

WJEC PRIVACY NOTICE

INTRODUCTION

This privacy notice provides you with information about the ways in which WJEC uses your personal data.

WJEC uses personal data for a number of different reasons. This privacy notice is therefore split into different parts, so that you can easily find the information that relates to you.

- Part 1 of this privacy notice sets out general privacy information which will be relevant to anyone whose personal data is processed by WJEC.
- Part 2 of this privacy notice sets out privacy information for individuals who are entered for WJEC qualifications ('Candidates').
- Part 3 of this privacy notice sets out privacy information for WJEC's examiners and moderators ('Appointees')
- Part 4 of this privacy notice sets out privacy information for teachers.
- Part 5 of this privacy notice sets out privacy information for exam officers.
- Part 6 of this privacy notice sets out privacy information for individuals who attend any of WJEC's CPD events.
- Part 7 of this privacy notice sets out information for individuals who subscribe to WJEC publications.
- Part 8 of this privacy notice sets out privacy information for WJEC's suppliers and contractors.
- Part 9 of this privacy notice sets out privacy information for individuals who make an enquiry or complaint.
- Part 10 of this privacy notice sets out privacy information for individuals who visit any of WJEC's premises.
- Part 11 of this privacy notice sets out privacy information for job applicants.
- Part 12 of our privacy notice sets out privacy information for individuals who attend WJEC marketing events, including the Moving Images Award and Innovation Awards

Parts 2 to 12 of this privacy notice will provide you with the following information in relation to the different processing activities we undertake:

- Why we need to process your personal data;
- What personal data we process about you;

- The source of that data;
- Why we are able to process your personal data;
- How long we store your personal data;
- When and why we may share your personal data with other organisations or individuals;
- Whether we transfer your personal data to another country and if so how we ensure it is protected;
- About any automated decision making or profiling we carry out.

PART 1 - GENERAL INFORMATION

INFORMATION ABOUT WJEC

WJEC is a registered charity and a company limited by guarantee. We are Wales' largest provider of bilingual qualifications (general and vocational). We are also one of the leading qualification providers in England and Northern Ireland, where we offer qualifications under the 'Eduqas' brand.

WJEC is recognised as a provider of qualifications and regulated by Ofqual in England, Qualifications Wales in Wales and by the Council for the Curriculum, Examinations and Assessment ('CCEA') in Northern Ireland (the 'Regulators'). This means that we must operate in accordance with various rules and policies laid down by the Regulators. We refer to those rules and policies in this privacy notice as the 'Regulatory Rules'.

WJEC is a member of the Joint Council for Qualifications ('JCQ'). JCQ is a not for profit company limited by guarantee which represents the eight largest providers of qualifications in the UK. Amongst other things, JCQ creates common administrative arrangements and policies for examinations and assessments which are followed by its members. We refer to those arrangements and policies in this privacy notice as the 'JCQ Policies'.

DATA PROTECTION LAW IN THE UK

Data protection law in the UK is mainly governed by the UK General Data Protection Regulation ('UK GDPR') and the Data Protection Act 2018 ('DPA 2018').

Certain uses of personal data are also governed by the Privacy and Electronic Communications Regulations 1993 ('PECR'). PECR sets out laws relating to the privacy of electronic communications, including direct electronic marketing and cookies.

WJEC'S STATUS UNDER DATA PROTECTION LAW

Under the UK GDPR, organisations which have control over whether, why and how your personal data is processed are known as 'controllers'. The majority of obligations set out in the UK GDPR and DPA 2018 apply to data controllers.

WJEC is the data controller for the personal data we process.

The UK GDPR and DPA 2018 also apply to 'processors'. Generally speaking, an organisation which processes personal data will be acting as a processor where it is processing that personal data on behalf of another organisation and in accordance with its instructions.

WJEC uses processors in a number of scenarios (for example, companies which provide IT services to us will usually be acting as our processor). Where WJEC uses a processor, we are required to ensure that the processor is able to operate in accordance with the UK GDPR (including keeping personal data secure) and enter into a written contract with the processor which sets out the terms on which it is permitted to process personal data on our behalf.

HOW WE ENSURE OUR PROCESSING IS LAWFUL

Under the UK GDPR, controllers must have a lawful basis (or bases) for processing personal data. Essentially, this means that any processing activity must be authorised by one or more of six lawful bases for processing set out in Article 6 of the UK GDPR.

The lawful bases are:

- **Consent:** the individual in question has clearly consented to the processing of their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract the controller has entered into with the individual, or because the relevant individual has asked the controller to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary to enable the controller to comply with its obligations under UK law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for the controller to perform a task in the public interest or for its official functions, and the task or function has a clear basis in UK law.
- **Legitimate interests:** the processing is necessary for the purpose of the controller's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the relevant individual's personal data which overrides those legitimate interests.

When we process personal data, we are required to select the lawful basis which is most appropriate to the processing activity in question. However, sometimes in this privacy notice we refer to WJEC relying upon a number of lawful bases in connection with a processing activity. Where this is the case, it will be because the purpose we are processing personal data for requires us to carry out a number of different processing activities, each of which may have a different lawful basis. If you require further information about when any of the different lawful bases apply, please contact us.

SPECIAL CATEGORY DATA

The UK GDPR defines special category data as:

- personal data revealing racial or ethnic origin;

- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life; and
- data concerning a person's sexual orientation.

Where a controller is processing special category data, it must have both a lawful basis for processing and satisfy a special category condition for processing. There are ten conditions for processing special category data, which are set out in Article 9 of the UK GDPR. Five of the conditions require controllers to meet additional conditions and safeguards set out in Schedule 1 of the DPA 2018.

Separate rules apply to the processing of personal data relating to criminal convictions or offences.

YOUR DATA PROTECTION RIGHTS

Under data protection law, data subjects (i.e. living individuals who are identified or identifiable from information) have a number of different rights. Brief details of those rights are set out below. Whether a particular right applies to our use of your personal data will sometimes depend upon the reason why WJEC is processing your personal data.

The rights available to data subjects under the UK GDPR are:

The right to access your personal data

This is a right to receive confirmation of whether we are processing any of your personal data and, if we are, to receive certain information about that processing and to obtain copies of the personal data in question. Certain exemptions apply to this right, which means WJEC will not always be required to provide you with access to the personal information we hold about you.

A right to have your personal data rectified

This is a right to have any errors in the personal data we hold about you corrected or completed.

A right to have your personal data erased

This is a right to ask us to erase personal data we hold about you. It only applies in certain circumstances.

A right to restrict processing

This is a right to ask us to restrict the processing we carry out using your personal data. It only applies in certain circumstances.

A right to data portability

This is a right to ask us to provide you with the personal data we hold about you in a commonly used and machine readable format (or to transfer that information to another organisation). It only applies in certain circumstances.

A right to object

This is a right to object to our processing of your personal data. It only applies in certain circumstances. Where you are entitled to exercise this right, we must stop processing your personal data. One of the situations in which this right applies is if we are processing your personal data for direct marketing purposes.

How to exercise your data protection rights

If you wish to exercise any of your rights as a data subject, please email us at data.protection.officer@wjec.co.uk.

We are not permitted to charge you for exercising your data subject rights, unless a request is manifestly unfounded or excessive. Generally, we are required to respond to any request you make within 1 month.

Further information about your rights under data protection law can be found on the Information Commissioner's website (see [Information Commissioner's Office \(ICO\)](#)).

SHARING YOUR PERSONAL DATA WITH OTHERS

Sometimes, we will need to share your personal data with other organisations. Where we do so, the organisation we share your personal data with will either be acting as a controller in its own right or as our processor.

