Overview of Data Protection Matters in the Calculated Grades Process

Background

The Minister for Education and Skills on Friday 8 May 2020 announced the postponement of the 2020 Leaving Certificate. Following a decision at Cabinet, all students will be given the option to receive a State Certificate of Calculated Grades in each subject. It will have the same status as Leaving Certificates awarded to students in previous years. Students will also have the opportunity to sit the Leaving Certificate examination if they wish at a time when it is safe and practicable to do so.

The decision was taken following an assessment of public health advice and other information and the implications for holding the exams from the previously rescheduled date of Wednesday 29 July 2020. After detailed consideration, it was the department’s firm assessment that running the exams posed too great a risk to students, their families and those involved in running them. The logistics of holding the exams, with all the precautions that would have to be put in place to prevent the risk of further infection, would have meant that examinations could not be held under normal conditions.

The Calculated Grades system is overseen by an Executive Office (CGEO) in the Department of Education and Skills, established by the Minister for that purpose.

FAQ for candidates


Consideration of Initial Data Protection Matters

Consideration of data protection matters in the calculated grades process has been an important issue for the Department. In establishing the CGEO it was agreed that the DES data protection officer (DPO) would be the DPO for the Executive Office and work with the Executive Office to assist them in meeting requirements. The following documents were outlined for development:
• Data Protection Impact Assessment (DPIA) on the Calculated Grade process - identifying risks and mitigations

• Data protection statement/element for online portals etc.

• Privacy Notice for candidates

The DPIA form was completed and is attached as Appendix A to this document and documents should be read together along with the other documents developed such as Privacy Notice and the general guidance notes issued by the Department around the calculated grades process. The Department is the Controller for the Calculated Grades Process while the SEC will remain Controller for the traditional examinations process. Schools will be Independent Controllers for the estimated grades and class rankings that they produce and submit to the Department.

Detailed information on the overall process has been published on:


In addition to the documents outlined above, data protection compliance is demonstrated through a range of measures such as:

• Communications between CGEO and DPO (and DPC where needed)

• IT Security Policy, Project security and QA measures

• DES Data Protection Policies

• Data processing contracts/agreements where required

• Other data protection technical and organisational measures such as staff training, and GDPR guidance documents and templates

• Oversight through a senior management group, Programme Board and Independent Steering Committee

Legal advice was sought and was received from the Department’s in-house legal advisor and the Office of the Attorney General, regarding elements of the process to best ensure compliance.
GDPR Principles

Lawfulness, Fairness and Transparency

The lawful basis for the processing is Article 6(e) of the General Data Protection Regulation (2016/679) and Section 38 of the Data Protection Act, 2018 underpinned by Section 7(1) of the Education Act 1998. Fairness and equitable treatment have been key principles underlying the approach taken and also contribute to meeting GDPR principles. The detail below sets out the steps involved and how they meet those principles. Transparency requirements have been met through the privacy notice for candidates and the amount of guidance and information published by the Department on the process.

The GDPR and Automated Decisions

Article 22 of the GDPR conveys the rights of data subjects around decisions “based solely on automated processing”. While the standardisation process incorporates the use of a statistical model, it is only one step within a number of steps that do involve “human intervention”. This is outlined in detail in the section on standardisation below and it is the view of the Department that Article 22 of the GDPR does not apply to the processing involved.

Purpose and Data Minimisation

The process is designed as a once-off solution to the problem posed by the Covid-19 situation. Data will be limited to what is required for this once-off solution and all non-essential data will be deleted at the end of the calculated grades process.

Accuracy

Significant guidance, support and quality controls have been put in place to best ensure accurate data is used in the process.

Storage and Security

ICT support has been provided and technology used is modern and secure. Only appropriate staff have access to the data. Robust data security and data back-up arrangements are in place...
place for all operating systems and all externally facing systems (students and schools) have been subject to extensive stress and vulnerability testing at key stages.

Consultation Process

A dedicated advisory group chaired by the Secretary General of the Department was tasked with the preparation of recommendations for contingency arrangements for the 2020 Leaving Certificate examinations in light of public health concerns as a result of the Covid-19 pandemic. This group comprised of representatives of students, parents, teachers, school managers, the NCCA, the HEA, and the SEC and it consulted widely including the following internal and external stakeholders: secondary students union, teacher unions, school management bodies, IT, potential processors, educational academics and practitioners, state examination and assessment managers, with advice from public health officials.

Data Subjects were represented by the Secondary Students Union as well as through direct contact with the Minister and Department on relevant issues. The processors, the Educational Research Centre and Polymetrika International Inc., were also consulted on the development and operation of the process. Internal support such as ICT Units were also consulted and provided key support in deciding upon the most appropriate and secure approach to data collection and processing.

Calculated Grades Data Elements

Purposes of Processing

To provide each Candidate who wants them with Calculated Grades in Leaving certificate Subjects in order to complete their second level education and use these grades for entry to higher level education or other purpose rather than delaying until traditional exams can be held.

- Processing applications for the option of receiving calculated grades to facilitate timely progression from second-level schooling to employment, further education and higher education, in light of the postponement of the Leaving Certificate examinations caused by the Covid19 pandemic.
• Processing estimated percentage mark and class rank orders for students in the 2020 Leaving Certificate class in order to produce calculated grades.
• For Research and Statistical purposes by the Department.

Information on Data Subjects

Data Subjects are all leaving certificate candidates (circa 64,000 of which 61,000 are in the class of 2020 and the remainder are students in the first year of the Leaving Certificate Applied programme), mostly students with a relationship to the Department via schools. Out-of-school learners, those who entered for their examinations as independent candidates are also included. Candidates are mostly in the State but there are also students residing outside the State with a small cohort of students (circa 80) in the School of Martyrs, Tripoli, Libya. Some candidates will be under 18, but few under 17. Some may have special needs and their school will have these details. Some students with special educational needs are provided with reasonable accommodations by the State Examinations Commission. These arrangements have been taken into account in the estimating of marks by schools.

Personal details were required from each Candidate via a Secure Portal. Having registered an account, they were asked to confirm levels and on a separate occasion to opt to receive calculated grades. Estimated percentage marks, class ID and class ranking (via existing secure ESINET schools portal) for each subject were obtained from the candidate’s school. A separate application process applied to out-of-school learner and those who were eligible had estimated marks provided on their behalf by tutors/teachers and centres of education.

