



# **Cokethorpe**

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## **SCHOOL**

### **Examinations Policy**

- Internal & External Examinations
- NEA/Coursework Processes, Risk Assessment & Appeals Procedure
- Complaints & Appeals
- GDPR Policy for Examinations
- Conflict of Interest
- Malpractice

May 2025

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Next review: September 2026

## INTERNAL EXAMINATIONS

The internal examinations process is co-ordinated by the Examinations Officer, with responsibility lying with the Director of Studies.

First to Third Form are examined once annually at the end of the Summer Term. These examinations take place in classrooms and are invigilated internally.

Fourth Form pupils are challenged with a more formal experience, sitting examinations in April in The Shed or Sports Hall. These examinations are typically invigilated externally.

Fifth Form pupils have a mock examinations programme in place for their return after the Christmas holiday period. Results from their examinations are used to frame discussions about entry to GCSE papers.

Lower and Upper Sixth: whilst AS examinations have largely been removed, the School assesses Lower Sixth students in April and Upper Sixth students in January. In both instances, external invigilators are used, and a formal environment enforced.

## EXTERNAL EXAMINATIONS

Entry to GCSE, GCE and other public examinations is the normal conclusion of study in the Fifth Form and Upper Sixth. The School reserves the right not to make entries for pupils who are considered not to have made sufficient progress over the course of study to give them a reasonable chance of success.

### Identification of Candidates

Cokethorpe School is relatively small and candidates are known by the staff members. Candidates can therefore be identified in the examination hall or room. This is done either by the Examinations Officer or a senior member of staff, who has been authorised by the Head of Centre, and attendance is recorded on the seating plan.

If an external candidate is entered for an examination, they are asked for photo identification by the Examinations Officer before entering the examination room.

### Disability Compliance

Arrangements are made for all with temporary or permanent disabilities to have equal access to examinations. All pupils are screened in the Third Form (or on entry to the School if later) for specific learning needs, and appropriate access arrangements are made in accordance with JCQ regulations.

### Access Arrangements and Special Consideration

Pupils are regularly assessed during the course of their time in school. The policies and procedures are clearly set out in the Learning Development Department Assessment Policies and Procedures.

Where there is a case for Special Consideration the Examinations Office will make the application and file the supporting evidence until after the period for Reviews of Marking and appeals has passed.

### Data Protection

Candidates will be asked to sign the JCQ Data Protection notice to authorise disclosure of their data to JCQ for the purposes of making an application for Access Arrangements.

### Results

Examination results belong to the candidate. A Statement of Results will be available in School for collection by the candidate in person on the morning of the day nominated by the Awarding Bodies. Results which have not been collected will be posted in the afternoon collection to the candidate's main

address as held on the School database. Candidates may telephone the School on the morning of Results Day and their results will be read to them. In such cases the Statement of Results will also be posted as above. Candidates may also request in advance for results to be emailed to their personal account or a third party with the student's consent.

Results will not be given over the telephone to anyone other than the candidate in person. Should a candidate wish to nominate another person to collect results on his or her behalf that must be done in writing preferably in advance of Results Day. Telephone authority from the candidate in person to hand the Statement of Results to a third party will be accepted on the day in exceptional circumstances.

Under no circumstances will results be given either in writing or verbally to parents or any other person without the authority of the candidate as described above.

Details of marks, UMS scores and grade boundaries are available on the day of results. Candidates who have concerns about them should speak to the relevant Head of Department.

### **Post Results Services and Review of Results**

Details of the available services are printed on the reverse of each Statement of Results. Candidates who wish to use any of these services should complete the relevant form and return it to the Examinations Office with the appropriate fee before the School's deadline which is four working days before the request must be lodged with the Awarding Body.

Awarding Bodies offer various levels of Review of Results, all of which incur a charge which is waived if the original result is altered. A form is available from the Examinations Office for completion by the candidate, supported by the subject Head of Department. RORs will only be made if a signed form with the appropriate fee attached is returned within the School's published deadline. For some subjects, which include a significant amount of coursework that is internally examined and subsequently moderated, options for a re-mark are limited and the School can only apply for a review of the whole cohort. In such cases, the professional judgement of the Head of Department, together with the Director of Studies, will determine whether or not pupils are advised to ask for a review. This can only happen with full consent.

### **Certificates**

Examination certificates are issued once results have been confirmed, usually about two months after Results Day. Candidates are given the option of having their certificates posted to them via a secure delivery service (for a fee) or collecting them in person. Students opting for the postage option are required to sign a declaration issued via the Examinations Office, agreeing that parental/guardian consent has been received for payment of the postage fee and agreeing that the School takes no responsibility for the loss of any certificates in the postal system. Certificates are valuable documents which are very difficult and expensive to replace in the event of loss. Candidates will be notified of their arrival in School, will be asked to collect them in person and to sign to say they have received them. Written authority from the candidate for a third party to collect certificates on their behalf will be accepted.

The School cannot replace lost certificates. If necessary, candidates must apply to the Awarding Body for a replacement.

### **Contingency Plan**

In accordance with the Joint Council for Qualifications, the School has a robust plan which exists to minimise the risk to examination administration and any adverse impact on students should the designated Examination Officer be absent at a critical stage of the examination cycle. Please see the School's Examinations Contingency Plan for full details.

