

Data Protection Policy

UK GDPR and Data Protection Act 2018

Centre	Excel Tutors (Centre 10488)
Address	161-163 Commercial Road, London, E1 2DA
Policy owner	Head of Centre
Operational lead	Exams Officer
Last reviewed	July 2026
Review cycle	Annually, on publication of updated JCQ regulations and guidance

This policy is aligned with:

- UK GDPR
- Data Protection Act 2018
- JCQ General Regulations for Approved Centres 2025-2026

Reviewed annually on the publication of updated JCQ regulations and guidance (General Regulations for Approved Centres, Instructions for Conducting Examinations, and related documents).

Excel Tutors, Data Protection Policy (UK GDPR, 2025 Edition)

This Data Protection Policy outlines how Excel Tutors Examination Centre collects, stores, processes, and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), Ofqual, JCQ, and CCEA regulations. It applies to all candidates (internal and private), staff, contractors, and third parties involved in examination administration and delivery.

1. Policy Statement

Excel Tutors is committed to protecting the privacy, confidentiality, and security of personal data. We ensure all processing activities are lawful, fair, and transparent. The Centre recognises its responsibility as a data controller under the UK GDPR and ensures data subjects' rights are upheld.

2. Scope

This policy applies to all personal data processed in connection with examination administration, including candidate registration, examination entries, results, appeals, access

arrangements, and staff information. It applies to internal students, private candidates, staff, and approved third-party processors (e.g., awarding bodies, invigilators, IT contractors).

3. Roles and Accountability

Head of Centre: Overall responsibility for compliance with UK GDPR, JCQ, and Ofqual requirements. Ensures policies and procedures are implemented effectively.

Exams Officer: Responsible for secure handling, processing, and transmission of candidate data to awarding bodies. Maintains accurate records of entries, results, and access arrangements.

Data Protection Lead: Oversees data protection compliance, coordinates Subject Access Requests (SARs), manages data breaches, and ensures staff training.

4. Lawful Bases for Processing

Excel Tutors processes personal data under the following lawful bases (Article 6 and 9 UK GDPR):

- Contractual necessity (for delivering educational and examination services)
 - Legal obligation (to comply with Ofqual, JCQ, CCEA, and awarding body requirements)
 - Legitimate interests (for operational management, quality assurance, and safeguarding)
 - Consent (for photographs, promotional materials, and optional data disclosures)
 - Public interest (where required by regulatory or statutory authorities)
- Special category data (e.g., medical or access arrangement data) is processed under Article 9(2)(g) for substantial public interest and education-related obligations.

5. Exam-Specific Data Handling Procedures

All candidate and staff data associated with examinations is securely managed according to JCQ and UK GDPR principles:

- Candidate entries and results are processed via secure awarding body portals.
- Access arrangements and supporting evidence are stored securely and only shared with authorised personnel.
- Candidate scripts and NEA coursework are handled, dispatched, and retained in compliance with JCQ Instructions for Conducting Examinations (ICE).
- Digital assessment data (including AI-assisted grading or submission verification) must be processed transparently and auditable by the Exams Officer and Data Protection Lead.
- Invigilator attendance and CCTV footage (if applicable) are processed under legitimate interests for security and integrity purposes.

6. Data Retention and Disposal

Data will be retained in line with JCQ and awarding body retention schedules:

- Candidate entries and results: 6 years after issue.
- Access arrangement documentation: retained until superseded or 6 years post-exam.
- Exam scripts and coursework: per awarding body guidance.
- Staff training and invigilation records: 6 years.

All confidential materials are securely shredded or permanently deleted after the retention period.

7. Data Breach and Reporting

Any actual or suspected data breach must be reported immediately to the Data Protection Lead. An internal investigation will be initiated, and if required, the Information Commissioner's Office (ICO) will be notified within 72 hours. Affected data subjects will be informed where there is a high risk to their rights or freedoms.

8. Data Subject Rights

Excel Tutors upholds all data subject rights under the UK GDPR, including the right to access, rectify, erase, restrict processing, and data portability. Requests must be submitted in writing to the Data Protection Lead and will be acknowledged within one month.

9. Training and Awareness

All staff involved in examination delivery must complete annual data protection training and JCQ compliance updates. Additional refresher sessions are provided when regulations or policies change.

10. Compliance and Monitoring

Excel Tutors conducts regular internal audits to ensure compliance with UK GDPR, JCQ, Ofqual, and CCEA standards. This policy will be reviewed annually or following regulatory updates.