



Respect Honesty Compassion Resilience Industry Courage

The Market Weighton School

Examinations Policy

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Purpose of the policy

The Market Weighton School is committed to ensuring that the exams management and administration process is run effectively and efficiently and in compliance with the published JCQ regulations and awarding body requirements. This exam policy will ensure that:

- all aspects of the centre's exam process is documented, supporting the exams contingency plan, and other relevant exams-related policies, procedures and plans are signposted to
- the workforce is well informed and supported
- all centre staff involved in the exams process clearly understand their roles and responsibilities
- all exams and assessments are conducted according to JCQ and awarding body regulations, guidance and instructions, thus maintaining the integrity and security of the exam/assessment system at all times
- exam candidates understand the exams process and what is expected of them
- This policy is reviewed annually to ensure ways of working in the centre are accurately reflected and that exams and assessments are conducted to current JCQ (and awarding body) regulations, instructions and guidance.

It is the responsibility of everyone involved in the centre's exam processes to read, understand, and implement this policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Where references are made to JCQ regulations/guidelines, further details can be found at www.jcq.org.uk.

Roles and responsibilities overview

Head of Centre

- Understands the contents, refers to and directs relevant centre staff to annually updated JCQ publications including:
 - General regulations for approved centres (GR)
 - Instructions for conducting examinations (ICE)
 - Access Arrangements and Reasonable Adjustments (AA)
 - Suspected Malpractice in Examinations and Assessments (SMEA)
 - Instructions for conducting non-examination assessments (NEA) (and the instructions for conducting coursework)
 - A guide to the special consideration process (SC)
- Ensures the centre has appropriate accommodation to support the size of the cohorts being taught including appropriate accommodation for candidates requiring access arrangements for exams and assessments
- Takes responsibility for responding to the National Centre Number Register annual update (administered on behalf of the JCQ member awarding bodies by OCR ocr.org.uk/administration/stage-1-preparation/ncn-annual-update/) by the end of October each year confirming they are both aware of and adhering to the latest version of the JCQ regulations and signs and returns the head of centre's declaration which is then kept on file for inspection purposes - in the EO office.
- Enables the relevant senior leader(s), the examinations officer and the SenCo to receive appropriate training and support in order to facilitate the effective delivery of examinations and assessments within the centre, and ensure compliance with the published JCQ regulations

- Appoints a SenCo who will determine appropriate arrangements for candidates with learning difficulties and disabilities
- Ensures centre staff undertake key tasks within the exams process and meet internal deadlines set by the EO
- Makes sure that a teacher who teaches the subject being examined, or a senior member of teaching staff who has had overall responsibility for the subject department and/or preparing the candidates for the examination, is not an invigilator during the timetabled written examination or on-screen test
- Ensures confidentiality and security within the examination process is compliant with and managed according to JCQ and awarding body regulations, guidance and instructions including
 - the location of the centre's secure storage facility in a secure room solely assigned to examinations for the purpose of administering secure examination materials
 - appropriate arrangements are in place to ensure that confidential materials are only delivered to authorised members of centre staff
 - access to the secure room and secure storage facility is restricted to the authorised 2-4 key holders
 - the relevant awarding body is immediately informed if the security of question papers or confidential supporting instructions is put at risk
 - that arrangements are in place to check that the correct question paper packets are opened by authorised members of centre staff
- Through taking an ethical approach and working proactively to avoid malpractice among students and staff takes all reasonable steps to prevent the occurrence of any malpractice/maladministration before, during the course of and after examinations have taken place
- Ensures irregularities are investigated and informs the awarding bodies of any cases of alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, are reported to the awarding body immediately
- Ensures risks to the exam process are assessed and appropriate risk management processes/contingency plans are in place (that allow the senior leadership team to act immediately in the event of an emergency or staff absence)

National Centre Number Register

- Takes responsibility for confirming, on an annual basis, that they are aware of and adhering to the latest version of the JCQ's regulations by responding to the head of centre's declaration which is managed as part of the National Centre Number Register (NCNR) annual update
- Understands that this responsibility cannot be delegated to a member of the senior leadership team or the examinations officer, and acknowledges that failure to respond to the NCNR annual update, and/or the head of centre's declaration, will result in:
 - The centre status being suspended
 - The centre not being able to submit examination entries
 - The centre not receiving or being able to access question papers

Recruitment, selection and training of staff

- Retains a workforce of an appropriate size and competence, including sufficient managerial and other resource, to undertake the delivery of the qualification as required by an awarding body. This includes taking reasonable steps to ensure occupational competence where this is required for the assessment of specific qualifications

- Provides fully qualified teachers to mark non-examination assessments, and/or fully qualified assessors for the verification of centre-assessed components
- Enables the relevant senior leader(s), the examinations officer (EO) and the ALS lead/SenCo to receive appropriate training and support in order to facilitate the effective delivery of examinations and assessments within the centre, and ensure compliance with the published JCQ regulations
- Appoints a ALS lead/SenCo who will determine appropriate arrangements for candidates with learning difficulties and disabilities

Internal governance arrangements

- Has in place a written escalation process should the head of centre, or a member of the senior leadership team with oversight of examination administration, be absent

Escalation Process

- Refer to the Exam Contingency Policy - found in the Staff Centre Resource Drive under Policies
- Has in place a member of the senior leadership team who will provide support and guidance to the examinations officer and ensure that the integrity and security of examinations and assessments is maintained throughout an examination series
- Ensures centre staff undertake key tasks within the exams process and meet internal deadlines set by the EO
- Makes sure that a teacher, a tutor or a senior member of centre staff who teaches the subject being examined, is not an invigilator during an examination

Delivery of qualifications

- Delivers qualifications, as required by the awarding body, in accordance with relevant equality legislation. This includes but is not limited to ensuring that qualifications are made available for all candidates capable of undertaking them and seeking reasonable adjustments for disabled candidates
- Enables candidates to receive sufficient and up to date laboratory experience, or relevant training where required by the subject concerned

Public liability

- Complies with local health and safety rules which are in place and that the centre is adequately covered for public liability claims