Candidates received data protection information via a privacy notice on opt in and guidance issued on different aspects of the process in addition to significant national coverage of issues. The Department has set out information for candidates on its website https://www.education.ie/en/The-Department/Data-Protection/. Information has also been provided on the candidate portal. Personal data of candidates is required to be processed in order for calculated grades to be provided. The Privacy Notice is available to see on the Department’s website here.

The initial correspondence that announced the Portal included the following:
What is my data being collected for?

The Minister for Education and Skills announced on 08 May 2020 that the Leaving Certificate 2020 examinations have been postponed and that the Calculated Grades model would be established in order to allow Leaving Certificate students to receive State certification for their learning achievements and to progress to third-level education or to the world of work in Autumn 2020. The main purpose for which the Department of Education and Skills requires the personal data provided by you is to provide you with Calculated Grades in the event that you opt to receive them. The personal data provided will be forwarded to your school to allow them to begin this process.

The privacy notice outlining further information on the use of personal data in this process can be found [here](https://www.education.ie/en/The-Department/Data-Protection/). Full details of the Department's data protection policy is also available at [https://www.education.ie/en/The-Department/Data-Protection/](https://www.education.ie/en/The-Department/Data-Protection/). Details of that policy and the privacy notice are also available in hard copy (see privacy notice for details).

Will I be able to get details of the information provided about me to the Department (estimated percentage mark and class rank) before the issue of the results?

No. Data protection legislation allows for restrictions to be placed on access to certain types of personal data including the results of examinations. Requests for access to the school’s estimated percentage mark and rank order will not be active until the date of issue of the results. After the results are issued by the Department, you will be able to access this information.

The main **Guides for students, schools, and parents** were developed in consultation with unions and management bodies through the National Advisory Group for Contingency Planning. The range of guidance documents comprised:

2. Guide for Schools on Providing Estimated Percentage Marks and Class Rank Orderings (21 May)
3. Calculated Grades – A Guide for parents and guardians (26 May)
5. Supplement to Guide for Schools (28 May)
6. Further Information in relation to the Calculated grades process (w/b 1 June)
7. Calculated Grades Data Collection Guide for Data Entry Users and Approvers (8 June)
8. Guide on application for out of school learners (25 June)
10. A Short Guide to the Calculated Grades Data Collection, National Standardisation and Quality Assurance Processes
11. Your Questions Answered – This is the Questions and Answers Section of www.gov.ie/leavingcertificate. It has been an evolving information resource.

All documents available on www.gov.ie/leavingcertificate

Other

Calculated Grades Student Portal – (Phase 1 Opening) 26 – 29 May - Registration and Confirmation of Levels – Before You Start Guide.
Calculated Grades Student Portal (Phase 2. Open 16 July) – Opt In to receive calculated grades. Student Guide.

Departmental press releases were published throughout the process:
1. Minister announces postponement of 2020 Leaving Certificate examinations (8 May)
2. Minister for Education and Skills Joe McHugh TD announces publication of guidance for schools on Calculated Grades (21 May)
3. Statement from the Department of Education and Skills on clarifications provided to the ASTI and TUI regarding indemnity for teachers (22 May)
4. Minister McHugh announces online registration for Leaving Certificate Calculated Grades opens on Tuesday 26 May (25 May)
5. 58,821 Students register so far on Leaving Certificate Student Calculated Grades Portal (28 May)
6. Leaving Certificate Student Calculated Grades Portal Deadline extended as 59,859 register (28 May)
7. 60,035 Students register on Leaving Certificate Student Calculated Grades Portal (29 May)
8. Minister McHugh announces opening of Calculated Grades Data Collection App for Schools (8 June)
9. Minister McHugh announces application process for out of school Learners. (25/6)
10. Minister Foley announces reopening of Calculated Grades Student Portal (16/7)
11. Minister Foley announces time of issue of results (20/07)

Radio/advertising campaign: This accompanied the opening of the Calculated Grades Student Portal in the week beginning 25th May. It involved radio and newspaper ads and social media campaign on Twitter and Snapchat.

Circulars on Calculated Grades include:
1. Circular 0037/2020 on Implementation of Calculated Grades Model was published on 21 May, along with the Guide for Schools.
2. Circular 0039/2020 on assistance for schools during the Calculated Grades Model was disseminated on 5 June.

Instructional videos were uploaded to the Department’s YouTube, including a Guide for Schools and Supplementary Advice.

How will individuals’ rights be implemented and supported?

The privacy notice outlines the rights of data subjects. Contact information for the DPO, the controller and the DPC is provided in the privacy Notice with a dedicated email for enquiries and requests.

As set out in the privacy notice, data protection legislation allows for restrictions to be placed on access to certain types of personal data including the results of examinations. Requests for access to the school’s estimated percentage mark and rank order will not be active until after the date of issue of the results but it is the Department’s intention to provide the estimated marks and rank order submitted by the school to students once final grades have been issued.

The process of schools forwarding estimated percentage marks and rank order forms is envisaged as Controller to Controller sharing of data from a GDPR perspective. The School (but not individual teachers) will securely retain the final approved forms until at least the end of appeal periods.

The calculated grades results data processed by the Department of Education and Skills will be retained for 100 years as this group of students may require a copy of their official state certificate of calculated grades at any stage during their lifetime. The data received from schools and tutors including the estimated percentage mark and class rank order data in order to produce calculated grades will be retained until the conclusion of the process including any
potential litigation. The Data is retained in the public interest for research, historical and archival purposes.

What Data are required and what are the sources?

Data Required

- Examination Number
- Programme i.e. Leaving Certificate Established, Vocational or Applied.
- PPSN
- DPIN (Departmental Pupil Identifier Number)
- Year
- School Roll Number
- School Type
- Surname
- Forename
- Gender
- Date of Birth
- Subject code
- Module Code
- Subject Irish indicator
- Address
- Eircode
- Telephone Number
- Email address
- Subject
- Subject Level
- Class ID
- Estimated Percentage Mark
- Class Rank Order
- Calculated Mark
- Calculated Grade
- Confirmation of conflict of interest and management (where applicable)
- Historical Leaving Certificate results and related Junior Certificate results.
- Historical Junior Certificate Results

There is no Special Category Personal data involved. The system has been designed to collect only data which is absolutely essential to the generation of reliable calculated grades. Only this data is being collected and processed and all non-essential data will be deleted at the end of the calculated grades process.

