



Royal Wootton Bassett Academy

Exams GDPR Policy

2018/19

Key staff involved in the General Data Protection Regulation policy

Role	Name(s)
Head of centre	Mr George Croxford
Exams officer line manager (Senior Leader)	Mrs Sue Britton
Exams Officer	Mrs Suzanne Henderson
Data Manager	Mrs Shelly Davies
Data Protection Officer	GDPR Lead : Mr Steve Gillott Registered DPO : Mrs Shelly Davies
IT Manager	Mr James Miller

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Purpose of the policy

This policy details how **Royal Wootton Bassett Academy**, 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(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 – Candidate information, audit and protection measures*.

Candidates' exams-related data may be shared with the following organisations:

- ▶ Awarding bodies
- ▶ Joint Council for Qualifications
- ▶ Department for Education
- ▶ Local Authority
- ▶ Multi Academy Trust
- ▶ Press
- ▶ 4Matrix
- ▶ ALPS
- ▶ School Staff
- ▶ GL Assessment
- ▶ Colleges
- ▶ Schools/Academies
- ▶ Employers

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

- ▶ hard copy
- ▶ email; SIMs Intouch; ECHO (Internal Classroom system)
- ▶ secure extranet site(s) – eAQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services
- ▶ SIMS; 4Matrix; ALPS; 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, special consideration requests and exam results/post-results/certificate information.

Section 2 – Informing candidates of the information held

Royal Wootton Bassett Academy ensures that candidates are fully aware of the information and data held.

All candidates are:

- ▶ informed via the school website on how to access their data.
- ▶ given access to this policy via centre website.

Section 3 – 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 Steve Gillott, Lead GDPR 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 4 – 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 in the Exams Office
- ▶ updates undertaken every [12] months (this may include updating antivirus software, firewalls, internet browsers etc.)

Section 5 – 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 GDPR policy (section 7) which shows the retention time for documents which is available/accessible from the Exams Policy Folder.

Section 6 – Access to information

Exam Results:

Former candidates that require to know their Examination results after they have left the school should contact the Examinations Officer with the name, candidate number and DOB. The Exams Officer is able to email these results back to the student.

Should a recruitment agency / Employer contact Royal Wootton Bassett Academy for information on a former student, the Third Party Access (below) should be followed.

All Information / Data:

Current and former candidates can request access to the information/data held on them by making a **subject access request** to Data Protection Officer in writing/email and how ID will need to be confirmed if a former candidate is unknown to current 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, 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 Child Protection Officer will confirm the status of these agreements and approve/reject any requests.

Section 7 – 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	Form 8 Applications, Evidence of normal way of working. Any hard copy information kept by the EO relating to an access arrangement candidate.	Candidate Name Candidate DOB Gender Data protection notice (candidate signature) 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 solely assigned to exams	Secure user name and password SIMs – Secure Username and Password In secure area solely assigned to exams	2 Years after candidate leaves RWBA before being archived for a further 3 years.
Attendance registers copies		Candidate Name	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Candidates' work	Non-exam assessment work (including controlled assessment, coursework, portfolios) returned to the centre after Awarding Body moderation.	Candidate Name Candidate DOB Gender	In secure area solely assigned to exams	In secure area solely assigned to exams	Until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed (whichever is later). Work then given back to the HOD for

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
					distribution back to students.
Certificates		Candidate Name Exam Result	In secure area solely assigned to exams	In secure area solely assigned to exams	2 Years after students have left RWBA.
Certificate destruction information	A record of unclaimed certificates that have been destroyed.	Candidate Name	In secure area solely assigned to exams	In secure area solely assigned to exams	5 Years
Certificate issue information	A record of certificates that have been issued to candidates.	Candidate Name Candidate DOB Gender Exams Results	In secure area solely assigned to exams	In secure area solely assigned to exams	10 Years
Entry information		Candidate Name Candidate number Candidate DOB Gender Exam Entries	MIS Lockable metal filing cabinet solely assigned to exams	SIMs – Secure Username and Password In secure area solely assigned to exams	Remains on MIS system until removed student removed from MIS system. To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Exam room incident logs	Logs recording of incident or irregularities in the exam room.	Candidate Name Candidate number	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy

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
					information is destroyed via confidential waste
Overnight supervision information		Candidate Name Candidate number Candidate DOB Gender JCQ Consent form Exam Timetable	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Post-results services: confirmation of candidate consent information		Candidate Name Candidate DOB Gender Exam Entry details	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Post-results services: requests/outcome information		Candidate Name Candidate DOB Gender Exam Entry details	MIS Lockable metal filing cabinet solely assigned to exams	SIMs – Secure Username and Password In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Post-results services: scripts provided by ATS service		Candidate Name Candidate DOB Gender Exam Entry details	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is

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
					destroyed via confidential waste
Post-results services: tracking logs		Candidate Name Candidate DOB Gender Exam Entry details	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Private candidate information		Candidate Name Candidate DOB Gender	MIS Lockable metal filing cabinet solely assigned to exams	SIMs – Secure Username and Password In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Resolving clashes information		Candidate Name Candidate DOB Gender Exam Entry details	MIS Lockable metal filing cabinet solely assigned to exams	SIMs – Secure Username and Password In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Results information	Print out of Broadsheet results summarising candidate final grades by subject by exam series Information loaded into SIMS / 4 MATRIX etc	Candidate Name Candidate DOB Gender Exams taken and Results	MIS Result Folders	SIMs – Secure Username and Password In secure area solely assigned to exams	Information on MIS

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
			4 MATRIX	Secure Username and Password	
Seating plans		Candidate Name Candidate DOB Gender	MIS Lockable metal filing cabinet solely assigned to exams	SIMs – Secure Username and Password In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Special consideration information		Candidate Name Candidate DOB Gender Exam Entry details Examination Boards Exam Timetbale Sensitive information to support application.	Lockable metal filing cabinet solely assigned to exams Electronically applied for via Examination Boards	In secure area solely assigned to exams Secure Username and Password	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Suspected malpractice reports/outcomes	Any hard copy information relating to a suspected malpractice investigation / report submitted to an awarding body and outcome information from the awarding body.	Candidate Name Candidate DOB Gender Exam Entry details Examination Boards Sensitive information to support application.	Lockable metal filing cabinet solely assigned to exams Electronically applied for via Examination Boards	In secure area solely assigned to exams Secure Username and Password	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Transfer of credit information		Candidate Name Candidate DOB Gender Exam Entry details	MIS Electronically applied for via Examination Boards	Secure Username and Password	To be kept for a 12 Month period from Exam season– Hardcopy information is

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
		Examination Boards	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	destroyed via confidential waste
Transferred candidate information	Any hard copy information relating to an application for a transferred candidate arrangement submitted to an awarding body for a candidate.	Candidate Name Candidate DOB Gender Exam Entry details Examination Boards	MIS Electronically applied for via Examination Boards Lockable metal filing cabinet solely assigned to exams	Secure Username and Password In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste
Very late arrival reports/outcomes	Any hard copy information relating to a very late arrival report submitted to an awarding body for a candidate and outcome information from the awarding body.	Candidate Name Candidate DOB Gender Exam details Sensitive information to support application.	Lockable metal filing cabinet solely assigned to exams	In secure area solely assigned to exams	To be kept for a 12 Month period from Exam season– Hardcopy information is destroyed via confidential waste