



Clovelly House School Stay safe, respect, achieve

Examinations Policy

January 2023



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Examinations Policy

1. Purpose

This is an overarching wraparound policy that provides a comprehensive reference document covering the exams management and administration process, informs other exams policies and signposts to other examinations policies at the centre. The purpose of the policy is:

- * to ensure the planning and management of exams is conducted ethically, efficiently and in the best interest of candidates
- * to ensure the operation of an efficient exam system in line with JCQ guidelines, with clear instructions and protocols for all relevant staff

It is the responsibility of everyone involved in the centre's exam processes to read, understand and implement this policy.

This examinations policy will be reviewed annually. The examinations policy will be reviewed by the school senior management team and the Examinations Officer.

2. Exam responsibilities

2.1 Head of Centre

- * Overall responsibility for the school as an examination centre
- * Responsibility for reporting all suspicions or actual incidents of malpractice. Refer to JCQ regulations document 'Suspected malpractice in examinations and assessments'
- * Responsible for organisation of teaching and learning
- * Responsible for the analysis of external exam results
- * Prepares and presents reports to the senior management team showing results achieved in relation to expected grades and comparable data for previous years, indicating where future procedural improvements might be made.

2.2 Examinations Officer

- * Manages the administration of public exams
- * Advises the school senior management team, subject and class tutors and other relevant support staff on annual timetables and application procedures as set by the various awarding bodies
- * Advises on appeals and remarks
- * Oversees the production and distribution to the SMT, staff and candidates of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events
- * Ensures that candidates and their carers/parents are informed of and understand those aspects of the exam timetable that will affect them
- * Consults with teaching staff to ensure that necessary coursework is completed on time and in accordance with JCQ guidelines
- * Provides and confirms detailed data on estimated entries
- * Receives, checks and stores securely all exam papers and completed scripts
- * Administers access arrangements and makes applications for special consideration using the JCQ publications 'Access arrangements, reasonable adjustments and special consideration 09/10' and 'Guidance relating to candidates who are eligible or adjustments in examinations'
- * Identifies and manages exam timetable clashes
- * Correlates Accounts for income and expenditures relating to all exam costs/charges
- * Ensures that academic staff are familiar with invigilation procedures
- * Submits candidates' coursework marks, tracks despatch and stores returned coursework and any other material required by the appropriate awarding bodies correctly and on schedule
- * Arranges for dissemination of exam results and certificates to candidates and forwards, in consultation with the senior managers, any appeals/re-mark requests
- * Maintains systems and processes to support the timely entry of candidates for their exams
- * Is responsible for collection of exam papers and other materials from the exams safe before the start of the exam
- * Collects all exam papers in the correct order at the end of the exam and packs them, ready for pick up by



- * Ensuring that exam scripts are signed for by Parcel Force driver
- * Filing the signed Parcel Force form safely
- * Liaising with drivers and site manager re transport arrangements for GCSE pupils
- * Facilitates the secure transport of exam materials to and from examination venues

2.3 Site education managers

* Offering guidance and pastoral oversight to candidates who are unsure about exam entries or amendments to entries

2.4 Curriculum Officer

- * Offers support to teaching staff about the work towards relevant qualifications
- * Liaises with the Examinations Officer to enter pupils for exams
- * Oversees internal moderations of designated subjects

2.5 Teachers

- * Notification of access arrangements requirements (as soon as possible after the start of the course)
- * Submission of candidates names to the Examinations Officer and Head teacher
- * Analysis of subject results and ensuring familiarity with post-results procedures
- * Accurate completion of coursework/controlled assessment mark sheets and declaration/authentication sheets
- * Administration of internal exams including year 11 mock exams where necessary
- * Accurate completion of entry and all other mark sheets and adherence to deadlines as set by the exams officer
- * Submission of estimated grades to the examinations officer when requested

2.6 SENCO

- * Identification and testing of candidates.
- * Liaison with examination officer regarding requirements for access arrangements
- * Provision of additional support with spelling, reading, mathematics, dyslexia or essential skills, hearing impairment, EAL, ICT equipment - to help candidates achieve their course aims

2.7 Connexions advisor

* Guidance and careers information

2.8 Invigilators

- * Collection of exam papers and other material from the exams office before the start of the exam
- * Collection of all exam papers in the correct order at the end of the exam and their return to the exams
- * Operates a 'second pair of eyes' system to ensure papers are sealed when collected and handed over at the start of exams and handed in after completion
- * Ensuring that pupils are complying with examinations regulations

2.9 Candidates

- * Confirmation of entries
- * Conforming to the rules and procedures of the exam and to display behaviour appropriate for exam conditions
- * Understanding coursework/controlled assessment regulations and signing a declaration
- * Authenticating the coursework/controlled assessment as their own

3. Qualifications

Qualifications offered are decided by the subject teachers in consultation with the Head teacher.

