

## EXAMINATIONS (incorporating the Examinations GDPR Policy)

Approved by Governors:	March 2019
Next Review:	March 2021
Policy Owner:	Dir of College Services

### Vision

Loreto College is centred in God, rooted in Christ and animated by the spirit of Mary Ward, the founder of the Institute of the Blessed Virgin Mary. Our vision is that it will be an educational community where each person has the experience of being loved and valued as a sacred individual created by a loving God; a community where students enjoy an enriching and liberating education that helps them grow into the fullness of life and empowers them to be men and women of courage who are alive to the needs of humanity and committed to making a better world.

### Introduction

The College aims to be an educational community which gives expression to the core values of Mary Ward - freedom, justice, sincerity, truth, joy, excellence and internationality.

Loreto College has the highest expectations of personal, academic and professional excellence. This document sets out the College's policy and guidance on the procedures it will follow in relation to examinations. In doing so, the college is mindful that this is not just an administrative exercise but is a critical framework for enabling students to take examinations and staff to administer them in a manner which promotes justice and excellence.

### The purpose of this examinations policy is:

- To ensure that the planning and management of exams is conducted efficiently and in the best interest of candidates.
- To ensure the operation of an efficient exam system with clear guidelines for all relevant staff.

It is the responsibility of everyone involved in the centre's examinations processes to read, understand and implement this policy.

This examinations policy will be reviewed annually by the Exams Manager and recommended changes referred to the Senior Management Team. Material changes leading to a full review will be referred for governor approval.

## 1. Exam responsibilities

### CMT nominees:

#### **Principal, Vice Principal (Curriculum), Director of Administration & College Services & Examinations Manager**

Overall responsibility for the College as an examination centre:

- Advise on appeals and re-marks
- Responsible for reporting all suspicious or actual incidents of malpractice (with reference to the JCQ document *Suspected malpractice in examinations and assessments*).

### **Exams Manager**

Manage the administration of public and internal exams and analysis of exam results:

- Communicate with the awarding bodies
- Advise the CMT nominees, Heads of Departments, Heads of Halls and other relevant support staff on annual exam timetables and application procedures as set by the various exam boards
- Oversee the production and distribution to staff and candidates of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events
- Provide and confirm detailed data on estimated entries
- Registrations of BTEC subjects to be completed before the 1<sup>st</sup> November deadline
- Maintain systems and processes to support the timely entry of candidates for their exams.
- Administer access arrangements (in conjunction with the Exams Assistant/College ALS Staff) and make applications for special consideration using the JCQ *Access arrangements and special considerations regulations* and *Guidance relating to candidates who are eligible for adjustments in examinations*
- Ensure that candidates are informed of and understand those aspects of the conduct of exams and the exam timetable that will affect them
- Consult with teaching staff to ensure that necessary estimates of grades are completed on time
- Consult with Heads of Department to ensure that necessary coursework is completed on time and in accordance with JCQ guidelines
- Receive, check and store securely all exam papers and completed scripts
- Identify and manage exam timetable clashes
- Line manage the Exams Assistant and help her with the recruitment, training and monitoring of a team of exam invigilators responsible for the conduct of exams
- Submit candidates' coursework marks, track dispatch and store returned coursework and any other material required by the appropriate awarding bodies correctly and on schedule
- Arrange for dissemination of exam results and certificates to candidates and forward, in consultation with the SMT, HOD's, CIS and the Director of College Services, any appeals/re-mark requests
- Account for income and expenditure relating to all exam costs/charges

## **Heads of Department**

- Guidance and oversight of candidates who are unsure about exam entries or amendments to entries.
- Involvement in post-results procedures.
- Accurate completion of coursework mark sheets and declaration sheets.
- Accurate completion of College Exams Departmental Unit Sheet and adherence to deadlines.
- Checking of exam entries & BTEC registrations by each year/exam series, prior to internal deadlines.
- Additions or removals from candidate lists.
- Submission of candidate names to Exams Manager.

