



DATA PROTECTION POLICY

(Exams)

2025/26

Key staff involved in the policy

Role	Name(s)
Head of centre	Mr M Rayner
Exams officer	Mrs M Thompson
Senior leader(s)	Mr M Rayner, Mr P Shufflebotham, Mrs E Pycroft, Mrs E Todd, Mrs T Leese, Mrs A Bradbury, Mrs K Nuttall Miss S Beasley – Associate Assistant Head
IT manager	Mr A Bailey
Data manager	Mrs E Pycroft

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Purpose of the policy

This policy details how St Thomas More Catholic Academy, 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;
- Members of Multi Academy Trust;
- Other trinity centres (Sixth Form);
- local Press;
- Exams Assist
- SMID data sharing service
- LRS Service
- Any other data analysis sharing organisation as and when required

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; NCFE Portal; Kings' Trust Portal (formerly Princes' Trust); ASDAN, MyCambridge/Teach Cambridge
- Management Information System (MIS) provided by Arbur sending/receiving information via electronic data interchange (EDI) using A2C Transport (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems; etc.
- Direct upload to data sharing sites Exams Assist, via secure site

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 Thomas More Catholic Academy ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via centre newsletter, electronic communication, data information pack, student exam handbook
- given access to this policy via centre website or on written request

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 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 Thomas More Catholic Academy** 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 computer Laptop	<p>Within last 6 years</p> <p>System is maintained and checked by IT Manger/Technicians.</p> <p>Support O/S (WIN11) (Sophos Intercept X)</p> <p>Staff require complex password over 8 characters different from last 4. Cannot contain name and must have 3/4 uppercase, lowercase, number, symbols. To be changed every 6 months</p>	N/A

Software/online system	Protection measure(s)
Arbor MIS System	Username/password
Cambridge OCR Interchange / MyCambridge	<p>Username/password, inc Access via two-factor authentication (2FA) app issued via mobile phone for access code</p> <p>Exam Officer creates accounts for staff if required.</p> <p>Exam Officer deletes staff accounts if no longer employed at this centre</p>
A2C Transport AVCOSYSTEMS	<p>Securely set up by IT Manager on Exam Officer computer/laptop drive.</p> <p>Access keys and passwords required from each awarding body to enable data exchange. Access keys have expiry date set by each awarding body.</p>

AQA Centre Services	Username and password (letters, numbers and special character) to access web site, including verification code send via txt to mobile from msverify for authentication or 'Call me' request. Exam officer to set up teacher user accounts with access rights
Edexcel online services	Access via username and password. Regular password update. Exam officer to set up centre user accounts with access rights. Secure login via Pearson Authenticator app. Security call from Pearson required if problems with app login.
WJEC Services portal	Access via username and password including verification code sent to email address linked to account. Exam Officer to create new staff accounts
NCFE Portal	Access via username/email
DfE Secure Site ASP Connect S2S GIAS GIAP CYSLD	Access via username and password. Password mixture of letters and numbers
SMID (Data)	Access via username and password. Admin to set up new user accounts with access rights
Exams Assist	Access via username and password.
The Exams Office	Access via username and password
LRS Portal	Access via username and password. Mixture of letters, numbers and characters. Password renewal required when requested by LRS
GL Assessments	Access via username and password
Kiteworks (Cambridge Assessments)	Access via username and password. Site to receive secure documents uploaded by OCR and documents uploaded from centre
Kings' Trust	Access via username and password

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

Mr D Rushton, GDPR for CMAT 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. Exam related documents regarding entries are retained for the period set by JCQ and the awarding bodies

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 automatically (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 Mrs M Thompson, Exam Officer

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 Mrs M L Thompson, Exams Officer, mthompson@stmca.org.uk, St Thomas More Catholic Academy, and Mr D Rushton, GDPR for CMAT, drushton@sgacmat.co.uk, c/o St Thomas More Catholic Academy, in writing or email. Request should include full name of student, DoB, exam candidate number, exam subject information, year exam taken.

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 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

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

Information with parents shared via:

- School web site
- Parent-app
- Newsletter
- Assessment Reports
- School MIS Communication (Arbor)

Publishing exam results

When considering publishing exam results, St Thomas More Catholic Academy will make reference to the ICO (Information Commissioner's Office) <https://ico.org.uk/for-the-public/schools/exam-results> / Can schools give my exam results to the media for publication?

OR

St Thomas More Catholic Academy 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 St Thomas More Catholic Academy 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 Mr M Rayner, Headteacher, St Thomas More Catholic Academy who will consider the objection before making a decision 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	Application details and supporting evidence of students with AA for use of specific exam arrangements	Candidate name Candidate DOB Gender 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	MFA; Secure user name and password [insert] In secure office (SENCo or equivalent role)	All AA information/forms to be retained by SENCo Form 8/9 can be transferred with the candidate to any other education establishment or FE
Alternative site arrangements	Applications made for exams for students to sit at off-site accommodation	Candidate Name Candidate DoB Candidate Exam Number Reason for alternative site arrangements Exam entry details (from timetable)	Exam Office Application made via JCQ CAP	Exam Secure Room Secure username and password for JCQ CAP site via awarding body site	Until deadline for review of results/moderation has passed or until RoR/moderation, appeal or a malpractice investigation has completed, which is later
Attendance registers copies	Produced via MIS Arbor/Exams Module or	Candidate Name Exam Number	Exam Office – secure room	Retained in secure room	Until deadline for a review of results/moderation

