Data Protection Policy (Exams)

2025/2026

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Paul Reddick	
Date of next review	15/01/2027

Key staff involved in the policy

Role	Name(s)
Head of centre	**Lee Cornwall**
Exams officer	**Julia Wilson**
Senior leader(s)	Luke Bullock Ellen Maude Sarah Horne Samantha Harvey Oliver Horner Rob Sutherland Simon Boddy
IT manager	**Steve Baumgardt**
Data manager	**Rob Sutherland**

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Purpose of the policy

This policy details how Crispin 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 6.1) 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.

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; SIMs

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

- hard copy
- email
- secure extranet site(s) – E-AQA & Centre Services, Cambridge OCR Interchange, WJEC Secure Website and Edexcel Online
- Management Information System (MIS) provided by Capita SIMS, sending/receiving information via electronic data interchange (EDI) using A2C and JCQ CAP System.

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

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

All candidates are given access to this policy via the school's website, which tells them what we hold, why we hold it and who we share it with.

Candidates are made aware of the above at the start of a course leading to a vocational qualification, or, where candidates are following GCE and GCSE qualifications, when the 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 online 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 Crispin 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 computers	Ongoing 6 year rolling replacement schedule. Network Manager checks hard drives and makes sure that the antivirus protection is up to date.	All new computers come with a 5-year warranty. All exam computers are under warranty

Software/online system	Protection measure(s)
SIMs, GL Assessment, Pearson. We have GDPR documentation for all internal software and external exam platforms.	There is a group policy in place to force regular secure password changes. (10+ character with at least 1 capital and number) The network is protected by our Smoothwall default gateway and BitDefender.
MS Word 2013 & 2016 Files saved in exam users documents and moved across to secure exam area after exam has finished.	Exam computer are logged on with secure exam accounts before the exams start. Group policy objects are in place to disable the internet, shared areas, spelling and grammar and the ability to tamper with any computer settings. Exam files are only accessible by the exams officer and network domain admin.
Exam board logins.	Protected by passwords which are changed regularly

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

Rob Sutherland 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 whenever we install a new piece of software when a Privacy Impact Assessment is carried out.

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 continuously by using BitDefender

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 Exams office or our website.

Section 7 – 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 Rob Sutherland (Data Officer) who will pass it onto Julia Wilson (Exams Officer). This must be made in writing/email in the first instance and photographic ID will be needed to confirm the identity of the person making the request.

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 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 ID of both parties, provided].

In the case of looked-after children or those in care, agreements may already be in place for information to be shared with the relevant authorities (for example, the Local Authority). The centre's Data Protection Officer will confirm the status of these agreements and approve/reject any requests.

Sharing information with parents

In line with the school's "Data Protection Policy 2021 including Freedom of Information Policy" 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:
The school has a designated email address for all GDPR & Data queries which is dataprotectionlead@crispinschool.co.uk

The centre 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 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
- 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

Students may collect their exam results on results day, however, if they are unable to collect them in person they can be collected by another person if they meet the criteria below;

The student must nominate a person and inform us from a personal email address stating the name of the person collecting the results.

The nominated person must bring in a form of photographic ID before the results are released.

The Exams Officer will make a note of the person's name and form of ID on collection

When considering publishing exam results, Crispin School will make reference to the ICO (Information Commissioner's Office) https://ico.org.uk/your-data-matters/schools/exam-results/ Can schools give my exam results to the media for publication?

OR
Crispin 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 Crispin 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 Rob Sutherland, 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		Candidate name Candidate DOB Gender 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	MFA Secure user name and password In secure office (SENCo)	See Access Arrangements policy
Alternative site arrangements		Name & DOB Exams entered for	On JCQ CAP System	By JCQ	N/A
Attendance registers copies		Name, exam number & exam entered for	Secure storage area	JCQ secure storage rules	Until exam season is closed
Candidates' scripts		Name & scripts	Secure storage area	JCQ secure storage rules	Until first opportunity to send via Parcelforce
Candidates' work					

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
Centre consortium arrangements for centre assessed work		Name, candidate number, marks & grades	Securely by individual teacher or H.O.D	Securely by individual teacher or H.O.D	Until exams season ends and is given back to candidate
Certificates		Name candidate number subjects and grades	Secured storage area	In lockable cabinet in secured storage area	See Archiving Policy
Certificate destruction information		Name, exam boards and subjects, date of destruction	Staff Shared Area	Only assessable by staff members password	Ongoing
Certificate issue information		Name photo	With certificates in secure storage area	In lockable cabinet	Ongoing
Conflicts of Interest records		Name and details of relationship	On Exams Officer's computer	Only accessible by EO using password	Until exam season ends.
Entry information		Name d.o.b ULN UCI Candidate Number	Sims Exams Organiser	Secure user name & password	Ongoing
Exam room incident logs		Name, candidate number, details of incident	Secured storage area	By JCQ secure storage rules	Until exam season is closed
Invigilator and facilitator training records		Name	In Exams Office	Office is locked when unattended	Until Invigilator leaves employment
Overnight supervision information		Name, Cand number & exams affected	JCQ CAP system	Username & password	Until exam season closes

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
Post-results services: confirmation of candidate consent information		Name, cand number & subject	In Exams Office	Office is locked when unattended	Until exam season is closed
Post-results services: requests/outcome information		Name, candidate no, exam board, subject, grade and marks	In Shared area (limited access)	Only assessable by limited members of staff	Until exam season is closed
Post-results services: scripts provided by ATS service		Name, candidate no, exam board, subject, grade and marks	In Shared area (limited access)	Only assessable by limited members of staff	Until exam season is closed
Post-results services: tracking logs		Name, candidate no, exam boards, subjects, grades and marks	In Exams Officers documents on computer	Only assessable by staff members password	Until exam season is closed
Private candidate information		Name, address, d.o.b, candidate number, exam details, UCI, ULN	SIMS Exams Organiser	Secure user name and password	Ongoing
Resolving timetable clashes information		Name, candidate number, exams details	SIMS Exams Organiser	Secure user name and password	Ongoing
Results information		Name, candidate no, UCI, ULN, d.o.b, exam boards, subjects, marks and grades	SIMS Exams Organiser	Secure user name and password	Ongoing
Seating plans		Name, candidate No, exams details, access arrangements	SIMS Exams Organiser		Until exam season is closed

Information type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Special consideration information		Name, candidate No, exams details, access arrangements, details of case	In Exams Office	Office is locked when unattended	Until exam season is closed
Suspected malpractice reports/outcomes		Name, candidate No, exams details, access arrangements, details of case	In Exams Office	Office is locked when unattended	Until exam season is closed
Transferred candidate arrangements		Name, candidate no, UCI, ULN, d.o.b, address, access arrangements, exam details	JCQ CAP system	Username & password	Until exam season is closed
Very late arrival reports/outcomes		Name, candidate no, UCI, ULN, d.o.b, address, access arrangements, exam details	JCQ CAP system	Username & password	Until exam season is closed