All key stage 3 and key stage 4 pupils will be entitled to access the Adult Entry level examinations in Adult Literacy and Numeracy when staff members determine that they are ready.

All candidates in key stage 4 will be entitled, and encouraged, to achieve an entry for qualifications from an external awarding body.



The school will offer the following qualifications:

GCSE

Functional Skills

B.Tec

Entry level

AQA Unit awards

ASDAN

Any other suitable and appropriate qualifications determined by the Head Teacher

All external exams are held under exam conditions

Choice of examination awarding bodies is made by the subject teachers

Informing the examinations officer of changes to a specification is the responsibility of the subject teachers Decision on whether a candidate should be entered for a particular subject will be taken in consultation with the candidates and the subject teachers

4. Exam procedures

Entries

Internal exams and assessments are scheduled 'on demand'.

Currently, at Clovelly House School Entry level Adult literacy and numeracy certificate exams are held in July, March and December.

GCSE exams are held November, January, March, May and June.

Once specific dates are confirmed the examinations officer will circulate the exam timetable for external exams

Candidates or parent/carers may make their wishes known for consideration, but they cannot demand a subject entry, change of level or examination withdrawal

The centre does not act as an exam centre for other organisations without permission from the Principal and JCQ

The centre only accepts entries from external candidates with permission of the Head Teacher Entry deadlines are circulated to staff and parents/carers by the Examinations Officer

Late entries are authorised by the examinations officer and the Head Teacher

Retake decisions will be made in consultation with subject teachers, the examinations officer and the Principal

GCSE retakes will be allowed.

Exams

The Examinations Officer will start all exams in accordance with JCQ guidelines

In practical exams subject teachers may be on hand in case of any technical difficulties.

Exam papers must not be read by subject teachers or removed from the exam room before the end of a session. Papers will be distributed to subject teachers at the end of the exam session.

A relevant subject teacher may be available to read out any subject-specific instructions and start the exam if required

5. Exam fees

Initial registration fees and entry exam fees for Clovelly House School pupils are paid by the centre Late entry or amendment fees are paid by the centre

There will be no charge for changes of tier, withdrawals made by the proper procedures or alterations arising from administrative processes, provided these are made within the time allowed by the awarding bodies

Re-take fees are paid for by the exam centre, unless the re-take is requested by the candidate or the candidate's parents/carers against the advice of the subject teacher in which case the fee will be paid by the candidate's parents/carers.

6. Disability Discrimination

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Clovelly House School Policy

All exam centre staff must ensure that they meet the requirements of the Disability Discrimination Act 1995 (DDA), extended in 2005, the Disability Equality Duty (DED) introduced in 2006 and the Equalities Act, (EA), 2012.

The centre will meet the requirements of the EA by ensuring that the exams centre is accessible and through improving candidate experience

The SENCO will determine any special needs requirements in consultation with the individual subject teachers

Making special arrangements for candidates to take exams in the responsibility of the SENCO and the exams officer

Submitting completed access arrangement application to the awarding bodies is the responsibility of the specialist teacher and the Examinations Officer

Where necessary, rooming for access arrangement candidates will be arranged by the examinations officer Invigilation and support for access arrangement candidates will be organised by the Exams Officer.

7. Managing invigilators

The Exams Officer will discuss with the Head teacher to determine which staff are to be used to invigilate exams

Staff members will not invigilate their own subject exams

The Exams Officer will train all staff on invigilation procedures, including procedures to do with emergency evacuations

8. Venues

The Exams Officer will book all exam rooms in liaison with the Head teacher and make the question papers, other exam stationery and materials available in good time for the beginning of the exam. The centres published rules on acceptable dress, behaviour and candidates' use of mobile phones and all electronic devices will apply at all times

Candidates may leave the exam room for a genuine purpose requiring an immediate return to the exam room, in which case a member of staff must accompany them

The Examinations Officer will attempt to contact any candidate who is not present at the start of an exam and deal with them in accordance with JCQ guidelines

The Examinations Officer will be responsible for organizing supervised breaks when exam clashes occur. Disruptive candidates are dealt with in accordance with JCQ guidelines. Candidates are expected to stay for the full exam time at the discretion of the Examinations Officer or Head teacher.

