



FELIXSTOWE
INTERNATIONAL COLLEGE
FRIENDSHIP THROUGH EDUCATION

Data Protection Policy: Exams

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Key staff involved in this policy

Role	Name(s)
Head of centre	Rebecca Mainprice
Senior leaders	Rebecca Mainprice, Chaerin Lee, Katherine Murphy
Exams officer (EO)	Chaerin Lee
IT manager	Cerys Parker
Data manager / data protection lead	Andy Crow [school to confirm who acts as data protection lead/DPO under the whole-school data protection policy]

Purpose of the policy

This policy details how Felixstowe International College, in relation to exams management and administration, ensures compliance with UK data protection law: the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), as amended by the Data (Use and Access) Act 2025. It should be read alongside the school's whole-school data protection policy, privacy notices and records retention schedule, which govern data protection across the College; this policy applies those requirements to the specific context of external examinations.

Candidates have the right to find out what information the school holds about them, how it is protected, how it 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 the data protection principles in Article 5 of the UK GDPR, ensuring that personal data is:

- Processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency)
- Collected for specified, explicit and legitimate purposes (purpose limitation)
- Adequate, relevant and limited to what is necessary (data minimisation)
- Accurate and, where necessary, kept up to date (accuracy)
- Kept for no longer than is necessary (storage limitation)
- Processed in a way that ensures appropriate security (integrity and confidentiality)
- Not transferred outside the United Kingdom without appropriate safeguards in place (transfer limitation)
- Handled in a way that respects candidates' data protection rights, with the school able to demonstrate its compliance (accountability)

To ensure that the centre meets these requirements, all candidates' exam information – even that which is not classified as personal or special category data – 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) and Section 9 (Table recording candidate exams-related information held).

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

- Awarding bodies
- Joint Council for Qualifications (JCQ)
- Department for Education; Independent Schools Council (ISC); local press (anonymised or with permission – see Section 7)

This data may be shared via one or more of the following methods: hard copy; email (using official school accounts and, where appropriate, encryption); and secure extranet site(s). It may relate to exam entries, access arrangements, the conduct of exams and non-examination assessments, special consideration requests, and exam results, post-results and certificate information.

Where a recipient organisation is outside the United Kingdom, the transfer will only be made in accordance with Chapter V of the UK GDPR (for example, where the destination benefits from UK adequacy regulations or appropriate safeguards are in place). Routine correspondence with candidates' own parents/carers and educational guardians overseas is conducted securely through official school channels (see Section 7).

Section 2 – Informing candidates of the information held

Felixstowe International College ensures that candidates are fully aware of the information and data held. All candidates are given access to this policy via the Student Drive on Google Drive, and are made aware of it within the first half-term of each academic year. At this point, the school also brings to candidates' attention the annually updated JCQ document 'Information for candidates – Privacy Notice', which explains how the JCQ awarding bodies process their personal data in accordance with UK data protection law, together with the school's own pupil privacy notice.

Section 3 – Candidate information, audit and protection measures

For the purposes of this policy, all candidates' exam-related information – even that not considered personal or special category data under the UK GDPR/DPA 2018 – will be handled in line with UK GDPR requirements. An information audit is conducted every three years, and a data protection impact assessment (DPIA) is completed, with the advice of the data protection lead, before any new technology or process is introduced that presents a high risk to candidates' rights (for example, new online assessment platforms).

The table below details the type of candidate exams-related information held, and how it is managed, stored and protected.

Candidate details	Stored	Managed	Protected
Name, candidate number, UCI number	Electronically on EO laptop	Exam registers, seating plans, EAA registers and hard copies of the above produced as/when necessary to run examinations. Stored/deleted on exams officer's laptop in line with the whole-school data protection and archiving policies.	Exam laptop is password protected; hard copies only in use by exam staff during actual exam periods
Candidate exam entries details	Electronically on EO laptop; hard copies in EO file	Hard copies of exam data are destroyed annually following the deadline for all reviews of results/appeals information received from awarding bodies.	Exam laptop is password protected; hard copies only in use by exam staff during actual exam periods
Exam access arrangement (EAA) information	Electronically on EO laptop; hard copies in EO file and invigilation files for exams	Deleted/returned to SENCO once candidate has left Felixstowe International College, in line with the exam records management policy.	Exam laptop is password protected; hard copies only in use by exam staff during actual exam periods