If we share your personal data with another controller, we need to have a lawful basis for doing so. Often, this will be that we are subject to an obligation under UK law (such as under the Regulatory Rules) to share the personal data in question. We may also need to share personal data with other organisations to further our or their legitimate interests.

HOW DO WE KEEP YOUR PERSONAL DATA SECURE?

We keep personal data confidential within a secure infrastructure protected by many firewalls and other technical and organisational measures. We are committed to keeping the security of our systems up to date.

Access to your personal data is only given to those who have a business need to know it. They can only access it on our instructions, and they are subject to a duty of confidentiality. Any third party we work with must have security measures in place to process your personal data. We have procedures in place to deal with any suspected personal data breach. We will inform you and the UK Information Commissioner of a breach where we are required to do so.

CHILDREN

WJEC has a direct relationship with centres, who apply for approval to deliver WJEC and Eduqas qualifications. Once approval is received, the Centre is then able to enter learners for qualifications.

Some of the information in this privacy notice is directed at individuals who may be below 18 who may be sitting our qualifications. (for example, Candidates). We have tried to ensure that the information in this privacy notice will be clear and understandable to all readers, in particular individuals who fall within the 14 to 18 years age group. However, please contact us if you require clarification in relation to any of the information set out in this privacy notice.

If you are below 13 years of age, we assume for the purpose of this privacy notice and data protection law more generally, that you will be represented by your parents, who will act on your behalf in making exercising your data protection rights. If you are 13 years of age or older, we will require your consent under data protection law.

TECHNOLOGY WE USE ON OUR WEBSITES

If you visit any of our websites we will use various technology to gather information about your visit. We will also use various third party tools on our websites.

Our use of cookies

We use cookies to gather information about you so that we can distinguish you from other users. Some of the cookies we use are essential for the functioning of our websites. Others help us to ensure that you have a good user experience and to improve our websites from time to time.

Where we use non-essential cookies on our websites, PECR requires us to obtain your consent before we place any such cookies on your computer or device. We use tools on our website to obtain such consent from you. You can find out more about the cookies we use on our websites and how you can decide which cookies to agree to in our Cookie Policies (which can be accessed on our websites).

Analytics data and website tools

We use online tools to collect information from you. For example:

- Google Analytics improves our marketing campaigns, strategies and website content
- Third party tools help to keep our website updated and relevant to you
- We use cookies to improve user experience, and analyse website traffic. For these reasons, we may share your site usage data with our analytics partners.

Our cookie banner allows you to opt-in or out of the various types of cookies we serve in terms of Strictly Necessary, Performance, Functional and Targeting. Please check [Cookie Policy](#) for a dynamic listing of what cookies we serve and other information. If at any time you wish to update your preferences or unsubscribe from our email communications you can do so through the link at the bottom of our emails.

Website security

WJEC uses several different technologies to protect its websites and web systems. During the course of this, some data is collected:

- Your IP address,
- Details about your computer and browser (user agent)
- The pages visited, and the time of day
- Search query data

This information is used to detect suspicious, malicious or unauthorised access attempts.

In addition, where users have individual usernames and passwords to log in (Secure website and Appointees site), the identity of the user is also logged.

WJEC employs behavioural analytics to detect abnormal patterns of activity on its systems, and may block access without warning if suspicious activity is detected.

How we ensure our processing is lawful

When we collect personal data from visitors to our public facing websites, the lawful bases we rely upon are either:

- Your consent (for example, where we need to obtain your consent to use certain cookies); or
- That the use of your personal data is necessary for the purposes of our legitimate interests (i.e. to maintain, run and improve our websites).

Links to other websites

Sometimes our websites may contain links to websites of other organisations. If you click on a link to another website, you will be leaving our website and navigating to the relevant third party website. Use of your personal data will then be governed by the privacy notice which applies to the website in question. We would encourage you to read that privacy notice so that you understand how and why your personal data will be used.

CHANGES TO THIS PRIVACY NOTICE

We review and update our privacy notice periodically. Below, you can find a table which logs the changes we have made to our privacy notice and sets out brief details of the changes we made.

LOG OF CHANGES TO OUR PRIVACY NOTICE	
Date change was made	Details of change
22 February 2023	New Privacy Notice drafted to make it more user friendly for the different readers

OUR CONTACT DETAILS

If you wish to contact us, you can do so by phone, email or post. Our contact details are set out below:

Postal address: WJEC, 245 Western Avenue, Cardiff, CF5 2YX

Telephone number: 029 2026 5000

Email address: data.protection.officer@wjec.co.uk

DATA PROTECTION OFFICER'S CONTACT DETAILS

You can contact our data protection officer at data.protection.officer@wjec.co.uk or via our postal address (please address your letter to 'Data Protection Officer, WJEC').

COMPLAINTS

If you have any concerns about the way we use your personal data, please email us at complaints@wjec.co.uk.

Alternatively, you can complain to the Information Commissioner's Office. Details of how you can submit a claim can be found on the Information Commissioner's website [Make a complaint | ICO](#)

PART 2 - PRIVACY INFORMATION FOR CANDIDATES

Before you read the information set out in this part of our privacy notice, please ensure you have read the information provided in Part 1 - General Information.

OVERVIEW

To deliver its general and vocational qualifications, WJEC needs to process personal data relating to Candidates for a number of different reasons. We have therefore split this part of our privacy notice into subsections. Each subsection covers a core reason for processing Candidate personal data and explains:

- Why we need to process your personal data;
- What personal data we process about you;
- The source of that data;
- Our lawful basis for processing;

- Whether we will share your personal data with other organisations or individuals; and
- Whether the processing will involve any automated decision making or profiling.

There are also separate sub-sections covering:

- Whether we will transfer your personal data outside the UK;
- How long we will keep your personal data; [and
- The rights you have in relation to your personal data].

Please note that:

- When we refer to 'Centres' in the information below, we mean the school or college which enters you for a qualification.
- When we refer to 'Appointees' in the information below, we mean WJEC's examiners and moderators.

TO ENTER YOU FOR AND DELIVER EXAMINATIONS AND ASSESSMENTS

Why will we process your personal data?

To undertake administrative steps necessary to enrol you for qualifications and deliver examinations and assessments. This includes:

- Taking the administrative steps necessary to enrol you for a qualification;
- Carrying out examination and assessment related administration;
- Delivering examination scripts to Centres;
- Storing and transporting examination scripts and recordings; and
- Corresponding and dealing with Centres and Appointees in connection with examinations and assessments.

What personal data will we process?

Your full name, your candidate reference numbers (UCI and ULN), your centre-generated candidate number, your date of birth, your gender, the qualifications you are being entered for, whether you are taking the qualification in English, Welsh or Irish and whether or not you are a private candidate ('Entry Data').

What is the source of the data?

Most of the Entry Data will be provided to us by Centres, including your centre-generated candidate number.

However, we will also create/generate some of the Entry Data (i.e. the UCI and ULN).

What is our lawful basis for processing?

Our lawful basis for processing will be one of the following:

- That the processing is necessary for compliance by us with our obligations under UK law (i.e. the Regulatory Rules);
- That the processing is necessary to enable us to perform a task carried out in the public interest. The public interest task in question is providing qualifications approved by the Regulators; or
- That the processing is necessary for the purposes of legitimate interests pursued by us. Those legitimate interests are to undertake tasks necessary to fulfil our contract with the Centre which entered you for the relevant qualification(s).

Will we share your personal data with anyone else?

To make the necessary arrangements for you to sit examinations and take part in external assessments, we will need to share Entry Data with the Centre which entered you for the relevant qualification(s). Our lawful basis for doing so will be our legitimate interests in ensuring that examinations and assessments can take place, in complying with our obligations under UK law.

