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**BROOKTHORPE
HALL SCHOOL**

General Data Protection Regulation Policy (Exams)

Qualification examination and assessment

Brookthorpe Hall School

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Contents

This policy details how Brookthorpe Hall 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). This should be read in conjunction with the OFG Data Protection Policy.

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01

Introduction

Details & Purpose

Policy details

This policy is annually reviewed to ensure compliance with current regulations.

Centre	Brookthorpe Hall School
Approved by	Headteacher
Reviewed by	Exams Officer
Date of next review	October 2027

Key staff involved

Head of Centre	Jon Bell
Deputy Headteacher	Louise Waller – Deputy Headteacher Sabrina Chowdhury – Deputy Headteacher
Additional Senior Leader(s)	
Exams Officer	Chloe Boothman
Other	OFG Education Data Protection Officer/Manager/Processor/Controller

Purpose of the policy

This policy details how Brookthorpe Hall 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). This should be read in conjunction with the OFG Data Protection Policy.

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.

02

GDPR in Qualification examination and assessment

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 (DfE)
- Local Authority
- Outcomes First Group / OFG Education

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

- hard copy
- email
- secure extranet site(s) – e.g. AQA Gateway; myAQA; EAQA; Pearson Edexcel Online; NCFE Portal; Access Arrangements Online (AAO).
- Management Information System (MIS) provided by ISAMS 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.

Informing candidates of the information held

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

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.

For candidates eligible for access arrangements/reasonable adjustments which require awarding body approval, an application for access arrangements will be processed using *JCQ Access arrangements online (AAO)* or the awarding bodies equivalent online platform, complying with the UK GDPR and the Data Protection Act 2018.

Candidates involved in suspected or alleged malpractice will be provided with the centres Malpractice Policy which informs 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 available on the school website.

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	Protection measure(s)
Desktop Computers, Laptops, Tablets, Servers	- Centrally managed by OFG Education IT - All protected by anti-virus software and monitored regularly by OFG IT Support Desk - Multi-Factor Authentication (MFA) is mandatory and enabled for all user accounts - rules for password setting and regular password changing
Software/Online System	Protection measure(s)
MIS - ISAMS	All users have assigned accounts with password protection. Active directory provides additional authentication and authorisation.
Evidence for Learning	All users have assigned accounts specific to a domain with password protection.
Intranet, Sharepoint and internet browsers	All users have assigned accounts with password protection. Active directory provides additional authentication and authorisation.
Awarding body secure sites: AQA Gateway; myAQA; EAQA; Pearson Edexcel Online; NCFE Portal; Access Arrangements Online (AAO).	All users have assigned accounts with password protection and Multi-Factor Authentication (MFA). User accounts are reviewed regularly.

Further information can be found in the OFG Information Security Policy.

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, as per the OFG Data Protection Policy (available on the school website), the school will follow the OFG Data Breach Procedure.

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.

The following table 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 12 months (this may include 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 on request.

Access to information

Current and former candidates can request information/data held on them by making a subject access request to the Head of Centre/Headteacher.

Subject access requests will be processed in accordance with the guidance set out in the OFG Data Subject Access Request Procedure.

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.

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.

Table recording candidate exams-related information held

Information type	What personal/sensitive data is/may be contained in the information	Where is information stored	How information is protected
Access arrangements information	Candidate name, DOB, Gender, Diagnostic testing, Specialist reports potentially containing address, Evidence of normal way of working	AAO MIS Schools secure network	Secure user name & password MFA
Attendance registers copies	Candidate name, DOB, Gender	Lockable storage	Restricted access to storage
Candidates' scripts	Candidate name, DOB, Signature	Lockable storage	Restricted access to storage
Candidates' work	Candidate name, DOB, Signature	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA

Certificates	Candidate name, DOB, Outcome	Lockable storage	Restricted access to storage
Certificate destruction information	Candidate name, DOB, Outcome	Schools secure network	Restricted access to secure file Secure user name & password MFA
Certificate issue information	Candidate name, DOB, Outcome	Schools secure network	Restricted access to secure file Secure user name & password MFA
Entry information	Candidate name, DOB, Candidate number, Entry Code, Qualification	Schools secure network	Restricted access to secure file Secure user name & password MFA
Exam room incident logs	Candidate name, Details of incident/s	Lockable storage	Restricted access to storage
Post-results services: confirmation of candidate consent information	Candidate name, DOB, Candidate number, Entry Code, Qualification, Signature	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA

Post-results services: requests/outcome information	Candidate name, DOB, Candidate number, Entry Code, Qualification, Outcome	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA
Post-results services: scripts provided by ATS service	Candidate name, DOB, Candidate number, Entry Code, Qualification, Outcome	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA
Post-results services: tracking logs	Candidate name, DOB, Candidate number, Entry Code, Qualification, Outcome	Schools secure network	Restricted access to secure file Secure user name & password MFA
Resilience arrangements: Evidence of candidate performance	Candidate name, Candidate number	Schools secure network	Restricted access to secure file Secure user name & password MFA
Results information	Candidate name, DOB, Candidate number, Entry Code, Qualification, Outcome	Schools secure network	Restricted access to secure file Secure user name & password MFA
Seating plans	Candidate name, Candidate number, Access arrangement(s)	Lockable storage	Restricted access to storage

Special consideration information	Candidate name, Candidate number, Access arrangement(s), Qualification, Entry Code	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA
Suspected malpractice reports/outcomes	Candidate name, Candidate number, Access arrangement(s), Qualification, Entry Code	Schools secure network Lockable storage	Restricted access to storage Restricted access to secure file Secure user name & password MFA
Transferred candidate arrangements	Candidate name, Candidate number, Access arrangement(s), Qualification, Entry Code	Lockable storage Schools secure network	Restricted access to storage Restricted access to secure file Secure user name & password MFA
Very late arrival reports/outcomes	Candidate name, Candidate number, Access arrangement(s), Qualification, Entry Code, Details of incident/s	Schools secure network Lockable storage	Restricted access to storage Restricted access to secure file Secure user name & password MFA



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