



# HENLEY-IN-ARDEN SCHOOL

*Achieving Excellence Together*

<b>Name of Policy</b>	Exams General Data Protection Regulation Policy	
<b>Lead</b>	Mr J Roper (Associate Headteacher) Mrs W Kelly (Exams Officer)	
<b>Policy Status</b>	Governor Approved	Yes
	Date Governor Approved	November 2022
<b>Review Frequency</b>	Annually	

This policy is reviewed annually to ensure compliance with current regulations

## Key staff involved in the policy

<b>Role</b>	<b>Name(s)</b>
Head of centre	<b>Joe Roper</b>
Exams officer	<b>Wendy Kelly</b>
Exams officer line manager (Senior leader)	<b>Joe Roper</b>
IT manager	<b>Rishy Liyanage</b>
Data manager	<b>Sarah Longden</b>

## Purpose of the policy

This policy details how Henley in Arden, 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).

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
- 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
- Schools within the Arden Multi-Academy Trust

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

- hard copy
- email
- Exam Intranet sites
- School intranet including Microsoft teams
- MIS provider (Capita SIMS; (<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

Henley in Arden ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed when they join the school about the data held and the right to opt-in.
- 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.

Candidates eligible for access arrangements are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent form (Personal data consent, Privacy Notice (AAO) and Data Protection confirmation) before access arrangements approval applications can be processed online.

### 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
Room D Computers D1 - D30	Hardware checked every half term or during the holiday period for errors or any security/windows updates. This is done by the in-house IT team.	N/A

Software/online system	Protection measure(s)
A2C	A2C is only accessible to the exams officer in the school. The username and password for A2C is not shared with anyone but the exams officer. Password rules are 8 characters only.
SIMS	School Sims details are provided by the school officer manager to support staff and teaching staff only. All staff have individual permissions on SIMS according to their job role. Password rules are 8 characters only.

### 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

If a data protection breach is identified, the following steps will be taken:

#### 1. Containment and recovery

Joe Roper 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 [detail the regularity].

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 [XX] months (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 [insert e.g. Exams archiving policy] which is available/accessible from [insert who and/or where].

## Section 7 – Access to information

Current and former candidates can request access to the information/data held on them by making a **subject access request** to Wendy Kelly via email. All requests will be dealt with within 40 calendar days.

### 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

The centre will share data with parents on request, not included the statutory data shared anyway, including exam results and student data.

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

### **Publishing exam results**

The school will publish exam results to students on results day. If a student cannot receive the results, they can give written consent to a family member in order to collect this.

When considering publishing exam results, the centre will make reference to the ICO (Information Commissioner's Office) Education and Families <https://ico.org.uk/for-organisations/education/> 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
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 MIS Lockable metal filing cabinet	For all information  If online - Secure user name and password survey which is backed up  If information is physical – in secure locked office
Alternative site 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	In the exam secure storage until is is required	
Attendance registers copies	Candidate name Candidate DOB Gender	In the exam secure room	

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected
	Data protection notice (candidate signature) Diagnostic testing outcome(s) Specialist report(s) (may also include candidate address) Evidence of normal way of working		
Candidates' scripts	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	In the exam secure storage	
Candidates' work	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	In the department in secure storage	

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected
Center consortium arrangements for centre assessed work		Online	
Certificates	Candidate name Candidate DOB Gender	In the exam secure room	
Certificate destruction information		In the exam secure room	
Certificate issue information		<b>In the exam secure room</b>	
Conflicts of interest records		Exams Officer's Office filed by exam season	
Entry 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	Exams Officer's Office	
Exam room incident logs	Candidate name Candidate DOB Gender	In the exam secure room	

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected
Invigilator and facilitator training records		Exams Officer's office	
Overnight supervision 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	N/A	
Post-results services: confirmation of candidate consent 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	Email folder	
Post-results services: requests/outcome information		Email Folder	

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected
Post-results services: scripts provided by ATS service		Exams Officer's office	
Post-results services: tracking logs		Exams Officer's office	
Private candidate 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	N/a	
Resolving timetable clashes information		Exams Officer Office	
Results 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	Data Manager	

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected
Seating plans	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	Exams Officer's office	
Special consideration information		SENCO office	
Suspected malpractice reports/outcomes		Exams Officer's office	
Transferred candidate arrangements		N/A	
Very late arrival reports/outcomes		Exams Officer's office	