Security of assessment materials

- Takes all reasonable steps to maintain the integrity of the examinations/assessments, including the security of all assessment materials, by ensuring:
 - The location of the centre's secure storage facility in a secure room solely assigned to the examinations for the purpose of administering secure examinations materials
 - Appropriate arrangements are in place to ensure that confidential materials are only handed to authorised members of centre staff
 - Access to the secure room and secure storage facility is restricted to the authorised two to six key holders (ensuring only persons authorised by the head of centre and the examinations officer and allowed access to the centre's secure storage facility as one of the two to six key holders)
 - The relevant awarding body is immediately informed if the security of question papers or confidential supporting instructions is put at risk
 - That arrangements are in place to check that the correct question paper packets are opened by authorised member of centre staff

- Makes arrangements to receive, check and store question papers and examination material safely and securely at all times and for as long as required in accordance with current JCQ publication Instructions for conducting examinations
- Makes arrangements to receive and issue material received from the awarding bodies to staff and candidates, and notify them of any advice and instructions relevant to the examinations and assessments
- Allows candidates access to relevant pre-release materials on, or as soon as possible after, the date specified by the awarding bodies
- Obtains written approval from the relevant awarding body before permitting a third party to deliver any part of a qualification including assessments
- Through taking an ethical approach and working proactively to avoid malpractice among students and staff, TMWS takes all reasonable steps to prevent the occurrence of any malpractice/maladministration before, during the course of and after examinations have taken place
- Ensures irregularities are investigated and informs the awarding bodies of any cases of alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, are reported to the awarding body immediately
- Ensures risks to the exam process are assessed and appropriate risk management processes/contingency plans are in place (that allow the senior leadership team to act immediately in the event of an emergency or staff absence)

Exam contingency plan

Please refer to the centre Exams Contingency Policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Internal appeals procedures

- Ensures required internal appeals procedures are in place and drawn to the attention of candidates and (where relevant) their parents/carers

Please refer to the centre Internal Appeals Procedure. The policy is available electronically on the Staff Central Resources drive under Policies.

Equalities Policy

Please refer to the centre Disability Equality for Supporting Learners Policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Complaints and Appeals Policy

Please refer to the centre Complaints and Appeals Policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Child Protection/Safeguarding Policy

Please refer to the centre Child Protection and safeguarding policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Data Protection Policy

This policy details how The Market Weighton School, ensures compliance with regulations set out by the Data Protection Act 2018 (DPA2018) and General Data Protection Regulations (GDPR) in relation to exams managements and administration.

Please refer to the centre Data Protection Policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Students are given the right to find out what information the centre holds about them, how this is protected, how this can be accessed and how data breaches are dealt with.

All exams office staff responsible for collecting and sharing candidates' data are required to follow strict rules called 'data protection principles' ensuring the information is:

- Used fairly and lawfully
- Used for limited, specifically stated purposes
- Used in a way that is adequate, relevant and not excessive
- Accurate
- Kept for longer than is absolutely necessary
- Handled according to peoples data protection rights
- Kept safe and secure
- Not transferred outside the European Economic Area without adequate protection

To ensure that the centre meets the requirements of the DPA 2018 and GDPR, all candidates' exam information - even that which is not classified as personal or sensitive - is covered under this policy.

Exams-related information

There is a requirement for the exams officer to hold exams-related information on candidates taking external examinations. For further details on the type of information held please refer to *Section 5 - Candidate information, audit and protection measures*.

Candidates' exams-related data may be shared with the following organisations:

- Awarding bodies
- Joint Council for Qualifications (JCQ)
- Department for Education, Local Authority, Capita SIMS; SISRA

This data may be shared via one or more of the following methods:

- Hard copy
- Email
- Secure extranet site(s) including eAQA; OCR Interchange; NCFE Portal; Pearson Edexcel Online; Access Arrangements Online; JCQ Centre Administration Portal (CAP); Management Information System (MIS) provided by Capita SIMS; sending/receiving information via electronic data interchanged (EDI) using A2C (<https://www.jcq.org.uk/about-a2c>) to/from awarding body processing systems; etc.

This data may relate to exam entries, access arrangements, the conduct of exams and non-examination assessments, special consideration requests and exam results/post-results/certificate information.

Informing candidates of the information held

The Market Weighton School ensures that candidates are fully aware of the information and data held with regards to external examinations.

All candidates:

- Are informed via assemblies and information packs
- Can access this policy via request at the school office

Candidates are made aware of the above as they prepare for their externally accredited qualification.

At this point, the centre also brings to the attention of candidates the annually updated JCQ document information for candidates - Privacy Notice which explains how the JCQ awarding bodies process their personal data in accordance with the DPA 2018 and GDPR.

Candidates eligible for access arrangements are also required to provide their consent by signing the GDPR compliant JCQ candidate personal data consent form (personal data consent, Privacy Notice (AAO) and Data Protection confirmation) before access arrangements approval applications can be processed online.

Hardware and Software

The table below confirms how IT hardware, software and access to online systems is protected in line with DPA and GDPR requirements.

| Hardware | Date of purchase and protection measures |
|---|---|
| Desktop Computer/Laptop/Tablet | <p>Date of purchase: 2008</p> <p>Student computers are checked periodically during term time by the IT Manager using Impero software and SCCM. Checks are made on the event logs and software installed. This is to ensure no software other than what should be installed is on the machine.</p> <p>Sophos protects the computers and servers from Viruses and Spyware. This is run twice per week, scanning the machines for any viruses.</p> |
| Software/online system | Protection measure(s) |
| Management Information System (MIS) provided by Capita SIMS | <p>Username and password protected</p> <p>No access to users when outside of school</p> <p>Protected by local authority malware</p> <p>Business Manager and IT manager only authorised persons to create new accounts, grant access rights, also remove rights and delete users when no longer required</p> |
| SISRA | <p>Password protected, centre administrator has authority to create/approve all new users and to remove users, block access and delete accounts when access for a user is no longer required</p> |
| FFT | <p>Password protected, centre administrator has authority to create/approve all new users and to remove users, block access and delete accounts when access for a user is no longer required</p> |
| GL Assessment | <p>Password protected, centre administrator has authority to create/approve all new users and to remove users, block access and delete accounts when access for a user is no longer required</p> |
| Secure awarding body extranet site(s) including e-AQA; OCR Interchange; NCFE Portal, NCFE Qualification Hub; Pearson Edexcel Online | <p>Password protected, centre administrator has authority to create/approve all new users and to remove users, block access and delete accounts when access for a user is no longer required</p> |

| | |
|---|---|
| Access Arrangements Online | Password protected, centre administrator has authority to create/approve all new users and to remove users, block access and delete accounts when access for a user is no longer required |
| Sending/receiving information via electronic data interchange (EDI) using A2C | |

Dealing with data breaches

See The Market Weighton School's Data Protection Policy - found in the staff central resources drive.