We are also required to share Entry Data with the Regulators, UK Government's Department for Education, Welsh Government, Northern Ireland Government, JCQ and its members. Our lawful basis for doing so will be compliance by us with our obligations under UK law (i.e. under the Regulatory Rules).

TO DEAL WITH APPLICATIONS FOR ACCESS ARRANGEMENTS AND REASONABLE ADJUSTMENTS

Why will we process your personal data?

Under the Regulatory Rules, we are required to ensure that we have clear arrangements in place to make access arrangements and reasonable adjustments for Candidates with disabilities. Those reasonable adjustments might include, for example, extra time to complete an examination or the provision of a scribe.

If your Centre considers that you are entitled to a reasonable adjustment, your Centre must submit an application for a reasonable adjustment on your behalf. If a Centre does so, we will need to process your personal data to:

- evaluate the application;
- make a decision about whether you are entitled to the requested reasonable adjustment(s);
- notify your Centre whether the application has been accepted or rejected.

What personal data will we process?

Entry Data plus information contained in the application made by your Centre. The application will need to include information about your disabilities or additional learning needs.

What is the source of the data?

- Our internal records - we will already hold Entry Data;
- Centres - applications made by Centres will repeat certain Entry Data and will also contain information relating to the reason(s) an application for reasonable adjustments is being made.

What is our lawful basis for processing?

As stated above, the Regulatory Rules require us to have a clear procedure in place for making reasonable adjustments. In addition, we have general obligations under the Equality Act 2010. Consequently, our lawful basis for processing is that the processing is necessary to enable us to fulfil our legal obligations under UK law.

In addition, as the processing may involve use of special category data, we also rely upon a condition in the DPA 2018 which permits us to undertake processing where necessary for reasons of substantial public interest based on UK law. In this case, the relevant law is the Equality Act 2010 or any legislation which amends or replaces that Act.

Will we share your personal data with anyone else?

Centres are required to submit applications for reasonable adjustments to us via a secure online portal which is run by Pearson (another awarding body) on behalf of JCQ. In providing the online portal, Pearson will act as WJEC's processor.

If a Centre makes an application to WJEC via the online portal, the application and the information contained in it will only be accessible by WJEC (via WJEC's secure login). However, if a reasonable adjustment is approved, the other awarding bodies which use the portal will be able to view the reasonable adjustment awarded. This is so that other awarding bodies can easily check whether a candidate is entitled to a reasonable adjustment. The lawful basis relied upon by WJEC to share information relating to reasonable adjustments with other awarding bodies is that WJEC is required to do so to comply with its obligations under UK law (i.e. under the Regulatory Rules).

Is there any automated decision-making?

Under the UK GDPR, organisations are only able to carry out solely automated decision-making that has legal or similarly significant effects on individuals if certain conditions set out in the UK GDPR are met.

There is an element of automated processing involved in the award of reasonable adjustments. More details on this process and the secure online portal is given in the JCQ document "Access Arrangements and Reasonable Adjustments".

The procedure for evaluating and determining whether a reasonable adjustment should be awarded is as follows:

- Before submitting an application for a reasonable adjustment, Centres are required to ensure that relevant evidence is available and retained on file within the centre. Details of what will constitute relevant evidence is contained within the JCQ document "Access Arrangements and Reasonable Adjustments";

- Once a centre is satisfied that relevant evidence is available and held on file, an application for a (or some) reasonable adjustment(s) can be processed using the secure online system. In most cases, the system algorithm will make an automated decision (accepted or rejected) which will be relayed back to the centre by the automated system. Where a centre does not agree with a decision, or where certain arrangements are not able to be dealt with automatically, the centre may make a referral of the application to the relevant awarding body / bodies for assessment by appropriate awarding body staff.

If approved, the centre will be allowed to make the adjustment(s) available to you in relevant examinations.

TO MARK EXAMINATIONS AND MODERATE CENTRE BASED ASSESSMENTS

Why will we process your personal data?

To be able to award to grades, we need to mark your examination scripts and other external assessments. We also need to monitor the marking of such examinations and assessments to ensure they are being marked consistently and that our marking schemes and guidance are being followed.

In relation to non-exam assessments, controlled assessments or course work which is initially marked by Centres ('Centre Marked Assessments'), we need to carry out a process of moderation to ensure that Centres are marking consistently at the right standard.

What personal data will we process?

- Entry Data;
- Your examination scripts and, in relation to some qualifications, recordings of oral or live assessments;
- Centre Marked Assessments; and
- Marks awarded to you by Appointees and Centres.

What is the source of the data?

- Our internal records – WJEC will already hold Entry Data;
- Appointees and Centres – marks awarded to you; and
- Centres – examination scripts, recordings and Centre Marked Assessments.

What lawful basis will we rely upon?

We are required under the Regulatory Rules to:

- Arrange for examination scripts and other external assessments to be marked;
- Ensure that the marking of examination scripts and other external assessments is monitored; and
- Ensure that moderation takes place in relation to Centre Marked Assessments.

Such marking, moderation and monitoring is also essential so that we can deliver regulated qualifications. As a result, the lawful bases we will rely upon are that the processing is necessary for the performance by us of our obligations under UK law and that the processing is necessary for the performance by us of a task in the public interest.

Will we share your personal data with anyone else?

We will arrange for examination scripts and other external assessments to be marked by Appointees. We will also arrange for senior Appointees to monitor the marking of examination scripts and other external assessments. We will also arrange for Centre Marked Assessments to be moderated by Appointees. Appointees are appointed by WJEC under contract and will process your personal data in their capacity as our processors.

The majority marking, monitoring and moderation by Appointees will take place via our secure online marking platform. The platform in question is supplied by an external service provider who will act as WJEC's data processor. In contrast, non-examination assessment (NEA) is generally marked on hard copy or uploaded to our e-submission platform.

Under the Regulatory Rules, we are required share details of the marks awarded to candidates and the marking, monitoring and moderation of examinations and assessments with the Regulators and UK Government's Department for Education, Welsh Government and Northern Ireland Government. Our lawful basis for doing so will be compliance with our legal obligations under UK law.

We use automated software programmes to mark multiple choice questions for some of our e-assessments. For the majority of assessments, even where automated marking takes place, a person determines which answers are acceptable before the programme executes their decision to all answers in bulk.

TO DEAL WITH APPLICATIONS FOR SPECIAL CONSIDERATION

Why will we process your personal data?

If your performance during an examination or assessment was affected by valid illness or injury or other event outside your control (or you miss an examination due to a valid reason), you may be entitled to special consideration (which may include a small percentage uplift applied to your mark). Centres are able to make applications for special consideration on your behalf.

If we receive a request for special consideration, we will need to process your personal data to:

- Consider the application;
- Determine whether or not you are entitled to special consideration; and
- Notify Centres of our decision.

What personal data will we process?

Entry Data, details of any marks already awarded to you, plus information relating to the reason an application for special consideration has been made on your behalf (which may include special category data, such as information relating to your health).

What is the source of the data?

- WJEC – we will already hold Entry Data and details of any marks that have been awarded to you;
- Centres – applications for special consideration made by Centres will repeat certain Entry Data and set out details relating to the reasons why an application for special consideration is being made.

What lawful basis will we rely upon?

Under the Regulatory Rules, we are required to have in place clear arrangements for special consideration to be given to Candidates where appropriate. Our lawful basis for processing will therefore be compliance with our obligations under UK law.

In relation to any processing of special category data, we will rely upon a condition in the DPA 2018 which permits us to undertake processing where it is necessary to do so for reasons of substantial public interest based on UK law.

Will we share your personal data with anyone else?

We will notify our decision relating to an application for special consideration to the Centre which made the application.

Is there any automated decision making?

