

**ALTERNATIVE ARRANGEMENTS FOR AWARDING GCSE,  
AS AND A LEVEL GRADES IN SUMMER 2021– STAGE 1 (PRE RESULTS)**

**Submitting controller details**

Name of controller	CCEA Awarding Organisation
Subject/title of DPO	David Wilson, Data Protection Officer
Policy	Alternative Arrangements for Awarding GCSE, AS and A Level grades in Summer 2021
Name of controller contact /DPO (delete as appropriate)	David Wilson
Date	7 April 2021

## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

Due to the ongoing Covid-19 public health crisis, the Minister for Education, Peter Weir announced that summer 2021 exams would be cancelled on the 6 January 2021 and subsequently issued a Ministerial Direction (<https://www.education-ni.gov.uk/news/statement-education-minister-ad-hoc-committee-1>) requiring CCEA to put in place alternative Awarding arrangements for Summer 2021.

CCEA is therefore charged with ensuring a fair and robust approach to providing learners with grades in summer 2021. In the absence of examinations, Centre Determined Grades (CDGs) will be developed by Centres using a range of evidence, and forwarded to CCEA. CCEA has issued guidance to centres to support the production of CDGs for each qualification (link to CCEA Website : <https://ccea.org.uk/document/7988>).

Most of the non-examined assessments due to be completed this summer cannot be used to award grades, as the process to complete and moderate these assessments was either incomplete at the time schools were closed or has not been possible due to the length of time learners have learning remotely.

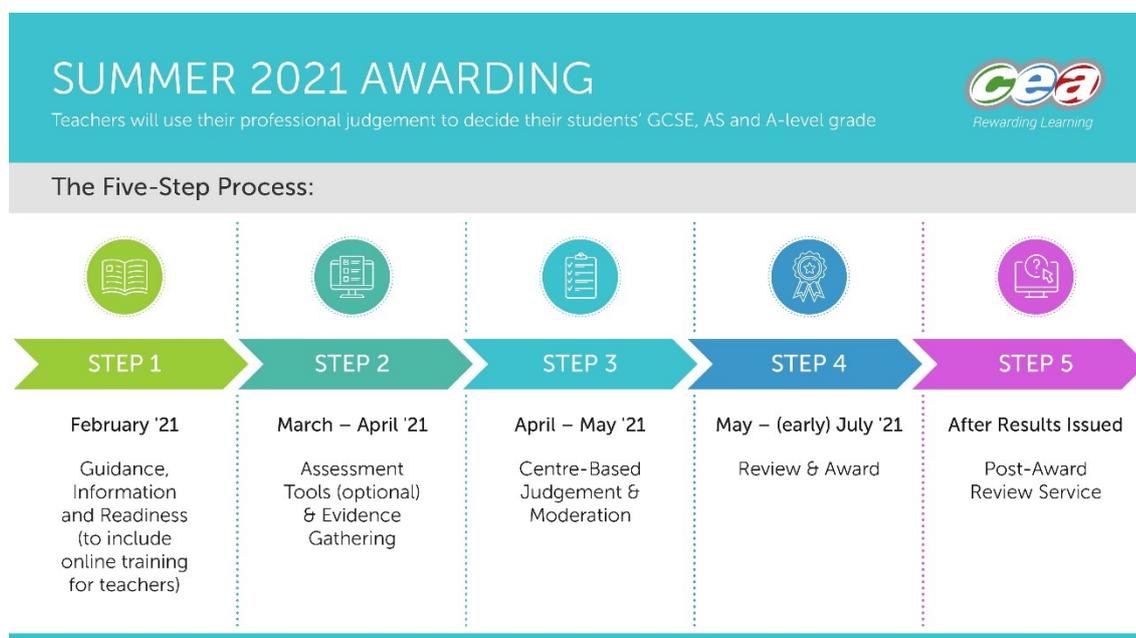
Ideally, on receipt of CDGs from Centres, CCEA would be in a position to award grades based on that information. Whilst CCEA will take every reasonable effort to ensure a consistent, standardised process across all centres to produce the CDGs to mitigate the risk that the process will result in an inconsistency of grading between cohorts who have sat exams in the past or will sit them in the future. It is also possible that this will have a differential effect on the results of groups of candidates, e.g. by age and sex.

There will also be a requirement for CCEA to quality assure the CDGs by asking centres for samples of the evidence used to determine CDGs.

A Data Protection Impact Assessment is required because there is significant public interest in this issue which in itself places this data processing at high risk. CCEA also wishes to identify and understand the data protection risks and impacts of learners (data subjects) to allow these risks to be mitigated (where possible) and to ensure that the rights and freedoms of data subjects are protected.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?



