

CAMS HILL SCHOOL
EXAMINATIONS –
GENERAL DATA PROTECTION REGULATIONS
(GDPR) POLICY



JCQ Requirement

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Contents

Purpose of the policy	3
Section 1 – Exams-related information.....	3
Section 2 – Informing candidates of the information held.....	4
Section 3 – Hardware and software.....	4
Section 4 – Dealing with data breaches	5
Assessment of ongoing risk.....	5
Notification of breach	5
Evaluation and response.....	5
Section 5 – Candidate information, audit and protection measures	5
Section 6 – Data retention periods.....	6
Section 7 – Access to information.....	6
Sharing information with parents.....	6
Publishing exam results	6
Section 8 – Table recording candidate exams-related information held	7

Key staff involved in the General Data Protection Regulation policy

Role	Name(s)
Head of Centre	Gwennan Harrison-Jones
Exams Officer	Olivera Ure
Exams Officer Line Manager (Senior Leader)	Rachel Matthews
Data Protection Lead	Rachel Matthews
Director of IT Services	Michael Charles
Data Manager	N/A

Purpose of the policy

This policy details how Cams Hill 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).

Pupils 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
- not transferred outside the European Economic Area without adequate protection

To ensure that the centre meets the requirements of the DPA 2018 and 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 – Candidate information, audit and protection measures*.

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

- Awarding Bodies
- Joint Council for Qualifications (JCQ)
- Local Authority

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

- hard copy
- email
- secure extranet site(s) – e-AQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services;
- Management Information System (MIS) provided by Capita SIMS
- sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-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.

Section 2 – Informing candidates of the information held

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

All candidates are given access to this policy via the school website.

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 GDPR.

Section 3 – Hardware and software

The table below confirms how IT hardware, software and access to online systems are protected in line with DPA & GDPR requirements:

Hardware	Date of purchase and protection measures	Warranty expiry
Desktop computer	Purchase date: January 2018 Protection measures: antivirus protection is up to date; the school uses 'Windows Defender' which also scans/looks for viruses; systems are in place to flag up any hardware issues these are completed by the IT department.	N/A

Software/online system	Protection measure(s)
SIMS; Awarding body secure extranet sites; A2C	Protected usernames and passwords are used (a mix of upper/lower cases letters, numbers and symbols are used); passwords have to be changed regularly; Exams Officer has to approve the creation of new user accounts and determines access rights.

Section 4 – Dealing with data breaches

For information regarding the procedure for dealing with a Personal Data Breach, please refer to the School's [Data Protection Policy](#), Section 17 and Appendix 1.

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?

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.

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.

Protection measures may include:

- password protected area on the centre's intranet

- secure drive accessible only to selected staff
- information held in secure area
- firewall updates undertaken in house/antivirus maintained by IT department when updates become available

Section 6 – Data retention periods

Details of retention periods specific to Exams, the actions taken at the end of the retention period and method of disposal are contained in the centre's Examinations - Archiving Policy which is available on request from the Examinations Officer, Olivera Ure.

Section 7 – Access to information

Please refer to the School's [Data Protection Policy](#), Section 8 'Sharing Personal Data' and Section 9 'Subject Access Requests and Other Rights of Individuals'.

Sharing information with parents

The centre will take into account any other legislation and guidance regarding sharing information with parents/carers (including non-resident parents/carers), for 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
- **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, the centre will make reference to the ICO (Information Commissioner's Office) Education and Families information on [Publishing 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	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 SIMS Lockable metal filing cabinet	Secure user name and password In secure area in SENDCOs office.	Until appeal, malpractice or other results enquiry has been completed
Attendance registers copies	Candidate name Candidate number	Filing Cabinet in Exams Office	Held in Locked Exams Office	According to JCQ ICE booklet – until appeal, malpractice or other results enquiry has been completed
Candidates' work	Candidate name Candidate number	Relevant Department	Locked Cupboard	According to JCQ NEA booklet – Unit appeal, malpractice or other results enquiry has been completed
Certificates	Candidate name Candidate number Candidate DOB	Exams store room	Locked Cupboard	To retain all unclaimed certificates under secure conditions for a minimum of 12 months from the date of issue.

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Certificate issue information	Candidate name Candidate number	Locked Exams office	Locked Cupboard Pupils to sign for their certificates	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Entry information	Candidate name Candidate number Candidate DOB	Exams Office On the shared drive, under 'exams' SIMS	Secure user name and password	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Exam room incident logs	Candidate name Candidate number	Locked Exams office	Filing cabinet in locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Invigilator and facilitator training records	Invigilator name	Locked Exams office	Filing cabinet in locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Overnight supervision information	Candidate name Candidate number	Locked Exams office	Filing cabinet in locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Post-results services: confirmation of candidate consent information	Candidate name Candidate number	Locked Exams office	Filing cabinet in locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Post-results services: requests/outcome information	Candidate name Candidate number	On the Shared drive under exams	Filing cabinet in locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Post-results services: scripts provided by ATS service	Candidate name Candidate number	On the Shared drive under exams Paperwork held in appeals file	Secure user name and password Locked Exams Office	N/A
Post-results services: tracking logs	Candidate name Candidate number	On the Shared drive under exams Paperwork held in appeals file	Secure user name and password Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Private candidate information	Cams Hill school does not accept private candidates	N/A	N/A	N/A
Resolving timetable clashes information	Candidate name Candidate number	SIMS Paper work stored on Shared Drive under Exams	Secure user name and password Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Results information	Candidate name Candidate number	SIMS Paper work stored on Shared Drive under Exams	Secure user name and password Locked Exams Office	Current academic year + 6 years (minimum).

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Seating plans	Candidate name Candidate number Access Arrangements	Paper work stored on Shared Drive under Exams	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Special consideration information	Candidate name Candidate number Access Arrangements	Paper work stored on Shared Drive under Exams	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Suspected malpractice reports/outcomes	Candidate name Candidate number Access Arrangements	Paper work stored on Shared Drive under Exams	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Transferred candidate arrangements	Candidate name Candidate number Access Arrangements	Paper work stored on Shared Drive under Exams	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.
Very late arrival reports/outcomes	Candidate name Candidate number Access Arrangements	Paper work stored on Shared Drive under Exams	Locked Exams Office	Until appeal, malpractice or other results enquiry has been completed, whichever is later.