



HARROGATE  
GRAMMAR SCHOOL  
EXCELLENCE FOR ALL

# Data Protection Policy (Exams) 2025/26

**Member of Staff Responsible**

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**Signed off by:**

**Kirstie Moat**

## Purpose of the policy

This policy details how Harrogate Grammar 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 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
- Department for Education
- Red Kite Learning Trust
- The Press
- North Yorkshire County Council

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 Website; AAO, CAP, PAAO

- Management Information System (MIS) provided by Arbor, SISRA, FFT, sending/receiving information via electronic data interchange (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems
- Wonde

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**

Harrogate Grammar School ensures that candidates are fully aware of the information and data held.

All candidates are:

- informed via the RKLTP privacy notice
- given access to this policy via the school website

Candidates are made aware of the above when they enrol at the school.

When candidates are entered for external exams, the centre also brings this to the attention of candidates via the candidate declaration which they receive and sign along with their entry statement.

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 Harrogate Grammar School needs to collect personal data
- what it plans to do with it
- how long it will keep it

- whether it will be sharing it with any other organisation

### Section 3 – Hardware and software

The table below confirms how IT hardware, software and access to online systems is protected in line with DPA & GDPR requirements.

Hardware	Date of purchase and protection measures
Desktop Computer Laptop Computers	Up to date virus protection on all hardware (automatically updated) Firewall in place on all hardware Staff training to raise awareness of external threats and how to spot them. All hardware managed and monitored by Network Services and replaced once obsolete

Software/online system	Protection measure(s)
Arbor	Centre administrator has to approve the creation of new user accounts and determine access rights. Staff are only given access to those areas which they require to carry out their role. Centre Administrator deletes accounts of any staff no longer working at the school 2 factor authentication required when using the software away from the school site.
Awarding Body Secure Extranet Sites	Centre administrator has to approve the creation of new user accounts and determine access rights. Centre Administrator deletes accounts of any staff no longer working at the school Two factor authentication required for all sites
Exams Assist	Centre administrator has to approve the creation of new user accounts and determine access rights. Staff are only given access to those areas which they require to carry out their role. Centre Administrator deletes accounts of any staff no longer working at the school 2 factor authentication required when using the software away from the school site.
Access by Examscreen Documents	No data is stored in the software. Documents produced are saved in the Exams Office area in Teams which is only accessible by a limited number of staff.

SISRA	Centre administrator has to approve the creation of new user accounts and determine access rights. Centre Administrator deletes accounts of any staff no longer working at the school
FFT	Centre administrator has to approve the creation of new user accounts and determine access rights. Centre Administrator deletes accounts of any staff no longer working at the school

## 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

The school Data Protection Lead (L 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.

The table in Section 7 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

## **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 on the HGS Website.

## **Section 7 – Access to information**

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

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

- their mark
- comments written by the examiner
- minutes of any examination appeals panels

This does not however give individuals the right to copies of their answers to exam questions.

## Requesting exam information

Requests for exam information can be made to the Exams Manager or Data Officer in writing or via e-mail.

The GDPR does not specify an age when a child can request their exam results or request that they are not 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 Data Officer as to whether the student is mature enough to understand the request they are making, with requests considered on a case-by-case basis.

## Responding to requests

If a request is made for exam information before exam results have been published, a request will be responded to:

- within five months of the date of the request, or
- within 40 days from when the results are published (whichever is earlier).

If a request is made once exam results have been published, the individual will receive a response within one month of their request.

## Third party access

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

Candidates' personal data will not be shared with a third party 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

Information regarding external examination results will only be shared with parents who have written authorisation from the candidate (letter or e-mail).

The centre will however take into account any other legislation and guidance regarding sharing information with parents (including non-resident parents and a local authority (the 'corporate parent'), e.g. 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](http://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](http://www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers)

### **Publishing exam results**

When considering publishing exam results, the centre 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?

HGS 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 HGS 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 Centre, 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
Access arrangements information	Required for administration of internal and external examinations  Required for inspection by JCQ	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/Pearson Access Arrangements Online  Arbor/Exams Assist  Lockable metal filing cabinet in Learning Support  Exams Office Store  Digitally on Teams	MFA: Secure username and password  In secure user area  With lock and key
Alternative site arrangements	Application made to JCQ and supporting documentation	Candidate name Invigilator Name Address of alternative site	Exams Office Store  Access Arrangements Online/Pearson Access Arrangements Online  Digitally in exams office Teams folder	MFA: Secure username and password  In secure area solely assigned to exams  With electronic lock and key
Attendance registers copies	Required for administration of internal and external examinations  Required for inspection by JCQ  Required by Awarding Body in case of queries	Candidate name Candidate exam number Invigilator Name Invigilator signature Access arrangements	Exams Office Store	In secure area solely assigned to exams   Lock and Key (2 keyholders)
Candidates' scripts	Completed examination scripts for submission to awarding bodies	Candidate name Candidate exam number	Exams Office Secure Storage Facility  Digitally on exams office shared area V: Drive	In secure area solely assigned to exams.

