

**ALTERNATIVE ARRANGEMENTS FOR AWARDING GCSE, AS AND A
LEVEL GRADES IN SUMMER 2021– STAGE 2 (PRE AND POST RESULTS –
INCLUDING THE EXAMINATION PROCEDURE REVIEW SERVICE (EPRS))**

Submitting controller details

Name of controller(s)	CCEA Awarding Organisation (All stages pre-EPRS) CCEA Regulation (EPRS)
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 Data Protection Officer	David Wilson
Date	6 August 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 (<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.

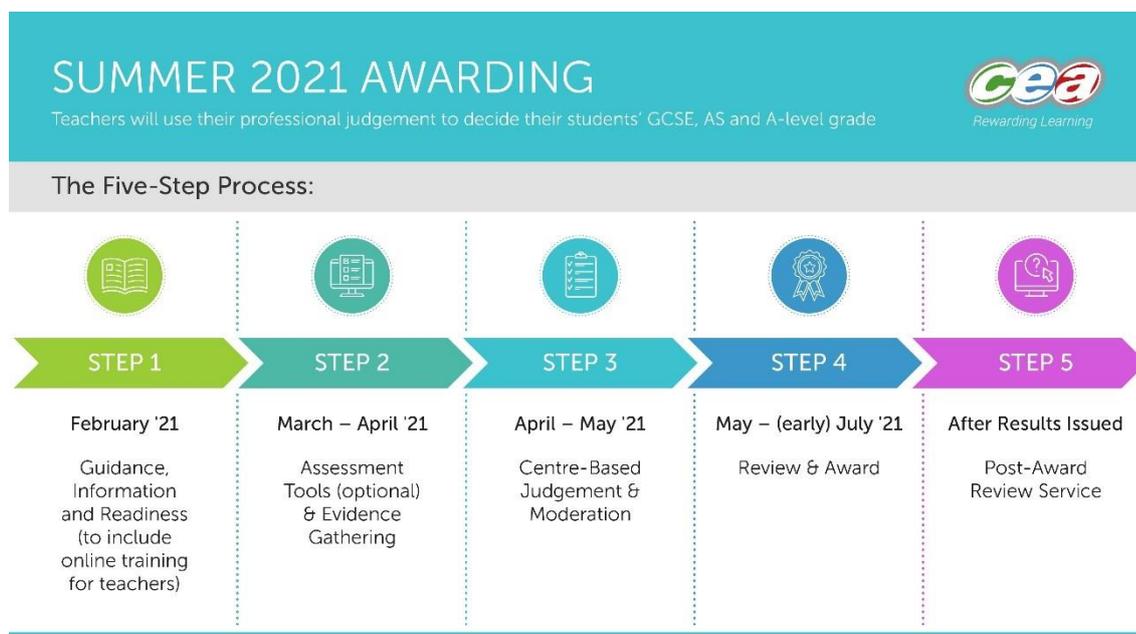
Ideally, on receipt of CDGs from Centres, CCEA would be in a position to award grades based on that information. Whilst CCEA will take every reasonable effort to ensure a consistent, standardised process across all centres to produce the CDGs to mitigate the risk that the process will result in an inconsistency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

There is also a requirement for CCEA to quality assure the CDGs by asking centres for samples of the evidence used to determine CDGs (Review and Award - Step 4) and there will also be a requirement for CCEA to process personal information relating to candidates as part of the post results processes (Post Award Review Service - Step 5) including the CCEA Regulation administered EPRS.

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?



Candidate entries for Summer 2021 qualifications are entered as per normal process by examination centres via CCEA's Centre Manager System and the Entries Applications. Candidate entries contain: candidate name, candidate number, centre number, gender, date of birth, Unique Candidate Identifier (UCI), Unique Learner Number (ULN), qualification unit and cash-in codes. The candidate entry forms the basis for all summer 2021 processing.

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.