Most applications for special consideration will be made by Centres via a secure online portal provided by WJEC. The application will involve Centres submitting yes or no answers to a number of questions in order to determine whether the criteria for special consideration have been met. Applications which do not meet the relevant criteria will automatically be rejected by the software application we use to review applications. However, your Centre can ask WJEC to review the decision. Applications for those candidates who have sat an examination and which meet the criteria for special consideration will be awarded a small standard percentage uplift in line with JCQ guidance.

TO TRANSFER CREDITS BETWEEN CENTRES

Why will we process your personal data?

- To ensure that credits awarded to you by other awarding bodies are taken into account if you transfer to a WJEC qualification; and
- To ensure that credits awarded to you by WJEC are taken into account if you transfer to a qualification provided by a different awarding body.

What personal data will we process?

Entry Data plus details of the units you have completed and the credits awarded to you in relation to the qualifications being transferred.

What is the source of the data?

- Where you are transferring to a qualification provided by another awarding body, we will already have your Entry Data and details of the units sat and credits awarded to you;
- Where you are transferring to a WJEC qualification, entry data and details of the units you have sat and credits awarded to you will be provided to us by other awarding bodies.

What is our lawful basis for processing?

Under the Regulatory Rules, we are required to make arrangements for the transfer of credits. The lawful basis we rely upon is therefore that the processing is necessary to enable us to comply with our obligations under UK law.

Will we share your personal data with anyone else?

We may need to share your personal data with other awarding bodies (i.e. to ensure that credits awarded to you are taken into account). Our lawful basis for doing so will again be compliance with our obligations under UK law.

TO AWARD GRADES AND PUBLISH RESULTS

Why will we process your personal data?

So that we can award you with grades, we will need to process your personal data for the purposes of:

- Setting grade boundaries; and
- Applying the grade boundaries to the marks awarded to you.

We will also need to use your personal data so that we can notify Centres and certain other organisations of the grades awarded to you.

What personal data will we process?

To set grade boundaries we use various data, including marks awarded to Candidates and samples of Candidate work and scripts.

To award you with grades, we will use Entry Data and the marks awarded to you by Appointees and Centres.

To notify Centres and other organisations of the grades awarded to you, we will use certain Entry Data to identify you and your grades.

What is the source of the data?

Our internal records since:

- We will already be holding Entry Data and details of the marks awarded to you by Appointees and Centres; and
- We will generate your grades.

What lawful basis will we rely upon?

The Regulatory Rules require us to set grade boundaries, apply those grade boundaries to Candidate marks and publish results. The lawful bases we will rely upon to process your personal data will therefore be:

- That the processing is necessary for compliance by us with our obligations under UK law; and
- That the processing is necessary for the performance by us of a task in the public interest. The public interest task in question is the provision of regulated qualifications.

Will we share your personal data with anyone else?

When setting grade boundaries, we will work with a team of senior WJEC Appointees (who will act as our data processors).

We will provide details of the grades awarded to you to:

- Your Centre;
- JCQ and its members;
- UCAS (if you have applied to university)
- Our Regulators
- UK Government's Department for Education, Welsh Government and Northern Irish Government

The lawful basis we will rely upon to do so will be complying with our obligations under UK law (in relation to notifying results to Centres) and legitimate interests (in the case of notifying results to JCQ, its members and UCAS).

We will also share candidate level results with JCQ, JCQ members, our Regulators. We are required to do so to comply with our legal obligations as a regulated provider of qualifications.

We also share candidate level data with the UK Government's Department for Education, Welsh Government and Northern Ireland Government. We are required to do so to comply with our legal obligations as a regulated provider of qualifications.

TO ISSUE CERTIFICATES AND REPLACEMENT CERTIFICATES

Why will we process your personal data?

To provide you with documentary evidence of the qualifications awarded to you.

What personal data will we process?

Entry Data, your grades, your payment details and details of any special consideration awarded to you.

What is the source of the data?

Our internal records.

What lawful basis will we rely upon?

The Regulatory Rules require us to issue certificates and replacement certificates. The lawful basis we rely upon is therefore compliance with our obligations under UK law.

Will we share your personal data with anyone else?

We print certificates in-house and then send the certificates to Centres for distribution.

TO DEAL WITH ALLEGATIONS OF CANDIDATE MALPRACTICE

Why will we process your personal data?

To consider and investigate allegations of Candidate malpractice and come to decisions in relation to alleged malpractice.

What personal data will we process?

Entry Data plus information relating to the allegation of malpractice made against you.

What is the source of the data?

- Our internal records – in relation to Entry Data;
- Centres, WJEC examiners or moderators and/or other Candidates – in relation to information about the allegation of malpractice.

What lawful basis will we rely upon?

The Regulatory Rules require us to investigate and make decisions about candidate malpractice. Our lawful basis for processing is therefore that the processing is necessary to enable us to comply with our legal obligations under UK law.

Will we share your personal data with anyone else?

We will notify Centres of our decision. The Centre will then notify you of the outcome of our investigation.

TO DEAL WITH CANDIDATE SAFEGUARDING ISSUES

Why will we process your personal data?

If, in the process of marking examination assessments (including scripts, feedback from oral assessments, and film and art work), we come across any information which raises safeguarding concerns, we must report those concerns to Centres so that they can ensure that appropriate action is taken.

What personal data will we process?

Entry Data and the information in your examination assessment which alerted us to a safeguarding concern. This may include special category data or information of a sensitive nature.

What is the source of the data?

Our internal records (Entry Data) and examination assessment.

What lawful basis will we rely upon?

The lawful basis we will rely upon is that the processing is necessary for the purposes of our legitimate interests (namely, to be able to raise our concerns with your Centre). If the information in your examination script includes any special category data, we will also rely upon a condition in the DPA 2018 which permits the use of special category personal data in connection with the safeguarding of children or vulnerable adults.

Will we share your personal data with anyone else?

As stated above, we will notify Centres of any safeguarding concerns.

TO DEAL WITH APPEALS

Why will we process personal data?

To be able to review the accuracy of marking external assessments or moderation of Centre Marked Assessments to ensure an appropriate qualification grade, reflecting the standard of the work submitted was awarded to you. We also need to monitor the reviews conducted by our Appointees to ensure consistent decisions are being made and that our marking schemes and guidance are being followed.

What personal data will we process?

- Entry Data
- Your examination scripts and, in relation to some qualifications, recordings of oral or live assessments
- Centre Marked Assessments
- Marks awarded to candidates by Appointees and Centres.

What is the source of the data?

- Our internal records – WJEC will already hold Entry Data;
- Appointees and Centres – marks awarded to you
- Centres – examination scripts, recordings and Centre Marked Assessments.

What lawful basis will we rely upon?

We are required under the Regulatory Rules to:

- Provide an appeals service to learners and centres for examination scripts, other external assessments, and Centre Marked Assessments
- Review the marking and moderation processes we conducted to ensure they were accurately and appropriately implemented
- Correct any marking or administrative errors that are found during the review and appeals process

The lawful bases we will rely upon are that the processing is necessary for the performance by us of our obligations under UK law and that the processing is necessary for the performance by us of a task in the public interest.

Will we share personal data with anyone else?

We will arrange for examination scripts and other external assessments to be reviewed by Appointees. We will also arrange for senior Appointees to monitor the reviews of examination scripts and other external assessments. We will also arrange for Centre Marked Assessments to be reviewed by Appointees. Appointees are appointed by WJEC under contract and will process personal data in their capacity as our processors.

The majority of reviews of marking and moderation and the monitoring of such work by Appointees will take place via WJEC's secure online platform.

Under the Regulatory Rules, we are required share details of the reviews of marking and moderation with the Regulators. Our lawful basis for doing so will be compliance with our legal obligations under UK law.

TO PROVIDE INFORMATION THIRD PARTIES

Why will we process your personal data?

