

DATA PROTECTION POLICY (Exams) 2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Cathy Robbins	
Date of next review	28/11/2026

Key staff involved in the policy

Role	Name(s)
Head of centre	Helen Cairns
Exams officer	Heather Renton
Senior leader(s)	Cathy Robbins
IT manager	Jonathan Price
Data manager	Jonathan Price

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Purpose of the policy

This policy details how Bishops' Blue Coat Church of England High 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) 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
- Local Authority

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

- hard copy
- email (encrypted)
- secure extranet site(s) –AQA Centre Services; Cambridge OCR Interchange; Pearson Edexcel Online; WJEC Portal; NCFE Portal.
- a Management Information System (MIS) provided by [SIMS] sending/receiving information via electronic data interchange (EDI) using A2C (<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 including controlled assessments and coursework, special consideration requests and exam results/post-results/certificate information.

Section 2 – Informing candidates of the information held

Bishops' Blue Coat Church of England High School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via electronic communication
- given access to this policy via written request

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 Bishops' Blue Coat Church of England High School 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

Hardware	Date of purchase and protection measures	Warranty expiry
Desktop computer	All desktop and laptop computers in use for exams are less than 5 years old and configured in accordance with the school's ICT Security policy ensuring software is up-to-date and anti-malware measures are in place.	5 years from purchase
Exams laptop		3 years from purchase
Exams iPad (used for Exams Assist administration)	The exams iPad is configured in accordance with the ICT Security Policy. It runs a supported version of iOS. Installed apps are up-to-date and anti-malware is installed.	
Phones – Invigilator personal devices	All protection is software-based. See below.	

Software/online system	Protection measure(s)
MIS – SIMS	Each staff member with access to SIMS uses a unique account with their own password. Users are only allowed access to data and functions within the system that are in accordance with their role. New users or users with a changed role are approved by a member of SLT and the changes implemented by the ICT Support team in accordance with the ICT Security policy.
Awarding body secure extranet sites	Access to Awarding Body portals is restricted to the Head of Centre, Exams officer, Exams administrator, Head of Sixth Form, Sixth Form administrator. All accounts are protected by unique user accounts and emails, and multi-factor authentication.
A2C	A2C software is only installed on the desktop computers in the Exams office and as such is accessible only by the Exams office staff. The A2C software ensures secure transfer of data by the use of security keys which are unique between this school and each awarding body.
Exams Assist	Each user of Exams assist has their own password-protected account. Multi-factor authentication is also in place. User accounts are administered by the Exams office staff ensuring that accounts are created/deleted in accordance with the current roll of exam invigilators. Invigilators' access to student data is restricted to only the students sitting the exam they are invigilating that day (AM/PM). Access is further restricted meaning they only get access 1hr before the scheduled start and access is closed 3hrs after the scheduled end.

	<p>If the invigilator doesn't turn up for an exam, their access is removed to that exam. If they leave the employ of the school their access to Exams Assist is immediately removed.</p>
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The student data they get access to is – student name, photo, exam number and exam access arrangements (if any).

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 data breach procedure, contained within the school's main Data Protection Policy will be followed.

In brief the Data Protection team (Jonathan Price, Sara Sowden, Alison Beasley) will gather the information about the breach and in communication with the person(s) responsible for the breach will ensure that the breach is contained, that remedial steps are taken to recover lost data, inform the individuals whose data has been incorrectly shared/lost, inform the School Data Protection Officer and if necessary in form the ICO.

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 annually

Section 8 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
- regular updates to software, hardware and anti-malware measures. By regular we mean that centrally managed systems in the school automatically ensure that the latest updates are deployed to all devices, application software and anti-malware software.

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 from the exams office.

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 themselves 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 exams officer.

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

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

Bishops' Blue Coat Church of England High 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 Bishops' Blue Coat Church of England High 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 the head of centre, 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 – 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**)

See the separate Exams Archive policy for details of exams-related information held and what the retentions periods are and methods of destruction.