Candidate results	Downloaded electronically and stored on EO laptop; hard copies printed for individual candidates, SMT and subject co-ordinators; hard copies of annual results kept in the exams office	Anonymised results information supplied to the ISC and local press; candidates' permission will be sought before any named results information is given to the press. Candidates will be informed prior to named results being given to those with a legal right to named results information. Stored/deleted on EO laptop in line with the whole-school data protection and archiving policies.	Exam laptop is password protected; hard copies only in use by exam staff during actual exam periods
Candidate scripts	Not stored by EO	Given directly to candidate/teaching staff as required.	Given directly to candidate/teaching staff as required
Candidate post-results requests information	Saved on exam laptop; hard copies in EO file	Deleted/confidentially shredded once the deadline for return of post-results has passed, in line with the exam records management policy.	Exam laptop is password protected; hard copies in locked cabinet in EO office
Candidate special consideration application information	Saved on exam laptop; hard copies in EO file	Deleted/confidentially shredded once the deadline for return of post-results has passed, in line with the exam records management policy.	Exam laptop is password protected; hard copies in locked cabinet in EO office

Protection measures may include: a password-protected area on the centre's intranet; a secure drive accessible only to selected staff; information held in a secure area; and updates undertaken at least every month (this may include updating antivirus software, firewalls, internet browsers, etc.).

Section 4 – Data retention periods

Details of retention periods, the actions taken at the end of the retention period and the method of disposal are contained in the school's exam records management policy, which is available from the Felixstowe International College office, and in the whole-school records retention schedule. Personal data that is no longer needed is disposed of securely: paper records are confidentially shredded and electronic files deleted or overwritten.

Section 5 – Access to information (subject access requests)

The UK GDPR gives individuals the right to see personal information held about them. This means candidates can request information about themselves and their exam results, including their mark, comments written by the examiner, and minutes of any examination appeals panels. This does not, however, give individuals the right to copies of their answers to exam questions: under Schedule 2, Part 4, paragraph 25 of the DPA 2018, exam scripts are exempt from the right of access (though examiners' comments are not).

Requesting exam information

Requests for exam information can be made to the school office or the data protection lead in writing or by email. A request does not have to mention data protection law or use the words 'subject access request' to be valid; any staff member receiving such a request must forward it to the exams officer and data protection lead immediately. Identity will need to be confirmed by passport, driving licence or another form of photo ID if a former candidate is unknown to current staff; for third-party requests, the identity of both parties and the candidate's permission must be evidenced. In line with the Data (Use and Access) Act 2025, the school is required to conduct

reasonable and proportionate searches when responding, and the response time may be paused where the school reasonably needs further information or ID to clarify the request.

Children and subject access requests

Personal data about a child belongs to that child, not the child's parents or carers. The UK GDPR does not specify an age at which a child can make or control such requests. When a child makes a request, those responsible for responding will take into account whether the child wants their parent (or someone with parental responsibility) to be involved, and whether the child properly understands what is involved. As a general guide, a child of 12 or older is expected to be mature enough to understand the request they are making, so requests from parents of candidates aged 12 and over will not normally be granted without the candidate's consent; however, maturity is always considered case by case, and the head of centre will decide whether the student understands the request they are making. Given our international intake, the school will also consider whether language support is needed for a candidate to understand and exercise their rights.

Responding to requests

The DPA 2018 (Schedule 2, paragraph 25(4)) sets special time limits for exam information requested before results are announced. If a request is made before results have been announced, it will be responded to within five months of the date of the request, or within 40 days of the results being published, whichever is earlier. If a request is made once exam results have been published, the individual will receive a response without delay and within one month of the request (or of receipt of ID, where required). Where a request is complex or numerous, this may be extended by up to a further two months; the individual will be informed within one month, with an explanation. Information is provided free of charge, although a reasonable fee may be charged, or the request refused, where it is manifestly unfounded or excessive; if a request is refused, the individual will be told why and of their right to complain to the Information Commissioner's Office (ICO) or to enforce their rights through the courts.

Third-party access

Permission must be obtained before requesting personal information about another individual from a third-party organisation. Candidates' personal data will not be shared with a third party unless the request is accompanied by the candidate's permission and appropriate evidence to verify the ID of both parties. 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 school's data protection lead will confirm the status of these agreements and approve or reject any requests.

