Langley Park School for Boys

Data Protection Policy: Exams 2024/25

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by
P Appel/P Sarson

Date of next review	October 2025

Key staff involved in the policy

Role	Name(s)
Head of Centre	S Munday
Duty Head Teacher (Senior Leader in charge of exams)	P Sarson
Duty Head Teacher	R Guy
Exams officer	P Appel
Network Manager	O Fish

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Purpose of the policy

This policy details how Langley Park School for Boys, 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 6.1) 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, 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
- Bromley Council (Local Authority)
- Impact Multi Academy Trust

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

- Hard copy
- Email
- AQA Centre Services
- OCR Interchange
- Pearson/Edexcel Online
- WJEC Portal
- Management Information System MIS) provided by ESS SIMS, 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

Langley Park School for Boys ensures that candidates are fully aware of the information and data held.

All candidates are given access to this policy via the school website (www.lpsb.org.uk).

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 programmes 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 using Access arrangements online are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent form before approval applications can be processed online.

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	Protection measures	Warranty expiry
Desktop computer Laptop	PCs kept in locked office. PC's protected with anti-virus software and firewall. Real-time website filtering (Smoothwall). Secure login and password protected. Administrator access restricted to IT Support staff. Users access profiles created for role specific requirements. Network has levels of content filtering, email protection (against malware, suspicious attachments/files and phishing). Controlled internet connection. Privacy screens in place over monitors.	N/A
File Server	Server secure in locked location. System has highly restricted administrator access. Regular full back-ups. User access to data is controlled. External access to network by staff securely maintained by use of the Microsoft Authenticator app. All IT equipment is protected by a combination of layers of security.	N/A

Software/online system	Protection measure(s)
MIS – ESS SIMS	Limited/specific access rights granted to user - dependant on user job role. Individual usernames and passwords. Complex password combinations required. Limited personnel with administration access rights. One administrator to approve and create user accounts (Data Manager). Software is kept up-to-date. Restricted access to Exam Organiser Module.

Awarding Body Secure Extranet sites	One administrator to approve and create user accounts (Exams Officer).
	Individual usernames and passwords.
	Complex password combinations required.
	Two step authentications used on secure sites.
	Limited/specific access rights granted to user - dependant on user job role.
	Auto log out systems set after a short time period of inactivity.
A2C	One administrator to approve and create user accounts (Data Manager).
	Individual usernames and passwords.
	A2C installed on limited number of PCs.

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

Carole Connelly (Trust Data Protection Officer - Carole@schoolDPOservice.com) 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 annually.

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 (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 from the exams officer by written request.

Section 7 – Access to information

(With reference to ICO information https://ico.org.uk/your-data-matters/schools/exam-results/)

The 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 in writing to the exams officer (exams@lpsb.org.uk). For former candidates unknown to current staff, confirmation of ID will be requested.

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 consider 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 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

Please see section 8 of the Impact Multi Academy Trust Data Protection Policy (https://www.imat.uk/486/key-information-1/category/19/policies-forms-information)

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 (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

Langley Park School for Boys 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 Langley Park School for Boys 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 deciding to publish and reply with a good reason to reject the objection to publish the exam results.

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	Information obtained to support access arrangement considerations	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 Pearson's Access Arrangements Online Staff shared folders	Secure individual user accounts with password. Access restricted to minimum number of centre staff.	To be retained until the end of the current examination series or until after the deadline for EARs or the resolutions of any outstanding enquires, appeals or malpractice investigations.
			SIMS	Secure individual user accounts with password.	
			Lockable filing cabinet	In secure/locked office (Access Arrangements Co-ordinator).	
Alternative site arrangements	N/A	Candidate name Alternative site address Qualifications being held	Exams office lockable cabinet	In secure/locked office (Access Arrangements Co-ordinator).	To be retained until the end of the current examination series or until after the deadline for EARs or the resolutions of any outstanding enquires, appeals or malpractice investigations.
			Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of centre staff.	
Attendance registers copies	N/A	Candidate name Candidate number	Before and after the exams these are in the exams secure room.	Access to secure area solely assigned to exams staff.	To be retained until the end of the current examination series or until after the deadline for EARs