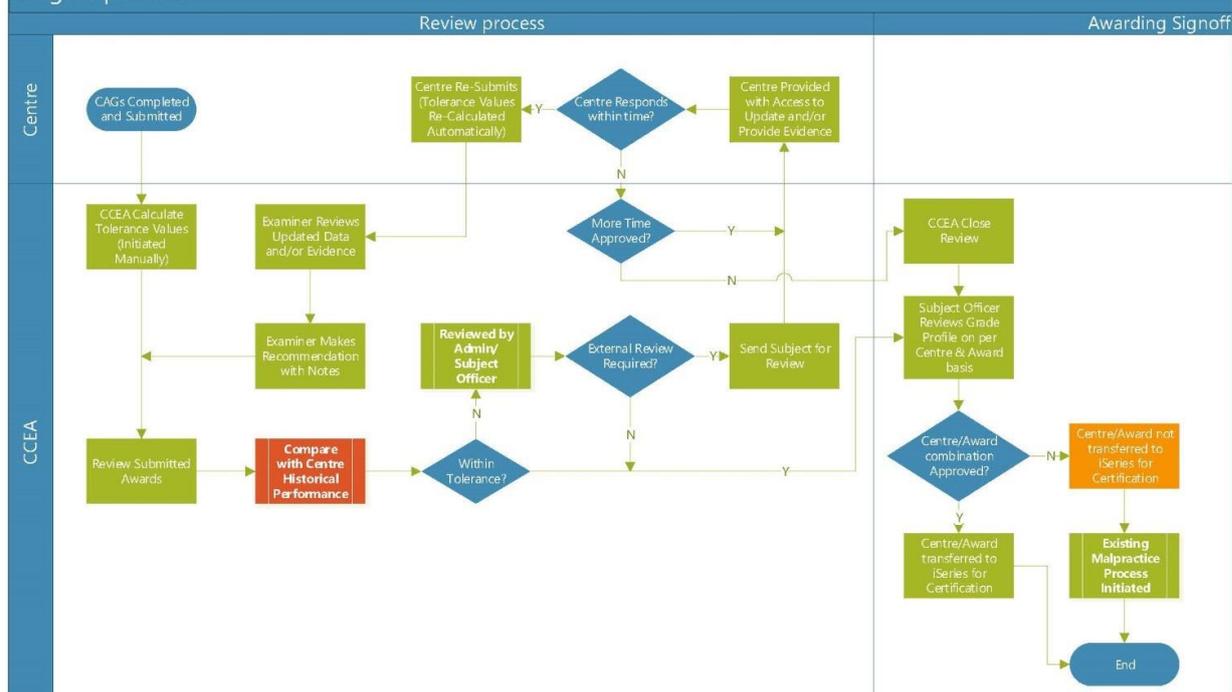
CCEA has previously deployed pseudonymisation techniques so individual centre and candidates cannot be identified in marking/grading process. As part of CCEA’s normal process CCEA pseudonymises data on the CCEA Central Server with unique candidate identifiers which link the Centre Number with the individual Candidate Numbers. This approach has been in place in excess of 10 years. All internal documents, systems and processes are based upon the pseudonymised data.

CDGs will be pseudo-anonymised within the CCEA Central Server with 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.

The Step 4 (Review and Award) process is described in the flow chart below.

Stage 4 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

In order to implement this process, CCEA will potentially require access to and processing of candidate personal information relating to evidence of candidate assessment work used to develop the CDGs of selected candidates. Candidates will be randomly selected based on centre, subject and Awarding level (GCSE, AS or A level) as fully describes in the Context of Processing section of this DPIA. These sources may include:

- Centre/class assessments
- Mock Examinations
- Controlled assessments
- Coursework
- Class tests
- Tracking/Review evidence

CCEA may also require details of access arrangements/Special Consideration factors in order to carry out the Review and Award stage and this may potentially include special category information such as medical evidence at a candidate level. CCEA, as a member body of the Joint Council for Qualifications (JCQ), follows its guidance with regards special considerations/reasonable adjustments. Information regarding the process to be adopted is available on the JCQ website at: <https://www.jcq.org.uk/summer-2021-arrangements/>. Special consideration is considered within the Centre as part of the CDG process. However, should a candidate seek to appeal a grade, and after following the centre's own internal complaints process, an appeal may be made to CCEA which results in CCEA being in receipt of medical evidence to support the appeal request.

CCEA has established processes with regards the receipt, handling and disposition of special category information (e.g. medical evidence) as a normal awarding year sees all awarding organisations managing special consideration/reasonable adjustment requests.

The process for applying special consideration including tariffs differs from a normal year in that it is applied by the centre as part of their determination of the grade for Summer 2021. It is essential that each centre is consistent with their approach.