9. Special consideration

Should a candidate be too ill to sit and exam, suffer a bereavement of other trauma or be taken ill during the exam itself, the Examinations Officer must be informed

Any special consideration claims must be supported by appropriate evidence within five days of the exam, such as a letter from the doctor.

The Examinations Officer will then forward a completed special consideration form to the relevant awarding bodies within seven days of the exam.

10. Coursework/Controlled assessment and appeals against internal assessments

Subject teachers must ensure that all internal assessment is ready for dispatch at the correct time. The Examinations Officer will assist by keeping a record of each dispatch, including the recipient details and the date and time sent.

Marks for all internally assessed work and estimated grades are provided to the Examinations Officer by the subject teachers

Appeals against internal assessments must be made by April of the school year.

Where pupils are educated at different sites and coursework and controlled assessment is taking place at their school site, the JCQ and, where necessary, the relevant awarding bodies will be informed in writing. Subject teachers who are undertaking coursework and controlled assessment at different school sites will be responsible for transporting pupils' work and sensitive materials in a secure, locked box. Those teachers



are responsible for the security for the materials and for ensuring that they are securely handed over to the Examinations Officer.

The procedures for appeals are:

- * appeals will only be entertained if they apply to the process leading to an assessment
- * appeals should be made in writing by the end of April to the Examinations Officer and the Head teacher who will decide whether the process used conformed to the necessary requirements
- * the Examinations Officer and the Head teacher's findings will be notified in writing, copied to the subject teacher and recorded for awarding body inspection

11. Results, enquiries about results (EARs) and access to scripts (ATS)

Results

Candidates will be informed by telephone of their exam results

Arrangements for the centre to be open on results days will be made by the Head teacher Individual results slips will be available for collection after the centre receives the results

EARs

EARs may be requested by centre staff or candidates if there are reasonable grounds for believing that there has been an error in marking. Candidates' consent is required before any EAR is requested If a result is queried, the Examinations Officer, subject teacher and Head teacher will investigate the feasibility of asking for a re-mark at the expense of the centre

When the centre does not support a candidate's or parent's request for an EAR, a candidate may apply to have an enquiry carried out. If a candidate requires this against the advice of the subject teacher they will be charged the fee.

ATS

After the release of results, subject teachers may request the return of priority photocopies of papers within three days scrutiny of the results

If a result is queried, the Examinations Officer and subject teacher will investigate the feasibility of asking for a remark at the centre's expense

Centre staff may also request scripts for investigation or for teaching purposes. For the latter, the consent of the candidate must be obtained.

GCSE re-marks cannot be applied once a script has been returned

12. Certificates

Certificates are collected and signed for.

Certificates can be collected on behalf of a candidate by third parties, provided they have been authorised to do so

Certificates are forwarded to pupils who have left the school

Certificates are not withheld from candidates who owe fees

The centre retains certificates for one year

A transcript of results may be issued if a candidate agrees to pay the costs incurred

13. Monitoring and review of the policy

This policy will be circulated for comment by all stakeholders

The Examinations Officer and the Head teacher will be responsible for the implementation of the policy The policy will be reviewed annually by the Examinations Officer and the Head of Centre in consultation with all stakeholders and any changes necessary will be incorporated.

Signed: Examinations officer	Date:
Signed: Head of Centre	Date:
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Appendix 1 - Procedures Relating to the Conduct of Exams

1. Candidate absence -

Where possible candidates are requested to inform the school if they are going to be absent from exams. The Centre may need to deal with unauthorised absence of candidate during exams. Once candidates are seated and have started the examination, the invigilator will complete the attendance register. This will allow for the identification of absent candidates who can be contacted to try to ascertain their whereabouts. Where a candidate is noted as absent, the invigilator must inform the exams officer who will try to find out where the candidate is. This will be recorded in detail, giving times and circumstances relating to the candidate.