**Sources**

A. *Student ("Candidate"):* Identifier, Evidence of Opt in, clarification of Subject Level

B. *Department of Education and Skills (PPOD Database):* Details on students using identifier.

C. *School:* Estimated percentage mark for each Subject, Class Ranking for each subject, class ID.

D. *Teacher/Tutor/centre of education:* Estimated percentage mark for each Subject for out-of-school learners


**How will data quality be ensured?**

The management and reconciliation of data has been a considerable focus of attention of the Calculated Grades Executive Office, given the volume of student and school level data moving through the process and the number and different systems in which data is being collected,
processed, stored and handled. The complexity of the system, involving 786 schools; 61,000 students and 445,000 individual subject level entries, means that careful data management is required throughout the process. The core objective has been ensuring that data is appropriately treated through all stages of the process; between and within systems; ensuring that points of risk are identified and managed; that system checks and validations are identified; developed and implemented throughout the system.

Specific measures include:

- Comprehensive guide provided for teachers to arrive at an estimated percentage mark for each student including an in-school class alignment process, principal oversight and clear guidelines for destroying manual records held.
- Secure portal developed for schools to submit the estimated percentage marks and class rank order on the Esinet system
- Comprehensive guide provided for the 2-tier data entry process – data entry and data approval with data approval at principal level.
- Verification and check points built in to the school data entry process.
- Mapping of data flows and identification of key points of risk
- Appropriate data flows and identification of key points of risk
- Appropriate data checking, reconciliation and validation procedures have been developed and applied at each transfer and transformation point;
  - From CGEO database to Schools Esinet system
  - From schools to CGEO database
  - From CGEO to Student Portal
  - From Student Portal to CGEO
  - From CGEO to statistical standardisation system
  - From statistical standardisation system to CGEO database
  - Within CGEO database involving contact with schools to resolve data issues in transforming calculated grades to calculated marks
- Development of IT systems to identify data changes and anomalies; and to provide a full audit trail of the micro level data changes.
- Both the historical and the current data have been subject to robust checks through each stage to ensure data accuracy before being processed through the standardisation process.
- At a macro level, data quality assurance and verification is being undertaken by the Educational Research Centre on the data processing and standardisation processes associated with the 2020 Leaving Certificate and Leaving Certificate Applied Calculated Grades including all data integrity checks.
• Direct helpline and dedicated e-mail address available to schools during the data capture process
• QA measures for student portal
• Comprehensive guide to the calculated grades process for students and their parents.
• Comprehensive guide for students for registering and logging in to the secure student portal to be updated at each opening of the portal
• Privacy notice published on log in page.
• Direct helpline and dedicated e-mail address available to students.
• Data Processing agreements in place.
• Processing to take place only in secured premises behind appropriate firewalls.
• Project delivery by a Management Group reporting to a Programme Board.
• Oversight by an Independent Steering Committee
• ERC replicate Polymetrika’s processing as part of the validation and verification process

Data Sharing

Data may be shared with:

• The Educational Research Centre and Polymetrika International Inc as processors.
• The Central Applications Office, and the Higher Education Institutions for the purposes of entry to higher education
• The State Examinations Commission, for the purposes of facilitating access to the later sitting of the Leaving Certificate examination which will be arranged when it is safe to do so and to maintain the permanent record of the Calculated Grade results as part of the 2020 Leaving Certificate record.
• Other contractors including Viatel, ISP for the Student Portal
• The Economic and Social Research Institute and Recognised Scholarship Awarding Bodies.
• Data may also be shared with the UK university and college admission office, (UCAS) and otherwise at the request of data subjects. The CAO provides result information to UCAS UK as Irish applicants to UCAS provide their consent to UCAS to gather their result information from the CAO as part of the application process.
Transfers

The student identifier, estimated percentage marking and class rankings will be hosted in Dublin on Azure Cloud for processing by Polymetrika Inc.

Polymetrika International Inc support part of the standardisation process for the calculated grades and are bound to operate within the written instructions of their processor contract with the Department. Polymetrika International Inc have their headquarters in Canada and data transferred there is safeguarded by adequate standards of data protection under an EU adequacy decision.

A secure file transfer SFTP will be used for transfer of data from the portal which is hosted in the Department, Athlone for sharing with the other processor, the ERC who are based in Dublin.

The Calculated Grades System

At the core of the system for providing calculated grades is a sophisticated, highly-complex statistical standardisation methodology, grounded in a psychometric framework. The system has been developed by an international expert in the field of statistics and psychometrics. The Educational Research Centre will engage in a parallel process of quality assurance and verification alongside the primary standardisation process. The system combine estimates of a student’s expected performance in a subject and level, with other information to arrive at fair representations of student performance. The estimation methodology for 2020 has been designed to minimise arbitrary disadvantage imposed on students for whom the normal examinations represent an opportunity to provide objective proof of their academic proficiency. Specifically, the methodology is designed so as not to compound existing socio-economic or demographic disadvantages in the education system.

Published guide:

https://www.gov.ie/pdf/?file=https://assets.gov.ie/74043/96076aa3e16240cc93e2a56a1ea94d75.pdf#page=1

The system of calculated grades that is being offered is based on the following key principles:

- **Teacher professionalism**: Teachers know their students and can balance a variety of factors in arriving a professional judgement in relation to their students’ expected
performance. Their professional code of practice, underpinned by the values of Integrity, Trust, Care and Respect is core to how they work in schools to ensure the best outcomes for their students.

- **Support for students**: The offer of calculated grades takes account of the need to support student wellbeing and satisfies the need for students to be provided with valid certification.

- **Objectivity**: Teachers and schools will be objective in their assessment of the student’s expected performance and will take into consideration a range of evidence to support the judgements that are made. Schools and teachers will work collaboratively to ensure that no bias, conscious or unconscious, influences the decisions made in relation to a student’s expected performance.