Summer 2021 arrangements in relation to Special Consideration and Access Arrangements have been documented as part of the guidance documentation to centres: [GCSE, AS and A Level Alternative Awarding Arrangements - 2021](#) and in CCEA Frequently Asked Questions.

The Step 5 (Post Results Review Service) process is described in published guidance which can be found at: <https://ccea.org.uk/document/8659>. The Post Results Review Service is available to all candidates and centres are obliged to refer all such requests to CCEA.

In order to implement this process, CCEA will potentially receive and process candidate personal information received from centres as part of the review request including the following;

- UCAS Number (for A Level candidates)
- Evidence sources (such as those highlighted above for Stage 4) which support the centre/candidate review request.
- Any other evidence deemed relevant by the Centre/Candidate to support the review request. This may potentially include special category information such as medical evidence for example, to support reviews with access/special consideration aspects.

The Post Results Review Service also includes the option of requesting a review under the Examination Procedures Review Service (EPRS) which is independently administered by CCEA Regulation. At the EPRS stage, CCEA Regulation will process candidate information identical to that described above and will process this information in exactly the same manner as outlined for CCEA Awarding Organisation in this DPIA.

CCEA may need to share candidate information with Regulatory Authorities for issues related to the maintenance of standards and EPRS for example. CCEA must also share candidate data with: universities and colleges as well as UCAS, CAO and the Learning Records Service (LRS) as part of the qualifications and results process. This ensures that those candidates who are applying to college/university courses are processed through the college/university clearance process and are then allocated a course based on their examination results. This mainly applies to GCE examinations results but may include GCSE/essential skills performance in, for example, English and Maths. 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.

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 75,000 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. CCEA will process information relating to all learners entered for Summer 2021 Awards at the Pre-Award and Award stages (Steps 1-3) and will process information relating to those candidates selected for involvement in Step 4 and those candidates who request a review in Step 5 as this may potentially include special category information such as medical evidence (in limited circumstances). The legal basis for processing this data is based on Article 9 (2) (6) of the UK GDPR; processing necessary for reasons of substantial public interest. In specific, the processing meets the substantial public interest condition set out at Schedule 1, Part 2 (6) of the Data Protection Act 2018. There is a substantial public interest in ensuring that the alternative awarding process is fair and does not disadvantage candidates with illness, disability or special needs.

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. In accordance with CCEA's Disposal of Documents Schedule (DoDs) data relating to appeals will be retained for 6 years, data relating to complaints will be retained for 3 years and data relating to special investigations will be retained for 6 years after the legal case has completed. These retention periods have been set in accordance with business needs to allow for the completion of any appeals process and/or to assist CCEA in defending future legal challenges.

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 4 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.

Data subjects (learners) have been provided with clear information about how their personal data will be used as part of the assessment and review process. CCEAs published Privacy Notice sets out CCEAs treatment of personal information relating to learners (<https://ccea.org.uk/legal/privacy-policy>) in normal circumstances. CCEA has also published an Exceptional Circumstances Privacy Notice which specifically refers to the Summer 2021 Alternative Awarding Arrangements (<https://ccea.org.uk/document/8195>). CCEA has also published the Stage 1 Data Protection Impact Assessment which specifically refers to the treatment of candidate personal information at Steps 1-3 of the Alternative Awarding Arrangements (<https://ccea.org.uk/document/8196>).

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 using a fair and robust process which also includes the complementary post results review service. This requirement has been mandated by the Minister for Education. The benefits are that candidates 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.

Publication of Stage 1 Data Protection Impact Assessment (<https://ccea.org.uk/document/8196>) and notification to schools/candidates

Publication of Exceptional Circumstances Privacy Notice (<https://ccea.org.uk/document/8195>) and notification to schools/candidates

Public Consultation exercise on the Post Results Process (<https://ccea.org.uk/document/8657>).

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
- Student/Parent Guidance
- 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.
- Guidance for Centres and Parents/Students regarding the CCEA Post Results Service.

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 processing data in compliance with Article 6(1)(e) of the UK GDPR on the basis that the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in CCEA. The lawful basis for processing the information derives from Article 6 (1) (e) of the UK GDPR; the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Specifically, the processing is necessary for the exercise of a function conferred by an enactment or rule of law as per Section 8 of the Data Protection Act 2018. 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 direction from the Minister of Education, Peter Weir which provides CCEA with the basis in the public interest to award learners entered for CCEA accredited GCSEs, AS levels and A levels with CDGs.