2. Candidate late arrival -

Pupils who attend Clovelly House School have SEMH difficulties which manifest as stress and anxiety. They come to the school from a wide catchment area, of up to 40 miles or more away and they are reliant on Local Authority taxi services and traffic challenges to get to school and back.

A candidate who arrives after the start of the examination will be allowed to enter the exam room and sit the exam, up to forty-five minutes after the starting time of the exam. Candidates who arrive late due to circumstances beyond their control may be highly anxious about the situation and will be allowed a drink and up to ten minutes to overcome their anxieties before beginning the exam. They will be allowed the full allocated time for writing the exam.

Before the day of the exam, candidates will be informed about what will happen if they should arrive late. Invigilating staff involved in the exams process, must be familiar with these procedures.

In all cases, an exams room incident report should be completed and the exams officer informed so that the centre can be accountable for the decision and that the centre can justify the late start as being in the best interests of the candidate. If the candidate arrives later due to circumstances beyond their control, and they do not meet the conditions for late starter, the exams officer will immediately contact the awarding body to get guidance as to how to move forward.

3. Food and Drink -

Bottled water will be provided for candidates to drink during exams. Bottles will be free from packaging and will have all labels removed from drink containers before the start of exams. Candidates will not bring their own food or drink into the exams room.

4. Leaving the exam room -

Candidates who need to leave the exam room temporarily must be accompanied by a member of the centre staff. This must not be the candidate's subject teacher or a subject expert for the examination in question. If the candidate needs to go to the toilet the staff member will wait for him/her to come out and return the candidate to the exam room immediately after. These candidates may be allowed extra time to compensate for their temporary absence. (ICE 23). Candidates will be made aware of these procedures before writing the examination. All staff involved in the exams process will understand how this will be managed before starting the exam. In all cases, an exams room incident report will be completed stating who left the room, who they were with and how long they were out the room. The report must also state the starting time of the exam and whether or not the candidate was granted additional time for completion of the paper.

5. Managing Behaviour during exams -

Clovelly House School is a special school for pupils with SEMH difficulties which can manifest as challenging behaviour. This paragraph should, therefore, be read in conjunction with paragraph 7. Where a candidate is being disruptive, the invigilator must warn the candidate that s/he may be removed from the examination room if they are disrupting other candidates who are writing in the room. They must also be warned that the awarding body will be informed and may decide to penalise them, which could include disqualification. In all cases where behaviour escalates, an exams room incident form will be completed giving details of the behaviour, who was affected, what was said and what the outcome was. In serious instances, the exams officer, and/or Head of centre must be informed without delay. They will make the decision about whether or not it need reporting to the awarding body.



6. Overnight Supervision arrangements -

Clovelly House Exams Centre does not offer overnight supervision arrangements for candidates.

7. Separate Invigilation -

Candidates may be offered the opportunity to take their exams under separate invigilation within the centre where s/he has an established difficulty – see section 5.16 of the JCQ publication: *Access Arrangements and Reasonable Adjustments*, (ICE 14).

The Head of centre, together with the Exams Officer and SENCO, will meet prior to the exam date to plan invigilation arrangements for the cohort. This will include arrangements for invigilation in smaller rooms, covering or removing of work and displays from walls, details about invigilators so that subject specialists are not invigilating their subjects and having a 'floating support person' in corridors to support invigilators in smaller rooms. Under no circumstances will these arrangements be allowed to change before or during examinations. At all times granting candidates separate invigilation will be clear and will comply with JCQ regulations.



Appendix 2 – Guidance from the JCQ regarding Examinations

Outlining staff responsibilities - GCSE controlled assessment

Senior leadership team

- Accountable for the safe and secure conduct of controlled assessments. Ensure assessments comply
 with JCQ guidelines and awarding bodies' subject-specific instructions.
- At the start of the academic year, begin coordinating with heads of department/subject to schedule controlled assessments. (It is advisable that controlled assessments be spread throughout the academic years of key stage 4).
- Map overall resource management requirements for the year. As part of this resolve:
 - o clashes/ problems over the timing or operation of controlled assessments.
 - o issues arising from the need for particular facilities (rooms, IT networks, time out of school etc.)
- Ensure that all staff involved have a calendar of events
- Create, publish and update an internal appeals policy for controlled assessments.