To respond to requests for information made by other organisations (for example, employers, universities, the police or the courts).

What personal data will we process?

Employers and universities will sometimes contact us to ask us to confirm whether you have attained a particular qualification (for example, as part of an investigation). In this situation, we will generally check our internal records and provide a 'yes' or 'no' answer in response to the query.

In relation to police investigations or information requested by the courts, the personal data we will process will depend on the nature of the inquiry.

What is the source of the data?

Our internal records.

What lawful basis will we rely upon?

In relation to information requested by employers or universities or other similar enquiries, the lawful basis we will rely upon is that the processing of your personal data

is necessary for the purposes of legitimate interests pursued by the organisation in question (for example, to assist them with their legitimate investigations).

Where we receive a request for information from the police, again, the lawful basis we will generally rely upon is that the processing of your personal data is necessary for the purposes of legitimate interests pursued by the police (for example, to assist them with their investigations).

Where we receive a request for information from the courts, the lawful basis we will generally rely upon is that the provision of the information is necessary under UK law.

Will we share your personal data with anyone else?

No.

TO COMPILE REPORTS AND STATISTICS

Why will we process your personal data?

As a regulated provider of qualifications, we are required to compile reports and statistics relating to a number of different matters. Such reports and statistics may be required:

- For our internal management purposes;
- Internal and external research;
- To formulate predictions, projections and for moderation exercises;
- So that we can report to the Regulators,
- For the purpose of sharing information with other awarding bodies in accordance with the Regulatory rules;
- To report to government bodies.

What personal data will we process?

We will use a wide range of personal data to produce the reports and statistics, including Entry Data, information relating to marks and grades awarded. However, generally speaking, the reports and statistics compiled will not contain any personal data relating to you (i.e. the data will be aggregated so that it is provided on an anonymous basis). Where we do need to share your personal data with other organisations, we have included specific information about that situation in this privacy notice.

What is the source of the data?

Our internal records.

What lawful basis will we rely upon?

The compilation of reports and statistics will generally be a requirement under the Regulatory Rules. The lawful basis we will rely upon is therefore that the processing of

your personal data is necessary to enable us to comply with our legal obligations under UK law.

However, sometimes, the lawful basis we will rely upon is that the processing of your personal data is necessary for us to perform a task in the public interest. The public interest task in question will be providing report and statistics to government bodies in accordance with UK education law.

Will we share your personal data with anyone else?

In certain circumstances, we are required to share the reports and statistics we compile with the Regulators and over government bodies. Where we do so, the lawful basis we will rely upon is that the processing is necessary to enable us to comply with our obligations under UK law (for example, under the Regulatory Rules)

WILL WE TRANSFER CANDIDATE PERSONAL DATA OUTSIDE THE UK?

The majority of candidate personal data processed by WJEC is either stored on our internal servers or is stored on systems or servers hosted by third party service providers within the UK or EU.

Where we store personal data in the EU we will either rely upon adequacy arrangements which are in place between the UK and the EU (which allow personal data to flow freely between the UK and EU) or, if such adequacy arrangements cease apply at any time, a mechanism known as 'standard contractual clauses'.

If, in relation to any processing activity, WJEC will need to transfer your personal data outside the EU, we will specifically bring this to your attention (including how we will ensure that your personal data is protected).

One situation where your personal data may transferred outside the EU is if you are entered for a qualification by a Centre which is located outside the EU. This is since the arrangements we will need to make with your Centre for you to sit examinations and/or take part in external assessments will mean that we will need to send your personal data outside the EU (i.e. to the Centre in question). In this situation, we will either rely on an adequacy decision or standard contractual clauses to ensure that your personal data is adequately protected.

HOW LONG WILL WE STORE CANDIDATE PERSONAL DATA?

To comply with the Regulatory Rules, we will generally, we will store Candidate personal data indefinitely. This is because data within Regulatory Returns is retained indefinitely.

Below, we set out details of situations in which your personal data will be held for a different period if it has not been included within a Regulatory Return:

- In relation to applications for reasonable adjustments and access arrangements, personal data is stored on the online portal for a period of 3 years and is accessible to WJEC during this time. After 3 years, the data will be archived by Pearson indefinitely.
- Hard copy data relating to applications for special consideration are stored until the deadline for making appeals has expired in relation to the examination

series in question. Information stored on WJEC's special consideration platform will be retained for 3 years.

- Although we retain information relating to allegations of candidate malpractice for a period of 7 years, a record of any candidate malpractice sanction is retained indefinitely.

PART 3 – PRIVACY INFORMATION FOR APPOINTEES

OVERVIEW

The term Appointee is an umbrella term used by WJEC to describe a number of different roles which are undertaken by individuals on behalf of WJEC as part of the examination and assessment process. For example, examiners, principle examiners and moderators, and their role in supporting qualifications development.

All Appointees are appointed by WJEC as independent contractors under standard Terms of Appointment. The Letter of Engagement will set out the specific duties of an Appointee, and the Terms of Appointment states the obligations of the Appointee in relation to data protection.

This part of our privacy notice sets out information for Appointees relating to the use of their personal data by WJEC.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We need to use your personal data for the following purposes:

- To enter into a contract with you and administer your appointment;
- To keep a record of training you have undertaken;
- To monitor and assess your performance (including any malpractice allegations received by our Malpractice team);
- So that we can contact you in the case of an emergency;
- To facilitate visits to Centres if required;
- To prepare reports for the Regulators;
- To monitor equality and diversity;
- So that we can contact you about new opportunities to work for WJEC; and
- To make arrangements for you to attend training events and conferences.

WHAT PERSONAL WILL WE USE?

We will use the following personal data:

- Your name, address and contact details (i.e. your email address and telephone numbers);

- Your date of birth;
- Your gender;
- Your car registration number;
- Your emergency contact details;
- Details relating to your employment record, qualifications and experience;
- References;
- Details of any conflicts of interest;
- Your National Insurance Number and information relating to tax and salary payments;
- Your bank details;
- Your training record;
- Performance records;
- Blue badge accreditation and access requirements; and
- Details of any dietary requirements.

WHAT IS THE SOURCE OF THE DATA?

We will obtain the majority of your personal data directly from you, either when you apply for a role as an Appointee or during the course of your appointment.

Some personal data may be provided to us by a third party, for example references provided by your employer.

WHAT LAWFUL BASIS WILL WE RELY UPON?

We will rely upon several different lawful bases to process your personal data:

- In relation to your appointment and the administration of your appointment, to keep a record of training you have undertaken and to monitor and assess your performance, we rely upon the lawful basis that processing your personal data is necessary for the performance of a contract between us.
- In relation to your emergency contact information and details relating to your dietary requirements, we rely upon the lawful basis that processing your personal data is necessary for the purposes of our legitimate interests (namely, so that we can ensure your safety).
- In relation to use of your personal data so that we can contact you about new opportunities with WJEC, we rely upon the lawful basis that processing your personal data is necessary for the purposes of our legitimate interests (namely, so that we can inform you about potential Appointee roles).

- In relation to the preparation of reports for the Regulators, we rely upon the lawful basis that use of your personal data is necessary to enable us to comply with our legal obligations under UK law (namely, under the Regulatory Rules). No personal data relating to you will be included in any such reports (which will only contain aggregated data relating to Appointees).
- In relation to any Special Category Data we process about you (for example, information relating to any medical conditions you have) we will rely upon the lawful basis that the processing is necessary for the purposes of our legitimate interests and that the processing is necessary to enable us to comply with our obligations under UK employment law.
- In relation to any Personal Data we collect for the purposes of monitoring equality and diversity, the lawful basis we rely upon is that the processing is necessary to enable us to comply with our legal obligations and for reasons of substantial public interest (namely, for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment with a view to enabling such equality to be promoted or maintained).