Access Arrangements Policy

Please refer to the centre Accessibility plan policy. The policy is available electronically on the Staff Central Resources drive under Policies.

Conflicts of Interest

- Ensures the relevant awarding bodies are informed of any Conflict of Interest where
 - a member of centre staff is taking a qualification at the centre which includes internally assessed components/units (taking at the centre as a last resort where unable to find an alternative centre)
 - a candidate is being taught and prepared for a qualification which includes internally assessed components/units by a member of centre staff with a personal connection to the candidate
- Maintains records that confirm the measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected by the above, and where
 - a member of exams office staff have a personal connection to a candidate being entered for exams and assessments at the centre or at another centre
 - a member of centre staff is taking a qualification at the centre which does not include internally assessed components/units (taking at the centre as a last resort where unable to find an alternative centre)
 - a member of centre staff is taking a qualification at another centre
- Ensures other relevant centre staff where they may be involved in the receipt and dispatch of confidential exam materials are briefed on the requirements for maintaining the integrity and confidentiality of the exam materials
- Ensures members of centre staff do **not** forward e-mails and letters from awarding body or JCQ personnel without prior consent to third parties or upload such correspondence onto social media sites and applications
- Ensures members of centre staff do **not** advise parents/candidates to contact awarding bodies/JCQ directly nor provide them with addresses/email addresses of awarding body examining/assessment or JCQ personnel

Centre Inspections

- Co-operates with the JCQ Centre Inspection Service, an awarding body or a regulatory authority when subject to an inspection, an investigation or an unannounced visit, and takes all reasonable steps to comply with all requests for information or documentation made by an awarding body or regulatory authority as soon as it practical
- Allows all venues used for examinations and assessments, paperwork and secure storage facilities to be open for inspection

- Understands the HCQ Centre Inspector will identify him/herself with a photo ID card and must be accompanied throughout his/her tour of the premises, including inspection of the centre's secure storage facility

Exams Officer

- Understands the contents of annually updated JCQ publications including:
General regulations for approved centres
Instructions for conducting examinations
Suspected Malpractice - Policies and Procedures
Post-results services (PRS)
- Completes/submits the National Centre Number Register annual update (administered on behalf of the JCQ member awarding bodies by OCR by the end of October each year)
- Is familiar with the contents of annually updated information from awarding bodies on administrative procedures, key tasks, key dates and deadlines
- Ensures key tasks are undertaken and key dates and deadlines met
- Recruits, trains and deploys a team of internal/external invigilators; appoints lead invigilators, as required and keeps a record of the content of training provided to invigilators for the required period
- Works with the SenCo to ensure invigilators supervising access arrangement candidates and those acting as a facilitator supporting access arrangement candidates fully understand the respective role and what is and what is not permissible in the exam room
- Supports the head of centre in ensuring that awarding bodies are informed of any Conflict of Interest declared by members of centre staff and in maintaining records that confirm the measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected before the published deadline for entries
- Briefs other relevant centre staff where they may be involved in the receipt and dispatch of confidential exam materials on the requirements for maintaining the integrity and confidentiality of the exam materials

Senior Leaders (SLT)

- Are familiar with the contents, refer to and direct relevant centre staff to annually updated JCQ publications including:
General regulations for approved centres
Instructions for conducting examinations
Access Arrangements and Reasonable Adjustments
Suspected Malpractice - Policies and Procedures
Instructions for conducting non-examination assessments (and the instructions for conducting coursework)
A guide to the special consideration process

Special Educational Needs Co-ordinator (SenCo) /Additional Learning Support (ALS) Lead

- Understands the contents, refers to and directs relevant centre staff to annually updated JCQ publications including:
Access Arrangements and Reasonable Adjustments
- Leads on the access arrangements and reasonable adjustments process (referred to in this policy as 'access arrangements')
- If not the qualified access arrangements assessor, works with the person appointed, on all matters relating to assessing candidates and ensures the correct procedures are followed
- Presents when requested by a JCQ Centre Inspector, evidence of the assessor's qualification

Head of Department (HoD)

- Ensures teaching staff undertake key tasks, as detailed in this policy, within the exams process (exam cycle) and meet internal deadlines set by the EO and SenCo
- Ensures teaching staff keep themselves updated with awarding body subject and teacher-specific information to confirm effective delivery of qualifications
- Ensures teaching staff attend relevant awarding body training and update events

Teaching staff

- Undertake key tasks, as detailed in this policy, within the exams process and meet internal deadlines set by the EO and SenCo
- Keep updated with awarding body subject and teacher-specific information to confirm effective delivery of qualifications
- Attend relevant awarding body training and update events

Invigilators

- Attend / undertake training, update, briefing and review sessions as required
- Provide information as requested on their availability to invigilate
- Sign a confidentiality and security agreement and confirm whether they have any current maladministration/malpractice sanctions applied to them

Reception staff

- Support the EO in the receipt and dispatch of confidential exam materials and follow the requirements for maintaining the integrity and confidentiality of the exam materials

Site staff

- Support the EO in relevant matters relating to exam rooms and resources

Candidates

Where applicable in this policy, the term 'candidates' refers to candidates and/or their parents/carers.

The exam cycle

The exams management and administration process that needs to be undertaken for each **exam series** is often referred to as the **exam cycle** and relevant tasks required within this grouped into the following stages:

- planning
- entries
- pre-exams
- exam time
- results and post-results

This policy identifies roles and responsibilities of centre staff within this cycle.

