

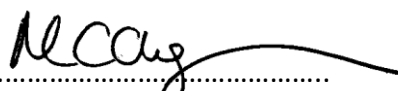


ST ALBANS GIRLS' SCHOOL

	GENERAL DATA PROTECTION REGULATION EXAMS (Statutory)		
	GB sub-committee: Curriculum, Assessment and Standards		
	Co-ordinator: Ms K Thomas		
	Last Reviewed: Summer 2021	Next Review: Summer 2022	

Signed by 
Margaret Chapman (Head Teacher)

Signed by 
Claire Barnard (Chair of Governors)

PURPOSE OF THE POLICY

This policy details how St Albans Girls' School, in relation to exams management and administration, ensures compliance with the regulations as set out by the General Data Protection Regulation (GDPR) Data Protection Act (DPA) Act 2018.

As at the date of reviewing this policy, although the UK has left the European Union the General Data Protection Regulation still has direct effect within the UK (JCO's General Regulations for Approved Centres (GR, section 6.1, Personal Data).

COVID -19 Update – Summer Exams Series 2021

Data subjects (students) can request their personal data under Article 15 of the General Data Protection Regulation. However, in respect of personal data such as Teacher Assessed Grades, an exemption from disclosure exists under paragraph 25(2) of the Data Protection Act. This allows the Data Controller (in this case STAGS) to delay disclosure of such information until after results have been issued.

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 exam 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 Officer to hold exam related information on candidates taking external examinations.

Candidates' exam related data may be shared with the following organisations/people:

- Awarding bodies
- Joint Council for Qualifications
- Department for Education
- Local Authority
- School consortium
- Exam Board Moderators
- Centre staff including invigilators as necessary
- Parents of student
- UCAS
- Learning Records Service

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

- Hard copy
- USB memory sticks
- CD/DVD recordings
- Post/Parcelforce Yellow Label service
- Email
- Secure extranet sites – eAQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure Services; City and Guilds; CISI Financial Qualification
- Management Information System – Capita SIMS; sending and receiving electronic data interchange using A2C from awarding body processing systems.
- Personally by telephone conversations

This data may relate to exam entries, access arrangements, the conduct of exams and non-examination assessments, special consideration requests, exam results, post result services and certificate information.

Section 2 – Informing candidates of the information held

Ensures that candidates are fully aware of the information and data held and that awarding bodies may be required to provide personal data to the agencies listed in **Section 1**.

All candidates are:

- Informed via regularly updated policies (including the JCQ document Information for candidates – Privacy Notice, General and Vocational Qualifications) on the school website and ParentComms.
- Candidates are made aware of the above in assemblies and via the school website.

Section 3 – Hardware and Software

The table below confirms how IT hardware, software and access to online systems is protected in line with the DPA and GDPR requirements.

Hardware

Date of purchase & Protection Method

Warranty expiry

- Desktop Computer
- Chrome books
- PC’s
- USB sticks

Refer to IT Policy

N/A

Software/online system

- MS Office Word and Excel
- MIS system
- Email
- A2C (used to transfer data to Exam Boards) Information stored in secure Exams folder. Access limited to designated staff.
- SIMS Exam Organiser
- Awarding body secure websites

Software/ online systems Protection Measures – Password Protected

Refer to IT Policy for further details of data security measures

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 unauthorized use
- Equipment failure
- Human error
- Unforeseen circumstances such as fire or flood
- Hacking attack
- ‘Blagging’ offences where information is obtained by deceiving the organisation who holds it

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

1.	Containment and recovery
	<p>Mr P O’Neil will lead on investigating the breach.</p> <p>Refer to the GDPR Policy for details on how the breach will be investigated.</p>
2.	Notification of breach
	<p>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.</p> <p>Where malpractice is suspected or alleged, personal data of any person involved in administering, teaching, or completing examinations/assessments will be provided to awarding bodies, the qualifications regulator(Ofqual) or professional bodies in accordance with the <i>JCQ publication Suspected Malpractice – Policies and Procedures</i>.</p>
3.	Evaluation and response

	<p>Once a data breach has been resolved, a full investigation of the incident will take place. Refer to GDPR and Freedom of Information Policy for details.</p> <p>The investigation will:</p> <ul style="list-style-type: none"> • Review what data is held, where and how it is stored • Identify where risks and weak points in security measures lie (for example, use of portable storage devices or access to public networks) • Review methods of data sharing and transmission • Increase staff awareness of data security and filling gaps through training or tailored advice • Review contingency plans <p>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.</p> <p>Refer to the GDPR Policy for full audit and protection measures</p> <p>Section 6 – Data retention periods Refer to Record Retention Policy</p> <p>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 Mr P O’Neil, Chief Operations Officer, in writing/email. All requests will be dealt with within 40 calendar days.</p>
4.	Third party Access
	<p>Permission should be obtained before requesting personal information on another individual from a third party organisation.</p> <p>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.</p> <p>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. Data Protection Officer will confirm the status of these agreements and approve/reject any requests.</p>

