



The Henslow and Evolution School 25-26

# DATA PROTECTION POLICY

## (Exams)

### 2025/26

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Julian Cattley	
Date of next review	Oct 2025

#### Key staff involved in the policy

Role	Name(s)
Head of centre	<b>Jacqui Brooks</b>
Exams officer	<b>Julian Cattley {Deputy Head}</b>
Senior leader(s)	<b>Donna Barber {Assistant Head / SENCo}</b>

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## Purpose of the policy

This policy details how Henslow and Evolution 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
- Social worker and Local Authority of any looked after child

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

- hard copy
- email
- secure extranet site(s) – AQA Centre Services; OCR Interchange / My Cambridge; Pearson / Edexcel Online; Trinity Portal; Duke of Edinburgh eDofE.
- Online entries are made directly within the awarding body websites.

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

The Henslow and Evolution School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via exams information pack, student exams agreement and exams assemblies or one-to-one briefings
- given access to this policy via centre website and written request

Candidates are made aware of the above at the start of a course or when the registration/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 The Henslow and Evolution 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	Protection measures
Desktop and laptop computers maintained with a Windows 365 focused build by Telford	➤ Computers installed with a dedicated specialist build to manage maintain and communicate via secure network.

and Wrekin IDT School Service.	<ul style="list-style-type: none"> <li>➤ Virus checking and software updates on continuous rolling schedule</li> <li>➤ Filtering and monitoring through Lightspeed with regular checks by school IT specialist {Julian Cattley}</li> <li>➤ Full support, monitoring and maintenance provided by Telford and Wrekin including service desk for immediate support needs.</li> </ul>
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Software/online system	Protection measure(s)
Arbor	<ul style="list-style-type: none"> <li>➤ Cloud based, password protected MIS system.</li> <li>➤ Centre admin controls access and editing of information.</li> <li>➤ Arbor normally accessed via Telford and Wrekin secure connection.</li> <li>➤ Cybersecurity training following the National Cyber Security Centre (NCSC) {see cybersecurity (exams) policy} for all staff using systems</li> <li>➤ Only accessible to authorised staff and immediate changes can be made to add or remove access as required.</li> </ul>
Awarding body secure extranet sites	<ul style="list-style-type: none"> <li>➤ Administration of access organised by Exams Officer.</li> <li>➤ Account capabilities set and authorised depending on needs of staff.</li> <li>➤ Extranet sites accessed through Telford and Wrekin built computer using secure connection.</li> <li>➤ Cybersecurity training following the National Cyber Security Centre (NCSC) {see cybersecurity (exams) policy} for all staff using systems</li> <li>➤ Firewall and antivirus provided and updated by Telford and Wrekin</li> <li>➤ Regular filtering and monitoring checks on usage across systems conducted by IT specialist (Julian Cattley).</li> </ul>
School secure site and secure admin area	<ul style="list-style-type: none"> <li>➤ Secure internal working space including Microsoft OneDrive and SharePoint.</li> <li>➤ Specific Admin area only accessible to small team as required.</li> <li>➤ Cybersecurity training following the National Cyber Security Centre (NCSC) {see cybersecurity (exams) policy} for all staff using systems</li> <li>➤ All accounts and access password protected.</li> <li>➤ Software and precautions such as firewall and virus protection all updated regularly by Telford and Wrekin.</li> </ul>

## 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**

Jacqui Brooks, Head Teacher; and Julian Cattley, Exams Officer and IT support will consult with the schools Data Protection Officer, Rob Montgomery; and 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 by Telford and Wrekin on a regular basis with usual monthly updates (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:

Data retention periods:

- Any materials no longer required to be stored in the secure storage will be stored in the exams filing cabinet whether as an archive or where held prior to disposal
- Examination documentation and materials will be retained at least until results are issued and/or appeals procedures have been completed.
- Where documentation is required to be kept longer by JCQ or any awarding body then the materials will be kept for the required time in the exams filing cabinet {where it is information or material that is not from a live exam series}.
- Where material is deemed appropriate to keep with the students records {e.g. scanned copies of certificates or any outcomes from appeals to be held on file} then records will be kept with other student specific materials until the student reaches the age of 25. Information of this kind would be stored physically in the exams filing cabinet and/or SchoolPod MIS system.
- Disposal of any physical materials would be through secure shredding.
- Disposal of digital material would be through deletion of records from our MIS system.
- For retention periods of specific material please see Section 8

## **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 Julian Cattley in writing/email and with appropriate ID for former candidates who may not be known to current staff.