- **Fairness and equity**: Schools and teachers will strive to achieve fairness and equity in the way in which they apply the process at school level.

- **Collaboration**: A collaborative approach will be used in schools to ensure that each stage of the process is completed.

- **Timeliness**: Schools and teachers will ensure that the deadlines set for the completion of the in school processes are met and that each stage is completed within the designated timeframe

**Data Process**

Each step in the process has been designed with fairness in mind.

The first stage in this system was to be able to base the Calculated Grades on really good quality information from schools about students’ expected performance in the Leaving Certificate examinations, had their educational experience not been interrupted by Covid-19. While the school data will be subject to adjustment in the national standardisation process, it forms the basis for the Calculated Grades, so a lot of time and effort was spent in seeking to get this part right.

The approach taken centres on international, educational research which tells us that teachers are more likely to make accurate judgments of student performance in a high
stakes context and that teachers are good at ranking their students relative to each other. Therefore, schools were asked to provide an estimated mark and a rank order for each student in a class group.

Very clear and comprehensive guidance and training was provided in order that schools could provide their students with the fairest possible estimate of their performance in the Leaving Certificate. Schools were asked to engage in a robust and rigorous three-stage process to arrive at their best estimates of student performance, which involved

- teachers applying their professional judgement to various sources of evidence
- a process to align standards among different teachers of the same subject
- and finally, oversight of the process by the school principal.

The only sound means to achieve fairness across different class groups taking the same subject within a school was through the in-school alignment procedure, so this was a very important part of the process. Specific guidance was also provided on recognising and avoiding unconscious bias that might affect the estimates.

Following the completion of the estimating process, schools had to return the data to the Calculated Grades Executive Office (CGEO) in the Department of Education and Skills, using an online data collection system. Checks and balances in the process ensured that the data was entered correctly and accurately. A similar robust and rigorous quality assurance process has been carried out by the CGEO on receipt of the school data and in subsequent processing.

Guidance issued to schools on the process:

https://www.gov.ie/pdf/?file=https://assets.gov.ie/74606/745492ee42f64db9aedcd1863f0cd368.pdf#page=null

https://www.gov.ie/pdf/?file=https://assets.gov.ie/75018/c3c8f852-e834-4c00-847c-7943fbde194c.pdf#page=null


**Standardisation**

The objective of the system of calculated grades is to provide results which are fair and accurate representations of likely student performance in the Leaving Certificate examinations.
By collecting and using a range of different types of information, the different sources of data will complement each other, to provide the most accurate and fair set of results within the limitations of the available data. As the school data is only accurate at school level, the final calculated marks, and so Calculated Grades, provided to students, for any subject and level, may be higher or lower than the estimates provided by their school.

The national standardisation process is an iterative process involving the application of a statistical model to the data, detailed review of outcomes to identify desirable and undesirable features and artefacts in the output data. It will also include adjustment of the parameters, constraints and similar details of the model to be applied in the next iteration, leading through a number of such iterations to a final version of the model that yields fair and just representations of student performance.

The national standardisation process will use the range of Junior Cycle and Leaving Certificate historical data to determine the particular distributions of results that are most likely for each subject and level. The use of such distributions as part of the estimation process is referred to as conditioning. At school and national level, Junior Cycle examination results are strong predictors of Leaving Certificate performance but are not good at estimating individual student performance. The Junior Cycle data will be used in the model to produce a distribution of the likely performance of the particular group of students taking each subject in each school.

No one pattern of expected results on its own will determine the Calculated Grades, as the model will combine the range of patterns to generate the grades in a way which is as reasonable, fair and accurate to students as possible. While the school-based estimates may move upwards or downwards as a result of the standardisation process, the class rank order, provided by the school, will not be changed. The fact that the distribution of results is not based entirely on any one data set, but capitalises on the distinct strengths of each source of information, contributes to accuracy and fairness in the model.

The statistical process takes account of whether the group of students taking a subject in the school this year is academically stronger (or weaker) than in previous years. This means that distribution of grades emerging the school is not pre-ordained to be the same as it was before.

The model does not impose any predetermined score on any individual in a class or in a school. Provided the school has accurately reflected the relative differences between students within the class, there will be no barrier to any excellent student achieving high grades in any school. For example, if there is a high-performing student within a class of low-performing students they will not be unfairly disadvantaged by using the distributional information as described earlier. Provided the school has recognised the atypically high performing student, they will be correctly identified as an outlier student. The same will apply
if there are outlier students at the lower end of performance. The model is designed to accommodate such outliers.

Even if the standardisation process shifts the marks upwards (or downwards) for the entire class, the calculation process within the model will take account of the relative standing of the student within the class, as set out in the school-based data, and will allow the estimates for the group as a whole to be properly realigned, if necessary, without losing this information about the degree to which this high-performing outlier student exceeds the norm.

The national standardisation process being used does not impose any predetermined score on any individual in a class or a school.

The rank order within the class group is preserved in the statistical process. However, the teachers’ estimated marks from each school will be adjusted to bring them into line with the expected distribution for the school. The national standardisation process being used will not impose any predetermined score on any individual in a class or a school.

After the national standardisation process, the calculated marks will be converted into calculated grades, and these grades will be issued to candidates. The calculated grades will be expressed in the same manner as currently applies to Leaving Certificate grades.

After the results are issued, students will be able to see the final mark that led to their grade.

Validation of the Model

To ensure that the statistical model is behaving as expected, and is achieving its objectives, there needs to be a related process of model validation. The workings of the statistical model will be reviewed and validated in a number of ways:

- There will be review of the distributions of results for each subject and level.
- There will also be a review of the outcomes using a number of different demographic characteristics which will include gender and socio-economic status. This is to ensure that the model is presenting outcomes that are as fair and equitable as possible given its constraints, and in line with previous outcomes as much as is possible.

The purpose of the Calculated Grades system is to arrive at the grade that each student would have achieved if the examinations had taken place as normal. The validation process will check to see if the interactions between these characteristics and the calculated results are similar to the interactions in the historical data between these characteristics and
examination results. For example, in the case of gender, if the performance of female students relative to male students in various subjects turns out to be similar under the Calculated Grades model as was normally the case in previous examination years, then this can be taken as an indicator that the Calculated Grades model is in line with previous years in relation to this.