Heads of department/faculty

- Decide on the awarding body and specification for a particular GCSE.
- Ensure that at least 40% of overall assessment (controlled and/or external assessment) is taken in the exam series in which the qualification is certificated, to satisfy the terminal assessment requirement in accordance with the awarding body specification.
- Standardise internally the marking of all teachers involved in assessing an internally assessed component.
- Ensure that individual teachers understand their responsibilities with regard to controlled assessment.
- Ensure that individual teachers understand the requirements of the awarding body's specification and are familiar with the relevant teachers' notes, and any other subject specific instructions.
- Where appropriate, develop new assessment tasks or contextualize sample awarding body assessment tasks to meet local circumstances, in line with awarding body specifications and control requirements.

Teaching staff

- Understand and comply with the general guidelines contained in the JCQ publication *Instructions for conducting controlled assessments*.
- Understand and comply with the awarding body specification for conducting controlled assessments, including any subject-specific instructions, teachers' notes or additional information on the awarding body's website.
- Supply to the exams office details of all unit codes for controlled assessments.
- Obtain confidential materials/tasks set by awarding bodies in sufficient time to prepare for the assessment(s) and ensure that such materials are stored securely at all times.
- Supervise assessments (at the specified level of control). Undertake the tasks required under the regulations, only permitting assistance to students as the specification allows.



- Ensure that students and supervising teachers sign authentication forms on completion of an assessment.
- Mark internally assessed components using the mark schemes provided by the awarding body. Submit
 marks through the exams office to the awarding body when required, keeping a record of the marks
 awarded.
- Retain candidates' work securely between assessment sessions (if more than one).
- Post-completion, retain candidates' work securely until the closing date for enquiries about results. In
 the event that an enquiry is submitted, retain candidates work securely until the outcome of the enquiry
 and any subsequent appeal has been conveyed to the centre.
- Ask the appropriate special educational needs coordinator (SENCO) for any assistance required for the administration and management of access arrangements.

Exams office staff

- Enter students for individual units, whether assessed by controlled assessment, external exam or onscreen test, before the deadline for final entries.
- Enter students' 'cash-in' codes for the terminal exam series.
- Where confidential materials are directly received by the exams office, to be responsible for receipt, safe storage and safe transmission, whether in CD or hard copy format.
- Download and distribute marksheets for teaching staff to use, and collect and send marksheets to awarding bodies before deadlines.
- On the few occasions where controlled assessment cannot be conducted in the classroom arrange suitable accommodation where controlled assessment can be carried out, at the direction of the senior leadership team.

Special educational needs coordinator/additional learning support

- Ensure access arrangements have been applied for.
- Work with teaching staff to ensure requirements for support staff are met.

Outlining staff responsibilities - Diploma principal learning controlled assessment

Senior leadership team, consortium management and lead assessor

- Accountable for the safe and secure conduct of controlled assessment, and ensure that it complies with both the JCQ general guidelines and awarding body instructions.
- Ensure procedures are in place to cover requirements for summative assessment and that these are communicated to all relevant consortium staff.
- Map overall requirements for the year. Resolve any clashes/problems arising over the timing or
 operation of controlled assessments. Also any issues arising from the need for particular facilities
 (rooms, IT networks, time out of school etc.)
- Ensure that all staff involved have a calendar of events
- Create, publish and update an internal appeals policy for controlled assessments.



