



Saint Joseph's
CATHOLIC SCHOOL

DATA PROTECTION POLICY
(Exams)
2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Mrs Elaine Oakley	
Date of next review	Oct 2026

Key staff involved in the policy

Role	Name(s)
Head of centre	Mr Higgins
Exams officer	Mrs Elaine Oakley
Senior leader(s)	Mr Rooney, Mr Ford
IT manager	Mr French
Data manager	Mrs Elaine Oakley

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Purpose of the policy

This policy details how St Joseph's school 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) 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 and 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
- Local Authority

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

- hard copy
- email
- secure extranet site(s) – AQA Centre Services; Cambridge OCR Interchange; Pearson Edexcel Online; WJEC Portal
- Management Information System (MIS), provided by 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 including controlled assessments and coursework, special consideration requests and exam results/post-results/certificate information.

Section 2 – Informing candidates of the information held

St Joseph’s school ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via electronic communication.
 - Exam boards privacy notices will be shared with all students at the beginning of the course, this will then be shared again when students are entered for exams.
 - Students will sign to say that they have read and understood the document
 - The document will be put onto the school website for students/parents to refer to.

Materials which are submitted by candidates for assessment may include any form of written work, audio and visual materials, computer programs 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 will be informed that an application for access arrangements will be processed using *Access arrangements online*, complying with the UK GDPR and the Data Protection Act 2018.

Candidates involved in suspected or alleged malpractice will be informed that their personal data will be provided to the awarding body (or bodies) whose examinations/assessments are involved, and that personal data about them may also be shared with other awarding bodies, the qualifications regulator or professional bodies, in accordance with the JCQ document *Suspected Malpractice – Policies and Procedures*.

Candidates will be informed:

- that awarding bodies may be required to provide a candidate’s personal data to educational agencies, such as DfE, Welsh Government, Department of Education (Northern Ireland), ESFA, regulators, HESA, UCAS, Local Authorities and the Learning Records Service (LRS)
- that their personal data may be provided to a central record of qualifications approved by the awarding bodies for statistical and policy development purposes
- of the processing that the centre undertakes, for example, that the centre will provide relevant personal data, including name, date of birth and gender, to the awarding bodies for the purpose of examining and awarding qualifications

Candidates may obtain access to their personal data, such as examination results by applying to the appropriate awarding body’s data protection officer.

Candidates are also referred to the centre’s privacy notice which explains:

- why St Joseph’s Catholic school needs to collect personal data.
- what it plans to do with it
- how long it will keep it
- whether it will be sharing it with any other organisation

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	Anti-virus software automates computer checking – hard disks scanned	N/A

Laptops	Anti-virus software automates computer checking – hard disks scanned	N/A
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Software/online system	Protection measure(s)
MS Word	Dedicated accounts for exam use only – students do not know credentials
ClaroView	
ClaroRead	
Redirected Documents Folder	Once exam is complete a script is run to copy the answer documents from the documents folder for secure storage on server. Documents then deleted from exam accounts.

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

Mrs Snell - Operations & Strategic Director 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 in line with School Care practise and policies (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/accessible from The Exams Policy on the school website.

Section 7 – Access to information

(With reference to ICO information <https://ico.org.uk/for-the-public/schools/exam-results/>)

The UK 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 to The Examinations Officer by email and this should be sent from the student or former students personal email.

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 take into account 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 the Examinations Officer 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 St Joseph's Catholic school do not share information with third parties, 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

St Joseph's Catholic school will not share information with parents unless we have the written consent from students to do so. In addition to any written consent, we would also need to be accompanied by ID, this can be a driving licence or a passport.

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 (Last 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

St Joseph's Catholic School will publish exam results to the media or within the centre 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

Section 8 – Table recording candidate exams-related information held

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		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 SIMS Digitally – Staff Shared Drive – SEN Folder	Secure username and password Staff Drive, Restricted access	7 years from start of Year 10
Alternative site arrangements	N/A	Candidate Name Candidate DOB Candidate Number Gender	Digitally – Exams Exams Folder	Exams Drive – restricted access	3 years
Attendance registers copies		Candidate Name Candidate DOB Candidate Number Gender	Lever Arch file whilst current Boxed up at end of exam season	In locked exam strong room	Until review of marking deadline, or until any appeal, malpractice or other results enquiry has been completed
Candidates' scripts		Candidate Name Candidate DOB Candidate Number Gender	Scripts are parcelled up with the attendance register and stored overnight	In locked and barred steel filing cabinet in the locked exam strong room	Overnight or over weekend if exam is on a Friday afternoon. Unless Mocks then kept until the end of the exam season
		Candidate Name Candidate Number	Stored in locked cupboards in the relevant departments whilst being completed.	Locked cupboard In locked exam strong room	Whilst it is being completed

