



General Data Protection Regulation policy (exams)

2018/19

This policy is annually reviewed to ensure compliance with current regulations

Approved/reviewed by	
A. Flack	
Date of next review	March 2019

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GDPR policy (exams) template (2017/18)

Hyperlinks provided in this document were correct as at February 2018

Key staff involved in the General Data Protection Regulation policy

Role	Name(s)
Head of centre	Mrs Tammy Day
Exams officer	Mrs Michelle Bristow
Exams officer line manager (Senior Leader)	Ms Anjna Flack
Data Protection Officer	Mr Alfred Egembah
IT manager	Mr Nauman Ullah
Data manager	Mrs Michelle Bristow

Purpose of the policy

This policy details how Bishop Stopford's 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(x) 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

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- ▶ Joint Council for Qualifications
- ▶ Bromcom, LDBS, DFE, PiXL, FFT, 4Matrix, Local Authority, LPUK, Managed moved schools, Local Authorities (other than Enfield)

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; NCFE;
- ▶ Management Information System (MIS) provided by Bromcom; sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems; LDBS, DFE, PiXL, FFT, 4Matrix, LPUK.

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

Bishop Stopford’s School ensures that candidates are fully aware of the information and data held.

All candidates are:

- ▶ informed via electronic communication (such as Parent mail, MCAS on Bromcom and on website)
- ▶ given access to this policy via centre website.

Candidates are made aware of the above at 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
Desktop computers	Password protected using windows active directory with complex password rules, all user data is stored on servers with roaming profiles. All computers are protected from outside threats with Cisco Firewall and Sophos antivirus protection with daily updates from Sophos.	N/A
Laptops	Password protected using windows active directory with complex	N/A

	password rules, all user data is stored on servers with roaming profiles.	
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Software/online system	Protection measure(s)
Bromcom	All computers are protected from outside threats with Cisco Firewall and Sophos antivirus protection with daily updates from Sophos. Bromcom has its own GDPR policy.
Awarding body secure extranet sites; A2C; eAQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services; NCFE;	Protected usernames and passwords; centre administrator has to approve the creation of new user accounts and determine access rights; regular checks to Firewall/Antivirus software; all external sites have their own policies on protection.
4Matrix	Protected usernames and passwords; centre administrator has to approve the creation of new user accounts and determine access rights; regular checks to Firewall/Antivirus software;
FFT	Protected usernames and passwords; centre administrator has to approve the creation of new user accounts and determine access rights; regular checks to Firewall/Antivirus software; FFT has its own GDPR policy.

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

Mr Alfred Egembah 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

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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 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 every 12 months (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 GDPR policy which is available/accessible from the school's website.

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 Mrs Bristow, Exams Officer in writing with photograph ID if the candidate is unknown to the member of staff. 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.

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.

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	All student information and assessment material related to Access Arrangements.	<p>Candidate name</p> <p>Candidate DOB</p> <p>Gender</p> <p>Data protection notice (candidate signature)</p> <p>Diagnostic testing outcome(s)</p> <p>Specialist report(s) (may also include candidate address)</p> <p>Evidence of normal way of working</p>	<p>Access arrangements online</p> <p>MIS</p> <p>Lockable metal filing cabinet</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p>	3 years
Attendance registers copies	Registers of exams	Candidate names and exam details	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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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
Candidates' work	Exam scripts, Additional work and notes	Candidate name, candidate numbers, details of course.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	
Certificates	Certificates of results	Candidate name, candidate numbers, details of course.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	

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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
			material can be sorted in private.		
Certificate destruction information	Certificates of results	Candidate name, candidate numbers, details of course, final grades, awarding body.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	Shredded so as no information is retained.	3 years
Certificate issue information	Certificates of results	Candidate name, candidate numbers, details of course, final grades, awarding body.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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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
			that confidential exam material can be sorted in private.		
Entry information	Course entry information.	Candidate name, candidate numbers, details of course including possible tiers of entry.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p> <p>MIS - Bromcom</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years
Exam room incident logs	Description of any incidents during an exam.	Student names, invigilator names, details of incident.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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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
			the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.		
Overnight supervision information	Details of any information related to when a student has to be supervised overnight.	Exam details, candidate name and number, signed letters.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years
Post-results services: confirmation of candidate consent information	Signed documents of students consenting for post exams information requests.	Exam details, candidate name and number, signed letters.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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			examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private		
Post-results services: requests/outcome information	Signed documents of students consenting for post exams information requests.	Exam details, candidate name and number, signed letters.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years
Post-results services: scripts provided by ATS service	Signed documents of students consenting for post exams information requests.	Exam details, candidate name and number, signed letters.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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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
			administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.		
Post-results services: tracking logs	All information online related to requests for information.	Exam details, candidate names and details of request.	MIS - Bromcom	Secure user name and password	3 years
Private candidate information	All information related to candidates who are not taught at Bishop Stopford's School.	Candidate name, candidate numbers, details of course including possible tiers of entry.	Bishop Stopford's School has a secure room specifically for exams (Room 23). The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.	Secure user name and password In secure area solely assigned to exams Only restricted access to staff.	3 years
Resolving clashes information	Information on candidates who have clashes.	Candidate name, candidate numbers, details of course including possible tiers of entry.	Bishop Stopford's School has a secure room specifically for exams (Room 23).	Secure user name and password	3 years

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Results information	All results.	Candidate name, candidate numbers, details of course, final grades, awarding body.	Bishop Stopford's School has a secure room specifically for exams (Room 23). The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private. MIS- Bromcom	Secure user name and password In secure area solely assigned to exams Only restricted access to staff.	3 years

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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
			4Matrix		
Seating plans	Where the students sit for each exam.	Candidate names, numbers and seat number.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	Secure user name and password	1 year
Special consideration information	Details required for any special consideration requests.	Candidate name, candidate numbers, details and evidence (if required) of the special consideration	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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			that confidential exam material can be sorted in private.		
Suspected malpractice reports/outcomes	Details of any investigation with regards to malpractice.	Candidate names and numbers, witness statements, evidence of malpractice, any other information from investigation.	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years
Transfer of credit information	All information with regards to candidate results.	Candidate names, numbers, school information, results information	<p>Bishop Stopford's School has a secure room specifically for exams (Room 23).</p> <p>The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be</p>	<p>Secure user name and password</p> <p>In secure area solely assigned to exams</p> <p>Only restricted access to staff.</p>	3 years

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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
			closed behind them so that confidential exam material can be sorted in private. MIS- Bromcom		
Transferred candidate information	All information with regards to candidate results.	Candidate names, numbers, school information, results information	Bishop Stopford's School has a secure room specifically for exams (Room 23). The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of examinations. Within the room there is a large walk-in cupboard and the door can be closed behind them so that confidential exam material can be sorted in private.	Secure user name and password In secure area solely assigned to exams Only restricted access to staff.	3 years
Very late arrival reports/outcomes	Details required and any further information to be submitted to the awarding exam board.	Candidate name, candidate numbers, details and evidence (if required) of the timings.	Bishop Stopford's School has a secure room specifically for exams (Room 23). The room contains <u>only</u> exam related material and access is restricted to members of staff directly involved in the administration of	Secure user name and password In secure area solely assigned to exams Only restricted access to staff.	3 years

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