## **Heads of Halls**

- Guidance and pastoral oversight of candidates who are unsure about exam entries or amendments to entries.
- Involvement in post-results procedures.
- Additions or removals from candidate lists (to CIS).
- Changes of course/entry/levels (to CIS)

## **CIS/Finance**

- The input of data to the College's Information Systems.
- Taking fee payments from candidates.
- Managing achievement data.

## **ALS (Additional Learning Support) Staff**

- Identification and testing of candidates' requirements for access arrangements.
- Administration of access arrangements (in conjunction with the Exams Manager & Exams Assistant).
- Provision of additional support - with spelling, reading, mathematics, dyslexia or essential skills, hearing impairment, English for speakers of other languages, IT equipment - to help learners achieve their course aims.

## **Lead invigilator/invigilators**

- Collection of exam papers and other material from the exams office before the start of the exam.
- Application of College summary of JCQ *Instructions for conducting exams*.
- Collection of all exam papers in the correct order at the end of the exam and their return to the exams office.

## **Candidates**

- Confirmation of entries.
- Understanding JCQ coursework regulations and signing a declaration that authenticates the coursework as their own.
- Understanding JCQ warnings/notices for written/oral/practical exams

- Confirmation of ATS (Access to scripts) and EARs (Enquiries about results)

## **2. The qualifications offered**

The qualifications offered at this centre are decided by the SMT in consultation with the Heads of Faculty and Heads of Department.

The qualifications offered are GCSE, GCE A levels, BTEC Level 1, 2 & 3, Functional Skills, EPQ & NOCN Pathways qualifications.

The subjects offered for these qualifications in any academic year may be found in the College's published prospectus for that year. If there has been a change of syllabus from the previous year, the CIS & Exams Manager must be informed by the start of the new academic year.

## **3. Exam windows, timetables and clashes**

### **3.1 Exam windows**

External exams are scheduled in November, January (NEW NQF BTEC only), March, May and June; on-line tests are available on demand. College internal exams are scheduled for December/February and March/May. All internal exams are held under external exam conditions whenever possible.

Exam windows in the College are decided by the SMT in consultation with the Heads of Faculty

### **3.2 Timetables and seating plans**

The exams office will circulate a timetable of all external exams at dates specified in the published schedule; College exams will be added whenever appropriate. Room details and seating plans will be posted by the exams office. The exams office will allocate invigilators.

## **4. Entries, entry details, late entries and retakes**

### **4.1 Entries**

Candidates are selected for their exam entries by the Heads of Department and if necessary in consultation with Heads of Halls.

The College can withdraw candidates from resits for non-attendance & behaviour issues.

The College does not accept entries from private/external candidates except in rare circumstances.

The College does not act as an exam Centre for other organizations except in rare circumstances.

### **4.2 Entry details**

All individual candidate statements of entry or individual timetables will be produced by the exams office and will be available to view on 'MY LORETO'. Date, time, rooms, candidate number & seat numbers will be displayed,

### 4.3 Late entries, amendments and withdrawals

Deadlines for late entries are circulated via memos, online notifications & email.

The Exams Office will accept entry amendments and withdrawals (using the appropriate CIS course change & leavers forms), up to the dates set by the awarding bodies.

### 4.4 Retakes (Resits)

Retake decisions are made in consultation with the Heads of Department, Heads of Halls and candidates.

A separate procedure & information document is in place for resits

## 5. Exam fees

Normal registration and exam fees are paid by the centre.

Retake (resit) fees are paid for by the candidates except when approved by HoH.

## 6. The Disability Discrimination Act (DDA), special needs and access arrangements

### 6.1 DDA

The Disability Discrimination Act 2010 extends the application of the DDA to general qualifications. All exam centre staff must ensure that access arrangements and special consideration regulations and guidance are consistent with the law.

### 6.2 Special needs

The Exams Office/ALS Staff, Tutors/Heads of Halls & CIS will inform subject teachers of candidates with special educational needs who are embarking on a course leading to an exam, and the date of that exam. The Exams Office/ALS staff can then inform individual staff of any special arrangements that individual candidates may be granted during the course and in the exam.

