



Exam Data Protection Policy 2025-2026

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Approved by the Board of Governors:

August 2025

Date of next review:

August 2026

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1. Key staff involved in the policy

Head of Centre	Claire Phelps
Exams Officer	Jorge Rodriguez
Deputy Head	Toby Robertson
IT manager	

2. Purpose of the procedure

Details of how the School complies with the General Data Protection Regulation and how this is managed on an ongoing basis is contained in the School's Data Protection Policies and Privacy Notices which are published on the school's website.

This policy details how More House School, specifically, in relation to exams management and administration, ensures compliance with the regulations as set out by the Data Protection Act 2018 (DPA 2018) and 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 6.1) 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.

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

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.

3. Exams related information

There is a requirement for the exams officer to hold exams-related information on candidates taking external examinations. For further details on the type of information held please refer to section 6.

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

- Awarding bodies
- Joint Council for Qualifications
- Department for Education
- ISC
- ISI
- HMC
- GSA
- The Press
- NHS or other medical provider (notably if an examination is to be transferred to a medical venue)

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

- Hard copy
- Email
- Secure extranet site(s) - e.g. AQA Centre Services; OCR Interchange; Pearson Edexcel Online; WJEC Secure services; CIE; ISI; ISC; media sites relating to league tables
- a Management Information System (MIS) provided by ISAMS sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems

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.

4. Informing candidates of the information held

More House School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via exams briefings
- given access to this policy by written request to the Exams Officer or the Head of Centre

Candidates are made aware of the above at key points throughout their course where candidates are following GCE and GCSE qualifications, when the entries are submitted to awarding bodies for processing.

At this point, the centre also brings to the attention of candidates the annually updated JCQ document Information for candidates - Privacy Notice which explains how the JCQ awarding bodies process their personal data in accordance with the DPA 2018 and UK GDPR (or law relating to personal data in any jurisdiction in which the awarding body or centre are operating).

Candidates eligible for access arrangements/reasonable adjustments which require awarding body approval using access arrangements online are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent before approval applications can be processed online.

5. Dealing with data breaches

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

The School has a clear compliance failure and incident management process for detecting, containing and evaluating any personal data breach which can be found in the School's Policy and Procedure for Compliance Failure or Security Incident Resulting in a Data Breach.

Any data breach investigation will follow the Information Commissioner's Office (ICO) suggested Breach Management Plan guidelines for:

- Containment and recovery;
- Assessment of ongoing risk;
- Notification of breach;
- Evaluation and response.

Data breaches will be reported to the ICO within the statutory 72 hours under the General Data Protection Regulation. Data subjects affected or potentially affected will be informed as soon as possible after the school becomes aware of any breach.

6. 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.

The table in section 9 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 (this may include updating antivirus software, firewalls, internet browsers etc.)

7. Data retention periods

Details of retention periods, the actions taken at the end of the retention period and method of disposal are contained in the centre's exams archiving policy which is available from the exams officer by written request.

8. Access to information

(with reference to ICO information <https://ico.org.uk/your-data-matters/schools/exam-results/>)

The GDPR gives individuals the right to see information held about them. This means individuals can request information about them and their performance, including:

- Their internally assessed 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 exams officer.

A request to see personal information held on an individual represents a 'subject access request'. Any such request must be made in writing to the Head of Center.

The Head of Center can be contacted via email or in writing at the School's address.

The GDPR does not specify an age when a student can request their exam results or request that they aren't published. When a student makes a request, those responsible for responding should take into account whether:

- The student wants their parent (or someone with parental responsibility for them) to be involved; and
- The student 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 student of 12 or older is expected to be mature enough to understand the request they are making. A student 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 unless otherwise stated in the school's privacy notices and data protection policies which are published on the school's website.

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).

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

Publishing exam results

When considering publishing exam results, More House School will make reference to the ICO (Information Commissioner's Office) <https://ico.org.uk/your-data-matters/schools/exam-results/> Can schools give my exam results to the media for publication?

(Publishing examination results is a common and accepted practice. Many students enjoy seeing their name in print, particularly in the local press and the GDPR does not stop this happening. However, under the GDPR schools have to act fairly when publishing results, and where people have concerns about their or their student's information being published, schools must take those concerns seriously.

Schools should make sure that all pupils and their parents or guardians are aware as early as possible whether examinations results will be made public and how this will be done. Schools should also explain how the information will be published. For example, if results will be listed alphabetically, or in grade order.

In general, because a school has a legitimate reason for publishing examination results, pupils or their parents or guardians do not need to give their consent to publication. However, if you have a specific concern about publication of your results, you have the right to object. Schools should consider objections from pupils and parents before making a decision to publish. A school would need to have a good reason to reject someone's objection to publication of their exam results.)

OR

More House School 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 student'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 More House 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 the Head of Center, 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.

9. 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	Information obtained to support access arrangement considerations	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 Pearson's Access Arrangements Online ISAMS Lockable filing cabinet Staff shared folders	Secure user name and password In secure office	
Attendance registers copies	Registers sent to Examinations Officer from awarding bodies.	Candidate name Candidate DOB Gender	Before and after the exams these are in the exams secure room	In secure area solely assigned to exams	To be retained until after the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed whichever is later
Candidates' scripts		Candidate name Candidate exam number Candidate work	Secure lockable area either in Exams Store Staff shared folders	In secure area assigned to exams or teaching staff Protected drive assigned to staff only	To be retained securely until the awarding body's earliest date for confidential disposal of unwanted scripts. Where teachers have used copies of candidates' scripts for teaching and learning purposes but no longer wish to retain them, they must ensure that the scripts are disposed of in a confidential manner
Candidates' work	Non-examination assessment work returned to the centre by the awarding body at the end of the moderation period Vocational qualification records of the verification process	Candidate name, number, gender, evidence of marking	Secure lockable area either in Exams Store or room accessible to teaching staff	In secure area assigned to exams or teaching staff	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.