The purpose of this review of the outcomes of the statistical model is to check whether the Calculated Grades model is resulting in any particular group being advantaged or disadvantaged relative to previous years’ outcomes. It is important to note that this assessment is being made relative to previous years; the validation will check, for example, that disadvantage effects, or gender effects, are not exacerbated within the model. It is also important to note that the system will not correct for relative biases that are internal to the sets of estimates provided by individual schools. Schools should have resolved the issue of any unconscious bias within their own estimating process. This was advised in the Guidance to Schools.

**Appeals Process**

It is open to a candidate to appeal his/her calculated grades. The appeal process will include a three stage process:

- **Stage 1:** Checks will be undertaken to ensure that the intended information was recorded correctly by the school and that the information was transferred correctly into the data collection system.
- **Stage 2:** There will be also be a review to ensure that the data was correctly received and processed in the national standardisation process conducted by the Department.
- **Stage 3:** Students unhappy with the outcome of stage 1 and 2 can seek a review by Independent Appeal Scrutineers.
- **While described as a three-stage process, stages 1 and 2 will be undertaken on foot of the initial application by the student. Stage 3 will be a separate process which can be invoked by any student dissatisfied by the outcome of the initial appeal.**

The focus of the appeals process will be on:
a) establishing whether any errors have been made by schools in inputting the data from the forms, which were used to record the student data (Class ID, estimated percentage marks and rank orders,) into the Calculated Grades Data Collection Application.

b) establishing whether any errors have been made in transferring the data (Class ID, estimated marks and ranks order for the student) from the Calculated Grades Data Collection Application to the CGEO database and from the CGEO database to the statistical model, being undertaken for CGEO by the external contractor, in which the standardisation process is being undertaken. In the statistical model, as a result of the application of the process of standardisation, the student’s estimated mark will be converted to a calculated mark.

c) establishing whether any errors have been made in transferring the student’s data, including the calculated mark, from the standardisation system back to CGEO

d) establishing whether the result the student is seeing on the Calculated Grades Student Portal accurately reflects the grade on the CGEO database

e) checking that the class rank order, assigned the school to the student in the subject/level class group, has been retained in the statistical moderation process where appropriate.

f) establishing whether there has been any material error made at any stage in the process which would have given rise to a mark change for the student which would have given rise to a higher grade.

Finally, candidates who remain unhappy with the outcome of the calculated grade awarded have the opportunity to sit the 2020 Leaving Certificate examination in the subject(s) at a later stage when it is safe to do so. If a candidate sits such an examination and achieves a higher grade than his/her calculated grade, the higher grade (whether calculated or from the examination) will stand. If the improvement in the candidate’s grade means that he/she would have been entitled to a higher offer of a CAO course, he/she will be facilitated in taking up that place as soon as practicable.
Governance and Oversight

There has been strong oversight and control and a number of inherent quality assurance measures to ensure students receive a fair result.

National Standardisation Group

The national standardisation process is overseen by a National Standardisation Group responsible for the implementation of the process and the application, review, and adjustment of the data to arrive at fair and just representations of student performance.

Independent steering committee

The Government Decision of 8 May 2020 also approved the establishment of a non-statutory independent steering committee who will oversee the quality and independence of the process being undertaken by the Executive Office under the authority of the Minister.

External Reviewer

In addition, there will be oversight by an independent expert. The External Reviewer is an independent expert, unconnected with the design of the Calculated Grades model, who will provide further independent oversight of the system and overall validation on the model, including the operation of the appeals system.

Dr Janet Brown, former Chief Executive of the Scottish Qualifications Authority, was appointed to this role by the Assistant Secretary with responsibility for Calculated Grades on 7 August 2020.

Automated Decisions

While the standardisation process incorporates the use of a statistical model, there are a number of steps in the process involving human interventions which are conducted by the National Standardisation Group.

The combination of the data sets and the data collected from schools will be processed through the statistical model. While a statistical methodology is by its nature data driven, the calculated grades model must be influenced by other concerns. There is a significant level of human intervention required to be able to stand over the statistical model and to approve the issue of the Calculated Grades to students.
The national standardisation process is overseen by a National Standardisation Group responsible for the implementation of the process and the application, review, and adjustment of the data to arrive at fair and just representations of student performance.

The expertise of the National Standardisation Group is in the field of high stakes examinations and assessment, educational evaluation, and second level education and the organisations and individuals represented on the Group were central to the development of the system of Calculated Grades. The Group comprises representatives from the Calculated Grades Executive Office and the Inspectorate, both from the Department of Education and Skills; Educational Research Centre and the State Examinations Commission. The group meets regularly to analyse and review the most recent iteration of the model and to discuss the outcomes and review how best to proceed in relation to adjusting the model and also to work through the validation process.

National distributions, which range across 79 Leaving Certificate curricular subjects and levels, 18 non-curricular languages and approximately 20 Leaving Certificate Applied subjects and tasks are reviewed for 2020.

Where distributions are not aligned satisfactorily, the model is adjusted to ensure comparability and fairness for candidates. With each adjustment to the model, there is further review, to check for negative impacts elsewhere in the model, and further adjustment as required until the group is satisfied that a safe, satisfactory and defensible set of result outcomes has been achieved.

The NSG is being assisted in its work by the CGEO. In recognition of the large number of model output data sets that need to be examined in detail at each iteration of the model and the extremely tight timeframe available between iterations, the CGEO has engaged an analysis support team.

The purpose of this is to assist the CGEO in keeping the National Standardisation Group fully informed about the outcomes of each iteration of the model, recognising that is not feasible for all members of the Group to examine all model output distributions in detail on each occasion.

The Analysis Support Team reviews, across all distributions, the features of the model outcomes that are due to be discussed by the National Standardisation Group at forthcoming
meetings and provides the CGEO with relevant qualitative summary information about what is observed, including identifying subjects or subject-level combinations that are atypical or otherwise warrant specific attention.

The CGEO in turn uses this information to keep the Group fully informed. This allows members of the Group to have confidence regarding the extent to which the features they observe in the distributions that they are in a position to examine in detail themselves are replicated across other subjects and levels.