Section 6 – Sharing information with parents, carers and guardians

Felixstowe International College will only share candidates' exam information with parents/carers with due regard to data protection law and DfE guidance on parental responsibility and school reports on pupil performance (www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility and www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers). Candidates will be informed prior to any such sharing.

Because many of our candidates' parents live overseas, results and exam correspondence are routinely sent to parents/carers, and to educational guardians where authorised, outside the UK. This is done securely through official school channels (school email accounts and My School App) to the contacts authorised in the admissions documentation. Communications sent to a data subject's own family in this way are handled in accordance with UK GDPR requirements; any transfer of

candidate data to an organisation outside the UK is made only with appropriate safeguards under Chapter V of the UK GDPR.

Section 7 – Publishing exam results

When considering publishing exam results, Felixstowe International College refers to the ICO's guidance for schools (<https://ico.org.uk/your-data-matters/schools/>). Publishing examination results is a common and accepted practice, and data protection law does not prevent it; however, the school must act fairly when publishing results and take seriously any concerns raised. The school makes sure that all pupils and their parents/carers are aware, as early as possible, whether examination results will be made public and how (for example, whether results will be listed alphabetically or in grade order). Because the school has a legitimate interest in publishing examination results, consent is not generally required; however, pupils and parents/carers have the right to object, the school will consider objections before deciding to publish, and would need a good reason to reject an objection.

Felixstowe International College publishes anonymised exam results to the Independent Schools Council (ISC) following the summer examinations. The school may also make local press statements regarding summer exam results, but will not name any candidate without their prior permission.

Section 8 – Artificial intelligence (AI)

AI tools are now widespread and easy to access, and pose particular risks to exams data. To ensure that personal and sensitive candidate data remains secure, no one is permitted to enter candidates' personal data, exam entries, access arrangements information, candidate work or results into unauthorised generative AI tools or chatbots. If such data is entered into an unauthorised AI tool, the school will treat this as a personal data breach and follow the breach procedure in the whole-school data protection policy. The use of AI by candidates within assessments themselves is managed separately under the JCQ guidance on AI use in assessments and the school's exam contingency and malpractice arrangements.

Section 9 – Personal data breaches and complaints

Any suspected loss, theft or unauthorised disclosure of candidates' exam information (for example, results emailed to the wrong recipient, or the loss of the exams laptop) must be reported immediately to the data protection lead, who will follow the personal data breach procedure in the whole-school data protection policy. Where required, the school will report a breach to the ICO within 72 hours of becoming aware of it, and will notify affected candidates where legally required.

In line with the Data (Use and Access) Act 2025, anyone who is unhappy with how the school has handled their exams-related personal data can complain to the school: complaints should be made to the data protection lead, will be acknowledged within 30 days, investigated, and responded to without undue delay. Complainants also have the right to complain to the ICO at any time (ico.org.uk / 0303 123 1113).

Section 10 – Links with other policies

- Whole-school data protection policy and personal data breach procedure
- Privacy notices (pupil and workforce)
- Exam records management policy (retention and disposal)
- Records retention schedule

- Online safety and acceptable use policies
- Exam policy, exam contingency plan and JCQ-required exams procedures
- Child protection and safeguarding policy

For details of how to request access to information held, refer to Section 5 of this policy. For further details of how long information is held, refer to Section 4 and the exam records management policy.

Section 11 – Table recording candidate exams-related information held

Information type	Description (where required)	Personal/sensitive data contained	Where stored	How protected	Retention period
Exam access arrangements (EAA) information	Held to establish a student's eligibility for specific exam arrangements	Candidate name, number, DoB, gender, DPN, specialist report, medical evidence, other work evidence, exam details	Access Arrangements Online; MIS/exam laptop; lockable filing cabinets	Secure username and password; in secure offices (SENCO and exams)	All EAA information/forms returned to SENCO/students when they leave the school; any paper copies held by the exams office shredded at the same time
Alternative site arrangements	Required if exams need to be moved from the school	Candidate and exam details	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Attendance register copies	Produced by MIS for use in exam rooms	Candidate name, number	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Candidates' scripts	Live exam papers	Candidate name, number, signature, exam responses	In exam secure storage	Secure room, limited key holders	Minimum time until scripts can be despatched to the awarding body
Candidates' work	NEA work kept securely by teaching staff	Candidate name, number, signature	In secure storage by subject teachers	In accordance with JCQ NEA requirements, in secure storage by subject teachers	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later