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			When returned to centre stored in the exam strong room		Until all PRS deadlines have passed
Centre consortium arrangements for centre assessed work	N/A	N/A	N/A	N/A	N/A
Certificates		Candidate Name Candidate DOB Candidate Number Gender	In locked cabinet in the exam strong room whilst being collated Centre reception for distribution	In locked exam strong room In locked cupboard in main office	Indefinitely, but may be subject to change if storage space becomes an issue
Certificate destruction information		Candidate Name Candidate DOB Candidate Number Gender	Record of destruction would be stored in a specific folder in a locked cupboard	In locked cupboard in locked exams office	4 years from date of destruction
Certificate issue information		Candidate Name Candidate Number	Record including candidate signatures and date collected, stored in school reception	Locked cupboard in main office Eventually will be locked in exam strong room with any unclaimed certificates	Indefinitely
Conflicts of interest records		Candidate Name Candidate Number	Electronically on school drive	Computer is password protected	Until the end of the summer season and any review of marking/appeals
Entry information		Candidate Name Candidate DOB Candidate Number Gender	SIMS	Secure name and password	Indefinitely on SIMS

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
Exam room incident logs	Exam room incident log is completed on	Candidate Name Candidate Number	In daily packs in the exam strong room	In ring binders with daily activity, stored in EO's locked room	Until appeal, malpractice or other
Invigilator and facilitator training records		Invigilator name	On spreadsheet and also hardcopy in central invigilator training file	In ring binders with daily activity, stored in EO's locked room	Until appeal, malpractice or other results enquiry has been completed
Overnight supervision information		Candidate name Candidate signature Candidate number Supervisor name Supervisor signature	File in exam office	In ring binders with daily activity, stored in EO's locked room	Until appeal, malpractice or other results enquiry has been completed
Post-results services: confirmation of candidate consent information		Candidate Name Candidate Number	File in exam office	In ring binders with daily activity, stored in EO's locked room	Until appeal, malpractice or other results enquiry has been completed
Post-results services: requests/outcome information		Candidate Name Candidate Number	On spreadsheet on admin drive In file in exams office	Secure username and password	Until appeal, malpractice or other results enquiry has been completed
Post-results services: scripts provided by ATS service		Candidate Name Candidate DOB Candidate Number Gender	On Computer Paperwork retained in file in exams office	Secure username and password In ring binders with daily activity, stored in EO's locked room	Until appeal, malpractice or other results enquiry has been completed
Post-results services: tracking logs		Candidate Name Candidate Number	On spreadsheet on admin drive	Secure username and password	Until appeal, malpractice or other results

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
			In file in exams office	In ring binders with daily activity, stored in EO's locked room	enquiry has been completed
Private candidate information		Candidate Name Candidate DOB Candidate Number Gender Address Photo ID Information	SIMS Exam Organiser	Secure username and password	Indefinitely on SIMS Until appeal, malpractice or other results enquiry has been completed
Resilience arrangements: Evidence of candidate performance		Candidate Name Tutor Name Date Exam taken	In secure online location and securely within Depts.	Secure username and password and locked cupboards	Until the results have been published
Resolving timetable clashes information		Candidate Name Candidate Number	SIMS Exam Organiser Relevant paperwork in a clash candidate file	Secure username and password Locked cupboard in locked exams office	Until the end of the exams season
Results information		Candidate Name Candidate DOB Candidate Number Gender	SIMS Exam Organiser Spreadsheet on computer Paperwork retained in file in exams office	Secure username and password Locked cupboard in locked exams office	7 years
Seating plans		Candidate Name Candidate Number Candidate Access Arrangements (written on)	SIMS Exam Organiser Paperwork retained in file in exams office	Secure username and password In file in exams locked strong room	Until appeal, malpractice or other results enquiry has been completed
Special consideration information		Candidate Name Candidate DOB	Access Arrangements Online	Secure username and password	Until the review of marking deadline or until

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 Number Gender Sensitive Information	Lockable metal filing cupboard	In locked exams office	any appeal, malpractice or other results enquiry has been completed
Suspected malpractice reports/outcomes		Candidate Name Candidate DOB Candidate Number Gender	Lockable metal filing cupboard	In locked exams office	Until the end of malpractice enquiry has been completed
Transferred candidate arrangements		Candidate Name Candidate DOB Candidate Number Gender	SIMS Exam Organiser Paperwork retained in file in exams office	Secure username and password In ring binders with daily activity, stored in EO's locked room	7 years
Very late arrival reports/outcomes		Candidate Name Candidate DOB Candidate Number Gender	Awarding Body secure sites Spreadsheet	Secure username and password In ring binders with daily activity, stored in EO's locked room	Until the review of marking deadline or until any appeal as passed