

ARRANGEMENTS FOR AWARDING GCSE, AS AND A LEVEL GRADES IN SUMMER 2022



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	Arrangements for Awarding GCSE, AS and A Level Grades in Summer 2022
Name of Data Protection Officer	David Wilson
Date	5 May 2022

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.

On 17 May 2021 the Education Minister, Peter Weir MLA, announced a roadmap to a return to public examinations for all CCEA Qualifications for 2022, along with significant reductions in the assessment requirements across a range of CCEA qualifications (<https://www.education-ni.gov.uk/publications/ministerial-statement-ccea-qualifications-2022>). In doing so, the Minister charged CCEA with putting in place suitable Awarding arrangements for Summer 2022 to fulfil this roadmap.

As in previous years, CCEA is required to ensure that a fair and robust approach to providing learners with grades in summer 2022 is in place. As a result, CCEA was obliged to put in place some changes to take account of the ongoing disruption to candidates and Examination Centres as a result of COVID-19.

The changes may be summarised as follows:

- In the majority of GCSE and GCE qualifications, CCEA has defined one unit of assessment which may be omitted for candidates completing the qualification in Summer 2022.
- This unit omission is optional, and the unit will still be available for any candidates wishing to be assessed in all units.
- Should candidates choose to sit all units of the GCSE or GCE, they will receive the higher grade from their performance in all units or in the mandatory units only.

- Where possible, internally assessed tasks issued in the academic year 2019/20, and carried across into 2020/21, will be carried over for a further academic year for submission in Summer 2022. This will be detailed in the 2021/22 specification addendum for each relevant qualification.
- Visiting Examination and Visiting Moderation will be in place for Summer 2022; however, CCEA will keep this under review in light of the changing public health context.
- In Occupational Studies, candidates can omit one unit of their choice from final assessment. Should candidates choose to sit all units, they will receive the higher grade from their performance in all units or in the mandatory units only.
- In Entry Level and Vocational Qualifications, candidates can omit assessments up to a maximum of 50% of the qualification.

In all cases centres were advised that they should aim to cover the full specification. A published record of all changes for subjects at all levels can be found at: <https://ccea.org.uk/document/8638>.

A further factor in the Summer 2022 Awarding series is the potential for the Awarding of Centre Determined Grades for contingency purposes. The contingency arrangements primarily affect candidates who have experienced significant disruption which will affect their ability to sit examinations (as a result of COVID-19 for example). There also remains in place, contingency to award based on Centre Determined Grades relating to the GCSE, AS and A level cohorts should there be a significant escalation in the scale of the pandemic and the disruption caused. For this reason, this Data Protection Impact Assessment (DPIA) addresses both scenarios for completeness.

A DPIA is required because there is significant public interest in this issue which in itself places this data processing at high risk. Although it is hoped that Summer 2022 arrangements will represent a significant move towards the normalisation of the examinations process, it is accepted that there will still be the need to provide adaptations and contingencies to reflect the ongoing disruption from COVID-19. 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?

A return to a normalised examinations process in Summer 2022 will see CCEA return to a process where examination papers are developed by suitably skilled examiners and provided to centres. CCEA Examiners will then mark examinations and moderate coursework and will retain these for a limited period of time to allow Post Results processes to operate. CCEA will continue to supply and receive hard copy examination scripts (as well as audio/video material where appropriate) for all subjects (with the exception of Moving Image Arts) and most of these scripts will then be digitised to facilitate online marking by examiners.

CCEA has in place a contract with an outsourced external provider (Research Machines Education Solutions) to carry out the scanning and indexing function and the scripts are transferred under the Parcelforce contract to provide consistency via an end-to-end transfer process under one contractor. CCEA aims to continue to modernise the marking process to facilitate as much on line marking as possible and estimates that over 90% of scripts will be marked on line in Summer 2022. There will still be some subjects (for example English Language/English Literature and any subject modules with less than 500 entries) where online marking is either not practical or does not make sense cost wise.

