



**THAMESVIEW SCHOOL**

**Thong Lane, Gravesend,  
Kent DA12 4LF**

**General Data Protection  
Regulation Policy (Exams)  
2017/18**

## Key staff involved in the General Data Protection Regulation Policy

Role	Name(s)
Head of centre	<b>Mr G Rorke</b>
Exams officer	<b>Mrs J Reilly</b>
Exams officer line manager (Senior Leader)	<b>Mrs E Rafferty-Tally</b>
Data Protection Officer	<b>Mrs N Sandy</b>
IT manager	<b>Mr N Colcombe</b>
Data manager	<b>Mrs J Champ</b>

### Purpose of the policy

This policy details how Thamesview, in relation to exams management and administration, ensures compliance with the regulations as set out by the Data Protection Act (DPA) and General Data Protection Regulation (GDPR).

Students are given the right to find out what information the centre holds about them, how this is protected, how this can be accessed and how data breaches are dealt with.

All exams office staff responsible for collecting and sharing candidates' data are required to follow strict rules called 'data protection principles' ensuring the information is:

- ▶ used fairly and lawfully
- ▶ used for limited, specifically stated purposes
- ▶ used in a way that is adequate, relevant and not excessive
- ▶ accurate
- ▶ kept for no longer than is absolutely necessary
- ▶ handled according to people's data protection rights
- ▶ kept safe and secure
- ▶ not transferred outside the European Economic Area without adequate protection

To ensure that the centre meets the requirements of the DPA and GDPR, all candidates' exam information – even that which is not classified as personal or sensitive – is covered under this policy.

### Section 1 – Exams-related information

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

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

- ▶ Awarding bodies
- ▶ Joint Council for Qualifications
- ▶ department for Education
- ▶ Local Authority
- ▶ On occasions the Press (with consent)

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

- ▶ hard copy
- ▶ email
- ▶ secure extranet site(s) e.g. e - AQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services; City & Guilds Walled Garden
- ▶ A Management Information System (MIS) provided by EIS through 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.

## Section 2 – Informing candidates of the information held

Thamesview ensures that candidates are fully aware of the information and data held.

All candidates are:

- ▶ informed via written and electronic communication
- ▶ given access to this policy via the school website, following the policy links

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

## 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	Computers are scanned daily, and active anti-virus measure are in place. These are run automatically and checked by the IT support team.	N/A
Laptops	Computers are scanned daily, and active anti-virus measure are in place. These are run automatically and checked by the IT support team.	N/A

Software/online system	Protection measure(s)
Exam accounts	Only ICT support team knows the passwords for the student accounts. Accounts are restricted in accordance to the examining body.
SIMS	Username and password Students don't have access to SIMS
Internet explorer	Restricted accounts don't have access to IE or internet. These are set up in relation to the examining body regulations.
Awarding bodies secure sites A2C	Software on machine of the exam officer which connects to examining bodies sites. This is restricted to the exam officer machine only.

## 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

If a data protection breach is identified, the following steps will be taken:

### 1. Containment and recovery

The Data Protection Officer 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 this may include updating antivirus software, firewalls, internet browsers etc.) these are run automatically

## Section 6 – Data retention periods

Details of retention periods, exam results are kept for six years and certificates are kept for one year.

## Section 7 – Access to information

Current and former candidates can request access to the information/data held on them by making a **subject access request** to the Data Protection Officer in writing/email. If the candidate left Thamesview more than 3 years ago they will be required to provide photographic ID to confirm who they are (ID card/ valid driver's license/valid passport). All requests will be dealt with within 40 calendar days.

### Third party access

Permission should be obtained before requesting personal information on another individual from a third-party organisation.

Candidates' personal data will not be shared with a third party [insert your centre's process for sharing data with a third-party e.g. 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.

## 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 Data protection notice (candidate signature) Diagnostic testing outcome(s) Specialist report(s) (may also include candidate address) Evidence of normal way of working	Access arrangements online SIMS Lockable filing cabinet	Secure user name and password <b>Locked Cupboard in SENCO office</b>	<b>Pupil records until pupil reaches 25 years of age</b>
Attendance registers copies	Candidate name Candidate Exam Number	Exam office	Locked cupboard Exam office	After completion of all EAR
Candidates' CA/NEA work	Candidate name Candidate Exam Number	Subject office	Locked cupboard	After completion of all EAR
Certificates	Candidate name Candidate Exam number	Exam office	Locked Cupboard	1 year
Certificate destruction information	Candidate name Candidate Exam Number	Spreadsheet	Secure user name and password	5 years

Information type	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Certificate issue information	Candidate name Candidate Exam Number Candidate exam results	Printed lists from exam board - Exam office Spreadsheet	Locked cupboard Exam office Secure password and log in	1 year
Entry information	Candidate name Candidate Exam Number Candidate subject entered	Printed lists Exam office SIMS	Locked cupboard Exam office Secure log in and password	After completion of all EAR
Exam room incident logs	Candidate name Candidate Exam Number Details of incident	Written sheets Exam office	Locked cupboard Exam office	After completion of all EAR
Post-results services: confirmation of candidate consent information	Candidate name Candidate Exam Number Candidates results information	Signed consent forms Exam office	Locked cupboard Exam office	After completion of all EAR
Post-results services: requests/outcome information	Candidate name Candidate Exam Number Candidate results information	Signed consent forms and outcome information	Exam office Exam board secure website	After completion of all EAR
Post-results services: scripts provided by ATS service	Candidate name Candidate Exam Number Candidate script	Subject office	Locked cupboard	No set time limit

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: tracking logs	Candidate name Candidate Exam Number	Exam office	Locked cupboard Exam office	After completion of all EAR
Resolving clashes information	Candidate name Candidate Exam Number Candidate Exam information	Exam Office SIMS	Secure password and log in	After completion of all EAR
Results information	Candidate name Candidate Exam Number Candidate results	Exam Office SIMS	In locked room Exam office Secure log in and password	6 years & current year
Seating plans	Candidate name Candidate Exam Number	Exam Office SIMS	In locked cupboard Exam office Secure log in and password	After completion of all EAR
Special consideration information	Candidate name Candidate Exam Number Candidate reason for special consideration & evidence	Exam Office Secure exam board on line	In locked cupboard Secure log in and password	After completion of all EAR
Suspected malpractice reports/outcomes	Candidate name Candidate Exam Number	Exam office Exam board	Locked cupboard Exam office	After completion of enquiry/ EAR
Very late arrival reports/outcomes	Candidate name	Exam office	Locked cupboard Exam office	After completion of all EAR

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

### GENERAL DATA PROTECTION REGULATION POLICY (EXAMS) 2017/18

This policy was agreed and adopted at a Governors' Meeting held on \_\_\_\_\_ (date)

Signed: \_\_\_\_\_ (Governor)

Signed: \_\_\_\_\_ (Headteacher)

The policy will be formally reviewed in \_\_\_\_\_ (date)

These procedures are reviewed annually to ensure compliance with current regulations.