Bowbrook School

BOWBROOK HOUSE SCHOOL

DATA PROTECTION POLICY (EXAMS)

2026/27

THIS POLICY IS REVIEWED AND UPDATED ANNUALLY TO ENSURE COMPLIANCE WITH CURRENT REQUIREMENTS AND REGULATIONS

PURPOSE & SCOPE

This policy sets out how Bowbrook House School manages and protects personal data in relation to examinations and assessments. It applies to all staff involved in exams administration and delivery and ensures compliance with UK GDPR, Data Protection Act 2018, and JCQ regulations.

LEGAL BASIS AND PRINCIPLES

Processing is based on public task/legal obligation for administering regulated assessments and consent where required (e.g., Access Arrangements Online for candidates aged 13+). Principles: fairness, purpose limitation, minimisation, accuracy, storage limitation, integrity/confidentiality, accountability.

ROLES AND RESPONSIBILITIES

- Head of Centre has overall accountability
- DPO – overall data protection
- Exams Officer: day-to-day data processing
- SENDCo: manage AA evidence and consent
- Data/IT Manager: secure systems; Invigilators: confidentiality of candidate data.

EXAMS DATA WE PROCESS

Candidate identifiers, entries/results, access arrangements evidence, secure materials logs, conduct and incident reports.

CANDIDATE INFORMATION: TRANSPARENCY

Candidates receive Privacy Notices explaining how their data is used by the centre and awarding bodies.

DATA SHARING

Data shared with awarding bodies for entries, exams administration, results, certification, and regulators as required.

SECURITY OF DATA AND SECURE MATERIALS

Physical security: locked storage for question papers; electronic security: encryption, access controls, audit trails.

ACCESS ARRANGEMENTS (AARA)

Process AA in line with JCQ AARA, maintain evidence, obtain candidate consent for AAO submissions.

SPECIAL CONSIDERATION

Applications processed and retained per JCQ guidance.

MALPRACTICE AND INCIDENT HANDLING

Prevent, IDENTIFY, report and investigate suspected malpractice per JCQ SMPP.

DATA BREACHES

Report immediately to Exams Officer and DPO; assess risk, contain, notify JCQ if secure materials compromised.

DATA RETENTION SCHEDULE

Define retention aligned to UK GDPR and JCQ guidance: entries/results (1-3 years), AA evidence (3 years), malpractice files (until case closed + limitation period).

CANDIDATE RIGHTS AND ACCESS REQUESTS

Candidates have rights under UK GDPR; requests handled by DPO.

TRAINING AND AWARENESS

Mrs Ruth Hunt (DPO) to provide annual training for all staff on data protection, secure materials handling, AARA, malpractice.

POLICY GOVERNANCE

Approved by Head of Centre; reviewed annually or when JCQ rules change.

CONTACT POINTS

- Exams Officer: J. Ironside – julie.ironside@bowbrookhouseschool.co.uk
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- DPO: R. Hunt – ruth.hunt@bowbrookhouseschool.co.uk