Information Type	Description	What information is contained	Where is information stored	What protection	Retention Period
Access Arrangement Information		Candidate name Candidate DOB Gender Data Protection Notice Candidate number UCI Diagnostic testing outcome Specialist reports that may include candidate address Personal medical information EHCP Evidence of normal way of working	Access arrangements (online) MIS Lockable filing cabinet Locked and secure in SENCo Office	Secure username and password In secure area solely assigned to exams	Until the student is 25 years of age
Attendance Registers			Secure Exams Office		Exam Series
Candidates' work	Hard copy controlled assessment MFL orals on CD	Candidate Number Name	Secure Exams Office Secure departmental storage areas		Exam Series
Certificates	Hard copy Exam Board Certificates	Candidate number Candidate name Exams taken Exam results	Secure Exams Office		Obligatory period 1 year but keep for 2 years. A record of certificates that have been destroyed is kept for 4 years
Certificate Issue information		Name House Signatures Date of collection	Excel and Secure Exams Office		Exam Series

Exam room incident logs		Date Time Exam Invigilator names Access arrangements Record of any incidents during exam – can include personal candidate details for instance illness.	Secure Exams Office		Exam Series
Post Results information		EAR forms with candidate number, name, email and phone number details	Secure Exams Office Secure username and password.		Hard copy maintained for 2 years
Post result service scripts			Stored on line in secured area		Exam series
Private Candidate information		Candidate name, address, DOB, passport and/or driving licence details	Secure Exams Office On Line	Secure username and password	Exam series
Resolving clash candidate information		Exam details, times and candidates' names	Excel	Secure username and password	Exam series
Result information		Candidate name, candidate number exams taken and outcomes	MIS	Secure username and password	Until student is deleted from MIS system
Seating plans		Candidate name Candidate number Access candidates highlighted	Exam Hall Secure Exams office		Exam series
Special consideration information		Candidate name, Candidate number Personal information pertinent to request Medical evidence	Secure Exams Office	Secure Exam Board Sites Secure username and password protected folder Hard copy in secure office	Exam series
Suspected malpractice reports and outcomes		Candidate name Candidate number Evidence	Secure Exams Office Online	Secure username and password Exam Board website	Exam series



ST ALBANS GIRLS' SCHOOL

Equality Impact Analysis

When reviewing all schools policies, the following Equality Impact Analysis (EIA) should be undertaken to ensure fairness of the new proposals/policy and to identify any action needed to redress any potential discrimination, positively promoting equal opportunities, improved access and participation for all.

Title of Policy:	General Data Protection Regulation Exams (Statutory)
Date:	Summer 2021
EIA carried out by:	Maggie Maddison
EIA reviewed by:	Curriculum, Assessment and Standards Committee

1. Identify the aims and objectives of the policy, what will be the proposed change and how will it be implemented	
<ul style="list-style-type: none">New policy contains information about: Overall aims and objectives? What is the proposed change? Who is intended to benefit from the proposal and in what way? Outcomes of the policy? How will it be put into practice and who is responsible for this?	<p>Aim:</p> <p>To provide guidance to ensure that legal responsibilities for data protection, equality and freedom of information legislation are met.</p>

2. Assessment of Impact? To include impact of policy, any plans needed to mitigate any negative impact, equality issues to be addressed		
Characteristic	Group	Effect/Impact
<ul style="list-style-type: none">AgeDisabilityGender reassignmentMarriage/civil partnershipPregnancy/MaternityRaceReligion or BeliefSexSexual orientation		No impact

3. Consultation	
<ul style="list-style-type: none"> • New policy contains information about: Policy audience, Data Protection Principles Consultation, notification and communication process (how data is shared) Accessibility for all Fair access to the consultation process • Lessons learnt from previous consultation, if appropriate 	Compliance with requirements of the DPA and GDPR
4. Decision	
<ul style="list-style-type: none"> • Should the new proposal/policy be agreed and any impacts identified following consultations? • What reasonable adjustments are required? 	No issues or adjustments required
5. Action Planning	
<ul style="list-style-type: none"> • Any actions identified to address inequality for different groups? • Any actions identified to promote equality and diversity? • Where are these actions recorded and who is responsible for them? 	None
6. Monitoring and Review	
<ul style="list-style-type: none"> • When will the impact assessment be reviewed? • Who is responsible? 	Summer 2022 Mrs M Maddison Exams Officer
7. Publication of the results of the impact assessment	
<ul style="list-style-type: none"> • Results of EIA are published – where and when? • The results are kept as a public record of the EIA – where and when? 	With policy