



# BEECHWOOD

## *Sacred Heart School*

## **Policy on releasing the Centre Assessment Grade (CAG) to a student**

### **General principles:**

CAGs must not be revealed before results day. It would be deemed malpractice to do so.

There are technically three options available to schools and trusts in relation to releasing the Centre Assessment Grade (CAG). This is the grade that the centre sent to the Awarding Organisation, which may be different from the grade awarded to the student following the statistical moderation process.

1. Release the CAG on results day to all students
2. Release the CAG on request
3. Release data held by the centre only in the case of a Subject Access Request

**Beechwood Sacred Heart School will apply option 2 for Summer 2020 results.**

### **Rationale:**

#### **Option two: Release the CAG on request (but not the rank order)**

This enables a supportive conversation to be had with the student in the days following results day, with a focus on their destination.

#### **Key considerations in relation to this approach:**

1. Arrangements will be put in place for a student who makes such a request to meet with a member of staff to discuss the CAG, the difference to the awarded grade (if there is a difference), the student's preferred destination and how the school can support this.
2. This policy will be shared with students and parents to ensure they know they can request the CAG, how to go about doing so and under what conditions. This ensures that students have equal access to information about how they request their CAG. Students who wish to request their CAG under the policy will need to make their request to the school's exams officer via a specific form, with the Head of Division notified. This is intended to distinguish between a request for CAG under this policy from a Subject Access Request under the GDPR. A record of all requests for CAGs will be kept including who the request was made to, by whom and the date in a central log.

3. The school will ensure that there is a clear distinction in terms of application process to be able to distinguish between a request for the CAG under this policy and a Subject Access Request under GDPR. Under GDPR, Subject Access Requests do not have to be made in writing and do not have to mention the words “GDPR” or “Subject Access Request”. It is for the school and trust to be able to recognise that the student is exercising their legal right to make a Subject Access Request.

4. Where it is reasonable and practicable to do so, the Data Protection Officer (DPO) will be involved in all enquiries and applications for CAGs in addition to the school exams officer and Head of Division. This is because the DPO will be best placed to recognise and distinguish a request for CAGs under this policy and a Subject Access Request under GDPR.

5. As with Option 1 above, choosing Option 2 does not prevent students from being able to exercise their legal right to make a Subject Access Request under GDPR for their personal data including information about ranking, other information used to generate CAG or indeed any other personal data you hold relating to them.

6. Although there is no statutory obligation on the school or trust for the policy document to inform students of their legal right under GDPR to request personal data other than their CAG, students will be regarded by GDPR as “vulnerable” and deserving of extra protection. It is therefore important that the school outlines their legal rights in relation to their data are made clear and transparent. Beechwood Sacred Heart School will be under a legal obligation under GDPR to inform students of their individual legal rights under GDPR (including their right to make a Subject Access Request) and this is available to students in the school’s Privacy Notice.

7. Where the CAG is disclosed to the student under this policy, it is expected that they would not be disclosed to their parents or carers unless the student has consented to this. Schools and trusts will obtain written evidence of student consent before releasing their CAG to any third party, including parents and carers.

### **Why have we decided not to apply either option 1 or option 3?**

For option one, the school feels that this option would potentially undermine the awarding process this year and create the situation where there are two grades in circulation. It is potentially confusing for students, parents, employers, universities, sixth form provision and apprenticeship providers.

*\*Choosing option 2 does not prevent students from being able to exercise their legal right to make a Subject Access Request under the EU General Data Protection Regulation (GDPR). This means they could still make a Subject Access Request for their personal data including information about ranking, other information used to generate the CAG or indeed any other personal data you hold relating to them.*

The school has decided not to apply option 3 for each of the exam cohorts, Year 11 and Year 13 (release the entire student’s exam results personal data held by the centre), unless the student makes a Subject Access Request under GDPR. The CAG, together with ranking and any other information used to generate the exam grade, is the student’s personal data. This means that the student is legally entitled to request this information under GDPR. Making such a request is usually referred to as a Subject Access Request or SAR for short.

Under GDPR, unless an exemption applies that allows you to claim an extension of time, students would need to deal with a SAR without delay as the school, if the SAR is received after the results publication date, will need to comply with the SAR in the usual GDPR statutory timeframe of one calendar month from the day on which the SAR was received.

Because of the way this exemption operates, a student that submits a SAR for their CAG after the final results are announced may be legally entitled to a response to that SAR faster than a student who submitted their request before the final results were announced.

Deadlines for responding to SARs will be carefully logged. This will be carefully monitored by the Deputy Head.

Source guidance:

<https://cstuk.org.uk/wp-content/uploads/2020/07/CST-guidance-on-releasing-centre-assessment-grades-final-July-2020.pdf>

Policy created by DHM August 2020

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