It will be necessary to process some special category data, for example, information about individual candidates' health, including disabilities and special needs. The legal basis for processing this data is based on Article 9 (2) (6) of the UK GDPR: processing necessary for reasons of substantial public interest. In specific, the processing meets the substantial public interest condition set out at Schedule 1, Part 2 (6) of the Data Protection Act 2018. There is a substantial public interest in ensuring that the alternative awarding process is fair and does not disadvantage candidates with illness, disability or special needs. In the context of the legislation, the current public health crisis and the Direction of the Minister outlined above, there is a clear public interest in ensuring that learners receive grades calculated using a fair and robust approach and which includes a post-results review process. 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 worked under a direction from the Minister to develop a process that was robust, fair and aligned to the other jurisdictions. Whilst other options were considered, the options were narrowed significantly due to the parameters put in place by the Minister. The process followed a five-step approach including extensive up-front support for teachers, provision of support materials including assessment resources, evidence gathering, policy review, sampling, moderation, professional dialogue where necessary, awarding and a post-results service. This process is similar to other jurisdictions and is in line with a decision taken by the Minister of Education. 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 UK 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. CCEA will also apply this principle to any information required at the Award and Review and Post Results Review stages. 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 UK GDPR (particularly the right to access personal information held by CCEA) under these arrangements subject to relevant lawful exemptions. Similarly, CCEA will ensure that those seeking to exercise any other rights under the UK GDPR, such as the right to object and right to rectification are able to do so where appropriate. Such requests will be directed to CCEA's Data Protection Officer in the first instance, and will be responded to within the relevant timescales stipulated under the UK GDPR (normally within one calendar month).

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
1. Learner data will be incorrectly processed leading to inaccurate awarded grades or incorrect post results reviews. Learners may be unable to access services or opportunities and suffer distress. Potential for reputational damage to CCEA and a loss of public confidence in the awarding arrangements.	Possible	Significant	High
2. The processing cannot be completed within the proposed timescales leading to delays in awarding grades or delays in post results reviews. Learners may be unable to access services or opportunities and suffer distress for example delays may lead to lost opportunities in relation to further study e.g. loss of university placement/delays in starting course or employment.	Possible	Significant	High
3. Unavailability of key CCEA staff due to sickness or the requirement to self-isolate leading to delays in awarding grades or conducting post results reviews. Learners may be unable to access services or opportunities and suffer distress.	Possible	Significant	Medium

<p>4. There will be a breach of personal data during transfer between centres and CCEA. Learners will lose control over their personal data and may suffer distress. There is a risk that learners will be the victim of identity fraud or theft.</p>	Possible	Significant	High
<p>5. There could be a breach, theft or loss of personal data due to unauthorised access to CCEA databases or human error. Learners will lose control over their personal data and may suffer distress. There is a risk that learners will be the victim of identity fraud or theft. A breach could also occur as a result of pseudonymisation failures.</p>	Possible	Significant	High
<p>6. There will be an error in the processing and/or awarding of grades or the administration of post results reviews by CCEA. Learners may be unable to access services or opportunities and suffer distress for example where inaccurate data is held in relation to a candidate. Inaccuracies could arise e.g. as a result of human or computational error, or bias. This could lead to lost opportunities for candidates in relation to further study or employment, and distress. Potential for reputational damage to CCEA, regulatory challenge and a loss of public confidence in the awarding arrangements.</p>	Possible	Significant	High
<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 or the administration of post results reviews. Learners may be subject to discrimination. Potential for reputational damage to CCEA and a loss of public confidence in the awarding arrangements.</p>	Possible	Significant	Medium
<p>8. Some candidates may be treated differently if AS evidence is not available. Learners may be disadvantaged.</p>	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
<p>1. Learner data will be incorrectly processed leading to inaccurate awarded grades or incorrect post results reviews. Learners may be unable to access services or opportunities and suffer distress. Potential for reputational damage to CCEA and a loss of public confidence in the awarding arrangements.</p>	<p>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.</p> <p>Provide clear guidance and timescales to Heads of Centre.</p> <p>CCEA Statisticians adhere to ONS Code of Practice.</p> <p>CCEA Statisticians use documented QA processes.</p> <p>For Post Results, Centres must retain evidence as per CCEA guidance so all information should be accurate and accessible when it comes to appeal.</p> <p>Quality assurance checks will be in place in Centres before submission of appeals and multiple checks in place before completion of appeal by CCEA.</p>	Reduced	Medium	Yes