The secure application for submitting CDGs will be accessible via CCEA Central Login. This application is password protected and there are additional password strength rules applied to enhance security. It will be pre-populated with the data for each centre, to include information and student numbers for each qualification, based on the entry information received by CCEA. Within each qualification, a grade must be selected for each student from the drop-down menu. The steps to access and input CDGs are as follows:

### Accessing the Application

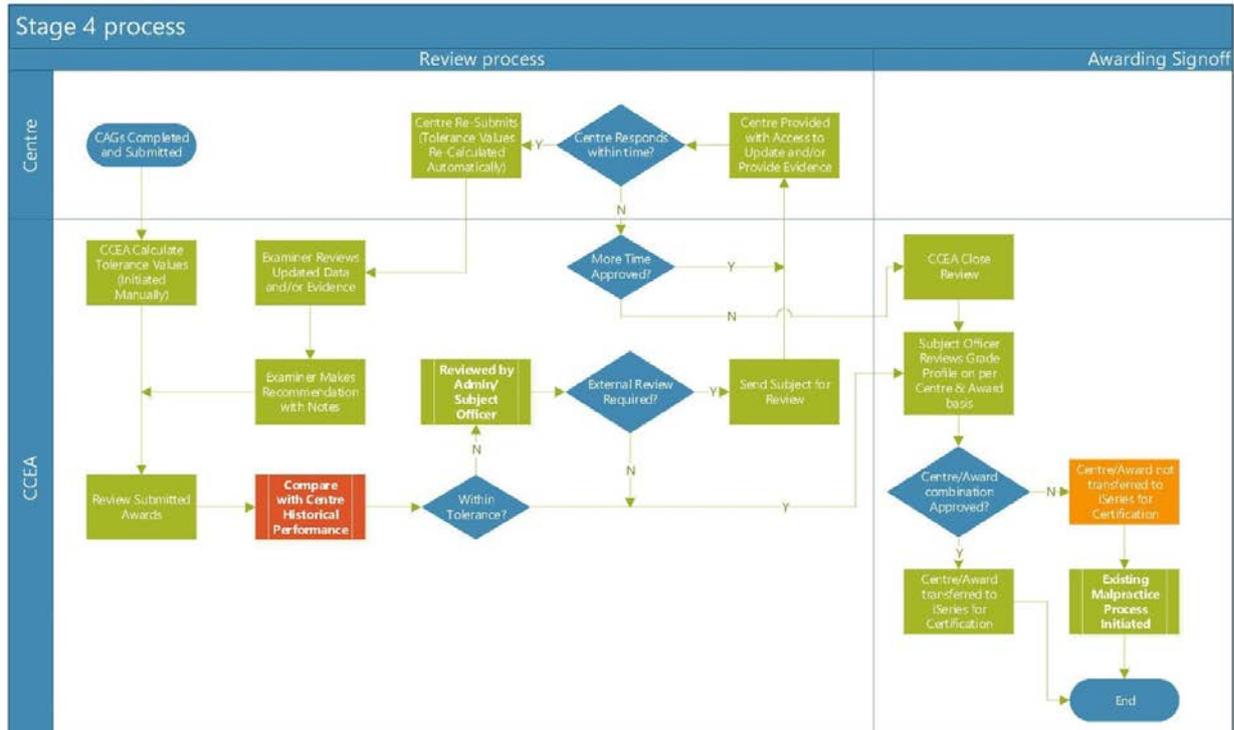
- Centre User loads the Centre Login application.
- Key their email and password to authenticate.
- They are then presented with a list of CCEA Applications for CCEA Services.
- They will select the CDG Application by clicking the “Start” button beside it.

### Inputting Centre Determined Grades

- The Centre user will be presented with a list of Awards which they have Entries for.
- They will click the “Edit” link on the Award they wish to input data for.
- This will present a list of Candidates who are entered at that Centre for that Award.
- Each Candidate will have a drop down list on the row to assign a CDG.

CCEA will store the data provided from centres in the CCEA central server. CDGs will be pseudo-anonymised within the CCEA Central Server with a unique identifiers of Centre Number and Candidate Number attached to individual CDGs. It is possible to match this information to separately held personal information within the Examination Entries database in order to identify individuals. For quality assurance and moderation purposes the CDGs will be sampled. Due to the size of the moderation approach CCEA will randomly select one subject from every centre for quality assurance. Purely as a method for selecting centres, those who have significantly higher or

lower outcomes than seen in a normal examination year (2017 to 2019) will be selected for review to ensure that evidence exists to support the grades awarded. If submitted centre grades are deemed reasonable, they will be approved. If it would not be reasonable to accept the grades without supporting evidence (assessed at individual subject level), the review process will begin. If the evidence does not support the grade, then a professional dialogue will take place and centres will be expected to rerun their process.