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 Jacqui Brooks, Head Teacher 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](https://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](https://www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers)

### **Publishing exam results**

The Henslow and Evolution School will publish exam results to the media or within the centre (e.g. on an honours board) in line with the following principles:

- Our learners identities are normally protected / confidential. No results will be published that either identify candidates or compromise their protected identity.
- Where there is only one candidate in a year where publishing results would reveal that persons individual performance, results will not be published.
- 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 Henslow and Evolution School 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: Mrs J. Brooks, Head Teacher; 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	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 Diagnostic testing outcome(s) Specialist report(s) (may also include candidate address) Evidence of normal way of working	Access Arrangements Online MIS {Arbor} Admin Area on SharePoint Locked cabinet / cupboard	MFA; Secure user name and password In locked cabinet	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Alternative site arrangements	Candidate name Candidate DOB Gender Access Arrangements	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Attendance registers copies	Candidate name Candidate DOB Gender	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Candidates' scripts	Candidate name Candidate No. Candidate signature	Where secure storage required: Secure storage {JCQ regs}	In locked cabinet / cupboard {Where required}	<i>Until results are issued <b>or</b> appeals process is complete.</i>  <i>Edexcel FS – 3 years</i>

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Mock exams: digital scans of secure papers as contingency evidence  Where not for secure storage: then in locked cabinet / cupboard / classroom when not being reviewed.	Also may be in locked classroom / workspace	
Candidates' work	Candidate name Candidate No. Candidate signature Other identification of people / places	Where secure storage required: Secure storage {JCQ regs}  Where not for secure storage: then in locked cabinet / cupboard / classroom as required when not in use.	In locked cabinet / cupboard  {Where required}  Also may be in locked classroom / workspace	<i>Until results are issued <b>or</b> appeals process is complete.</i>  <i>Edexcel FS – 3 years</i>
Certificates	Candidate name Candidate DOB	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area – Student Folder	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Issued upon receipt.</i> <i>Where not issued then held in exams filing cabinet until candidate reaches 25.</i>
Certificate destruction information	Candidate name Candidate DOB	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Where certificates are destroyed, record would be kept until candidate reaches 25.</i>
Certificate issue information	Candidate name Candidate DOB Candidate signature Other names and signatures where collected on behalf of candidate	Hard copy Collected in file at reception and then transferred to the Exams folder(s) Locked cabinet / cupboard	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Until candidate reaches 25.</i>

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Digital Admin area - Exams		
Conflicts of interest records	Staff name Staff signature	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Entry information	Candidate name Candidate DOB Gender	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Exam room incident logs	Candidate name	Hard copy Exams folder(s) Locked cabinet / cupboard	In locked cabinet / cupboard	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Invigilator and facilitator training records	Staff / Invigilator name Staff / Invigilator signature Staff / Invigilator mobile phone number	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Records held on file for the duration of the staff members employment.</i>
Overnight supervision information	Candidate name Staff name(s) Gender Staff signatures	Hard copy Exams folder(s) Locked cabinet / cupboard Digital	In locked cabinet / cupboard  Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Admin area - Exams		
Post-results services: confirmation of candidate consent information	Candidate name Candidate DOB Candidate signature	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Post-results services: requests/outcome information	Candidate name Candidate DOB	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>  <i>Outcome will be kept with appropriate candidate record until candidate is 25.</i>
Post-results services: scripts provided by ATS service	Candidate name Candidate signature	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Post-results services: tracking logs	Candidate name Candidate DOB	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>

Information type	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	Candidate name Candidate DOB Candidate Signature Candidate marks / outcomes	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Hold materials according to update exam board and JCQ regulations given at time of events.  and at least until:  Until results are issued <b>or</b> appeals process is complete.</i>
Resolving timetable clashes information	Candidate name Candidate signature	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Results information	Candidate name Candidate DOB Gender	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until candidate reaches 25.</i>
Seating plans	Candidate name	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Special consideration information	Candidate name Candidate DOB	Hard copy Exams folder(s) Locked cabinet / cupboard	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
		Digital Admin area - Exams		
Suspected malpractice reports/outcomes	Candidate name	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>  <i>Outcomes would be held with candidates records until they are 25.</i>
Transferred candidate arrangements	Candidate name Candidate DOB Gender	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>
Very late arrival reports/outcomes	Candidate name	Hard copy Exams folder(s) Locked cabinet / cupboard Digital Admin area - Exams	In locked cabinet / cupboard Secure username(s) and password(s)	<i>Until results are issued <b>or</b> appeals process is complete.</i>