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Sometimes, we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our lawful basis for doing so and steps we will take to protect your personal information.

Your employer

We will share the dates of your appointment with your employer to enable the payment of teacher release. Our lawful basis for doing so will be that sharing of your personal data is necessary for the purposes of our legitimate interests (namely, so that that we can pay teacher release).

Examination Centres

We will share your name and address with examination centres to:

- Make arrangements for you to visit examination centres to carry out examinations;
- Enable examination centres to send examination scripts and recordings to you.

Our lawful basis for doing so is that sharing your personal data is necessary for the performance of a contract between us. We safeguard your Personal Data by ensuring that it is shared with examination centres via a secure web portal.

DRS & BTL

Our online marking platforms and related services are supplied to us by third party service providers (currently DRS & BTL). DRS and BTL will act as WJEC's processors and will be given access to your name, email address, telephone number and details of any conflicts of interest you may have in order to provide services to us relating to the marking platforms. We will safeguard your personal data by transferring it securely to DRS and BTL using File Transfer Protocols.

Other Appointees

We will provide your name and contact details to other Appointees who are appointed as team leaders or principal examiners so that they can oversee your work and provide you with support. Our lawful basis for doing so is that sharing your Personal Data is necessary for the performance of a contract between us. We safeguard your Personal Data by ensuring that it is only accessible via our Appointee Management Portal, access to which is password protected.

Compliance with legal obligations

On occasion, we may be required to disclose your Personal Data to other third parties, such as the courts, HMRC or the police. Where we are required to do so, we will generally be acting in accordance with a legal obligation.

Professional advice and legal action

We may need to disclose your Personal Data to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims. Where we do so, the lawful basis we will rely upon will be our legitimate interests. We may also rely upon the fact that the disclosure is necessary for the purpose of the establishment, exercise or defence of legal claims.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

As WJEC examinations and assessments take place on a regular basis throughout the academic year, we retain your personal data both while you are performing a particular Appointee role and on an ongoing basis. If at any point you cease to act as an Appointee, we will only retain such personal data as may be necessary for our records and to enable us to comply with our legal obligations.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our servers and IT systems are hosted in the EU. Where this is the case, we will rely on adequacy decisions between the UK and EU to ensure that your personal data is protected. If any such adequacy decisions cease to apply, we will rely upon standard contractual clauses as an alternative.

One situation where your personal data may be transferred outside the EU is if you are entered for a qualification by a Centre which is located outside the EU. This is since the arrangements we will need to make with your Centre for you to sit examinations and/or take part in external assessments will mean that we will need to send your personal data outside the EU (i.e. to the Centre in question). In this situation, we will either rely on an adequacy decision or standard contractual clauses to ensure that your personal data is adequately protected.

PART 4 – PRIVACY INFORMATION FOR TEACHERS AND OTHER SCHOOL STAFF

OVERVIEW

This part of our privacy notice is directed at staff who work for schools and centres which offer WJEC qualifications. This includes teachers, and may apply to non-

teaching staff, such as IT technicians, exam officer and other support staff as appropriate.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We will process your personal data for the following purposes:

- In connection with the moderation of Centre based assessments (including distribution lists for newsletters and centres agreeing to share information with other centres via WJEC's centre maps);
- To deliver teacher training and engagement, including CPD training, network meetings and focus groups;
- To provide you with WJEC publications and other information;
- To deal with malpractice allegations (this will include investigating the relevant allegation and reaching a decision about whether there has been any malpractice); and
- To deal with enquiries and complaints.

Relevant privacy information relating to our processing of your personal data in connection with CPD training, the provision of publications and other information and dealing with enquires and complaints is set out elsewhere in this privacy notice. Please follow the link to the relevant section of our privacy notice set out in the Introduction to this privacy notice.

WHAT PERSONAL DATA WILL WE PROCESS?

- In relation to the moderation of Centre based assessments, we will process your name and details of your position and the Centre you work for;
- In relation to allegations of malpractice, we will process your name, details of your position and the Centre you work for and any personal data about you which is relevant to the allegation in question.

WHAT IS THE SOURCE OF THE DATA?

- In relation to the moderation of Centre based assessments, your personal data will be provided to us by the Centre you work for;
- In relation to allegations of malpractice, the source of some of the data will depend upon who has made the allegation (for example, we may be provided with information by Appointees). We are also likely to obtain some personal data directly from you.

WHAT IS OUR LAWFUL BASIS FOR PROCESSING?

In relation to both the moderation of Centre based assessments and dealing with allegations of malpractice, the lawful basis we will rely upon is that the processing is necessary to enable us to comply with our obligations under the Regulatory Rules.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

To investigate an allegation of malpractice made against you, we may need to share your personal data with individuals involved in the allegation. However, we will only share such data as may be strictly necessary to enable us to properly investigate the allegation made. We will also inform your Centre of the outcome of our investigations.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

The Centre-based assessment awarding archive is maintained for two years after the lifetime of the specification. This means that a selection of anonymised scripts and Centre based assessments are kept on each of the grade boundaries from each exam series. All other Centre based assessments are sent back to Centres, and Centre based assessments submitted electronically are deleted in line with the script retention policy.

Although we retain information relating to malpractice allegations for a period of 7 years, a record of any malpractice sanction is retained indefinitely.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our servers and IT systems are hosted in the EU. Where this is the case, we will rely on adequacy decisions between the UK and EU to ensure that your personal data is protected. If any such adequacy decisions cease to apply, we will rely upon standard contractual clauses as an alternative.

PART 5 – PRIVACY INFORMATION FOR EXAM OFFICERS & HEADS OF CENTRE

OVERVIEW

This part of our privacy notice is directed at Exam Officers and Heads of Centre who engage with WJEC as part of the Centre approval process.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

- For Centre registration and monitoring purposes;
- To facilitate the inspection of a Centre applying for approval for the first time or after a period of inactivity.
- To deal with malpractice allegations (this will include investigating the relevant allegation and reaching a decision about whether there has been any malpractice); and
- To deal with enquiries and complaints.

Relevant privacy information relating to our processing of your personal data in connection with enquiries and complaints are set out elsewhere in this privacy notice. Please follow the link to the relevant section of our privacy notice set out in the Introduction to this privacy notice.

WHAT PERSONAL DATA WILL WE PROCESS?

- In relation to Centre registration and monitoring purposes, we will process your name, position and email address.
- In relation to allegations of malpractice, we will process your name, details of your position and the Centre you work for, and any personal data about you which is relevant to the allegation in question.

WHAT IS THE SOURCE OF THE DATA?

- In relation to Centre registration and monitoring purposes, we will obtain the personal data directly from you as part of the registration application for the Centre.
- In relation to allegations of malpractice, the source of some of the data will depend upon who has made the allegation (for example, we may be provided with information by Appointees). We are also likely to obtain some personal data directly from you.

WHAT LAWFUL BASIS WILL WE RELY UPON?

In relation to both Centre registration and monitoring, and dealing with allegations of malpractice, the lawful basis we will rely upon is that the processing is necessary to enable us to comply with our obligations under the Regulatory Rules.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Where it is a Centre's first application to us or where the Centre is making a registration application after a period of inactivity, it will be necessary for us to share the application data with the JCQ Centre Inspection Service (which is operated on behalf of JCQ by AQA in England, CCEA in Northern Ireland and WJEC in Wales).

We will also share the application data with the National Centre Number Register (NCNR) to enable them to allocate a Centre Registration Number.

Application data is shared via mail.

Our lawful basis for sharing your personal data in respect of Centre registration and monitoring will be through a data sharing agreement between JCQ and its members.