In the case of the relatively smaller number of hard copy scripts, these are returned to CCEA via Parcelforce, stored in a single, secure repository (with strictly controlled staff access) before being allocated to examiner for marking. Hard copy examination scripts are transferred to and from examiners using the Parcelforce contract.

CCEA operates secure transfer of examination papers to centres and the return of examination scripts via a formal contract with Parcelforce. This contract is managed by CCEA's Distribution Team (based in the Mallusk facility) and all Examination scripts are transferred under this contract to and from the Mallusk facility by a team of dedicated CCEA staff who ensure consistency of approach.

CCEA may also require details of Access Arrangements/Special Consideration 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-2022-arrangements>

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.

Summer 2022 arrangements in relation to Special Consideration and Access Arrangements have been documented as part of the JCQ guidance documentation to centres and in CCEA Frequently Asked Questions. All relevant guidance can be found in the dedicated Summer 2022 section of the CCEA website and on the JCQ website : <https://ccea.org.uk/summer-2022> and <https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/>

The Post Results Review Service process is described in published guidance which can be also found at: <https://ccea.org.uk/examiner-centre-support/post-results-support>. The Post Results Review Service is available to all candidates. A similar process to the main examination process is carried out for CCEA's post results services whereby Parcelforce manage all examination script transfers to and from examiners/moderators. And for online marked subjects this work is done by CCEA examiners in the same secure portal facilitated by Research Machines Education Solutions.

The Post Results Review Service also includes the option of requesting an appeal of the marking review outcome. At the appeal stage, CCEA Business Assurance team implement the agreed JCQ process involving offering a Preliminary Appeal and an Appeal Hearing.

If candidates are unhappy with an appeal outcome, an Examination Procedures Review Service (EPRS) which is independently administered by CCEA Regulation is available. 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 examination results but may include GCSE/essential skills performance in, for example, English Language and Mathematics. 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.

In line with the contract with Research Machines Education Solutions, Personal Data may be transferred to India for the purposes of providing support services and matching Candidates to scripts. Staff will have access to script images which may contain the types of Personal Data as set out above. The return or destruction of Personal Data will be in accordance with the contract.

As outlined in Step 1, contingency arrangements are in place should circumstances require Centre Determined Grades to be awarded. The Data Protection implications of this contingency position are identical to those published in the Summer 2021 DPIAs which can be found at: https://ccea.org.uk/search?search_fulltext=dpia.

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 55,000 learners and around 215,000 individual qualification 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, the Summer 2022 awarding process is regarded as a one-off exercise in that there will be assessment modifications required to reflect the disruption to teaching caused by COVID-19. 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. All physical materials i.e. attendance registers, examination scripts, additional booklets, graphs etc. must be stored on the Contractor's premises for a minimum of ten (10) months after the relevant examination date. All digitally held images/media files from an examination series must be stored for a minimum of 24 months after the relevant examination date. Marking and reporting data from an examination series must be stored for 60 months after the relevant examination date. This is in line with agreed retention and

disposal arrangements, relevant contractual arrangements and reflects the need to retain examination scripts for a safe period of time to allow the full scrutiny of agreed post results processes as required by JCQ and other relevant guidance. 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 following types of Personal Data will be held and processed by CCEA and/or the contractor in order to award candidate grades for Summer 2022;

- Candidate name;
- Candidate number;
- Centre number;
- Gender;
- Date of birth;
- UCI number;
- Candidate answers;
- Teacher marks; and
- Examiners marks and comments relating to the candidate answers.

Data processing will not involve automated decision making, profiling or artificial intelligence processing for any awarding approach in Summer 2022.

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 engages with data subjects (learners/candidates) through centres and as such the direct relationship is with centres and not data subjects. CCEA ensures that the rights of data subjects are fully protected and this is demonstrated through the information provided in this DPIA.

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://ceea.org.uk/legal/privacy-policy>) in normal circumstances.

