



St Peter & St Paul
Catholic Voluntary Academy
Pro Petro Paulo Patria

DATA PROTECTION POLICY

(Exams)

2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Date of next review	

Key staff involved in the policy

Role	Name(s)
Head of centre	Caroline Hewerdine
Exams officer	Clive Crossman
Senior leader(s)	Rebecca Carter
IT manager	Paul Archer
Data manager	Jessica McGovern

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Purpose of the policy

This policy details how St Peter and St Paul Catholic Voluntary Academy, 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) 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.

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
- Lincolnshire County Council
- Our Lady of Lourdes Multi Academy Trust
- the Press

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

- hard copy
- email
- secure extranet site(s) –
 - AQA Centre Services
 - OCR Interchange
 - Pearson Edexcel Online
 - WJEC Portal
 - ASDAN
- A Management Information System (MIS) provided by Arbor, 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.

Section 2 – Informing candidates of the information held

St Peter and St Paul Catholic Voluntary Academy ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via Candidate Handbook and electronic communication.
- given access to this policy via centre website, written request and hard copy available in the Exams Office.

Candidates are made aware of the above at the start of a course or when the registrations/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 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 St Peter and St Paul Catholic Voluntary Academy 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 computer	Hardware checked and maintained by on site IT support and remote support provided by the trust. Maintenance is server based and access is based on profiles. All HDD's are protected by Bitlocker.	N/A
Laptop	Hardware checked and maintained by on site IT support and remote support provided by the trust. Maintenance is server based and access is based on profiles. All HDD's are protected by Bitlocker.	N/A

Software/online system	Protection measure(s)
Arbor – Management	Accessed using Arbor account system administered by Arbor IT. Protections include: <ul style="list-style-type: none"> • Protected usernames and passwords • Rules for password setting (use of a mix of upper/lower cases letters and numbers) Rules for regularity of password changing
Microsoft Edge	Accessed using PC's & laptops on site via school account system administered by IT. Protections include: <ul style="list-style-type: none"> • Protected usernames and passwords • Rules for password setting (use of a mix of upper/lower cases letters and numbers) Rules for regularity of password changing
Awarding Body secure sites: <ul style="list-style-type: none"> • AQA • OCR • Pearson / Edexcel WJEC / Educas	<ul style="list-style-type: none"> • Protected usernames and passwords • Rules for password setting (use of a mix of upper/lower cases letters and numbers) • Rules for regularity of password changing • 2 step authentication procedure via authentication app Centre administrator has to approve the creation of new user accounts and determine access rights
A2C – Secure file transfer Software	Accessed via specific PC & Laptop using school account system administered by IT. Protections include: <ul style="list-style-type: none"> • Protected usernames and passwords

	<ul style="list-style-type: none"> Rules for password setting (use of a mix of upper/lower cases letters and numbers) <p>Rules for regularity of password changing</p>
Outlook	<p>Accessed using school account system administered by IT. Protections include:</p> <ul style="list-style-type: none"> Protected usernames and passwords Rules for password setting (use of a mix of upper/lower cases letters and numbers) <p>Rules for regularity of password changing</p>

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

A Data Protection Officer, appointed by Our Lady of Lourdes Catholic Multi-Academy Trust, 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 in line with Our Lady of Lourdes Catholic Multi-Academy Trust policy.

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 regularly, as update become available (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 from Teams and the Exams Office/Examinations Officer.

Section 7 – Access to information

(With reference to ICO information <https://ico.org.uk/for-the-public/schools/exam-results/>)

The **UK** 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 the Data Protection Officer, via the Examinations Officer, in writing or by e-mail. Identification will be requested and will need to be confirmed if the request is from a former candidate who is unknown to current staff.

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 Data Protection Officer and/or 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

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:

- 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 (Last 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

St Peter and St Paul Catholic Voluntary Academy 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 St Peter and St Paul Catholic Voluntary Academy 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 the Examinations Officer, 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.