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
		Candidate answers		
Candidates' work	Completed NEA work to be available if required by awarding body for moderation	Candidate name Candidate exam number Candidate answers	Departmental storage	In locked cupboard
Certificates	Certificates issued by Awarding Bodies detailing exam results achieved	Candidate name Candidate exam number Candidate DOB Gender	In lockable cupboard in exams office	In secure area solely assigned to exams
Certificate destruction information	Spreadsheet detailing uncollected certificates that have been destroyed in line with data retention policy	Candidate name Candidate exam number	In exams office shared Teams folder	Secure username and password
Certificate issue information	Sheets to be signed and dated by person collecting certificates	Candidate name Signature of person collecting	In lockable cupboard in exams office	In secure area solely assigned to exams  With electronic lock and key
Conflicts of Interest records	Hard copy sheets and electronic sheets returned by staff detailing conflicts of interest.	Staff name Candidate name	In file in exams office	In secure area solely assigned to exams  With electronic lock and key
Entry information	Marksheets on which departments can make/confirm subject entries	Candidate name Candidate exam number	In exams office SIMS Exams Office/Arbor	In secure area solely assigned to exams  Secure username and password
Exam room incident logs	Log of any incidents occurring in exam rooms during external	Candidate name	Exams Office Secure Store	In locked secure room

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
	examinations which may be required by awarding bodies in cases of suspected malpractice	Candidate exam number Personal data regarding involvement in the incident		2 Keyholders only
Invigilator and facilitator training records	Record of training provided to invigilators and of who has completed it for inspection by JCQ	Invigilator name Invigilator signature Invigilator e-mail address	In exams office Teams folder On TEO website Hard copy in file in exams cupboard	Secure username and password With electronic lock and key
Overnight supervision information	Record of students requiring overnight supervision including candidate and supervisor signed agreement to be available for inspection by JCQ and used to rearrange examinations and ensure the confidentiality of exams.	Candidate name Candidate exam number Candidate signature Parent name Parent signature HOC name HOC signature	Exams Office Store In exams office Teams folder	In secure area solely assigned to exams With electronic lock and key
Post-results services: confirmation of candidate consent information	Consent required for staff to request reviews of scripts/ATS	Candidate name Candidate exam number Candidate signature	Exams Office Store	With electronic lock and key
Post-results services: requests/outcome information	Candidate requests for reviews of marking or ATS and outcome information from awarding body	Candidate name Candidate exam number Candidate DOB Candidate signature Candidate address Candidate phone number Candidate e-mail address	Exams Office Store Awarding body extranet sites In exams office Teams folder	In secure area solely assigned to exams MFA: Secure username and password With electronic lock and key

<b>Information type</b>	<b>Information description (where required)</b>	<b>What personal/sensitive data is/may be contained in the information</b>	<b>Where information is stored</b>	<b>How information is protected</b>
Post-results services: scripts provided by ATS service	Electronic or paper copies of candidate scripts	Candidate name Candidate exam number Candidate answers	Departmental storage Exams office Teams folder	MFA: Secure username and password
Post-results services: tracking logs	Spreadsheet detailing post results requests made and outcomes	Candidate name Candidate exam number Candidate marks	Exams office Teams folder	MFA: Secure username and password
Private candidate information	Requests made by private candidates for external exam entries	Candidate name Candidate exam number Candidate DOB Candidate signature Candidate address Candidate phone number Candidate e-mail address	Exams Office Store Exams office Teams folder	In secure area solely assigned to exams MFA: Secure username and password With electronic lock and key
Resilience arrangements: Evidence of candidate performance	Electronic or paper copies of candidate mock exams/CAT tests	Candidate name Candidate marks	In Faculty storage areas In faculty Teams folders	In secure office only accessible by electronic lock MFA: Secure username and password
Resolving timetable clashes information	Timetable and resolution information for use when timetabling exams and ensuring confidentiality of exams is maintained	Candidate name Candidate exam number	Exams Office Store Exams office Teams folder Arbor	In secure area solely assigned to exams MFA: Secure username and password With electronic lock and key

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
Results information	External examination results which are downloaded from the awarding body or CTF files and uploaded into MIS's before being issued to students.  Where students join in Year 12 these may be paper copies.	Candidate name Candidate exam number Candidate DOB Candidate marks/grades	Exams Office Store Exams office Teams folder Arbor SISRA Awarding body extranet sites A2C	In secure area solely assigned to exams  MFA: Secure username and password  With electronic lock and key
Seating plans	Record of where each candidate was sitting in each room for each exam which may be required by awarding bodies in cases of suspected malpractice or where there are attendance queries.	Candidate name Candidate exam number Access Arrangements	Exams Office Secure Store Arbor/Exams Assist	In secure area solely assigned to exams  MFA: Secure username and password  With lock and key
Special consideration information	Information from candidates/pastoral managers/ invigilators which detail why a candidate may qualify for special consideration for an exam. Used when making SC applications and available if requested by awarding bodies.	Candidate name Candidate exam number Candidate DOB Candidate address Medical details	Exams Office Store Exams office Teams folder Awarding body extranet sites	In secure area solely assigned to exams  MFA: Secure username and password  With electronic lock and key
Suspected malpractice reports/outcomes	Reports from invigilators, head of centre submitted to awarding body in cases of suspected malpractice.	Candidate name Candidate exam number Personal data regarding involvement in malpractice	Exams Office Store Exams office Teams folder	In secure area solely assigned to exams  MFA: Secure username and password  With electronic lock and key
Transferred candidate arrangements	Record of candidates transferred from or to other centres to take exams	Candidate name Candidate exam number Candidate DOB	Exams Office Store Exams office Teams folder Awarding body extranet sites	In secure area solely assigned to exams

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
				MFA: Secure username and password With electronic lock and key
Very late arrival reports/outcomes	Record of students arriving very late to exams which may be required by awarding bodies when considering whether to accept a candidate's script	Candidate name Candidate exam number	Exams Office Store Exams Assist Exams office Teams folder Awarding body extranet sites	In secure area solely assigned to exams MFA: Secure username and password With electronic lock and key