special consideration	Candidate's name Details of the incident Witness name(s)	Secure storage in the exams office	Secure locked office with restricted key holders	Following the resolution of any enquiries/appeals
Invigilator and facilitator training records	Invigilator training records which detail the training each invigilator has undertaken and when	Invigilator names Invigilator signatures (where applicable) Records and results of any online training or other tests to confirm knowledge and understanding of role	Exams office, either in hard copy or on the school's intranet	Secure locked office with restricted key holders Username and password	For six years after the current year
Overnight supervision information	To obtain permission from JCQ and the awarding bodies.	Candidate's name Candidate number Date of Birth Candidate's signature	Exams office	Secure locked office with restricted key holders	Following the resolution of any enquiries/appeals



	Needs to be retained for inspection purposes	Candidate's supervisor's name			
Post-results services: confirmation of candidate consent information	Used to gain informed permission to apply for a post results service	Candidate's name Candidate number Exam grades/marks Candidate's signature	Exams office	Secure locked office with restricted key holders	One year
Post-results services: request/outcome information	Used to apply for a post results service and when the outcome is received	Candidate's name Candidate number Exam grades/marks	Exams office	Secure locked office with restricted key holders	One year
Post-results service: scripts provided by ATS	Used to apply for a copy of a candidate's exam script. Either to obtain a copy for the candidate or for teaching and learning purposes (prior written permission is needed from the candidate)	Candidate's name Candidate number Exam grades/marks Exam paper	Exams office School intranet	Secure locked office with restricted key holders Secure username and password	Scripts purchased by the candidate are sent to them immediately Scripts obtained for teaching and learning are retained until the specification becomes obsolete
Post-results service: tracking logs	Used to keep a record of the requests made and progress of the outcome	Candidate's name Candidate number Exam grades/marks	Exams office	Secure locked office with restricted key holders	One year
Private candidate information	Details required by the awarding body to enter a candidate for external exams, including to allow identification of the candidate to negate potential fraud	Candidate's legal name Address Telephone number(s) Email address Date of Birth Gender Copy of photographic identification (e.g. passport or driving licence)	Exams office	Secure locked office with restricted key holders	Five years



		Candidate number UCI ULN Exam subject entry details			
Resolving timetable clashes information	Ensure any exam clashes are administered correctly and all parties are kept informed	Candidate's name Candidate number Access arrangements	Arbor system Exams office Exam officer's computer	Username and password protected Secure locked office with restricted key holders	One year
Results information	External examination results to be supplied to candidates, authorised third parties and as part of the school's data analysis	Candidate's name Candidate number UCI ULN Exam subject entry details	Arbor SISRA Exam office	Username and password protected Secure locked office with restricted key holders	Six years
Seating plans	To ensure candidates know where to sit and also as a mandatory record of the details which can be requested by the awarding body	Candidate's name Candidate number	Arbor Exam officer's computer Hard copy in exam office and in exam rooms	Username and password protected Secure locked office with restricted key holders in the exams office Exam rooms locked when not in use	One year
Special consideration information	The information is required to process information with the awarding bodies for disadvantaged candidates	Candidate's legal name Candidate number Candidate's signature Details of disadvantage Appropriate evidence Supporting documentation	Exam office	Secure locked office with restricted key holders	Maximum of one year after the student has left Woodhey High School



Suspected malpractice reports/outcomes	The information is required to provide evidence of suspected malpractice. The outcome of which is held as a record in school and a copy is supplied to the candidate	Candidate's legal name Candidate number Candidate's signature Witness(es) name Witness(es) signature(s) Details of incident	Exam office	Secure locked office with restricted key holders	One year
Transferred candidate arrangements	The information is required by the awarding body and the receiving school to allow a candidate to sit their exam at another centre	Candidate's legal name Candidate number UCI ULN Exam subject entry details Reason for transfer	Exam office	Secure locked office with restricted key holders	One year
Very late arrival reports/outcomes	The information is required to ensure the integrity of the exams and must be reported to the awarding body for their consideration. The outcome of which is held as a record in school and a copy is also supplied to the candidate	Candidate's legal name Candidate number Supervisor's name Supervisor's signature Invigilator's name Invigilator's signature Details of incident	Exam office	Secure locked office with restricted key holders	One year