When considering publishing exam results, St Peter and St Paul Catholic Voluntary Academy will make reference to the ICO (Information Commissioner's Office) <https://ico.org.uk/your-data-matters/schools/exam-results/> Specifically the section on the linked page titled: **Can schools give my exam results to the media for publication?**

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	Any hard copy information kept by the Examinations Officer relating to an access arrangement candidate.	Candidate name Candidate DOB Gender Signed candidate personal data consent form 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		
Alternative site arrangements	Any hard copy information generated on an alternative site arrangement. Notifications submitted online via CAP.	Candidate name Candidate DOB Location information	Lockable metal filing cabinet		
Attendance registers copies	Centre copies of registers provided by awarding bodies for individual exams. These records contain names and candidate numbers for each candidate plus a record of their attendance. The record will detail the exam for which the register refers to.	Candidate Name Candidate Number Present/Absent Mark Exam information and date	Lockable metal filing cabinet		
Candidates' scripts	Any unwanted copies of scripts returned to the centre through the Access to Scripts (ATS) service.	Candidate Name Candidate Number	Lockable metal filing cabinet		

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
Candidates' work	Non-examination assessment work returned to the centre by the awarding body at the end of the moderation period.	Candidate Name Candidate Number	Secure Exams Cupboard prior to being returned to Head of Department. Held securely within department.		
Certificates	Candidate certificates issued by awarding bodies.	Candidate Name Candidate Number Grades awarded	Lockable metal filing cabinet		
Certificate destruction information	A record of unclaimed certificates that have been destroyed.	Candidate Name Candidate Number Certificate Number	Lockable metal filing cabinet		
Certificate issue information	A record of certificates that have been issued	Candidate Name Candidate Number Certificate Number Signature of Collection	Lockable metal filing cabinet		
Conflicts of interest records	Records demonstrating the management of conflicts of interest	Candidate Name Staff Member Name	Lockable metal filing cabinet		
Entry information	Any hard copy information relating to candidates' entries.	Candidate Name Candidate Number Qualification Level/Type	Lockable metal filing cabinet		
Exam room incident logs	Logs recording any incidents or irregularities in exam rooms for each exam session	Candidate Name Candidate Number Details of Incident	Lockable metal filing cabinet		
Invigilator and facilitator training records	Records pertaining to training completed by invigilators and facilitators (scribes/readers etc..)	Invigilator Name Completed Training Dates	Secure Exams Cupboard		

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
Overnight supervision information	The JCQ Overnight Supervision form is completed online using CAP. The JCQ Overnight Supervision Declaration form is downloaded from CAP for signing by the candidate, the supervisor and the head of centre.	Candidate Name Candidate Number Present/Absent Mark Exam information and date	Lockable metal filing cabinet		
Post-results services: confirmation of candidate consent information	Hard copy or email record of required candidate consent.	Candidate Name Candidate Number Candidate Signature Exam paper details	Secure Exams Cupboard		
Post-results services: requests/outcome information	Any hard copy information relating to a post-results service request (RoRs, appeals, ATS) submitted to an awarding body for a candidate and outcome information from the awarding body.	Candidate Name Candidate Number Candidate Signature Exam paper details Awarded grade details	Secure Exams Cupboard		
Post-results services: tracking logs	Logs tracking to resolution all post-results service requests submitted to awarding bodies.	Candidate Name Candidate Number Exam paper details Awarded grade details	Held digitally on Teams		
Resilience arrangements: Evidence of candidate performance	The collection of evidence of student performance to ensure resilience in the qualifications system.	Candidate Name Candidate Number Exam paper details Awarded/predicted grade details	Secure location / Held digitally		
Resolving timetable clashes information	Any hard copy information relating to the resolution of a candidate's clash of timetabled exam papers.	Candidate Name Candidate Number Exam paper details	Lockable metal filing cabinet		

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
Results information	Broadsheets of public examination results summarising candidate final grades by subject by exam series.	Candidate Name Candidate Number Exam details Awarded grade details	Secure Exams Cupboard		
Seating plans	Plans showing the seating arrangements of all candidates for every exam taken.	Candidate Name Candidate Number Exam details Any Access Arrangements	Lockable metal filing cabinet		
Special consideration information	Any hard copy information relating to a special consideration application which has been submitted to an awarding body for a candidate and signed evidence produced by a senior leader in support of the application.	Candidate Name Candidate Number Exam details Any Access Arrangements Additional details for consideration purposes	Secure Exams Cupboard		
Suspected malpractice reports/outcomes	Any hard copy information relating to a suspected or actual malpractice investigation/report submitted to an awarding body and outcome information from the awarding body.	Candidate Name Candidate Number Exam details Any Access Arrangements Details of incident	Secure Exams Cupboard		
Transferred candidate arrangements	Any hard copy information relating to a transferred candidate arrangement. Applications submitted online via CAP.	Candidate name Candidate DOB Gender Candidate Number Any Access Arrangements	Lockable metal filing cabinet		
Very late arrival reports/outcomes	Any hard copy information relating to a candidate arriving very late to an	Candidate Name Candidate Number Exam details	Secure Exams Cupboard		

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
	exam. Reports submitted online via CAP.	Any Access Arrangements Details of incident			