**Notes:**

- The Review Request sent to Centre should be time bound (say 7 calendar days for response)
- The Feedback Process needs to have a firm close date which will supersede the Review Request allowed time. This is to facilitate transfer of grades for certification.
- A separate process will exist to ensure all centres have been sampled in at least one subject

CCEA may need to share candidate information with Regulatory Authorities. CCEA must also share candidate data with universities and colleges as well as UCAS and CAO as part of the entry process. CCEA may also share candidate data with the Department of Education and the Department for the Economy for certain courses/qualifications. CCEA will retain the data if there is a defined business need to do so and CCEA will retain the data as long as is necessary and not longer than is necessary.

Processing is identified as high risk due to the large volume of data which is on a national scale for all Northern Ireland and relates to multiple subjects. Data includes centre details about children under 18 and with some belonging to vulnerable groups (e.g. learners with special needs. CDGs will be pseudo-anonymised within the CCEA Central Server with a unique identifiers of Centre Number and Candidate Number attached to individual CDGs. It is possible to match this information to separately held personal information within the Examination Entries database in order to identify individuals.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The scope of the data to be processed is likely to involve around 60,000 learners and around 230,000 individual subject grade awards entered for CCEA GCSE, AS and A Level qualifications (accepting that qualification entries are subject to ongoing change). For the purposes of this Data Protection Impact Assessment, this alternative awarding process is regarded as a one off exercise.

The vast majority of learners reside in Northern Ireland but due to the portability of qualifications offered by CCEA, there will be a small number of learners from outside Northern Ireland. The data will include data subjects most of whom will be under 18 and/or in vulnerable groups (e.g. learners identified to have special needs). The data processed by CCEA will be retained as long as is necessary and not longer than is necessary.

The data processing will not involve automated decision making, profiling or artificial intelligence processing.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

CCEA does not have a direct relationship with the data subjects. The data is collected by centres from data subjects (learners) and shared with CCEA securely using Hypertext Transfer Protocol Secure (HTTPS) protocol. HTTPS protocol facilitates the sharing of encrypted data between a client and a server, protects against eavesdropping, forging of information and tampering of data.

Data subjects (learners) would expect CCEA to use data in this way due to our role as the Awarding Organisation for CCEA accredited qualifications. A significant proportion of the information relates to data subjects are children under 18 and with some belonging to vulnerable groups (e.g. learners with special needs).

Step four of the overall process involves a CCEA review stage once CDGs have been submitted. Grade outcomes will be reviewed at overall centre level and within and across individual subjects. All centres will be asked to provide evidence for a minimum of one subject at one qualification level. Purely as a method for selecting centres, those who have significantly higher or lower outcomes than seen in a normal examination year (2017 to 2019) will be selected for review to ensure that evidence exists to support the grades awarded. If submitted centre grades are deemed reasonable, they will be approved. If it would not be reasonable to accept the grades without supporting evidence (assessed at individual subject level), the review process will begin. If the evidence does not support the grade, then a professional dialogue will take place and centres will be expected to rerun their process.

CCEA may request additional evidence for different subjects and qualification levels. Reviews will normally involve submission of approximately 5 students' performance evidence at specified grades. For example, key evidence for five students at grades A and C for GCSE Mathematics. Students for whom evidence must be submitted will be specified by CCEA. Samples of student evidence are likely to cover all available grades, and the sample size may be determined based on subject cohort size. Sections 11 (Quality Assurance) and 12 (CCEA Review of Evidence and Centre Moderation) of the Head of Centre Guidance contain further detail (see link to CCEA Website : <https://ccea.org.uk/document/7988>).

The approach to reviewing grades is aimed at minimising the burden on centres. Every centre will have a minimum of one subject at one qualification level sampled to support consistency and fairness. Where centres' grades appear egregious additional evidence will be requested for relevant subjects and qualifications.

CCEA will not adjust grades as part of the review stage. Where there are concerns that the evidence does not support the grades submitted, CCEA will undertake a more extensive review of the centre's evidence, engage in professional dialogue with the centre, and in some cases may require the centre to re-run their grading process. In such circumstances, this may delay the issue of results to a centre. In these instances, a meeting will be required with the Head of Centre and CCEA representatives. Failure to comply with CCEA policies and procedures can result in a centre being investigated for malpractice.