To investigate an allegation of malpractice made against you, we may need to share your personal data with individuals involved in the allegation. However, we will only share such data as may be strictly necessary to enable us to properly investigate the allegation made. We will also inform your Centre of the outcome of our investigations.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

In terms of Centre registration and monitoring, we will retain your personal data for as long as the Centre remains registered or until we are informed that you have ceased to be the Exam Officer or Head of Centre.

In terms of malpractice allegations, we will retain records of the investigation for 7 years.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

One situation where your personal data may be transferred outside the EU is if you are entered for a qualification by a Centre which is located outside the EU. This is since the arrangements we will need to make with your Centre for you to sit examinations and/or take part in external assessments will mean that we will need to send your personal data outside the EU (i.e. to the Centre in question). In this situation, we will either rely on an adequacy decision or standard contractual clauses to ensure that your personal data is adequately protected.

PART 6 - PRIVACY INFORMATION FOR INDIVIDUALS WHO ATTEND CPD TRAINING EVENTS

OVERVIEW

WJEC runs a number of online and face-to-face CPD training events for teachers. This part of our privacy notice relates to individuals who register for any of our CPD / Professional Learning events.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We will need to use your personal data to:

- Register you for the event;
- Carry out internal and external administration relating to the delivery of the event (e.g. create a list of delegates and/or a register of attendees, inform external venues of dietary / access requirements, communicate instructions on how to join online events with our external webinar provider);
- Invoice your school or college or other employer for the event;
- Obtain your feedback about an event you attended;
- If you agree, use your feedback and your name to publicise future CPD / Professional Learning events; and
- If you agree, notify you about future CPD / Professional Learning events.

WHAT PERSONAL DATA WILL WE PROCESS?

- Your name;
- The name of your school, college or other employer;
- Any dietary requirements (i.e. if the event is a face-to-face event);
- Your email address (to communicate event details e.g. venue, times, materials, online joining instructions with you); and

- Your name, email address and feedback (if you agree to us using your feedback to publicise future CPD training events, and if you ask us to tell you about future CPD / Professional Learning events.).

WHAT IS THE SOURCE OF THE DATA?

We use an online booking system to enable individuals to book a place on CPD / Professional Learning events. In booking, we will obtain details of your name, school, college or other employer and any dietary requirements via the online booking platform.

We use an online survey provider to obtain feedback about CPD / Professional Learning events.

WHAT IS OUR LAWFUL BASIS FOR PROCESSING?

Generally, our lawful basis for processing will be our legitimate interests (i.e. our need to use your personal data to enroll you on a CPD / Professional Learning event and deliver that event).

However, we will rely on your consent for the following processing activities:

- To notify you of future CPD / Professional Learning events;
- To use your name and feedback to publicise future CPD events.

You can withdraw your consent at any time by contacting us via cpd@wjec.co.uk

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

We use online platforms to:

- Register individuals for CPD / Professional Learning events;
- Deliver online events; and
- Obtain feedback from attendees about events (though any feedback will be provided on an anonymous basis unless you agree otherwise).

The providers of such platforms will act as our processors and will only use your personal data on our behalf and in accordance with our instructions.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

- We will retain any 'named feedback' until we publicise our next series of CPD / Professional Learning events.
- We will retain details of each event you attend for a period of five years (which aligns with the cycle for updating WJEC qualifications);
- If you consent to us using your personal data to notify you of future CPD / Professional Learning events, we will retain your name and email address for this purpose until you tell us that you no longer wish to receive such notifications from us.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

The systems we use to register individuals for events, deliver events and obtain feedback are hosted in the UK.

PART 7 – PRIVACY INFORMATION FOR INDIVIDUALS WHO SUBSCRIBE TO WJEC PUBLICATIONS

OVERVIEW

This part of our privacy notice is directed at individuals who ask to receive copies of WJEC publications and/or other information.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We will process your personal data so that we can provide you with copies of WJEC publications and/or other information.

WHAT PERSONAL DATA WILL WE PROCESS?

Your name and your email address (which is likely to be your work email address) and details of your school, college, employer or other organisation you belong to.

WHAT IS THE SOURCE OF THE DATA?

We will only provide you with copies of WJEC publications and/or other information if you have asked to receive such publications/other information (for example, by registering to receive updates on one of our websites or at an event).

WHAT LAWFUL BASIS WILL WE RELY UPON?

Your consent. If you decide you no-longer wish to receive a publication, you can withdraw your consent at any time by contacting us.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

No.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

We will retain your personal data until you tell us that you no longer wish to receive updates from us.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our internal systems and/or data may be hosted by service providers in EU. Where this is the case, we will rely on adequacy arrangements in place between the UK and the EU to ensure that your personal data is protected. If the adequacy arrangements cease to apply, we will rely on standard contractual clauses to protect your personal data as an alternative.

PART 8 – PRIVACY INFORMATION FOR SUPPLIERS AND CONTRACTORS

OVERVIEW

If you supply WJEC with goods or services, WJEC may need to process certain personal data relating to you or your staff in connection with such supply.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

- To make administrative arrangements connected to the receipt of the relevant goods or services;
- To make enquiries and to arrange payment;
- To order relevant goods and services; and
- To set up and maintain supplier accounts within our financial system.

WHAT PERSONAL DATA WILL WE PROCESS?

- Your name
- Your position
- Your email address
- Your VAT registration number
- Your bank account details.

WHAT IS THE SOURCE OF THE PERSONAL DATA?

We will generally obtain the personal data directly from you.

WHAT LAWFUL BASIS WILL WE RELY UPON?

The lawful basis we will rely upon will generally be that the processing of your or your staff's personal data is necessary for the purposes of our legitimate interests (namely, receiving the goods or services in question and making payment for them).

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

No.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

We retain personal data on our sale and purchase ledgers for 7 years for tax reasons. We also retain personal data relating to the contract between us for 6 years in case of contractual claims.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our services and/or IT systems are hosted in the EU. Where this is the case, we rely on adequacy arrangements between the UK and EU to ensure that your

personal data is protected. If any such adequacy arrangements cease to apply, we will rely on standard contractual clauses to protect your personal data.

PART 9 – PRIVACY INFORMATION FOR INDIVIDUALS WHO MAKE AN ENQUIRY OR COMPLAINT

OVERVIEW

This part of our privacy notice is directed at individuals who contact WJEC with an enquiry and individuals who lodge a complaint with WJEC.

If you are a parent of a student, we will assume that any enquiry or complaint you make is made on behalf of your child and when we refer to 'you' we mean you and your child.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We will need to process your personal data so that we can deal with your enquiry and/or investigate your complaint.

WHAT PERSONAL DATA WILL WE PROCESS?

- Your name;
- Your contact details;
- Any other personal data you provide when you make your enquiry or complaint; and
- Any personal data which we obtain about you in the course of dealing with your enquiry or complaint.

WHAT IS THE SOURCE OF THE DATA?

We will obtain most of the personal data directly from you. We may also obtain personal data about you from other sources in the course of dealing with your enquiry or complaint. If the complaint or enquiry relates to a student, we may also use personal data we already hold relating to that student.

WHAT IS OUR LAWFUL BASIS FOR PROCESSING?

Our lawful basis for processing that our use of your personal data is necessary for the purposes of our legitimate interests (namely, dealing with and/or investigating your query or complaint).

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Not unless we need to do so to properly deal with your enquiry or complaint. If we do need to share your personal data with anyone else, our lawful basis for processing will be our legitimate interests and we will ensure that your personal data is handled securely.

