ACCESS BY EXAMSCREEN

Data Protection Impact Assessment (DPIA)

Summary of software and usage: Access By Examscreen (Software) & Examscreen Extra (Web Portal)

Access By Examscreen (examscreenextra.co.uk/access) is a software application providing access arrangement tools (word processor, readers, scribes etc.) for students in exam environments and as a their Normal Way of Working (NWOW) in classrooms as appropriate. Access by Examscreen is deployed to support students with access arrangements, predominantly during exams.The platform allows authorised staff and students to log in and use assistive software during exams and practice. User accounts and usage are managed by the exam centre. The Examscreen Extra website portal processes basic professional information for log in purposes (e.g: name, school email).

Step 1: Identify the need for a DPIA

Access By Examscreen provides schools with a tool to create and manage student accounts for access arrangements in exams. Because the software facilitates the processing of data belonging to children (vulnerable data subjects), a DPIA is conducted to ensure "Privacy by Design." This DPIA for Access by Examscreen is structured according to UK GDPR / ICO guidance and contains the key elements required for a DPIA.

A DPIA is required when processing is likely to result in high risk to individuals' rights and freedoms. Even if risk is low (as is the case with using Access by Examscreen) DPIAs are good practice to demonstrate GDPR compliance. The purpose of this DPIA is so that you can adapt and include in your internal GDPR compliance documentation.

This software's unique selling point is that it avoids cloud storage of sensitive student data, keeping the database entirely within the school's local network (Local Area Network - LAN).

Step 2: Describe the processing

2.1 Nature of the processing

- **The Software:** Installed locally on school systems. It creates a database on the school's network.
- **The Website** (examscreenextra.co.uk): Used solely for license management.
- **Data Collection:**

-Admin Data: Staff name, school email, school address, and payment details collected via the website.
-**Student Data:** Input by the school into the local tool.

- **Data Retention:** The provider does not see or retain student data. Admin data is kept for the duration of the license plus statutory tax periods.

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2.2 Scope of the processing

- Data Items: School email and contact addresses and login credentials.
- Geography: Primarily UK-based schools.
- Volume: High volume of student records at a local level: but zero volume on Access by Examscreen servers.

2.3 Context of the processing

The software operates in an educational setting. The "Controller" is the School; the "Software Provider" is Examscreen Limited. There is no high-risk profiling or automated decision-making involved.

Scribe (speech-to-text): When a student uses Scribe and the device is online, their spoken audio is sent securely (HTTPS) to Microsoft Azure Speech in the UK South region, and the text is returned straight into their document. Microsoft acts as a sub-processor for this feature only. Audio is processed in real time and is not stored by Microsoft or Examscreen, and no names or other student details are sent with it. When the device is offline, Scribe uses a speech engine on the device and no audio leaves it. All other features work entirely on the device and the school's network.

Step 3: Consultation requirements

We have consulted with school IT teams and Exams Officers to ensure the software integrates with their existing local security policies. Ongoing feedback is monitored to ensure the tool remains compatible with school network security.

Step 4: Assess necessity and proportionality

- **Compliance:** The processing is necessary solely to enable schools to obtain the licence for the software
- **Proportionality:** We have practiced Data Minimisation by intentionally designing the software not to transmit student and personal data to our servers.
- **Alternatives:** Cloud-based alternatives were rejected to reduce the risk of large-scale data breaches and to keep schools in full control of their sensitive data.

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Step 5: Identify and assess risks

Describe source of risk	Likelihood of harm	Severity of harm	Overall risk
Local Data Breach: Unauthorised access to the student database on the school network.	Low	Medium	Low
Data Integrity: Local database corruption leading to loss of student accounts during exams.	Low	High	Low
Website Breach: Administrative contact/payment details leaked from examscreenextra.co.uk.	Low	Low	Low

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Step 6: Identify measures to reduce risks

Risk identified	Mitigation / Measure to reduce risk	Effect on risk
Local Access	Software is designed to utilise the school's existing Windows/Network permissions. Only authorised IT staff can run the tool.	Reduced
Web Security	The website uses HTTPS encryption. No credit card data is stored on our servers (handled by a secure PCI-compliant processor).	Reduced
Transparency	Clear documentation provided to schools stating that we have no access to their student database and data.	Managed

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Step 7: Sign-off and record outcomes

Item	Name/Role	Date	Notes
Measures approved by:	[Your Name/ Role]		Risks are accepted and mitigated.
DPO advice provided:	N/A		Small enterprise exemption applies.

Summary for your records:

This DPIA confirms that Access By Examscreen is a "Privacy First" application. By ensuring the database is held on the school's network, the software provider has eliminated the primary risk of a centralised data breach.

Residual risks are considered low. No personal or student data is stored by Access by Examscreen. The data is stored on the schools' network. Processing is limited, necessary, proportionate, and aligned with UK GDPR principles; and the DPIA supports accountability and transparency.