Certificates	Candidate certificates sent to the Examinations Officer from awarding bodies.	Candidate name & DOB Subjects taken Grades achieved	Lockable filing cabinet and scan in shared folder	In secure area assigned to exams Protected drive assigned to Exam Officer and SLT only	Unclaimed certificates to be retained securely for a minimum of 12 months from date of issue.
Conflicts of Interest records	Hard copies of declarations from staff confirming whether either staff themselves are sitting external exams or related people of staff are taking external exams either at Archer Academy or other schools/ centres.	Staff Name Student Name Information to be retained along with steps taken to avoid conflict of interest for JCQ inspection purposes for 1 year after results.	Exams Secure Store Staff shared drive Awarding bodies	Password protected google form In secure area assigned to exams Protected drive assigned to staff only In line with awarding body GDPR guidelines	To be retained for 1 year after results published and then securely destroyed. In line with awarding body GDPR guidelines
Entry information	Information relating to candidates' entries.	Candidate name Candidate UCI and learner numbers Candidate DOB Gender	ISAMS Staff shared folders Lockable filing cabinet Awarding body websites; JCQ CAP & A2C	Secure user name and password Protected drive assigned to staff only In secure cabinet solely assigned to exams	To be retained in Exam Storage until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Exam room incident logs	Logs recording any incidents or irregularities in exam rooms.	Candidate name Incident information	Exams Secure Store	In secure area assigned to exams	To be retained in Exam Storage until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Invigilator and facilitator training records	Log of invigilators taking training, transcript of training provided, copies of certificates where training taken on-line	Invigilator: name, signature, email address	Exams Secure Store Staff shared folders	In secure area assigned to exams Protected drive assigned to staff only	To be retained in Exam Storage until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Overnight supervision information	Copy of JCQ form Timetable variation and confidentiality declaration for overnight supervision for any candidate eligible for these	Candidate name Candidate signature Parent/Carer signature	Exams Secure Store	In secure area assigned to exams	Completed forms to be kept in centre for inspection until the deadline for reviews of marking has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later. Forms may be stored electronically or in hard copy paper

	arrangements.				format and must not be sent to an awarding body, unless specifically requested.
Post-results services: confirmation of candidate consent information	Copies of exam scripts (or an electronic image of the script) returned to the centre by the awarding body/copies downloaded by the centre where the awarding body provides online access to scripts.	Candidate name Candidate number Candidate responses	Staff shared folders Secure storage within classrooms Email folders	Protected drive assigned to staff only In secure areas assigned to teaching staff Secure to staff member	Where copies of scripts are retained by the centre, they must be securely stored (including any electronic versions) until they are no longer required.
Post-results services: requests/outcome information	Any hard copy information relating to a post-results service request (EARs, appeals, ATS) submitted to an awarding body for a candidate and outcome information from the awarding body.	Candidate name Candidate signature Carer/ parent signature	Lockable filing cabinet Email folders	In secure area assigned to exams Secure to staff member	EAR consent to be retained for at least six months following the outcome of the enquiry or any subsequent appeal. ATS consent to be retained for at least six months from the date consent given.
Post-results services: scripts provided by ATS service	Copies of exam scripts (or an electronic image of the script) returned to the centre by the awarding body/copies downloaded by the centre where the awarding body provides online access to scripts.	Candidate name Candidate number Candidate responses	Staff shared folders Secure storage within classrooms Email folders	Protected drive assigned to staff only In secure areas assigned to teaching staff Secure to staff member	Where copies of scripts are retained by the centre, they must be securely stored (including any electronic versions) until they are no longer required.
Resolving timetable clashes information	Any hard copy information relating to the resolution of a candidate's clash of timetabled exam papers or a timetable variation.	Candidate name Candidate number	Exams Secure Store Staff shared folders Email folders	In secure area assigned to exams Protected drive assigned to staff only Secure to staff member	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Results information	Broadsheets of results summarising candidate	Candidate name Candidate numbers	A drive: Staff shared folders	Protected drive assigned to staff only	Current year + 6 years

	final grades by subject by exam series.	Date of Birth Candidate results	ISAMS	Password Protected	
Seating plans	Plans showing the seating arrangements of all candidates for every exam taken.	Candidate name Candidate number Access Arrangements	Exams Secure Store ISAMS Examinations Staff shared folders	In secure area assigned to exams Secure user name and password Protected drive assigned to staff only	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Special consideration information	Any hard/ soft copy information relating to a special consideration request and supporting evidence submitted to an	Candidate name Medical/ psychological evidence	Lockable exam cupboard	In secure area assigned to exams	To be retained until after the publication of result
Suspected malpractice reports/outcomes	Any hard copy information relating to a suspected malpractice investigation/report submitted to an awarding body and outcome information from the awarding body	Candidate name Staff name Incident information	Lockable exam cupboard Staff shared drive Email folders	In secure area assigned to exams User name and password Secure to staff member	To be retained in Exam Storage until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later.
Very late arrival reports/outcomes	Any hard copy information relating to a very late arrival report submitted to an awarding body for a candidate and outcome information from the awarding body. Applications submitted online via CAP	Exams Secure Store Staff shared drive JCQ CAP	In secure area solely assigned to exams Protected drive assigned to staff only User name and password to protect online access	To be retained until after the deadline for EARs or until any appeal, malpractice or other results enquiry has been completed, whichever is later. In line with the JCQ GDPR guidelines	

Head of Centre:
Ms C Phelps

Examinations Officer:
Mr J Rodriguez

Date: August 2025