



The
Henrietta Barnett
School
FOUNDED IN 1911

External Exams – GDPR Policy 2025 2026

(GDPR = General Data Protection Regulations)

The key staff involved in the special consideration process are:

Head of Centre:	Mrs E MacLeod
Director of Studies:	Mrs D Walker
SENCO:	Mrs N Griffin
Exams Officer (EO):	Ms S Nanan
Data Protection Officer:	Mrs J Avey
IT & Estates Manager:	Mr R Cain

Purpose of the policy

This policy details how The Henrietta Barnett 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 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 2018 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 officer 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
- Barnet Local Authority

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

- hard copy

- email
- secure extranet site(s) e.g. eAQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services; etc
- the school's Management Information System (MIS), SIMs
- 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.

Section 2 – Informing candidates of the information held

The Henrietta Barnett School ensures that candidates are fully aware of the information and data held. All candidates are given access to this policy via the school website. Candidates are made aware of the above at the start of their course of study leading to an externally accredited qualification. 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 GDPR.

Section 3 – Hardware and software

The school's IT hardware, software and access to online systems are protected in line with DPA & GDPR requirements (for example by antivirus protection, firewalls, protection from unauthorised access, etc).

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 school's Data Protection Officer (Ms J Avey) 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 below details the type of candidate exams-related information held, and how it is managed, stored and protected. Protection measures may include:

- password protected access to school computers
- secure drive accessible only to selected staff
- information held in secure area
- updates undertaken regularly, including updating antivirus software, firewalls, internet browsers etc.

Section 6 – Data retention periods

Details of retention periods, the actions taken at the end of the retention period and method of disposal are contained in the centre's External Exams - Archiving Policy, which is available/accessible on the school website.

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 (ID will need to be confirmed if a former candidate is unknown to current staff). 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 unless a request is accompanied with permission from the candidate and appropriate evidence 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), 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
- 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, the centre will make reference to the ICO (Information Commissioner's Office) Education and Families [https://ico.org.uk/for-organisations/education/information-on Publishing exam results](https://ico.org.uk/for-organisations/education/information-on-publishing-exam-results). External exam results will not be given to a third party, including parents without the permission of the student.

Section 8 – Table recording candidate exams-related information held

For details of how to request access to information held, refer to section 7 of this policy (Access to information) For further details of how long information is held, refer to section 6 of this policy (Data retention periods)

Information Type	Information description (where required)	What personal/sensitive data is/may be contained in the information	Where information is stored	How information is protected	Retention period
Access arrangements information		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 MIS Lockable metal filing cabinet	Secure user name and password In secure area solely assigned to exams	After the candidate completed Year 11 – 13
Attendance registers copies		Candidate name Candidate number Invigilator name Invigilator signature	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Candidates' scripts		Candidate name Candidate number	Lockable metal filing cabinet	In secure area solely	To be retained

		Candidate signature Candidate written exam		assigned to exams	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 Disposed of in a confidential manner
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Candidates' work		Candidate name Candidate number Candidate signature Candidate written exam	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has passed or any appeal.
Certificates		Candidate name Candidate number Candidate results	Lockable metal filing cabinet	In secure area solely assigned to exams	12 months then shredded. A record of certificates that have been destroyed should be retained for four years from their date of destruction.
Certificate destruction information		Candidate name Candidate number Year candidate sat the exams and grades obtained	Lockable metal filing cabinet	In secure area solely assigned to exams	Kept for 4 years
Certificate issue		Candidate name	Lockable metal	In secure	12 months

information		Candidate number Candidate results	filing cabinet	area solely assigned to exams	then shredded
Entry information		Candidate name Candidate number Candidate DOB Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal completed
Exam room incident logs		Candidate name Candidate number Invigilator name Invigilator signature Details of the incident	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Invigilator and facilitator training records		Invigilator name Invigilator signature	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal

Overnight supervision information		Candidate name Candidate number Candidate signature Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Post-results services: confirmation of candidate consent information		Candidate name Candidate number Candidate signature Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	Kept until at least six months following the outcome of the clerical re-check or review of marking or any subsequent appeal
Post-results services: requests/outcome information		Candidate name Candidate number Candidate signature Results updates	Lockable metal filing cabinet	In secure area solely assigned to exams	After certificates have been printed
Post-results		Candidate name	Lockable metal	In secure	Return to

services: scripts provided by ATS service		Candidate number Candidate signature Candidates written exam	filing cabinet	area solely assigned to exams	candidates After all Review of marking has been passed or any appeal
Post-results services: tracking logs		Candidate name Candidate number Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	Confidentially shredded after all certificates are printed.
Private candidate information		N/A	N/A	N/A	N/A
Resolving timetable clashes information		Candidate name Candidate number Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Results information		Broadsheets of results summarising candidate final grades by subject by exam series	Lockable metal filing cabinet	In secure area solely assigned to exams	Records for current year plus previous 6 years to be retained as a minimum
Seating plans		Candidate number Invigilator name Invigilator signature	Lockable metal filing cabinet	In secure area solely Assigned to exams	After all Review of marking deadline has passed or any appeal
Special consideration information		Candidate name Candidate number Candidate DOB Confidential information/medical information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Suspected malpractice reports/outcomes		Candidate name Candidate number Candidate DOB Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After certificates are printed
Transfer of credit information		Candidate name Candidate number Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	To be retained until the issue of the GCE A level result for the candidate

Transferred candidate arrangements		Candidate name Candidate number Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal
Very late arrival reports/outcomes		Candidate name Candidate number Exam information	Lockable metal filing cabinet	In secure area solely assigned to exams	After all Review of marking deadline has been passed or any appeal

Review & Update

This policy will be reviewed annually. It was last updated in October 2025.