### 6.3 Access arrangements

Candidates who may require access arrangements are identified during the admissions process.

Course tutors identifying candidates who may require access arrangements after the start of the course should inform the Exams Office/ ALS staff at the earliest opportunity.

Making these special arrangements is the responsibility of the Exams Office/ ALS Staff

Submitting completed access arrangement applications to the awarding bodies is the responsibility of the Exams Office/ ALS Staff.

Lift passes for students with a disability are subject to confirmation from the Head of Hall/First Aid Room staff and will be communicated to Exams and CCIT.

## **7. Estimated grades**

These are no longer applicable.

## **8. Managing invigilators and exam days**

### **8.1 Managing invigilators**

External exams: a budget is provided to recruit external invigilators for such exams. Additional Internal invigilators will be required on rare occasions.

College internal exams cannot be held in the same rooms as external exams.

The recruitment of external invigilators is the responsibility of HR/Exams Assistant.

Securing the necessary DBS clearance for new invigilators is the responsibility of HR.

DBS fees for securing such clearance are paid by the College.

Invigilators are timetabled and briefed by the exams office.

Invigilators' rates of pay are set by the SMT.

### **8.2 Exam days**

The Director of College Services will coordinate the booking of all exam rooms in liaison with the Premises Manager/Exams Assistant.

The Premises Department is responsible for the setting up of allocated rooms.

The lead invigilator will start all exams in accordance with JCQ guidelines in conjunction with the Examinations Manager.

Subject staff may be present at the start of the exam to assist with identification of candidates and to alleviate any anxieties and to offer encouragement.

Nominee(s) identified in advance of external exam series will be responsible for contacting candidates who are late for the start of their exams, to advise them of the latest time they may enter the exam room to take a paper (in accordance with JCQ guidelines).

In practical exams subject teachers/technicians may be on hand in case of any technical difficulties.

Exam papers must not be read by subject teachers or removed from the exam room until the Exams Manager/Assistant releases them in accordance with JCQ guidelines.

Papers will be distributed to Heads of Department as soon as possible after the end of the exam session.

## **9. Candidates, clash candidates and special consideration**

### **9.1 Candidates**

JCQ rules on candidates' use of mobile phones and all electronic devices apply at all times.

Normal centre rules on dress and behaviour apply.

Candidates' personal belongings remain their own responsibility and the College accepts no liability for their loss or damage.

Disruptive candidates are dealt with in accordance with JCQ guidelines.

Candidates may leave the exam room for a genuine purpose requiring an immediate return to the exam room, in which case an invigilator/ member of staff must accompany them.

### **9.2 Clash candidates**

The supervision of escorts, identifying a secure venue and arranging overnight supervision is the responsibility of the Exams Manager.

### **9.3 Special consideration**

Should a candidate be too ill to sit an exam, suffer bereavement or other trauma or be taken ill during the exam itself, and then it is the candidate's responsibility to alert the centre, or the exam invigilator, to that effect.

The candidate must support any special consideration claim with appropriate evidence within five days of the exam, for example a letter from the candidate's GP and any NHS medical evidence.

The Exams Manager will then forward a completed special consideration form to the relevant awarding body within 10 days of the exam.

## **10. Coursework and appeals against internal assessments**

The College has a separate policy on this subject.

### **10.1 Coursework**

Candidates who have to prepare coursework should do so by the required date.

The Heads of Department will ensure all coursework is marked to meet the deadlines.

The Exams Office will ensure all coursework is dispatched at the correct time.

Keeping a record of what has been sent, when and to whom is the responsibility of the Exams Manager.

Marks for all internally assessed work are provided to the Exams Office by the Heads of Department.