Planning: roles and responsibilities

Information sharing

Head of Centre

- Directs relevant centre staff to annually updated JCQ publications including GR, ICE, AA, SM and NEA (and the instructions for conducting coursework)

Exams Officer

- Signposts relevant centre staff to JCQ publications and awarding body documentation relating to the exams process that has been updated
- Signposts relevant centre staff to JCQ information that should be provided to candidates
- As the centre administrator, approves relevant access rights for centre staff to access awarding body secure extranet sites

Information gathering

Exams Officer

- Undertakes an annual information gathering exercise in preparation for each new academic year to ensure data about all qualifications being delivered is up to date and correct
- Collates all information gathered into one central point of reference
- Researches awarding body guidance to identify administrative processes, key tasks, key dates and deadlines for all relevant qualifications
- Produces an annual exams plan of key tasks and key dates to ensure all external deadlines can be effectively met; informs key centre staff of internal deadlines
- Collects information on internal exams to enable preparation for and conduct of
 - Winter Session - Year 11 Mocks, held at the beginning of December
 - Spring Session - Year 11 February/March.
 - Summer Session - Year 10 Mocks, held in June after the completion of the Y11 external exams.

Head of Department

- Responds (or ensures teaching staff respond) to requests from the EO on information gathering
- Meets the internal deadline for the return of information
- Informs the EO of any changes to information in a timely manner minimising the risk of late or other penalty fees being incurred by an awarding body
- Notes the internal deadlines in the annual exams plan and directs teaching staff to meet these

Access arrangements

Head of Centre

- Ensures there is appropriate accommodation for candidates requiring access arrangements in the centre for all examinations and assessments
- Ensures a written process is in place to not only check the qualification(s) of the appointed assessor(s) but that the correct procedures are followed as per Chapter 7 of the JCQ publication Access Arrangements and Reasonable Adjustments
- Ensures the SenCo/ALS Lead is fully supported in effectively implementing access arrangements and reasonable adjustments once approved

SenCo/ALS Lead

- Assesses candidates (or works with the appropriately qualified assessor as appointed by the head of centre) to identify access arrangements requirements
- Gathers **evidence** to support the need for access arrangements for a candidate
- Liaises with teaching staff to gather evidence of **normal way of working** of an affected candidate
- Determines candidate eligibility for arrangements or adjustments that are centre-delegated
- Gathers signed **Personal data consent, Privacy Notice (AAO) and Data Protection confirmation** forms (candidate personal data consent form) from candidates where required

- Applies for **approval** through **Access arrangements online (AAO)** via the **Centre Admin Portal (CAP)**, where required or through the awarding body where qualifications sit outside the scope of AAO
- Keeps a file for each candidate for JCQ inspection purposes containing all the required documentation (if documentation is stored electronically, an e-folder must be created for each individual candidate. The candidate's e-folder must hold each of the required documents for inspection)
- Employs good practice in relation to the Equality Act 2010
- Liaises with the EO regarding exam time arrangements for access arrangement candidates
- Ensures staff appointed to facilitate access arrangements for candidates are appropriately trained and understand the rules of the particular arrangement(s) and keeps a record of the content of training provided to facilitators for the required period
- Works with the EO to ensure invigilators and those acting as a facilitator fully understand the respective role and what is and what is not permissible in the exam room
- Provides and annually reviews a centre policy on the **use of word processors** in exams and assessments

Word Processor Policy (exams)

- Please refer to the centre Word Processor Policy. The policy is available electronically on the Staff Central Resources drive under Policies.
- Ensures criteria for candidates granted **separate invigilation within the centre** is clear, meets JCQ regulations and best meets the needs of individual candidates and remaining candidates in main exam rooms

Separate invigilation within the centre

In the case of separate invigilation, the candidate's difficulties are known to Head of Year, the SenCo or a senior member of staff with pastoral responsibilities.

Separate invigilation reflects the candidate's normal way of working in internal school tests and mock examinations as a consequence of a long term medical condition or long term social, mental or emotional needs.

Senior Leaders, Head of Department, Teaching staff

- Support the SenCo in determining and implementing appropriate access arrangements
- Provide a statement for inspection purposes which details the criteria the centre uses to award and allocate word processors for examinations

Internal assessment and endorsements

Head of centre

Controlled assessments, coursework and non-examination assessments

- Ensures arrangements are in place to co-ordinate and standardise all marking or centre-assessed components and ensures that candidates' centre-assessed work is produced, authenticated and marked, or assessed and quality assured in accordance with the awarding bodies' instructions (including where relevant, private candidates)
- Ensures that teaching staff, in accordance with awarding bodies' instructions, return all subject-specific forms by the required date
- Provides fully qualified teachers to mark non-examination assessments
- Ensures an **internal appeals procedure** relating to internal assessment decisions is in place for a candidate to appeal against and request a review of the centre's marking (see Roles and responsibilities overview)

- Ensures a **non-examination assessment policy** is in place for GCSE qualifications which include components of non-examination assessment.

Non-examination assessment policy

Please refer to the centre Non examination assessment policy. The policy is available electronically on the Staff Central Resources drive under Policies.

- Ensures any irregularities relating to the production of work by candidates are investigated and dealt with internally if discovered prior to a candidate signing the authentication statement (where required) or reported to the awarding body if a candidate has signed the authentication statement

Senior Leaders/Head of Department

- Ensure teaching staff have the necessary and appropriate knowledge, understanding, skills, and training to set tasks, conduct task taking, and to assess, mark and authenticate candidates' work (including where relevant, private candidates)
- Ensure appropriate internal moderation, standardisation and verification processes are in place
- Ensures teaching staff delivering AQA Applied General qualifications, OCR Cambridge Nationals, Entry Level Certificate or Project qualifications follow JCQ Instructions for conducting coursework and the specification provided by the awarding body
- Ensures teaching staff delivering GCSE specifications (which include components of non-examination assessment) follow JCQ Instructions for conducting non-examination assessments and the specification provided by the awarding body
- For other qualifications, ensures teaching staff follow appropriate instructions issued by the awarding body
- Ensures teaching staff inform candidates of their centre assessed marks as a candidate may request a review of the centre's marking before marks are submitted to the awarding body

Teaching staff

- Ensure appropriate instructions for conducting internal assessment are followed
- Ensure candidates are aware of JCQ and awarding body information for candidates on producing work that is internally assessed (coursework, non-examination assessments, social media) prior to assessments taking place
- Ensure candidates are informed of their centre assessed marks as a candidate may request a review of the centre's marking before marks are submitted to the awarding body

Exams Officer

- Identifies relevant key dates and administrative processes that need to be followed in relation to internal assessment
- Signposts teaching staff to relevant JCQ *information for candidates* documents that are annually updated