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
					or the resolutions of any outstanding enquires, appeals or malpractice investigations.
Candidates' scripts (live)	Candidate scripts immediately after completion of examination.	Candidate name Candidate number	Immediately placed into secure storage, until postal collection arrive.	Access to secure area and storage solely assigned to keyholders.	Until postal collection arrives.
Candidates' scripts (post-results)	Candidate scripts that have been requested from the awarding body as part of post-results services which the candidate has granted permission to access.	Candidate name Candidate number	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of centre staff.	To be retained until the end of the current examination series or until after the deadline for EARs or the resolutions of any outstanding enquires, appeals or malpractice investigations.
Candidates' work	Non-examination assessment work returned to the centre by the awarding body at the end of the moderation period. Vocational qualification records of the verification process.	Candidate name Candidate number	Subject department area.	Locked cupboard in a lockable office under supervision of Head of Department.	12 months
Centre consortium arrangements for centre assessed work	N/A	N/A	N/A	N/A	N/A

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
Certificates	N/A	Candidate name Candidate number Date of Birth	Secure/locked storage room.	Secure/locked storage room.	Current Year + 6 years
Certificate destruction information	A record of unclaimed certificates that have been destroyed.	Candidate name Candidate number Date of Birth Candidate address at time of study	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff.	To be retained for 5 years from the date of certificate destruction.
Certificate issue information	A record of certificates that have been issued to candidates	Candidate name Candidate number Candidate signature	Secure/locked storage room.	Access to secure area and storage solely assigned to keyholders.	On going
Conflicts of interest records	N/A	Staff Name Student Name		Secure individual user accounts with password. Access restricted to minimum number of staff.	To be retained for 1 year after results published and then securely destroyed. In line with awarding body GDPR guidelines.
Entry information	Information relating to candidates' exam/qualification entries.	Candidate name Candidate Unique Candidate Identifier (UCI) Candidate Unique Learner Number (ULN) Candidate number Candidate Date of Birth	SIMS	Secure individual user accounts with password.	Digital copies stored on the exams area indefinitely.
			Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of centre staff..	
			Secure SIMS Documents area of network.		
			AQA Centre Services		

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
		Gender	Edexcel Online	Secure individual user accounts with password. Access restricted to limited number of staff.	5/6 years depending on awarding organisation.
			OCR Interchange		
			WJEC Secure Site		
Exam room incident logs		Candidate name Candidate number Invigilator name	Secure/locked storage room.	Access to secure area and storage solely assigned to keyholders.	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Invigilator and facilitator training records		Invigilator name Invigilator signature Invigilator signature	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff.	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Overnight supervision information		Candidate name Candidate number Candidate signature Supervisors name Supervisors signature	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff.	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
			Secure/locked storage room.	Access to secure area and storage solely assigned to keyholders.	

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
Post-results services: confirmation of candidate consent information		Candidate name Candidate number Candidate signature Candidate email Candidate telephone number	Paper copy: Secure/locked storage room.	Access to secure area and storage solely assigned to keyholders.	Securely destroyed after digital copy created.
			Digital copy: Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff.	To be retained a minimum of 6 months after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Post-results services: requests/outcome information		Candidate name Candidate number Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained a minimum of 6 months after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Post-results services: scripts provided by ATS service		Candidate name Candidate number Candidate signature	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained a minimum of 6 months after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.

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
Post-results services: tracking logs		Candidate name Candidate number Candidate signature Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained a minimum of 6 months after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Private candidate information		Candidate name Candidate Unique Candidate Identifier (UCI) Candidate Unique Learner Number (ULN) Candidate number Candidate Date of Birth Gender	SIMS	Secure individual user accounts with password.	Digital copies stored on the exams area indefinitely.
			Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	
Resolving timetable clashes information		Candidate name Candidate number	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained a minimum of 6 months after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Results information		Candidate name Candidate Unique Candidate Identifier (UCI)	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	Digital copies stored indefinitely.

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 Unique Learner Number (ULN) Candidate number Candidate Date of Birth	SIMS	Secure individual user accounts with password.	
Seating plans		Candidate number Invigilator name	Secure/locked storage room.	Access to secure area and storage solely assigned to keyholders.	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Special consideration information		Candidate name Candidate number Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained until after the publication of result
Suspected malpractice reports/outcomes		Candidate name Candidate number Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Transferred candidate arrangements		Candidate name Candidate number Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been

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
					completed, whichever is later.
Very late arrival reports/outcomes		Candidate name Candidate number Candidate email	Secure Exams Documents area of network.	Secure individual user accounts with password. Access restricted to minimum number of staff	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.