## 10.2 Appeals against internal assessments

The main points are:

- Appeals will only be entertained if they apply to the process leading to an assessment.
- Candidates may appeal if they feel their coursework has been assessed unfairly, inconsistently or not in accordance with the specification for the qualification
- Appeals must be made in writing to the Exams Manager who will decide whether the process used conformed to the necessary requirements. Appeals must be made by May 31<sup>st</sup> in any given academic year.
- The Exams Manager's findings will be notified in writing, copied to the SMT and recorded for awarding body inspection.

## 11. Results and ATS/EARs

### 11.1 Results

All individual candidate statements of results received will be distributed in College following publication of results.

All individual candidate statements of results will be presented in person at the centre **on production of a College Identity Card**.

### 11.2 ATS (access to scripts)

After the release of results of general qualifications, candidates may ask subject staff to request priority photocopies, with a view to requesting an EAR service. Candidates or College will pay such fees.

### 11.3 EARs (enquiries about results)

EARs for general qualifications may be requested by candidates or Heads of Departments if there are reasonable grounds for believing there has been an error in marking. Candidates or departments are to pay such fees, unless a cohort result is queried, when the Exams Manager, in conjunction with the Head of Department and SMT, will investigate the feasibility of asking for an EAR service, to be paid for by the College.

There is a separate College Procedure for 'Post Results Services'

Appeals are only based around the procedures and not the actual marking.

Heads of Departments may also request scripts for investigation or for teaching purposes.

## 12. Examination Security

12.1 The Examinations Manager will ensure the security of all examination papers, stationery and completed scripts in accordance with JCQ Regulations.

12.1 The Examinations Manager will ensure that there is an up to date contingency plan in place which follows JCQ guidelines. In the event of an incident the Examinations Manager will, in consultation with Senior Staff, implement the plan so as to mitigate any risks to the examinations process.

## 13. Certificates

Certificates will be available at the College's presentation evening, for those who cannot make it; procedures will be in place for collection in the form of a letter.

Certificates uncollected will be archived; any enquiries by former students for certificates will be directed to these and a signature & date will be required, which then will be put back in the students file as a record of collection.

From September 2018 it becomes the Student responsibility to apply for replacement certificates after 12 months of leaving.

Certificates may be collected on behalf of a candidate by a third party, provided they have been authorized to do so.

## 14. GDPR Examinations

### Key staff involved in the General Data Protection Regulation policy

Role	Name(s)
Head of centre	Peter McGhee - Principal
Exams Manager	Jason Fielding
Exams Manager line manager (Senior Leader)	Helen Green
GDPR & Data Protection Officer	Helen Green
IT Network manager	Phil Catlow
Data manager	Daniel Wray

### Purpose of the policy

This policy details how Loreto College in relation to exams management and administration, ensures compliance with the regulations as set out by the Data Protection Act (DPA) 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 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 office 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 and the Local Authority

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

- ▶ hard copy
- ▶ email
- ▶ Secure extranet sites include e-AQA; OCR Interchange; Pearson Edexcel Online; WJEC Secure services; City & Guilds Walled Garden; CCEA online, ASDAN, Cambridge Assessments and the Local press.
- ▶ College Management Information System (CIS) provided by Capita unit-e 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**

Loreto College ensures that candidates are fully aware of the information and data held.

All candidates are:

- ▶ informed via College newsletters, Intranet and electronic communication
- ▶ given access to this policy via College website

Candidates are made aware of the above when they enroll at Loreto College

## 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	Warranty expiry
Desktop PC - Examinations Manager Desktop PC – Examinations Assistant	August 2016	

Software/online system	Protection measure(s)
Capita Unit-e	Password protected and changed every 90 days
MyLoreto	College login, password changed every 90 days
Awarding body secure extranet sites	ALL password protected, some require a change every 90 days
Access Arrangements	AA's are done through the JCQ portal and can be access through any of the awarding body websites, passwords are the same as the awarding bodies
Awarding bodies secure testing sites	Edexcel/Pearson only, password protected and some entry/results emails arrive encrypted which has a separate secure password

## 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 Data Protection Officer 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' exams-related information – even that not considered personal or sensitive under GDPR – will be handled in line with GDPR guidelines.