This clearly demonstrates that there is a significant level of human intervention in the process meaning the calculated grade is not “based solely” on automated means and therefore it is the view of the Department that Article 22 of the GDPR does not apply.

Assessment of Issues arising

The traditional Leaving Certificate enjoys widespread public trust and confidence. This system cannot risk diminishing this level of trust. The technology in this area is modern and secure. The process made use of trusted existing facilities which are already in operation by the Department such as ESINET secure calculated grades student portal and secure file transfer protocol. While novel in this jurisdiction similar systems are being operated this year in other Countries.

Given the global nature of the pandemic, the use of an alternative means to certify achievement, to facilitate progression from second level schooling, is not unique to the Irish case. An estimation process is being implemented to certify achievement in the United Kingdom in the case of the GCSEs and A level examinations. A similar approach is being used in France in the case of the Baccalaureate and in other jurisdictions.

While identical processes are not being employed in the case of each of these jurisdictions, due to the variations in data and information available and the different types of assessments involved, they are based on similar data, including the prior achievement of the students and the previous outcomes in the examinations in the past.

As a result, and given the robust and rigorous processes involved in the national standardisation process, the outcomes from the Calculated Grades system will have the same
status as the Leaving Certificate in previous years. It can be used for access to further study outside of Ireland, including, for example through the UCAS system in the United Kingdom.

What safeguards have we put into the Irish approach to standardisation?

A number of safeguards have been built into the approach to standardisation adopted in Ireland:

- There is greater importance on the information coming from teachers about their students than on other data sources. In the Irish standardisation process, the starting point has been the teachers’ estimates of their students’ performance. The pattern of results (distribution) in these results is the starting point for the Calculated Grades model in Ireland. In the UK, in contrast, examination boards started with the historical pattern of achievement in each school and worked to fit the rank order of students from the school into this pattern (or distribution). Other than in exceptional cases, the teacher estimates were largely ignored.

- The data collected from schools is at a much more granular information about each student’s estimated performance. In Ireland, we collected individual percentage marks for each subject for each student. The UK authorities, in contrast, collected estimated grades – a much less refined measure of performance. Had we collected estimated grades rather than marks, it would not have been possible to adjust carefully how we combine the different sources of information that we have regarding students’ performance in the standardisation process.

- The standardisation process in Ireland is able to identify and fairly accredit the learning of an exceptional student, irrespective of the school that he or she attended. In Ireland, a student’s performance cannot be constrained by historical school performance if data from teachers suggests that a student may be exceptional. There is no evidence in the public domain of similar processes being used across the UK.
Appendix A
Data Protection Impact Assessment Form

Department of Education & Skills
Calculated Grade Process
Data Protection Impact Assessment

Step 1: Describe the Processing

<table>
<thead>
<tr>
<th>Describe the <strong>Nature</strong> of the Processing:</th>
</tr>
</thead>
<tbody>
<tr>
<td>How will you collect, use, store and delete data?</td>
</tr>
<tr>
<td>Due to the ongoing Covid-19 situation, on 8 May 2020 the Minister for Education and Skills announced that a system of Calculated Grades will be offered to Leaving Certificate students in 2020. Under the system outlined in the guidance document, teachers will use their professional judgement, taking into account a range of evidence from a student's past performance, to estimate the percentage mark a student would most likely have received had they sat the Leaving Certificate examination under normal conditions. The estimated percentage marks and rankings will undergo an in-school alignment process, involving colleague teachers of the same subject, to ensure that the standard being applied is consistent and appropriate for the subject. The principal will oversee the process and will also oversee the submission of the school's estimated marks and class rankings. Out-of-school learners who have tutors will be assessed by their subject tutor under a parallel and similar process provided there is credible satisfactory evidence on which an estimated percentage mark may be based. The school's estimated marks and class ranking will undergo a process of national standardisation. This will provide each student with a Calculated Grade. This process is outlined in a number of Departmental Publications available on <a href="http://www.gov.ie/leavingcertificate">www.gov.ie/leavingcertificate</a>. The Calculated Grades system will be overseen by an Executive Office in the Department of Education and Skills, established by the Minister for that purpose.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What is the source of the Data?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student (“Candidate”) – Identifier, Opt in, Subject Level</td>
</tr>
<tr>
<td>School – Estimated percentage mark for each Subject, Class Ranking for each subject, class ID.</td>
</tr>
</tbody>
</table>
Teacher/Tutor/centre of education - Estimated percentage mark for each Subject for out-of-school learners


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.

CAO
UCAS (via CAO)
Higher Education Institutes (via CAO)
SEC
and Recognised Scholarship Awarding Bodies
Polymetrika International Inc
The Educational Research Centre

What types of processing identified as likely high risk are involved?

None

Describe the **Scope** of the Processing:

What is the nature of the data?

- Historical Leaving Certificate results and related Junior Certificate results.
- Historical Junior Certificate Results
- Examination Number
- Programme i.e. Leaving Certificate Established, Vocational or Applied.
- PPSN
- DPIN
- Year
- School Roll Number
- School Type
- Surname
- Forename
- Gender
- Date of Birth
- Subject code
- Module Code
- Subject Irish indicator
- Address
- Eircode
How much data will you be collecting and using? How often will you be collecting the data?

Collected from each Candidate (circa 64,000) via Secure Portal, once to register and confirm levels, once to opt to receive calculated grades and optionally to appeal results and estimated percentage marks, class ID and class ranking (via existing secure ESINET) for each subject from the candidate’s school and estimated percentage marks from out-of-school learner tutors/teachers and centres of education.

How long will you keep the data for?

The calculated grades results data processed by the Department of Education and Skills will be retained for 100 years as this group of students may require a copy of their official state certificate of calculated grades at any stage during their lifetime. The data received from schools and tutors including the estimated percentage mark and class rank order data in order to produce calculated grades will be retained until the conclusion of the process including any potential litigation. The Data is retained in the public interest for research, historical and archival purposes.

How many individuals are affected?

Circa 64,000 Leaving Certificate Candidates

What geographical area does it cover?

