Maplewell Hall School

Exams General Data Protection Regulation Policy

Policy Created	**March 2019**
Governing Body Committee	
Date Reviewed by Governing Body	**TBC**
Date of Next Review	**March 2020**

Contents

1. Purpose of the policy

This policy details how Maplewell Hall 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 students' 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 students' exam information – even that which is not classified as personal or sensitive – is covered under this policy.

2. Exams-related information

There is a requirement for the exams office(r) to hold exams-related information on students taking external examinations. For further details on the type of information held please refer to *Section 5 – Student information, audit and protection measures*.

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

- Awarding bodies
- Joint Council for Qualifications
- Department for Education
- Local Authority

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

- hard copy
- email
- secure extranet site(s) – e.g. eAQA; OCR Interchange, Pearson Edexcel Online, WJEC Secure services, Gateway, Duke of Edinburgh, Sports Leaders, Access Arrangements Online
- Management Information System (MIS) provided by Capita 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, special consideration requests and exam results/post-results/certificate information.

3. Informing students of the information held

Maplewell Hall School ensures that students are fully aware of the information and data held. All students are:

- informed via electronic communication
- given access to this policy via centre website

Students are made aware of the above at the start of their course of study leading to external examinations.

4. 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	Purchase Date: N/A. Exam logins created by IT department. Internet and spellcheck removed. Stored and locked in exam room.	N/A
Laptop	Purchase Date: N/A. Exam logins created by IT department. Internet and spellcheck removed. Stored and locked in exam room.	N/A
Reading Pens	Purchase Date: November 2018. Exam Reading pens are removed from classrooms ensuring that anything stored in the internal storage is removed.	N/A

Software/online system	Protection measure(s)
SIMS	Protected usernames and passwords for all staff members. Centre administrator has to approve the creation of new user account and determine access rights. Staff deleted when they are no longer employed. Regular checks to Firewall/Antivirus software.
Go4Schools	Protected usernames and passwords for all staff members. Centre administrator has to approve the creation of new user account and determine access rights. Staff deleted when they are no longer employed. Regular checks to Firewall/Antivirus software.
Awarding Body Websites	Only authorised staff to be given logins by the Exams Officer. Staff deleted when they are no longer employed. Regular checks to Firewall/Antivirus software.
A2C	Only installed onto one computer (the Exams Officer). Regular checks to Firewall/Antivirus software.

5. 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:

Containment and recovery

- County Council 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

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?

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.

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

6. Student information, audit and protection measures

For the purposes of this policy, all students' exam-related information – even that not considered personal or sensitive under the DPA/GDPR – will be handled in line with DPA/GDPR guidelines.

The table below details the type of student exams-related information held, and how it is managed, stored and protected.

Protection measures include:

- Password protected area on the centre's intranet
- Secure drive accessible only to selected staff
- Information held in secure area

7. 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/accessible from the exams officer upon request.

8. Access to information

Current and former students can request access to the information/data held on them by making a **subject access request** to County Hall in writing. 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.

Students' personal data will not be shared with a third party.

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.

9. Table recording student 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	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Access arrangements information	Student Name Date of Birth Gender Data protection notice (student signature) Diagnostic testing outcome(s) Specialist report(s) (may also include student address) Evidence of normal way of working	Access arrangements online MIS Password protected spreadsheet Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	Until student is 30 years old
Attendance registers copies	Student Name Exam Number	MIS Lockable filing cabinet	In secure area solely assigned to exams	1 year
Students' work	Student Name Exam Number	Lockable filing cabinet/room	In secure area solely assigned to exams	1 year
Certificates	Student Name ULN	Shared Drive with limited access MIS Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	12 months from date of issue

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Certificate destruction information	Student Name	Shared Drive with limited access Lockable filing cabinet	In secure area solely assigned to exams	4 years from date of destruction
Certificate issue information	Student Name Correspondence Address	Shared Drive with limited access Lockable filing cabinet	In secure area solely assigned to exams	4 years from the date of issue
Entry information	Student Name Date of Birth Gender Exam Number ULN UCI	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Exam room incident logs	Student Name	Lockable filing cabinet	In secure area solely assigned to exams	1 year
Overnight supervision information	Student Name Exam Number	Lockable filing cabinet	In secure area solely assigned to exams	1 year
Post-results services: confirmation of student consent information	Student Name Date of Birth Exam Number	Shared Drive with limited access Exam Board Websites Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Post-results services: requests/outcome information	Student Name Date of Birth Exam Number	Shared Drive with limited access Exam Board Websites Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Post-results services: scripts provided by ATS service	Student Name Date of Birth Exam Number	Shared Drive with limited access Exam Board Websites Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Post-results services: tracking logs	Student Name Date of Birth Exam Number	Shared Drive with limited access Exam Board Websites Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Private student information	Name Date of Birth Gender Correspondence Address Phone Number	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Resolving clashes information	N/A	N/A	N/A	N/A

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Results information	Student Name Date of Birth Gender Exam Number ULN UCI	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Seating plans	Student Name Exam Number	MIS Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Special consideration information	Student Name Date of Birth Gender Exam Number ULN UCI	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Suspected malpractice reports/outcomes	Student Name Date of Birth Gender Exam Number	Shared Drive with limited access MIS Exam Board Website	Secure user name and password In secure area solely assigned to exams	1 year

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
	ULN UCI	Lockable filing cabinet		
Transfer of credit information	Student Name Date of Birth Gender Exam Number ULN UCI	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Transferred student information	Student Name Date of Birth Gender Exam Number ULN UCI	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year
Very late arrival reports/outcomes	Student Name Date of Birth Gender Exam Number ULN	Shared Drive with limited access MIS Exam Board Website Lockable filing cabinet	Secure user name and password In secure area solely assigned to exams	1 year

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
	UCI			