Invigilation

Head of Centre

- Ensures relevant support is provided to the EO in recruiting, training and deploying a team of invigilators
- Ensures, if contracting supply staff to act as invigilators, that such persons are competent and fully trained, understanding what is and what is not permissible
- Determines if additional invigilators will be deployed in timed Art exams in addition to the subject teacher to ensure the supervision of candidates is maintained at all times

Exams Officer

- Recruits additional invigilators where required to effectively cover all exam periods/series' throughout the academic year
- Collects information on new recruits to identify if they have invigilated previously and if any current maladministration/malpractice sanctions are applied to them
- Provides training for new invigilators on the instructions for conducting exams and an annual update for the existing invigilation team so that they are aware of any changes in a new academic year before they are allocated to invigilate an exam
- Ensures invigilators supervising access arrangement candidates understand their role (and the role of a facilitator who may be supporting a candidate) and the rules and regulations of the access arrangement(s)
- Ensures invigilators are briefed on the access arrangement candidates in their exam room and are made aware of the access arrangement(s) awarded (Ensuring these candidates are identified on the seating plan) and confirms invigilators understand what is and what is not permissible
- Collects evaluation of training to inform future events

Entries: roles and responsibilities

Estimated entries

Exams Officer

- Requests estimated or early entry information, where this may be required by awarding bodies, from HoDs in a timely manner to ensure awarding body external deadlines for submission can be met

Estimated entries collection and submission procedure

- Estimated entry information is collated from the school MIS database using the registration figures for each subject following enrolment and re-enrolment, and submitted online using the awarding bodies' secure sites.
- Makes candidates aware of the JCQ Information for candidates - Privacy Notice at the start of a vocational qualification or when entries are being processed for a general qualification

Head of Department

- Provides entry information requested by the EO to the internal deadline
- Informs the EO immediately of any subsequent changes to entry information

Final entries

Exams Officer

- Requests final entry information from HoDs in a timely manner to ensure awarding body external deadlines for submission can be met
- Informs HoDs of subsequent deadlines for making changes to final entry information without charge
- Confirms with HoDs final entry information that has been submitted to awarding bodies
- Ensures as far as possible that entry processes minimise the risk of entries or registrations being missed reducing the potential for late or other penalty fees being charged by awarding bodies
- Observes each awarding body's terms and conditions for the entry and withdrawal of candidates for their examinations and assessments

Final entries collection and submission procedure

HoDs are provided with a checklist specifying the awarding body, subject, level, and entry code(s) and asked to confirm entries by signing and returning the checklist to the EO. Entries are submitted via EDI file through the school MIS system using A2C.

Head of Department

- Provides information requested by the EO to the internal deadline
- Informs the EO immediately, or at the very least prior to the deadlines, of any subsequent changes to final entry information, which includes
 - changes to candidate personal details
 - amendments to existing entries
 - withdrawals of existing entries
- Checks final entry submission information provided by the EO and confirms information is correct

Entry fees

Entry fees are payable from the exam budget, all invoices signed off by the EO. Departments are charged late or higher late fees incurred for entries made after the deadline.

Late entries

Exams Officer

- Has clear entry procedures in place to minimise the risk of late entries
- Charges any late or other penalty fees to departmental budgets

Head of Department

- Minimises the risk of late entries by
 - following procedures identified by the EO in relation to making final entries on time
 - meeting internal deadlines identified by the EO for making final entries

Private candidates

- The school does not accept private or external candidates for examination entry

Candidate statements of entry

Exams Officer

- Provides candidates with statements of entry for checking

Teaching staff

- Ensure candidates check statements of entry and return any relevant confirmation required to the EO

Candidates

- Confirm entry information is correct or notify the EO of any discrepancies

Pre-exams: roles and responsibilities

Access arrangements

SenCo/ALS

- Ensures appropriate arrangements, adjustments and adaptations are in place to facilitate access to exams/assessments for candidates where they are disabled within the meaning of the Equality Act (unless a temporary emergency arrangement is required at the time of an exam)

- Ensures a candidate is involved in any decisions about arrangements, adjustments and /or adaptations that may be put in place for him/her
- Ensures exam information (JCQ information for candidates information, individual exam timetable etc.) is adapted where this may be required for a disabled candidate to access it
- Allocates appropriately trained centre staff to facilitate access arrangements for candidates in exams and assessments (ensuring that the facilitator appointed meets JCQ requirements and fully understands the rule of the particular access arrangement)
- Where relevant, ensures the necessary and appropriate steps are undertaken to gather an appropriate picture of need and demonstrate normal way of working for a private candidate (including distance learners and home educated candidates) and that the candidate is assessed by the centre's appointed assessor

Briefing candidates

Exams Officer

- Issues individual exam timetable information to candidates and informs candidates of any contingency day awarding bodies may identify in the event of national or significant local disruption to exams
- Prior to exams issues relevant JCQ information for candidates documents
- Where relevant, issues relevant awarding body information to candidates
- Issues centre exam information to candidates including information on:
 - exam timetable clashes
 - arriving late for an exam
 - absence or illness during exams
 - what equipment is/is not provided by the centre
 - food and drink in exam rooms
 - wrist watches in exam rooms
 - when and how results will be issued and the staff that will be available
 - the post-results services and how the centre deals with requests from candidates
 - when and how certificates will be issued

Dispatch of exam scripts

Exams Officer

- Identifies and confirms arrangements for the dispatch of candidate exam scripts with the DfE (STA) 'yellow label service' or the awarding body where qualifications sit outside the scope of the service

Estimated Grades

Senior Leaders/Head of Department

- Ensure teaching staff provide estimated grade information to the EO by the internal deadline (Where this still may be required by the awarding body)

Exams Officer

- Submits estimated grade information to awarding bodies to meet the external deadline (where this may still be required by the awarding body)
- Keeps a record to track what has been sent

Internal assessment and endorsements

Head of Centre

- Ensures procedures are in place for candidates to appeal internal assessment decisions and make requests for reviews of marking

SenCo

- Liaises with teaching staff to implement appropriate access arrangements for candidates undertaking internal assessments and practical endorsements

Teaching staff

- Support the SenCo in implementing appropriate access arrangements for candidates undertaking internal assessments and practical endorsements
- Assess and authenticate candidates' work
- Assess endorsed components
- Ensure candidates are informed of centre assessed marks prior to marks being submitted to awarding bodies