Domain assessors, line of learning leads, teaching staff and assessors

- Domain assessors and line of learning leads should decide on awarding body and specifications. (In some cases this might be the responsibility of the consortium lead assessor depending on local circumstances).
- Domain assessors must ensure that assessors understand controlled assessment requirements.
- Domain assessors and/or line of learning leads are responsible for ensuring that assessment tasks
 meet the requirements of the awarding body specifications, and for applying the relevant control
 requirements. (For example, by internally checking and approving assessments written by teaching staff
 and/or assessors, or ensuring they have been approved by the awarding body).
- Understand and comply with the general guidelines contained in the JCQ publication *Instructions for conducting controlled assessments*.
- Understand and comply with the awarding body specification for conducting controlled assessments, including any line of learning, level and unit specific instructions, teachers' notes or additional information on the awarding body's website.
- Supply to the exams office details of all unit codes for controlled assessments.
- Where appropriate, obtain confidential materials/tasks set by the awarding bodies from the relevant exams office in sufficient time to make preparation for assessments.
- Develop new assessment tasks or contextualize sample awarding body assessment tasks to meet local circumstances, in line with awarding body specifications and control requirements.
- Follow the requirements for supervision as set out in the awarding body specification at the specified level of control, only permitting assistance to students as the specification allows.
- Domain assessors need to work with assessors to standardise the marking of internally assessed units for each line of learning.
- Where an assessor will not be supervising the controlled assessment, he or she **must** arrange for a suitable person to do so, in line with the awarding body specification.
- Ensure that learners and assessors sign authentication forms on completion of an assessment.
- Mark assessments according to the mark schemes and guidance provided by the awarding bodies.
 Submit the marks through the relevant exams office to awarding bodies when required, keeping a record of the marks awarded.
- Retain learners work securely between assessment sessions (if more than one).
- Post-completion, retain learners' work securely until the closing date for enquiries about results. In the
 event that an enquiry is submitted, retain learners' work securely until the outcome of the enquiry and
 any subsequent appeal has been conveyed to the centre
- Ask the home centre special educational needs coordinator/additional learning support for any assistance required for the administration and management of access arrangements.

Exams office staff

(Please note this could refer to the exams office of an individual school or college, or to a centralised exams office that covers all controlled assessment within a consortium depending on local circumstances.)



- Enter learners for all units, whether assessed by controlled assessment internally, or externally assessed, before the awarding body deadline.
- Where confidential materials are directly received by the exams office, to be responsible for receipt, safe storage and safe transmission, whether in CD or hard copy format.
- Download and distribute marksheets for the use of teaching staff, and collect/send them to awarding bodies before deadlines.

Special educational needs coordinator/additional learning support

- Ensure access arrangements have been applied for.
- Work with teaching staff to ensure requirements for support staff are met.



Appendix 3

QCDA POLICY ON INTERNAL ASSESSMENTS FOR EXTERNAL QUALIFICATIONS

In accordance with the Code of Practice for the conduct of external qualifications produced by QCDA, Clovelly House School is committed to ensuring that:

- internal assessments are conducted by staff who have the appropriate knowledge, understanding and skills;
- assessment evidence provided by candidates has been produced and authenticated according to the requirements of the specification;
- the consistency of the internal assessment is secured through internal standardisation as necessary;
- Staff responsible for internal standardisation attend any compulsory training sessions.

Written appeals procedure

Each awarding body publishes its arrangements for appeals against its decisions. In addition, an appeal can be made to the School concerning internal assessment:

- the appeal applies only to the procedures used in arriving at internal assessment decisions and does <u>not</u> apply to the judgement themselves; you cannot appeal against the mark or grade only the procedures used
- the parent or guardian must make the appeal in writing to the School's Examinations Officer: appeals should normally be made by 30th April for examinations in the summer series. This deadline may be extended in exceptional circumstances in situations where the coursework marking and moderation schedule extends beyond this time (?);
- the enquiry into the internal process will normally be led by the Examinations Officer and the *Head of Sixth Form(?)*, provided that neither has played any part in the original internal assessment process;
- the teacher making the assessment will be able to respond to the appeal in writing, and a copy will be sent to the appellant (?);
- the enquiry will consider whether the procedures used for the internal assessment were in conformity with the published requirements of the Awarding Body and the 'Code of Practice'.

The student will be informed in writing of the outcome of the appeal, including:

- relevant communications with the Awarding Body;
- any steps taken to further protect the interest of the candidates.

If the *appellant* is unhappy about the response in writing, he/she can ask for a personal hearing, where the panel will consist of two persons not previously involved, normally the *Head Teacher and a member of the Senior management team*.

Enquiries About Results (Re-marks)

In cases of Enquiries about Results, where the school does not uphold a request for such an enquiry, the student may normally pay to have an enquiry carried out. Where the student wishes to challenge the decision not to hold an enquiry or consequent appeal, a similar procedure to that mentioned above will be carried out.

Note:

Each awarding body specifies detailed criteria for the internal assessment of work. In addition, the awarding body must moderate the assessment and the final judgement on marks awarded is that of the awarding body. Appeals against matters outside the School's control will not be considered in the School's appeals procedure.

This document is offered for guidance only – without liability of any kind on the part of NAA or its representatives