However, if you are a student and we receive a complaint or enquiry from your parent or guardian, we will assume that your parent or guardian is acting on your behalf and will share the outcome of the enquiry or complaint with them.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

For complaints, we will retain your personal data for 7 years. For general enquiries, we will retain your personal data for 3 years.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our services and/or IT systems are hosted in the EU. Where this is the case, we rely on adequacy arrangements between the UK and EU to ensure that your personal data is protected. If any such adequacy arrangements cease to apply, we will rely on standard contractual clauses to protect your personal data.

PART 10 – PRIVACY INFORMATION FOR INDIVIDUALS WHO VISIT OUR PREMISES

OVERVIEW

This part of the privacy notice is directed at individuals who visit WJEC's premises.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

We need to process your personal data for the following purposes:

- To keep records of visitors to our premises for administrative, security and health and safety purposes;
- So that we can verify the credentials of contractors working at our premises;
- To ensure the security of our premises and networks;
- To record details relating to accidents for health and safety reasons;

Due to the fact that confidential materials which are relevant to examinations and assessments are produced and are accessible at some of our, we may also need to process your personal data so that we can keep a record of any potential conflicts of interest you may have (e.g. where a relative of a visitor is has been entered for a WJEC qualification). The MAC address and hostname of devices connected to our public wireless network, plus the names of any sites visited may be logged for security monitoring.

WHAT PERSONAL DATA WILL WE PROCESS?

Your name, contact details, company details, vehicle registration details, details relating to certificates of competency or accreditation, any declaration of a conflict of interest, CCTV images, details of any accidents or injuries and your time of entry and exit from our premises.

WHAT IS THE SOURCE OF THE DATA?

Most of the personal data we will process will be obtained directly from you when you attend our premises. However, we will also collect personal data from the following sources:

- If you are involved in an accident at our premises, we may collect data from any witnesses or first aiders;
- If you are working for a contractor, we may obtain your details from your employer;
- CCTV images, which may be reviewed in the event of an incident, or a request from an authorised third party such as the police
- Any devices connected to our wireless network

WHAT LAWFUL BASIS WILL WE RELY UPON?

We will rely upon several different lawful bases to process your personal data:

- In relation to declarations of conflicts of interests and recording details of any accidents or injuries, we will rely upon the lawful basis that processing your personal data is necessary for compliance by us with our obligations under UK law (either under the Regulatory Rules or under Health and Safety legislation).
- In relation to other personal data relating to you, we will rely upon the lawful basis that the processing is necessary for the purposes of legitimate interests pursued by us. Those legitimate interests are to ensure the safety of visitors to our site and to maintain the security of our sites.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Sometimes we will need to share your personal information with others. This section sets out details of who we will share your personal information with and why. It also tells you about our lawful basis for doing so and steps we will take to protect your personal information.

CCTV Maintenance

Maintenance on our CCTV system is carried out annually by a contractor who will act as our processor. Whilst carrying out maintenance on the CCTV system, our contractor may have access to CCTV footage. However, access to CCTV footage is strictly controlled by us and is will only be accessible by authorised individuals, including out of hours monitoring by a contractor.

Compliance with legal obligations

On occasion we may be required share your personal data with other third parties such as the Regulators, HSE, auditors, courts or the police. Where we are required to do so, we will generally be acting in accordance with a legal obligation.

Professional advice and legal action

We may need to disclose your Personal Data to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims. Where we do so, the lawful basis we will rely upon will be our legitimate interests. We may also rely upon the fact that the disclosure is necessary for the purpose of the establishment, exercise or defence of legal claims.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

In general, we retain visitor personal data for 2 months following the date of your visit. However, in certain situations your personal data will be held for a different period:

- CCTV footage is retained for 30 days;
- Declarations of conflicts of interest are retained indefinitely (as required by the Regulatory Rules);
- Accident and injury records are retained indefinitely in accordance with legal obligations under Health and Safety Law and in case of personal injury claims.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

Some of our services and/or IT systems are hosted in the EU. Where this is the case, we rely on adequacy arrangements between the UK and EU to ensure that your personal data is protected. If any such adequacy arrangements cease to apply, we will rely on standard contractual clauses to protect your personal data.

PART 11 - PRIVACY INFORMATION FOR JOB APPLICANTS

OVERVIEW

This part of our privacy notice is directed at individuals who apply for roles at WJEC. Please note that you are under no statutory or contractual obligation to provide data to WJEC during the recruitment process. However, if you do not provide the information, the HR team may not be able to process your application properly or at all.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

- To take steps at your request prior to entering into a contract with you
- To

WHAT PERSONAL DATA WILL WE PROCESS?

- Your name, address and contact details, including email address and telephone numbers
- Details of your skills and qualifications, including membership of professional institutions;
- Details of your experience and employment history;
- Referees names, addresses and contact details, including email addresses and telephone numbers;
- Information about your Welsh language proficiency;
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability for which the Human Resources team needs to make reasonable adjustments during the recruitment process;
- Whether you have any criminal convictions not regarded as spent under the Rehabilitation of Offenders Act;
- Information about your entitlement to work in the UK; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, age range and religion or belief.

WHAT IS THE SOURCE OF THE DATA?

- Application forms and CVs
- Details from your passport or other identity documents
- Collected through interviews or other forms of assessment
- From third parties, such as:
 - References supplied by former employers;

- Information from the Disclosure and Barring service check providers; and
- Information from criminal records checks

WHAT LAWFUL BASIS WILL WE RELY UPON?

We will rely upon several different lawful bases to process your personal data:

WJEC needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you. We will rely upon several different lawful bases to process your personal data:

- In some cases, WJEC needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.
- WJEC has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. This includes:
 - Processing data from job applicants allows the HR team to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The HR team may also need to process data from job applicants to respond to and defend against legal claims.
 - The HR team processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.
 - Where the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, religion or belief, this is for equal opportunities monitoring purposes.
 - For some roles, WJEC is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.
- If your application is unsuccessful, the HR team may keep your personal data on file in case there are future employment opportunities for which you may be suited. The HR team will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, the hiring manager and interviewers involved in the recruitment process.

WJEC will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

If your application for employment is unsuccessful, WJEC will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow WJEC to keep your personal data on file, the HR team will hold your data on file for a further 12 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent; your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

No.

PART 12 – PRIVACY INFORMATION FOR INDIVIDUALS WHO ATTEND WJEC MARKETING EVENTS

OVERVIEW

This part of our privacy notice is directed at individuals who are invited to attend and/or attend a WJEC marketing event, such as the Moving Images Award or the Innovation Awards.

WHY WILL WE PROCESS YOUR PERSONAL DATA?

- To invite you to the event;
- To judge the event (if you submit an entry to the event);
- To administer the event; and
- To announce and publicise the winners.

WHAT PERSONAL DATA WILL WE PROCESS?

If you are a student, your name and the school or college you attend.

If you are a teacher, exam officer or other invitee, your name, position and email address.

WHAT IS THE SOURCE OF THE DATA?

Most of the personal data we use will be provided to us by the student's school or college.

We will also use stakeholder data from our database of contacts.

WHAT LAWFUL BASIS WILL WE RELY UPON?

The main lawful basis we will rely upon is that the processing is necessary for the purposes of our legitimate interests (namely, to enable us to organise and run the event).

If you are one of the winners at an event, we will also rely upon your consent to video your win and to use your name and details of the school or college you attend to publicise your win.

If we hold your data within our database of contacts (e.g. if you are a stakeholder), our lawful basis for processing will also be your consent.

You can withdraw your consent at any time by contacting us.

WILL WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

If you are one of the winners and you have provided us with your consent, we will publicise your win on our website and on social media platforms.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

If you are a winner, we will only retain your personal data once details of your win have been publicised.

If you are an exam officer, your personal data will be held on our records until you cease to act as an exam officer.

If you are a stakeholder in WJEC, we will retain your personal data until you ask us to remove your details from our records.

WILL WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE UK?

No.