Head of Department

- Ensures teaching staff assess and authenticate candidates' work to the awarding body requirements
- Ensures teaching staff assess endorsed components according to awarding body requirements
- Ensures teaching staff provide marks for internally assessed components and grades for endorsements of qualifications to the EO to the internal deadline
- Ensures teaching staff provide required samples of work for moderation and sample recordings for monitoring to the EO to the internal deadline

Exams Officer

- Submits marks, endorsement grades and samples to awarding bodies/moderators/monitors to meet the external deadline
- Keeps a record to track what has been sent
- Logs moderated samples returned to the centre
- Ensures teaching staff are aware of the requirements in terms of retention and subsequent disposal of candidates' work

Candidates

- Authenticate their work as required by the awarding body

Invigilation

Exams Officer

- Provides an annually reviewed/updated invigilator handbook to invigilators, trains new invigilators on appointment and updates experienced invigilators on any regulation changes
- Deploys invigilators effectively to exam rooms throughout an exam series (including the provision of a roving invigilator where a candidate and invigilator [acting as a practical assistant, reader or scribe] are accommodated on a 1:1 basis to enter the room at regular intervals in order to observe the conducting of the exam, ensuring all relevant rules are being adhered to and supporting the practical assistant/reader and/or scribe in maintaining the integrity of the exam)
- Allocates invigilators to exam rooms (or where supervising candidates due to a timetable clash) according to the required ratios
- Liaises with the SenCo regarding the facilitation and invigilation of access arrangement candidates

SenCo

- Liaises with the EO regarding facilitation and invigilation of access arrangement candidates

Invigilators

- Provide information as requested on their availability to invigilate throughout an exam series

JCQ Centre Inspections

Exams officer or Senior leader

- Will accompany the Inspector throughout a visit

SenCo or relevant Senior leader (in the absence of the SenCo)

- Will meet with the inspector when requested to provide documentary evidence regarding access arrangement candidates and address any questions, the inspector may raise

Seating and identifying candidates in exam rooms

Exams Officer

- Ensures a procedure is in place to verify candidate identity

Candidate Identification procedure

Individual exam cards populated with a student's ID number, photograph, exam entry details, and access arrangements if appropriate, are used in accordance with seating plans in every exam venue. Staff are able to refer to these for identification purposes and cross check information with the school database and exam database to resolve queries.

- Ensures invigilators are aware of the procedure
- Provides seating plans for exam rooms according to JCQ and awarding body requirements (and ensures candidates with access arrangements are identified on the seating plan and invigilators are informed of those candidates with access arrangements and made aware of the access arrangement(s) awarded)

Invigilators

- Follow the procedure for verifying candidate identity provided by the EO
- Seat candidates in exam rooms as instructed by the EO/on the seating plan

Security of exam materials

Exams Officer

- Confirms appropriate arrangements are in place to ensure that confidential materials are only handed over to those authorised by the head of centre.
- Ensures only persons authorised by the head of centre and the exams officer are allowed access to the centre's secure storage facility as one of the two to six key holders
- Has a process in place to demonstrate the receipt, secure movement and secure storage of confidential exam materials within the centre
- Ensures a log is kept at the initial point of delivery recording confidential materials received and signed for by authorised staff within the centre and that appropriate arrangements are in place for confidential materials to be immediately transferred to the secure storage facility until they can be removed from the dispatch packaging and checked in the secure room before being returned to the secure storage facility in timetable order
- Ensures the secure storage facility contains only current and live confidential material (ensuring that past examination question papers, internal tests and mock examinations are not kept in the centre's secure storage facility)

- Ensures that examination stationery, e.g. answer booklets and formula booklets are stored in the secure room (attempting to store this material in the secure storage facility, when sufficient space allows)
- Ensures the integrity and security of any electronic question paper is maintained during the downloading, printing and collating process (ensuring printing is carried out in an area that can be controlled to prevent unauthorised personnel accessing live assessment materials and ensuring only authorised members of centre staff have access to electronic question papers)

Reception staff

- Follow the process to log confidential materials delivered to/received by the centre to the point materials are issued to authorised staff for transferal to the secure storage facility

Teaching staff

- Adhere to the process to record the secure movement of confidential materials taken from or returned to secure storage throughout the time the material is confidential

Timetabling and rooming

Exams Officer

- Produces a master centre exam timetable for each exam series
- Identifies and resolves candidate exam timetable clashes according to the regulations (only applying overnight supervision arrangements as a last resort, once all other options have been exhausted)
- Identifies exam rooms and specialist equipment requirements
- Allocates invigilators to exam rooms (or where supervising candidates due to an exam timetable clash) according to required ratios
- Liaises with site staff to ensure exam rooms are set up according to JCQ and awarding body requirements
- Liaises with the SenCo regarding rooming of access arrangement candidates

SenCo

- Liaises with the EO regarding rooming of access arrangement candidates
- Liaises with other relevant centre staff to ensure appropriate arrangements, adjustments and adaptations are in place to facilitate access for disabled candidates to exams

Site staff

- Liaise with the EO to ensure exam rooms are set up according to JCQ and awarding body requirements

Alternative site arrangements

Exams Officer

- Ensures question papers will only be taken to an alternative site where the published criteria for an alternative site arrangement has been met
- Will inform the JCQ Centre Inspection Service to timescale by submitting a JCQ *Alternative Site arrangement* notification through CAP (or through the awarding body where a qualification may sit outside the scope of CAP) of any alternative sites that will be used to conduct timetabled examination components of the qualifications listed in the JCQ regulations

Transferred candidate arrangements

Exams Officer

- Liaises with the host or entering centre, as required

- Processes requests for *Transferred Candidate arrangements* through CAP to the awarding body deadline (or through the awarding body where a qualification may sit outside the scope of CAP)
- Where relevant (for an internal candidate) informs the candidate of the arrangements that have been made for their transferred candidate arrangements

Internal exams

Exams Officer

- Prepares for the conduct of internal exams under external conditions
- Provides a centre exam timetable of subjects and rooms
- Provides seating plans for exam rooms
- Requests internal exam papers from teaching staff
- Arranges invigilation

SenCo

- Liaises with teaching staff to make appropriate arrangements for access arrangement candidates

Teaching staff

- Provide exam papers and materials to the EO
- Support the SenCo in making appropriate arrangements for access arrangement candidates

Exam time: roles and responsibilities

Access arrangements

Exams Officer

- Provides cover sheets for access arrangement candidates' scripts where required for particular arrangements
- Has a process in place to deal with emergency access arrangements as they arise at the time of exams
 - applies for approval through AAO where required or through the awarding body where qualifications sit outside the scope of AAO

Candidate absence

Candidate absence policy

Students and their parents/carers are advised of the procedures to follow for candidates absent for examinations via the information to candidates guide referred to earlier in this policy. Staff taking attendance registers in exam venues are responsible for informing the EO as a matter of urgency. The HOY or attendance officer will follow up absentees, using contact information available on the school database.