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).

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 standardised examinations is to provide a fair and robust process which also includes the complementary post results review service. This requirement has been mandated by the Minister for Education and within the legislative provisions of the Education (NI) Order 1998. 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. In the absence of standardised examinations (as in Summer 2020 and Summer 2021 when examinations were cancelled through Ministerial Direction and potentially in Summer 2022 as a contingency) alternative arrangements are developed and implemented essentially involving the awarding of grades using a process involving teacher judgement.

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:

- Principals' groups
- Online Consultations
- Subject Advisory Groups
- Meetings with Teaching Unions, Association of School and College Leaders, local Universities, NI Children's Commissioner, Press/Media etc.

CCEA will also engage legal support to advise on the Summer 2022 arrangements, this Data Protection Impact Assessment and associated data protection issues, as required.

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 2022 Awarding. These measures include the following:

- Head of Centre Information
- Student/Parent Guidance
- Technical questions and answers
- Publications on the CCEA website in respect of the awarding process;
- Frequently Asked Questions and answers published on the CCEA website;
- 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.

Standards and Data Science staff also attend the Standards and Technical Groups (STAG and STIG) 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 and Schedule 3. One of the specified powers in this legislation is the power to conduct examinations.

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 Summer 2022 awarding process is fair and does not disadvantage candidates with illness, disability or special needs and 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 2022 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 in place during this period.. This process is similar to other jurisdictions and is in line with decisions taken by the Minister of Education. CCEA may need to share candidate data with Regulatory Authorities, universities and colleges as well as UCAS and CAO as part of the university 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 2022. 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 Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk 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
4. There will be a breach of personal data during transfer between centres, CCEA and/or contractors employed by 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.	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. 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

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>CCEA Regulation will ensure that awarding standards are maintained.</p> <p>CCEA Statisticians and Data Scientists adhere to ONS Code of Practice.</p> <p>CCEA Statisticians and Data Scientists use documented Quality Assurance processes.</p> <p>Post Results quality assurance checks will be in place in line with the documented process.</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>Reduced</p>	<p>Medium</p>	<p>Yes</p>

	Provide clear guidance and timescales to Heads of Centre.			
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>CCEA AO has a documented process which is shared with Centres.</p> <p>Contingency arrangements are in place to cover all CCEA key posts.</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>	Reduced	Medium	Yes
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.	Contingency arrangements are in place to cover all CCEA key posts.	Reduced	Medium	Yes
4. There will be a breach of personal data during transfer between centres, CCEA and/or contractors employed by 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>Awarding by CDG</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>	Reduced	Low	Yes

	<p>The data is shared securely between CCEA and Centres using the HTTPS protocol, with additional security provided by Geo-IP restrictions.</p> <p>Awarding by Examination</p> <p>CCEA has a secure transfer contract in place with Parcelforce. The terms of the contact allow for secure transfer, tracking of individual packs and urgent remedial actions in the event of an issue being detected. A contract is also in place with Research Machines Education Solutions which mitigates risks to candidate personal data.</p> <p>Any personal data shared electronically between CCEA and 3rd party contractors is done securely using the HTTPS protocol, with additional security provided by Geo-IP restrictions.</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>Awarding by CDG</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 information</p>	<p>Reduced</p>	<p>Medium</p>	<p>Yes</p>

	<p>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> <p>Awarding by Examination</p> <p>CCEA has security measures in place to protect hard copy scripts. These include strict personnel access procedures, a centralised, CCTV protected repository and strict procedures for staff accessing or handling exam scripts.</p>			
<p>6. 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>Grades are pseudo-anonymised within the CCEA Central Server.</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: 5/5/2022	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Margaret Farragher Interim CEO Date: 5/5/2022	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	David Wilson Data Protection Officer Date: 14/4/2022	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 directions provided by the Minister of Education, the legislation framework set out in the Education (NI) Order 1988 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 2022 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