CCEAs published Privacy Notice sets out CCEAs treatment of personal information relating to learners (<https://ccea.org.uk/legal/privacy-policy>). CCEA also intends to publish an Exceptional Circumstances Privacy Notice which specifically refers to the Summer 20201 Alternative Awarding Arrangements.

Specifically in relation to A level, the decision will be up to Centres whether or not they wish to include AS level evidence in determining A Level CDGs. AS evidence can be considered alongside A2 evidence if a centre deems this appropriate and/or necessary. As there are differences between AS and A Level (for example the AS qualification is weighted at 40% of the overall A level and has different grade descriptions (there is no A\* at AS). CCEA Head of Centre Guidance asks centres to be clear in their policy what types of evidence will be used and to be clear with candidates (link to CCEA Website : <https://ccea.org.uk/document/7988>).

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The purpose of the CDGs are to enable CCEA to award qualification grades in Summer 20201 following the cancellation of standardised examinations due to COVID-19. This requirement has been mandated by Ministerial Direction. The benefits are that Northern Irish Learners are not disadvantaged by not receiving Awarded Qualifications and that the integrity of the qualifications and public confidence in the Awarding process is maintained.

## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

CCEA has a range of consultative fora by which it seeks to elicit the views of stakeholders which inform policy and decision making. These include :

Peer Review group

Principals groups

Online Consultations

Subject Advisory Groups

Chief Executive meetings with Teaching Unions, Association of School and College Leaders, local Universities, NI Children's Commissioner, Press/Media etc.

Exceptional Circumstances Privacy Notice.

CCEA will also engage legal support to advise on the legal aspects of the alternative arrangements and will also seek the views of the Information Commissioner's Office (ICO) on this Data Protection Impact Assessment and associated data protection issues.

CCEA has and will continue to make significant efforts to ensure that the fairness and transparency principle has been adhered to and that learners, centres and the wider public understand the processes which CCEA has put in place for Summer 2021 Awarding. These measures include the following:

- Head of Centre Information
- Policy template
- Centre checklists
- Technical questions and answers
- Publications on the CCEA website in respect of the standardisation process;
- Video explaining the standardisation process;
- Frequently Asked Questions and answers published on the CCEA website;
- Head of Centre Guidance in respect of awarding predicted grades;
- Student, Teacher and Parent information publications, including a revised word version to ensure accessibility to students;
- Establishment of a help desk to answer queries and concerns;
- Engagement through social media and interviews; and
- Engagement with principals of Centres at all stages.

The Head of Centre Information document has been peer reviewed by a group comprised of Principals, Universities and Educational assessment experts.

Education partners link officers (for example EA and CCMS) will be supporting centres around policy development and implementation.

CCEA has also partnered with the Chartered Institute of Educational Assessors (CIEA) to deliver a programme to schools and colleges to support fairness and consistency in alternative awarding arrangements.

Standards staff participate in weekly meetings attended by JCQ, Ofqual, Department for the Economy and other Awarding Organisations. There are three discussion groups.

1. Exemplification of typical performance
2. Guidance on Balancing the Evidence
3. Statistics for Guidance and Monitoring

Standards staff also attend the Standards and Technical Group (STAG) meetings to ensure as much comparability as possible in the process across jurisdictions.

## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

CCEA is a body corporate established under the Education (NI) Order 1998. Our powers are conferred by this Order and CCEA's key functions arise from statutory powers as set out in Part 8 & Schedule 3. One of the specified powers in this legislation is the power to conduct examinations. Given the ongoing public health crisis, the power to conduct examinations has been set aside by a Ministerial Direction by the Minister of Education, Peter Weir which provides CCEA with the legal basis in the public interest to award learners entered for CCEA accredited GCSEs, AS levels and A levels with CDGs.

In the context of the legislation, the current public health crisis and the Ministerial Direction outlined above, there is a clear public interest in ensuring that learners receive grades calculated using a fair and robust approach. CCEA has not identified any other defensible process for achieving these objectives. CCEA has identified the process as set out as being the best process to provide learners with grades in summer 2021 from a fairness and transparency perspective in the current context. CCEA may need to share your personal information with Regulatory Authorities. CCEA must also share candidate data with universities and colleges as well as UCAS and CAO as part of the entry process. CCEA may also share candidate data with the Department of Education and the Department for the Economy for certain courses/qualifications. CCEA will take appropriate steps to make sure that data quality is ensured through robust and appropriate quality assurance processes.

As per the data minimisation principle of the GDPR, CCEA will require and process the minimal data required to carry out the stated objective which is to award fair and robust grades to all learners entered for CCEA accredited qualifications in Summer 2021. This scope of the information required is described at Step 2 in this DPIA.