Invigilators

- Are informed of the policy/process for dealing with absent candidates through training
- Ensure that confirmed absent candidates are clearly marked as such on the attendance register and seating plan

Candidates

- Are re-charged relevant entry fees for unauthorised absence from exams

Candidate behaviour

See *Irregularities* below.

Candidate belongings

See *Unauthorised items* below.

Candidate late arrival

Exams Officer

- Ensures that candidates who arrive very late for an exam are reported to the awarding body by submitting a report on candidate admitted very late to examination room through CAP to timescale
- Warns candidates that their script may not be accepted by the awarding body

Invigilators

- Are informed of the policy/process for dealing with late/very late arrival candidates through training
- Ensure that relevant information is recorded on the exam room incident log

Candidate late arrival policy

Students and their parents/carers are advised of the procedures to follow for late/very late arrival to examinations via the information to candidates guide referred to earlier in this policy. Within JCQ guidelines and using his/her own professional discretion, the EO may offer an opportunity to latecomers to sit the exam, and allow the full exam time. If the exam has started latecomers are instructed to report to main Reception, collected by the EO and accompanied to the exam venue. All examination instructions are given to the student outside the exam venue and an invigilator supervises the start of their exam once inside the venue. Parents/Carers of latecomers will receive an email / phone call from the Head of Year, recording their lateness and advising against repeat. The recording of persistent lateness will be escalated to senior management for response and appropriate sanction according to school disciplinary procedures.

Conducting exams

Head of Centre

- Ensures venues used for conducting exams meet the requirements of JCQ and awarding bodies

Exams Officer

- Ensures exams are conducted according to JCQ and awarding body instructions
- Uses an *exam day checklist* to ensure each exam session is fully prepared for, unplanned events can be dealt with and associated follow-up is completed

Dispatch of exam scripts

Exams Officer

- Dispatches scripts as instructed by JCQ and awarding bodies
- Keeps appropriate records to track dispatch

Exam papers and materials

Exams Officer

- Organises exam question papers and associated confidential resources in date order in the secure storage facility
- Attaches erratum notices received to relevant exam question paper packets
- Collates attendance registers and examiner details in date order
- Regularly checks mail or email inbox for updates from awarding bodies

- In order to avoid potential breaches of security, ensures care is taken to ensure the correct question paper packets are opened by ensuring a member of centre staff, additional to the person removing the paper from secure storage, e.g. an invigilator, checks the day, date, time, subject, unit/component and tier of entry, if appropriate, immediately before a question paper packet is opened
- Ensures this additional/second check (which takes place in the secure room if a question paper packet has to be split or in the designated exam room if not) is recorded
- Where allowed by the awarding body, only releases exam papers and materials to teaching departments for teaching and learning purposes after the published finishing time of the exam, or until any timetable clash candidates have completed the exam

Exam rooms

Head of Centre

- Ensures that internal tests, mock exams, revision or coaching sessions are not conducted in a room 'designated' as an exam room
- Ensures that when a room is 'designated' as an exam room it is not used for any purpose other than conducting external exams
- Ensures only approved centre staff (who have not taught the subject being examined) are present in exam rooms to perform permitted tasks
- Ensures the centre's policy relating to food and drink that may be allowed in exam rooms is clearly communicated to candidates
- Ensures the centre's policy on candidates leaving the exam room temporarily is clearly communicated to candidates

Food and drink in exam rooms

Students are advised, via the information for candidates guide referred to earlier in this policy, that bottled water is allowed into an exam room as long as the label is removed to comply with JCQ regulations. Items of food are not allowed in an exam room unless for medical reasons, and in such cases permission must be sought from the EO in advance of the exam season.

Leaving the Examination Room Policy

If a candidate leaves the exam room temporarily, they must be accompanied by a member of centre staff (not a teacher of the subject being examined) at all times. The time in which the candidate is absent from the examination room may or may not be compensated at the discretion of TMWS based on the reason for the temporary absence.

Exams Officer

- Ensures exam rooms are set up and conducted as required in the regulations
- Provides invigilators with appropriate resources to effectively conduct exams
- Briefs invigilators on exams to be conducted on a session by session basis (including the arrangements in place for any transferred candidates and access arrangement candidates)
- Ensures sole invigilators have an appropriate means of summoning assistance (if this is a mobile phone, instructs the invigilator that this must be on silent mode)
- Ensures invigilators understand they must be vigilant and remain aware of incidents or emerging situations, looking out for malpractice or candidates who may be in distress, recording any incidents or issues on the exam room incident log
- Ensures invigilators understand how to deal with candidates who may need to leave the exam room temporarily and how this should be recorded on the exam room incident log
- Provides authorised exam materials which candidates are not expected to provide themselves
- Ensures invigilators and candidates are aware of the emergency evacuation procedure

- Ensures invigilators are aware of arrangements in place for a candidate with a disability who may need assistance if an exam room is evacuated

Senior Leaders

- Ensure a documented emergency evacuation procedure for exam rooms is in place
- Ensure arrangements are in place for a candidate with a disability who may need assistance if an exam room is evacuated

Emergency Evacuation Policy

Please refer to the Emergency Evacuation and Lockdown Policies. The policies are available electronically on the Staff Central Resources drive under Policies. Information is also contained in the invigilator handbook and made available in every exam venue.