An information audit is conducted every year

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

Protection measures include:

- ▶ password protected area on the centre's intranet
- ▶ secure drive accessible only to selected staff
- ▶ information held in secure area
- ▶ CCIT update antivirus software, firewalls, internet browsers on a regular basis

## **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, see Section 8.

## **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 Data Protection Officer in writing and how 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 organization.

Candidates' personal data will not be shared with a third party Candidates personal information is used by us to exercise our official authority to provide further and higher education services within the legislative framework of the Further and Higher Education Act and the Education (Government of Further Education Colleges) Regulations 1992. We also have requirements placed on us by the Department for Education (DfE), and the Education Skills Funding Agency (ESFA).

In some cases, candidates' data will be shared with a third party processor who will be required to comply with the GDPR requirements, this will be done with their consent, unless the law requires the College to share your data. Where the College shares data with a third party processor, the same data protection standards that Loreto College upholds are imposed on the processor.

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 center's Data Protection Officer will confirm the status of these agreements and approve/reject any requests.

## 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, 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 CIS unit-e Exams Secure store	Secure user name and password  In secure area solely assigned to exams	<b>10 years</b>
Attendance registers copies	Candidate lists of exam entries	Candidate name, dob, candidate number and exam entry code	Lockable metal filing cabinet		1 year
Candidates' work	Subject Coursework	Student name & Candidate number			
Certificates	Provided by the Awarding Bodies	Centre number, Candidate name, dob, candidate number and UCI and exam subject	Lockable metal filing cabinets in Student Information and Administration		10 years
Certificate destruction information		n/a	College data systems		10 years
Entry information		Student name, DOB, gender, subject codes	College data systems, intranet	Secure user name and password	

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
Exam room incident logs		Student name, DOB and candidate number with dates	Exams secure store & Lockable metal filing cabinet		3 years
Overnight supervision information		Student name, DOB and candidate number with dates	Examinations Office		6 months
Post-results services: confirmation of candidate consent information		Student name, DOB, gender, candidate number, dates, subject codes	Awarding bodies, college data systems, examinations office	Secure user name and password	1 year
Post-results services: requests/outcome information		Student name, staff name, DOB, gender, candidate number, dates, subject codes & grade/s	Awarding bodies, college data systems, examinations office	Secure user name and password	5 years
Post-results services: scripts provided by ATS service		Student name, staff name, DOB, gender, candidate number, dates, subject codes	Awarding bodies, college data systems, examinations office and departmental areas	Secure user name and password	n/a
Post-results services: tracking logs		Student name, Staff name, DOB, gender, candidate number, dates, subject codes & grade/s	Awarding bodies, college data systems, examinations office	Secure user name and password	5 years
Private candidate information	n/a	n/a	n/a	n/a	n/a
Resolving clashes information		Student name, DOB, gender, candidate number, dates, subject codes	College data systems	Secure user name and password	Duration of exams in that particular series
Results information		Student name, staff name, DOB, gender, candidate number, dates, subject codes &	Awarding bodies, college data systems,	Secure user name and password	

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
		grade/s	examinations office		
Seating plans		Student name, DOB and candidate number with dates	College data systems and the Examinations Office	Secure user name and password	6 months
Special consideration information		Student name, DOB and candidate number with dates	College data systems and the Examinations Office	Secure user name and password	2 years
Suspected malpractice reports/outcomes		Student name, witness names (invigilators and senior managers), DOB and candidate number with dates	College data systems and the Examinations Office	Secure user name and password	
Transfer of credit information		Student name, dob, gender, former Centre, subject codes	College data systems and the Examinations Office	Secure user name and password	
Transferred candidate information		Student name, dob, gender, former Centre, subject codes	College data systems and the Examinations Office	Secure user name and password	
Very late arrival reports/outcomes		Student name, subject unit, date & time	Exams secure store & Lockable metal filing cabinet	Secure user name and password	

**Head of Centre:** Peter McGhee, Principal

**Exams Manager:** Jason Fielding