The State, students residing outside the State and small cohort of students (circa 80) in the School of Martyrs, Tripoli, Libya
### Describe the **Context** of the Processing:

<table>
<thead>
<tr>
<th>What is the nature of your relationship with the individuals?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Data Subjects are all leaving certificate candidates, mostly enrolled students with a relationship to the Department via schools. Out-of-school learners included were previously registered to sit the Leaving certificate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How much control will they have?</th>
</tr>
</thead>
<tbody>
<tr>
<td>They opt in to the process via a secure online student portal in order to receive a calculated grade and retain an option to sit the traditional examination in due course.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Would they expect you to use their data in this way?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes, they will receive data protection information via a privacy notice on opt in and at all stages of engagement with the Student Portal; guidance will issue on process in addition to significant national coverage of issues.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Do they include children or other vulnerable groups?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes. Some candidates will be under 18, but few under 17. Some may have special needs which their schools will be aware of and in a position to assist in addition to the LC2020 Office contact line.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Are there prior concerns over this type of processing or security flaws</th>
</tr>
</thead>
<tbody>
<tr>
<td>Some given the novel nature of the project in the Irish context, the scale of data subjects and the importance of producing highly accurate data based on combining, comparing and matching data from multiple sources. It was considered and agreed that the benefits of carrying out this processing to the 2020 Leaving Certificate cohort far outweighed the minor risk involved in the processing. The principle of privacy by design and default were followed and the other principles and requirements of data protection legislation will be maintained throughout the process.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is it novel in any way?</th>
</tr>
</thead>
<tbody>
<tr>
<td>In this jurisdiction yes but similar systems are being operated this year in other Countries</td>
</tr>
</tbody>
</table>

| What is the current state of technology in this area? |
Modern and secure. Making use of trusted existing facilities which are already in operation by the Department such as ESINET, secure calculated grades student portal and secure file transfer protocol.

Are there any current issues of public concern that you should factor in?

The traditional leaving certificate enjoys widespread public trust and confidence. This system cannot risk diminishing this level of trust.

Describe the **Purposes** of the processing:

What do you want to achieve?

To provide each Candidate who wants them with Calculated Grades in Leaving certificate Subjects in order to complete their second level education and use these grades for entry to higher level education or other purpose rather than delaying until traditional exams can be held.

What is the intended effect on individuals?

- Completion of Second level education
- Progression to Further or Higher Education or employment
- Avoid missing a year in traditional educational life

What are the benefits of the processing – for you, and more broadly?

- Meeting the obligations of the Minister for Education under section 7(1) of the education Act 1988.
- Completion of Second level education
- Progression to Further or Higher Education or employment
- Avoid missing a year in traditional educational life

**Step 2: Consultation Process – Consider how to consult with the relevant stakeholders**
Describe when and how you will seek individuals’ views?

A dedicated advisory group chaired by the Secretary General of the Department was tasked with the preparation of recommendations for contingency arrangements for the 2020 Leaving Certificate examinations in light of public health concerns as a result of the Covid-19 pandemic. This group comprised of representatives of students, parents, teachers, school managers, the NCCA, the HEA, and the SEC and it consulted widely including the following internal and external stakeholders: secondary students union, teacher unions, school management bodies, IT, potential processors, educational academics and practitioners, state examination and assessment managers, with advice from public health officials.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have you consulted the Department’s DPO?</td>
<td>Yes</td>
</tr>
<tr>
<td>Have you consulted the Data Subjects (or their representatives)?</td>
<td></td>
</tr>
<tr>
<td>- Secondary Students Union Direct contact</td>
<td></td>
</tr>
<tr>
<td>- Minister contact</td>
<td></td>
</tr>
<tr>
<td>Have you consulted any Data Processors involved?</td>
<td>Yes, the Educational Research Centre and Polymetrika International Inc</td>
</tr>
<tr>
<td>Have you consulted all the relevant stakeholders, in particular the Department’s IT Unit, which is responsible for information security?</td>
<td>Yes</td>
</tr>
<tr>
<td>Have you consulted the Department’s legal advisor (if necessary)?</td>
<td>Yes and the CSSO and the AG variously provided advice regarding the lawful purpose of the processing, the applicability of various aspects of the Education Act 1988 including section 56 and the management of the Department’s data processing relationship with third parties including schools and service providers.</td>
</tr>
</tbody>
</table>

**Step 3: Access necessity and proportionality – describe compliance and proportionality measures.**
What is your lawful basis for processing (e.g. a task in the public interest or in exercise of official authority conferred by enactment or the Constitution, legal obligation, contract)?

Article 6(e) of the General Data Protection Regulation (2016/679) and Section 38 of the Data Protection Act, 2018 underpinned by Section 7(1) of the Education Act 1998.

How will function creep be prevented?

The process is designed as a once-off solution to the problem posed by the Covid-19 situation. Data will be limited to what is required for this once-off solution and all non-essential data will be deleted at the end of the calculated grades process.

How will data quality be ensured?

- QA measures by schools entering data
- Comprehensive guide provided for teachers to arrive at an estimated percentage mark for each student including an in-school class alignment process, principal oversight and clear guidelines for destroying manual records held.
- Secure portal developed for schools to submit the estimated percentage marks and class rank order on the Esinet system
- Comprehensive guide provided for the 2-tier data entry process – data entry and data approval with data approval at principal level.
- In-house data clean up resolve any anomalies such as estimated percentage mark and class ranking not fully aligned or outstanding data.
- Direct helpline and dedicated e-mail address available to schools during the data capture process
- QA measures for student portal
- Comprehensive guide to the calculated grades process for students and their parents.
- Comprehensive guide for students for registering and logging in to the secure student portal to be updated at each opening of the portal (6)
- Privacy notice published on log in page.
- Direct helpline and dedicated e-mail address available to students.
- In-house clean-up of data following each use of portal by students.
- QA measures by processors and data integrity checks by the ERC.
- Data Processing agreements in place.
- Processing to take place only in secured premises behind appropriate firewalls.
- Oversight of processing by a group reporting to an Independent Steering Committee
- ERC to asynchronously replicate Polymetrika’s processing as part of the validation and verification process
- Weekly meeting to review progress
- QA measures to trigger checks ie. Comparison to JC
- Validation checks to be conducted throughout the standardisation process which will identify any deviations.
### How will data minimization be ensured?