CCEA will ensure that the rights of learners (data subjects) are protected under the GDPR (particularly the right to access personal information held by CCEA) under these arrangements.

## Step 5: Identify and assess risks

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b> Remote, possible or probable	<b>Severity of harm</b> Minimal, significant or severe	<b>Overall risk</b> Low, medium or high
1. Learner data will be incorrectly processed leading to inaccurate awarded grades.	Possible	Significant	High
2. The processing cannot be completed within the proposed timescales leading to delays in awarding grades.	Possible	Significant	High
3. Unavailability of key CCEA staff due to sickness leading to delays in awarding grades.	Possible	Significant	Medium
4. There will be a breach of personal data during transfer between centres and CCEA	Possible	Significant	High
5. There will be a breach or loss of personal data due to unauthorised access to CCEA databases or human error.	Possible	Significant	High
6. There will be an error in the processing and/or awarding of grades.	Possible	Significant	High
7. A conflict of interest situation will arise involving a member of CCEA staff involved in the processing of data and/or the awarding of grades.	Possible	Significant	Medium
8. Some candidates may be treated differently if AS evidence is not available.	Possible	Significant	Medium

## Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk Eliminated reduced accepted	Residual risk Low medium high	Measure approved Yes/no
1. Learner data will be incorrectly processed leading to inaccurate awarded grades.	Centres and CCEA use a unique Candidate Number and the secure application for collecting grades will be pre-populated based on centre entries, thus limiting possible centre keying errors.  Provide clear guidance and timescales to Heads of Centre  CCEA Statisticians adhere to ONS Code of Practice.  CCEA Statisticians use documented QA processes.	Reduced	Medium	
2. The processing cannot be completed within the proposed timescales leading to delays in awarding grades.	CCEA AO has a documented process map shared with Centres.  Provide clear guidance and timescales to Heads of Centre.	Reduced	Medium	
3. Unavailability of key CCEA staff due to sickness leading to delays in awarding grades.	Contingency arrangements are in place to cover all CCEA key posts.	Reduced	Medium	
4. There will be a breach of personal data during transfer between centres and CCEA	Data will be shared securely between Centres and CCEA using HTTPS protocol.  Provide clear guidance and timescales to Heads of Centre.	Reduced	Low	

<p>5. There will be a breach or loss of personal data due to unauthorised access to CCEA databases or human error.</p>	<p>Access to the system is protected by username/ password and restricted level of access.</p> <p>High risk regions are blocked from access via the firewall rules.</p> <p>Documentary evidence provided by centres will be encrypted on CCEA servers.</p> <p>Data updates and sign off are audited to record who made them.</p>	<p>Reduced</p>	<p>Medium</p>	
<p>6. There will be an error in the processing and/or awarding of grades.</p>	<p>In 2021 grades will be determined by the centre therefore CCEA has no role in 'awarding' grades.</p> <p>Quality assurance processes use data tolerances.</p> <p>CCEA Statisticians adhere to ONS Code of Practice.</p> <p>CCEA Statisticians use documented Quality Assurance processes.</p>	<p>Reduced</p>	<p>Medium</p>	
<p>7. A conflict of interest situation will arise involving a member of CCEA staff involved in the processing of data and/or the awarding of grades.</p>	<p>CCEA operates a strict Conflict of Interest Policy relating to relatives of staff members entered for CCEA Qualifications. This is reviewed for every series and where a potential conflict is identified, staff access to data can be restricted.</p> <p>CDGs will be pseudo-anonymised within the CCEA Central Server.</p>	<p>Reduced</p>	<p>Low</p>	
<p>8. Some candidates may be treated differently if evidence is not available (eg AS evidence informing A2 CDGs).</p>	<p>A range of evidence will be used to determine centre determined grades and the mitigations for absent or unavailable evidence will be set out in the centre policy document.</p>	<p>Reduced</p>	<p>Low</p>	

## Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Leah Scott Director of Finance and Corporate Services 7/4/2021	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Leah Scott Director of Finance and Corporate Services 7/4/2021	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	David Wilson Data Protection Officer 7/4/2021	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: It is my advice that the provisions of this Data Protection Impact Assessment are compliant with both the Ministerial Direction and the requirements of the UK GDPR. The mitigating measures described in Step 6 provide the basis to proceed with the lawful processing of the identified data for the stated purpose of Awarding CCEA Qualifications to Learners in Summer 2021.		
DPO advice accepted or overruled by:	Accepted	If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:	Not Applicable	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	David Wilson	The DPO should also review ongoing compliance with DPIA