Site staff

- Ensure exam rooms are available and set up as requested by the EO
- Ensure grounds or centre maintenance work does not disturb exam candidates in exam rooms
- Ensure fire alarm testing does not take place during exam sessions

Invigilators

- Conduct exams in every exam room according to *JCQ Instructions for conducting examinations* and/or awarding body requirements and as instructed by the centre in training/update and briefing sessions

Candidates

- Are required to follow the instructions given to them in exam rooms by authorised centre staff and invigilators
- Are required to remain in the exam room for the full duration of the exam

Irregularities

Head of Centre

- Ensures any cases of alleged, suspected or actual incidents of malpractice or maladministration before, during or after examinations/assessments (by centre staff, candidates, invigilators) are investigated and reported to the awarding body **immediately**, by completing the appropriate documentation

Managing behaviour

The invigilator should make the EO aware of any developing situations as a matter of urgency. Any candidate causing continuing disruption to other candidates may be removed from the exam room by the Head of Centre after discussion with the EO and providing an alternative exam room can be made available.

Senior Leaders

- Ensure support is provided for the EO and invigilators when dealing with disruptive candidates in exam rooms
- Ensure that internal disciplinary procedures relating to candidate behaviour are instigated, when appropriate

Exams Officer

- Provides an exam room incident log in all exam rooms for recording any incidents or irregularities
- Actions any required follow-up and reports to awarding bodies as soon as practically possible after the exam has taken place

Invigilators

- Record any incidents or irregularities on the exam room incident log (for example, late/very late arrival, candidate or centre staff suspected malpractice, candidate illness or needing to

leave the exam room temporarily, disruption or disturbance in the exam room, emergency evacuation)

Malpractice

See *Irregularities* above.

Special consideration

Senior Leaders

- Provide signed evidence to support eligible applications for special consideration

Exams Officer

- Processes appropriate requests for special consideration to awarding bodies
- Gathers evidence which may need to be provided by other staff in centre or candidates
- Submits requests to awarding bodies to the external deadline

Candidates

- Provide appropriate evidence to support special consideration applications, where required

Unauthorised items

Arrangements for unauthorised items taken into the exam room

No unauthorised materials are allowed in the exam rooms. The social area or personal lockers should be used by candidates to leave bags, coats, and other belongings whilst they sit their examinations. Candidates are asked to empty their pockets of mobile phones and smart watches and hand them in to an invigilator upon entry to the exam room.

Invigilators

- Are informed of the arrangements through training

Internal exams

Exams Officer

- Briefs invigilators on conducting internal exams
- Returns candidate scripts to teaching staff for marking

Invigilators

- Conduct internal exams as briefed by the EO

Results and post-results: roles and responsibilities

Internal assessment

Head of Department

- Ensures teaching staff keep candidates' work, whether part of the moderation sample or not, secure and for the required period stated by JCQ and awarding bodies
- Ensures work is returned to candidates or disposed of according to the requirements

Managing results day(s)

Senior Leaders

- Identify centre staff who will be involved in the main summer results day(s) and their role

- Ensures senior members of staff are accessible to candidates after the publication of results so that results may be discussed and decisions made on the submission of any requests for post-results services and ensures candidates are informed of the periods during which centre staff will be available so that they may plan accordingly

Exams Officer

- Works with senior leaders to ensure procedures for managing the main summer results day(s) (a results day programme) are in place

Results day programme

Results are downloaded and a statement of results is produced for each candidate. Candidates are invited in to school to collect results on results day. All candidates are made aware of these arrangements prior to the start of the exam series in the Information to candidate's guidance. If candidates are unable to collect results in person, they should complete a permission form giving details of who will be collecting them and confirming that they will bring photographic ID with them on results day.

Site staff

- Ensure the centre is open and accessible to centre staff and candidates, as required for the collection of results

Accessing results

Head of Centre

- Ensures results are kept entirely confidential and restricted to key members of staff until the official dates and times of release of results to candidates
- Understands that it is not permitted to withhold provisional results from candidates under any circumstances

Exams Officer

- Informs candidates in advance of when and how results will be released to them for each exam series
- Accesses results from awarding bodies under restricted release of results, where this is provided by the awarding body
- Resolves any missing or incomplete results with awarding bodies
- Issues statements of results to candidates on issue of results date
- Provides summaries of results for relevant centre staff on issue of results date

Post-results services

Head of centre

- Ensures an **internal appeals procedure** is available where candidates disagree with any centre decision not to support a clerical re-check, a review of marking, a review of moderation or an appeal
- Ensures that senior members of centre staff are available immediately after the publication of results
- Understands that if the centre has concerns about one of its component/subject cohorts, then requests for reviews of marking should be submitted for all candidates believed to be affected (candidate consent is required as marks and subject grades may be lowered, confirmed or raised)

Exams Officer

- Provides information to candidates (including private candidates) and staff on the services provided by awarding bodies and the fees charged (see also above *Briefing candidates and Access to scripts, reviews of results and appeals procedures*)
- Publishes internal deadlines for requesting the services to ensure the external deadlines can be effectively met
- Provides a process to record requests for services and to collect candidate informed consent (**after** the publication of results) and fees where relevant
- Submits requests to awarding bodies to meet the external deadline for the particular service
- Tracks requests to conclusion and informs candidates and relevant centre staff of outcomes
- Updates centre results information, where applicable

Teaching staff

- Meet internal deadlines to request the services and gain relevant candidate informed consent
- Identify the budget to which fees should be charged

Candidates

- Meet internal deadlines to request the services
- Provide informed consent and fees, where relevant

Analysis of results

Data Manager

- Provides analysis of results to appropriate centre staff
- Provides results information to external organisations where required
- Undertakes the *secondary school and college (key stage 4/16-18) performance tables June and September checking exercise*

Certificates

Certificates are provided to centres by awarding bodies after results have been confirmed.

Issue of certificates procedure

Candidates are invited into school to collect their certificates.

Candidates

- May arrange for certificates to be collected on their behalf by providing the EO with written or email permission/authorisation; authorised persons must provide ID evidence on collection of certificates

Retention of certificates

Certificates are held for 12 months after which they will be securely destroyed. A detailed record of certificates destroyed will be maintained by the EO

Exams review: roles and responsibilities

Exams Officer

- Provides SLT with an overview of the exam year, highlighting what went well and what could be developed/improved in terms of exams management and administrative processes within the stages of the exam cycle
- Collects and evaluates feedback from staff, candidates and invigilators to inform an exams review

Senior Leaders

- Work with the EO to produce a plan to action any required improvements identified in the review

Retention of records: roles and responsibilities

Exams Officer

- Keeps records as required by JCQ and awarding bodies for the required period
- Keeps records as required by the centre's records management policy