The system is being designed to collect only data which is absolutely essential to the generation of reliable calculated grades. Only this data is being collected and processed and all non-essential data will be deleted at the end of the calculated grades process.

### How will privacy information be provided to individuals?

- Data Protection Statement on candidate portal
- Online Privacy Notice covering all aspects of articles 12 to 14 (linked from Statement)
- Student Guidance on Process published
- Out-of-school learners Guidance published
- School Guidance on Estimated Percentage Marks
- Ongoing Q&As as required
- Department and Government Website summaries of the process

### How will individuals’ rights be implemented and supported?

Contact information for the DPO, the controller and the DPC is provided in the privacy Notice with a dedicated email for enquiries.

### What are the safeguards for international transfers i.e. outside of the European Economic Area – EU plus Iceland, Liechtenstein and Norway?

The student identifier, estimated percentage marking and class rankings will be hosted in Dublin on Azure Cloud for processing by Polymetrika Inc. Polymetrika Inc are based in Canada but are covered by an EU Adequacy Decision which will be fully referenced and explained in the privacy notice.

### How will Data Protection Compliance be demonstrated?

- Privacy Documentation
- ROPA
- DPIA
- Legal Advice
- Minutes of Expert Group
- IT Security Policy
- Project security and QA measures
- Data processing contracts
- Joint controller arrangement
- Data sharing agreement
- Data protection policy
- Other data protection technical and organisational measures such as staff training, and GDPR guidance documents and templates
- Communications between CGEO and DPO and DPC
- Guidance documents
- Fortnightly Data Management meetings

### Step 4: Identify and Assess Risks – Describe source of risk and nature of potential impact on individuals.

<table>
<thead>
<tr>
<th></th>
<th>Yes/No – Please provide description</th>
<th>Likelihood of harm (Remote, Possible or Probable)</th>
<th>Severity of Harm (Minimal, Significant or Severe)</th>
<th>Overall Risk (Low, Medium or High)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the processing affect an individuals’ ability to exercise rights (including but not limited to privacy rights)? Please describe in next column.</td>
<td>Unlikely</td>
<td>Remote</td>
<td>Significant</td>
<td>Medium</td>
</tr>
<tr>
<td>Will the processing affect an individuals’ ability to access services or opportunities? Please describe in next column.</td>
<td>Yes but positively. Receiving a Calculated Grade will provide earlier access to services such as third level and further education and progression to work.</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Will the processing contribute to loss of</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Question</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>------</td>
<td>------</td>
<td>------</td>
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</tr>
<tr>
<td>control over the use of personal data? Please describe in next column.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is the processing likely to contribute to Discrimination? Please describe in next column.</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Is the processing likely to lead to identity theft or fraud? Please describe in next column.</td>
<td>Unlikely</td>
<td>Remote</td>
<td>Significant</td>
<td>Medium</td>
</tr>
<tr>
<td>Is the processing likely to lead to any financial loss within the Department? Please describe in next column.</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Is the processing likely to lead to any reputational damage to the Department? Please describe in next column.</td>
<td>Unlikely</td>
<td>Remote</td>
<td>Significant</td>
<td>Medium</td>
</tr>
<tr>
<td>Is the processing likely to lead to any physical harm to individuals? Please describe in next column.</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Is the processing likely to lead to any loss of confidentiality? Please describe in next column.</td>
<td>Unlikely</td>
<td>Remote</td>
<td>Significant</td>
<td>Medium</td>
</tr>
<tr>
<td>Is the processing likely to contribute to re-identification of pseudonymised data? Please describe in next column.</td>
<td>No</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Are there any other significant economic or social disadvantages? Please describe in next column.</td>
<td>No, the opposite, significant social advantages</td>
<td>None</td>
<td>None</td>
<td>None</td>
</tr>
</tbody>
</table>
**Step 5: Identify measures to mitigate risk** – Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Step 4

<table>
<thead>
<tr>
<th>Risk</th>
<th>Options to reduce or eliminate risk</th>
<th>Effect on risk – Eliminated, reduced or accepted</th>
<th>Residual Risk – Low, Medium or High</th>
<th>Measure Approved – Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Will the processing affect an individuals’ ability to exercise rights (including but not limited to privacy rights)? Please describe in next column.</td>
<td>Ensuring Department and its processors have appropriate organisational and technical measures in place to vindicate data subject rights including appropriate safeguards for international data transfers. Processors are GDPR compliant and, where appropriate, PIPEDA compliant in order to meet the requirements of an EU Adequacy Decision for transfers of data to Canada.</td>
<td>Reduced</td>
<td>Low</td>
<td>Yes</td>
</tr>
<tr>
<td>Is the processing likely to lead to identity theft or fraud?</td>
<td>Secure candidate Portal in place With ID and PIN to ensure only the student can access their data.</td>
<td>Reduced</td>
<td>Low</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Secure data capture application via Esinet for schools. Data to be transferred to processors using VPN and secure FTP. Azure database to be encrypted using Advanced Data Security with two-factor authentication. Access to data via secure ID, strong password and whitelisted IP address. Access granted to authorised personnel only. Software, incl. antivirus to be kept up to date at all times. Data will not be downloaded or saved to hard drive or removable storage. No paper copies will be produced. Any data that is to be deleted will be done in a way that is unrecoverable.

<p>| Is the processing | Robust organisational, Reduced | Low | Yes |</p>
<table>
<thead>
<tr>
<th>Question</th>
<th>Description</th>
<th>Likelihood</th>
<th>Risk</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Likely to lead to any reputational damage to the Department? Please describe in next column.</td>
<td>Technical and security measures detailed above in place to ensure all aspects of controllers’ obligations and data subjects’ rights are met in full and comply with the underlying principles of GDPR.</td>
<td>Reduced</td>
<td>Low</td>
<td>Yes</td>
</tr>
<tr>
<td>Is the processing likely to lead to any loss of confidentiality? Please describe in next column.</td>
<td>The Secure candidate Portal in place with ID and PIN, secure data capture application for schools, the security measures outlined in the previous as well as the QA measures outlined above will ensure that the likelihood of a data breach is minimised and that the processing is highly unlikely to lead to a loss of confidentiality.</td>
<td>Reduced</td>
<td>Low</td>
<td>Yes</td>
</tr>
</tbody>
</table>