<p>2. The Processing cannot be completed within the proposed timescales leading to delays in awarding grades or delays in post results reviews. Learners may be unable to access services or opportunities and suffer distress for example delays may lead to lost opportunities in relation to further study e.g. loss of university placement/delays in starting course or employment.</p>	<p>CCEA AO has a documented process map shared with Centres.</p> <p>Provide clear guidance and timescales to Heads of Centre.</p> <p>Post Results will follow JCQ processes including published timelines to meet deadlines.</p>	<p>Reduced</p>	<p>Medium</p>	<p>Yes</p>
<p>3. Unavailability of key CCEA staff due to sickness or the requirement to self-isolate leading to delays in awarding grades or conducting post results reviews. Learners may be unable to access services or opportunities and suffer distress.</p>	<p>Contingency arrangements are in place to cover all CCEA key posts.</p>	<p>Reduced</p>	<p>Medium</p>	<p>Yes</p>

<p>4. There will be a breach of personal data during transfer between centres and CCEA. Learners will lose control over their personal data and may suffer distress. There is a risk that learners will be the victim of identity fraud or theft.</p>	<p>Data will be shared securely between Centres and CCEA using HTTPS protocol.</p> <p>Provide clear guidance and timescales to Heads of Centre.</p> <p>CCEA approach information security from strategic and operational perspectives. The strategic approach is reflected in ISO 27000 accreditation whilst the operational delivery of Information Security is audited and accredited against the National Cyber Security Centre (NCSC) Cyber Essentials and Cyber Essentials Plus standards.</p> <p>The data is shared securely between CCEA and Centres using the HTTPS protocol, with additional security provided by Geo-IP restrictions.</p>	<p>Reduced</p>	<p>Low</p>	<p>Yes</p>
<p>5. There could be a breach, theft or loss of personal data due to unauthorised access to CCEA databases or human error. Learners will lose control over their personal data and may suffer distress. There is a risk that learners will be the victim of identity fraud or theft. A breach could also occur as a result of pseudonymisation failures.</p>	<p>Access to the system is protected by username/password and restricted level of access. Access is regularly reviewed by senior managers.</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>Procedures are in place (maintained with the ISO 9001 framework) to support all processes. Experienced staff in handling personal data supported by training on good</p>	<p>Reduced</p>	<p>Medium</p>	<p>Yes</p>

	<p>information governance such as the receipt, handling and disposal of personal data.</p> <p>Designated Data Protection Officer for support and guidance to staff.</p> <p>CCEA has significant experience in the deployment pseudonymisation techniques. As part of CCEA's normal process CCEA pseudonymises data on the CCEA Central Server with unique candidate identifiers which link the Centre Number with the individual Candidate Numbers. This approach has been in place in excess of 10 years. All internal documents, systems and processes are based upon the pseudonymised data. No issues have arisen in relation to re-identification.</p>			
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<p>6. There will be an error in the processing and/or awarding of grades or the administration of post results reviews.</p> <p>Learners may be unable to access services or opportunities and suffer distress for example where inaccurate data is held in relation to a candidate</p> <p>Inaccuracies could arise e.g. as a result of human or computational error, or bias. This could lead to lost opportunities for candidates in relation to further study or employment, and distress. Potential for reputational damage to CCEA and a loss of public confidence in the awarding arrangements.</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>Post Results quality assurance checks will be in place in line with the documented process.</p>	<p>Reduced</p>	<p>Medium</p>	<p>Yes</p>
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<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 or the administration of post results reviews. Learners may be subject to discrimination. Potential for reputational damage to CCEA and a loss of public confidence in the awarding arrangements.</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>Yes</p>
<p>8. Some candidates may be treated differently if evidence is not available (eg AS evidence informing A2 CDGs). Learners may be subject to discrimination.</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>	<p>Yes</p>

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Margaret Farragher Interim CEO Date: 06 August 2021	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Margaret Farragher Interim CEO Date: 6 August 2021	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	David Wilson Data Protection Officer Date: 6 August 2021	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice: It is my advice that the provisions of this Data Protection Impact Assessment are compliant with any relevant decision taken by the Minister of Education 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 in a fair and robust manner and for administering a post results review service.</p>		
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