



GENERAL DATA PROTECTION REGULATION POLICY (EXAMS)

2017/18

This policy is annually reviewed to ensure compliance with current regulations

Approved/reviewed by	
Michelle Syred	
Date of next review	April 2019

Key staff involved in the General Data Protection Regulation policy

Role	Name(s)
Head of centre	Mrs C Trelfa
Exams officer	Mrs S Hollow
Exams officer line manager (Senior Leader)	Mrs M Syred
Data Protection Officer	Mrs M Singleton
IT manager	Mr J Relf
Data manager	Mr J Relf, Mrs P Vielvoye, Mrs L Crick

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GDPR policy (exams) template (2017/18)

Hyperlinks provided in this document were correct as at February 2018

Purpose of the policy

This policy details how The Towers School, in relation to exams management and administration, ensures compliance with the regulations as set out by the Data Protection Act (DPA) 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 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
- ▶ CEM, UKMT, Department for Education; Local Authority; the Press; Relevant Schools & Colleges for years 12 & 13.

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

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

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

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All candidates are:

- ▶ informed via letter for all examinations and tests listed above, and details on Firefly.
- ▶ given access to this policy via centre website/ Firefly
- ▶ Candidates are made aware of the above from April 2018 and thereafter the start of their course of study leading to external examinations.

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
Windows networked PC	N/A Enterprise grade Anti-virus and Mail filtering Password protected	N/A Continually updated

Software/online system	Protection measure(s)
SIMs	Password protected. Access limited accounts
A2C	Secure encrypted connection

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

Mrs M Singleton will lead on investigating the breach.

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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 at least annually.

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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 daily or as required (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 Exams archiving policy which is available/accessible on Firefly

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 The Examinations Officer Mrs S Hollow or Mrs A Martyn in writing/email. If unknown to current staff the person will have to give proof of identity such as passport or driving licence. 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.

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
					destroyed thereafter.
Certificates		Full name, date of birth, candidate number. Examination results	In locked filing cabinet.	Cabinet is locked in locked office. Proof of identity required for collection if candidate unknown to EO	To be retained until the candidate is 26 years of age
Certificate destruction information		Full name, date of birth, candidate number. Examination results	In locked filing cabinet.	Cabinet is locked in locked office. Proof of identity required if enquiring candidate unknown to EO	To be retained for 5 years after destruction
Certificate issue information		Candidate signature, Date of collection, examination results	In locked filing cabinet.	Filing cabinet locked in locked office	To be retained until the candidate is 26 years of age
Entry information		Full name, date of birth, candidate number. Subjects entered/withdrawn	In SIMs In locked filing cabinet.	Password protected, Filing cabinet locked in locked office	Hard copy retained for 1 year
Exam room incident logs		Full Name Candidate Number Examination component Details of incidents or malpractice	In filing cabinet with attendance registers	Filing cabinet locked in locked office	Until after enquiries after results are completed or a malpractice enquiry

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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
					whichever is the later. Malpractice record to be retained on candidate file for 10 years
Overnight supervision information		Full Name Candidate Number Examination component Family address	In SIMs In locked filing cabinet.	Filing cabinet locked in locked office	Until after enquiries after results are completed or a malpractice enquiry whichever is the later.
Post-results services: confirmation of candidate consent information		Full Name Candidate Number Examination component Family address	In locked filing cabinet with results information	Filing cabinet locked in locked office	To be retained until the candidate is 26 years of age
Post-results services: requests/outcome information		Full Name Candidate Number Examination component	In locked filing cabinet with results information	Filing cabinet locked in locked office	To be retained until the candidate is 26 years of age
Post-results services: scripts provided by Access to Scripts service		Full Name Candidate Number Examination component	On Computer or hard copy or given to student	With staff under secure conditions	Destroyed at first opportunity

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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
		Candidate script		Student advised to return for destruction	
Post-results services: tracking logs		Full Name Candidate Number Examination component	On Computer and hard copy	Computer pass worded Filing cabinet locked in locked office.	To be retained until the candidate is 26 years of age
Private candidate information		Private candidates not accepted			
Resolving clashes information		Full Names Candidate Numbers Examination components	On Computer and hard copy	Computer pass worded Filing cabinet locked in locked office.	Until after enquiries after results are completed or a malpractice enquiry whichever is the later.
Results information		Full name, date of birth, candidate number. Examination results	In SIMS and hard copy	Computer pass worded Filing cabinet locked in locked office.	To be retained until the candidate is 26 years of age
Seating plans		Full Name Candidate Number Examination component	In SIMS and hard copy	Computer pass worded Filing cabinet locked in locked office.	Until after enquiries after results are completed or a malpractice enquiry

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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
					whichever is the later.
Special consideration information		Full Name Candidate Number Examination component Details of illness/personal; circumstances	On Computer and hard copy	Computer pass worded Filing cabinet locked in locked office and transferred to school archive after 1 year	For 10 years
Suspected malpractice reports/outcomes		Full Name Candidate Number Examination component Details of allegation, reports and outcomes	On Computer and hard copy	Computer pass worded Filing cabinet locked in locked office and transferred to school archive after 1 year	For 10 years
Transfer of credit information		Full Name Candidate Number Examination component	On computer and hard copy	Computer pass worded Filing cabinet locked in locked office and transferred to school archive after 1 year	For 10 years
Transferred candidate information		Full Name Candidate Number	On computer and hard copy	Computer pass worded	

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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
		Examination component		Filing cabinet locked in locked office and transferred to school archive after 1 year	For 10 years
Very late arrival reports/outcomes		Full Name Candidate Number Examination component Reasons for late arrival	On Computer and hard copy	On Computer and hard copy Filing cabinet locked in locked office and transferred to school archive after 1 year	Until after enquiries after results are completed or a malpractice enquiry whichever is the later. If a case of malpractice is identified see above.