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
	Exams Assist To be displayed outside exam rooms Paper copies also received from Awarding Bodies	Component details		Username/password required to access MIS Arbor system and Exams Assist in order to print information	has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Candidates' scripts	Live exam papers	Candidate name Exam number Centre number Signature (if required) Exam answers	In exam secure storage	Secure limited key holders	To be despatched to awarding body via the DfE Yellow label Parcel Force Service within 24 hours of exam
Candidates' work	NEA/coursework kept securely by subject teachers	Candidate name Exam number Centre number Signature	Kept secure by subject teachers via hard copy or secure folder with back-up	In accordance with JCQ NEA in secure storage by subject teachers	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Centre consortium arrangements for centre assessed work	To be used for students included in trinity who require consortium arrangements	Exam details Centre details	JCQ CAP Paper application in exam store	Use of username/password for JCQ CAP	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or 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
					malpractice investigation has been completed, which is later
Certificates	Received from awarding bodies following every exam series	Candidate name Exam number UCI DoB Exam results	Exam Room	Locked filing cabinet then transferred to secure room (limited key holders)	Students informed when available to collect. Signature required upon collection. Archived after 12 months
Certificate destruction information	List of students who have not collected certificates and certificates have been destroyed	Candidate name Exam number DoB Date destroyed	Exam Room	Secure Room	4 years from date of destruction
Certificate issue information	Register of certificates collected by students	Candidate name DoB Exam number	Exam Office	Lockable filing cabinet	6 years
Conflicts of interest records	JCQ Requirement	Staff name Relatives name DoB Exam information	Electronically on computer Hard copy in Policy Folder to be	Username and password to computer Exam secure room	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or 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
			available for any JCQ Inspection		malpractice investigation has been completed, which is later
Entry information	Exam unit entry required every exam season to be send to each exam board where entries made	Candidate name Exam number UCI ULN Exam details	Exam Room	Lockable filing cabinet (hard copy) SIMS ESS Examination module Username/password	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Exam room incident logs	Record of any unusual occurrences in exam room/s	Candidate name, exam number, exam details, incident, invigilator name and signature	Exam Room	In secure room for exams	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Invigilator and facilitator training records	Records required for JCQ Inspection	Invigilator/facilitator name Training details	Exam office policy folder	Exam secure room	Retained on file until the deadline for reviews of marking has passed or until any appeal, malpractice or other

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
					results enquiry has been completed, whichever is later
Overnight supervision information	Required if candidate has clash of 3 or more exams on same day – need to move an exam to next day	Candidate name, number, place of residence, supervisors name, relationship to candidate.	Computer Exam office	Username/password Secure office	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Post-results services: confirmation of candidate consent information	Service request for candidates after	Candidate name, exam number, exam details, signature	Exam office	Lockable filing cabinet	Consent forms or emails from candidates must be retained by the centre and kept for at least 6 months following the outcome of the clerical re-check or review of marking or any subsequent appeal. The awarding bodies reserve the right to inspect such documentation.

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: requests/outcome information	Confirmation of decision made by awarding body following RoR	Candidate name, exam number, exam details, decision, ie result remains same or changes	Exam office	Lockable filing cabinet	Arbor exam record updated accordingly with any change of result. Retained for 6 months after review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Post-results services: scripts provided by ATS service	Service request by candidates as and when necessary to assist with possible RoM or by teaching staff (with permission of candidate) for use as part of teaching and learning	Candidate name, exam number, exam details, candidate signature	Script given direct to candidate or teaching staff	Teaching staff to keep securely	To be retained securely until the awarding body's earliest date for confidential disposal or unwanted scripts, or no longer needed by staff – then to be shredded.
Post-results services: tracking logs					
Private candidate information	n/a	n/a	n/a	n/s	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
Resilience arrangements: Evidence of candidate performance	Ofqual guidance on collecting evidence of student performance to ensure resilience in the qualifications system	Exam/assessment papers Student name Exam number Centre number Subject exam information Mark/result for paper	Results entered into MIS system via ESS Assessment Manager Data uploaded to SMID Hard copy of exam/assessment material stored securely in departments	Office/room within department	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Resolving timetable clashes information	Exam officer maintains record from entry information in MIS system	Candidate name, exam number, exam details	Copy candidate timetable Exam timetable for season	Exam office	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Results information - broadsheet	Downloaded and imported into MIS system by exam officer on each results day	Candidate name, exam number, UCI, exam result, DOB	Exam Office MIS SIMS system Computer	Lockable filing cabinet Username and password Username and password	Year of exam plus 6 years after which secure disposal

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
Seating plans	Produced by exam officer for each exam room and to be displayed outside each exam room	Candidate name, exam number, AA details	MIS Arbor Exam office Exams Assist	Secure username and password Secure exam storage room	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Special consideration information	Supporting information for candidates identified as disadvantaged during exams.	Candidate name, exam number, exam details, specific reason for applying for special consideration, ie medical, domestic crises. Supporting evidence provided by SLT	Exam office Computer	Lockable filing cabinet Username and password	12 months
Suspected malpractice reports/outcomes	JCQ documentation by Head of Centre, exam officer, invigilators following an incident during an exam	Candidate name, exam number, exam details, exam incident details, invigilator details, any supporting evidence following investigation from EO, Invigilator, candidate	Exam Office Computer	Lockable filing cabinet Username and password	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which 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
Transferred candidate arrangements	Organised by exam officer of both establishments through JCQ CAP	Candidate name, exam number, exam details, centre numbers	Electronically on computer	Username and password. JCQ CAP username and password	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later
Very late arrival reports/outcomes	Required to be completed if candidate very late for exam	Candidate name, exam number, exam details, reason for being late Candidate/invigilator/EO statement	Exam room JCQ CAP	Secure Storage Username and password	Until deadline for a review of results/moderation has passed for until of RoR/moderation, appeal or a malpractice investigation has been completed, which is later