Centre consortium arrangements for centre-assessed work	n/a	n/a	n/a	n/a	n/a
Certificates	Received following every exam series	Candidate name, number, UCI, DoB, exam results	In secure storage room in exam office	Secure room, limited key holders	Collected/posted to candidates; uncollected certificates retained for a minimum of 12 months, then may be confidentially destroyed
Certificate destruction information		Candidate name, number, UCI, DoB, exam results	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	5 years after the pupil leaves the school
Certificate issue information		Candidate name, number, UCI, DoB, exam results	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	5 years after the pupil leaves the school
Conflicts of interest records	Required annually by JCQ	Staff name, relatives' names, DoBs, exam information	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Entry information	Required every exam series	Candidate name, number, exam details	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Exam room incident logs	Record of any unusual occurrences in exam room(s)	Candidate name(s), number(s), invigilator name(s), details of exam incident	Lockable metal filing cabinet	In secure office (exams)	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later

Invigilator and facilitator training records	Records required by JCQ	Invigilator/facilitator names, addresses, contact details, training details	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Kept until no longer employed or for at least 3 years, whichever is longer
Overnight supervision information	Required if a candidate has a clash of 3 or more exams on the same day and an exam must be moved to a later date	Candidate name, number, place of residence, supervisor's name, relationship to candidate	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Post-results services: confirmation of candidate consent	Requested by candidate as/when necessary	Candidate name, number, signature, exam details	Lockable metal filing cabinet	In secure office (exams)	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Post-results services: requests/outcome information		Candidate name, number, signature, exam details	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password; internal exam records permanently amended accordingly	Retained for 6 months following the deadline for a review of results/moderation, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Post-results services: scripts provided by ATS service	Requested by candidates as/when necessary, or by teaching staff (with the candidate's written permission) to inform teaching and learning	Candidate name, number, signature, exam responses	Given directly to candidates or teaching staff	Teaching staff keep in locked storage	Retained securely until the awarding body's earliest date for confidential disposal of unwanted scripts, or no longer needed by staff – then shredded
Post-results services: tracking logs	Compiled by EO as/when necessary	Candidate name, number, exam details	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained for 6 months following the deadline for a review of results/moderation, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later

Private candidate information	Registration forms received before an exam series	Candidate name, number, UCI, address, contact details, exam details, any EAA evidence and requirements, DPN	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the candidate no longer wants to remain registered with Felixstowe International College, or for at least 6 months following publication of results
Resolving timetable clashes information	Completed by EO when necessary before each exam series	Candidate name, number, exam details	MIS, exam laptop; on timetables for use during exam period	Secure username and password; in exam office/rooms only	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Results information	Downloaded by EO following each exam series	Candidate name, number, UCI, DoB, exam results	Lockable metal filing cabinet; electronically on exam laptop/MIS	In secure office (exams); secure username and password	5 years after the pupil leaves the school
Seating plans	Produced by school for each exam series	Candidate name, number, exam details, EAA details	MIS, exam laptop; on timetables for use during exam period	Secure username and password; in exam office/rooms only	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Special consideration information	Produced by candidates/invigilators if/when necessary following exams	Candidate name, number, invigilator name, exam details, exam incident details, possible candidate medical/other supporting evidence	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until after publication of results
Suspected malpractice reports/outcomes	Produced by the Principal/invigilators if/when necessary following exams	Candidate name(s), number(s), invigilator name, exam details, exam incident details, possible other supporting evidence	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later

Transferred candidate arrangements	Organised by school where necessary	Candidate name, exam number, exam details	Electronically on exam laptop	Secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later
Very late arrival reports/outcomes	Required if a candidate is very late for an exam	Candidate name, exam number, exam details, any accompanying evidence/statements	Lockable metal filing cabinet; electronically on exam laptop	In secure office (exams); secure username and password	Retained until the deadline for a review of results/moderation has passed, or until a review of results/moderation, an appeal or a malpractice investigation has been completed, whichever is later