## NON-EXAMINATION ASSESSMENTS (NEA)

It is the responsibility of each Head of Department to obtain the NEA (or coursework where applicable) task details from the Examination Boards and choose the most appropriate time for the controlled assessment to take place. It is also their responsibility to familiarise themselves with and follow the JCQ instructions for conducting controlled assessments.

The NEA may take place during timetabled class time. All staff must be aware of the relevant level of control permitted (high, medium or low) as this will determine the level of permitted supervision, e.g. high control means that pupils are under exam conditions. Departments must plan when and how the assessment will take place, taking into account the accommodation and resources required. The Examinations Officer should be notified when high level controlled assessment is taking place. Relevant display materials must be removed or covered up.

Pupils must keep a diary to record any guidance and feedback received from their teacher which should also be used to record research and planning notes, diagrams, essay plans and bibliography.

All assessment materials must be locked in a suitable secure cabinet at the end of each session.

- For high level control pupils must have no access to the internet including email and must save work to drives only accessible during the controlled sessions. If work is saved on memory sticks these must be collected in after each session and locked away securely. Heads of Department are responsible for conducting a risk assessment and taking steps to minimise the possibility of disclosure of confidential material or any form of malpractice
- For medium level control pupils do not have to be directly supervised at all times but there must be enough supervision to ensure that the work is the candidates' own
- Low level control permits some work to be completed outside direct supervision, some working together and access to resources

If a pupil is absent an opportunity will be given to complete the assessment at a later date under controlled conditions. In the case of long absences the Examinations Officer should be requested to make an application for Special Consideration.

Entries for NEA must be made at the appropriate time as requested by the Examinations Office through Heads of Department and attendance records from assessment sessions should be kept by the Head of Department.

Work may be handwritten in black ink or word processed. Printouts, charts and videos may be included where appropriate. Where the specification permits pupils to work with others, e.g. during collection of data, any descriptions of the joint work must be in each candidate's own words.

Where work is assessed by the teacher and externally moderated by the examination board, standardisation of marking must take place in the School if more than one teacher is involved in the assessing.

If suspected malpractice occurs or if a pupil's work is lost within the School the Examinations Officer must be informed and an appropriate report will be made to the Examination Board.

Appropriate authentication forms must be signed and dated by the teachers and candidates.

Candidates will be allowed to have the same access arrangements in controlled assessment as they have in examinations.

The assessment marks must be submitted to the Examinations Office who will transfer them to the Awarding Body.

Candidates' work must be securely stored until all results have been released and the period allowed for Review of Results has passed.

The Examinations Office should be consulted in the event of any query regarding results.

### **Process for Centre Assessed Work**

In accordance with the Code of Practice for the conduct of external qualifications produced by the Joint Council of Qualifications (JCQ), Cokethorpe 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 is produced and authenticated according to the requirements of the relevant Specifications for each subject
- The consistency of internal assessment is assured through internal standardisation as set out by the Awarding Bodies
- Staff responsible for internal standardisation and/or assessment attend any appropriate training

The process Cokethorpe School follows in the setting, marking, moderation and submission of centre-assessed work is set out below.

#### **Stage One: setting, marking and moderating centre-assessed work**

- At least one member of the department should attend a specific training session conducted by the relevant awarding body prior to the centre-assessed work being set.
- Pupils should be made aware of the assessment criteria as they begin their centre assessed work.
- The deadline for completion of all centre-assessed work should be set at least six weeks in advance of the submission date.
- Once pupils have finished their assignment, and prior to teachers marking all work, a trial marking exercise should be conducted with the trained member of staff leading colleagues in ensuring the appropriate benchmarks are set.
- All marking should include annotations that correspond directly with the assessment criteria, clearly showing how and where credit has been awarded. The name of the original marker should be made clear on the script, along with the date on which it was marked.
- Once marking is complete, departments must arrange for a process of internal moderation.
- There must be clear evidence of moderation on the scripts, validating existing assessment or, when appropriate, identifying the reasons for querying the original application of the mark scheme. This should be recorded in a different coloured ink. The name of the moderator should be made clear on the script, along with the date on which it was moderated.
- In the event of discrepancy between the original mark and that awarded by the moderator, a third party should review the work.
- The Head of Department is responsible for ensuring that all marks are recorded as required by the awarding body.

#### **Stage Two: sharing centre-assessed marks with pupils and managing requests for reviews of marks**

- All internal moderation must be completed five weeks before the final submission date.
- Candidates must be given sight of all their centre-assessed work, together with the marks they have been awarded, the comments that have been made and the mark scheme upon which the assessment has been based.
- Under no circumstances should any moderated centre-assessed work leave the school.
- Should any candidate wish to file a request for review, they must do so through the office of the Director of Studies. Requests for review must be made in writing with specific reference to the grounds upon which the request has been made. These requests must be made no later than three weeks prior to the deadline for submissions.

- Where possible, departments should have a nominated member of staff who is responsible for managing the internal requests for review. This member of staff must have an appropriate level of knowledge and expertise to enable them to conduct this task and must not have a direct personal interest in the outcome of the review. In small departments where this is not possible, the review should be conducted by a member of staff who has not previously seen the work in question.
- The person responsible for the review of moderated work should ensure that any adjustments are made and subsequently recorded in a way that is appropriate for the awarding body.
- The candidate will be made aware of the outcome of their request for review in writing within one week of the review being requested.
- The request for review will be treated as a complaint and the Head of Centre will be made aware. A written record of the complaint will be kept by the centre and made available to the awarding body on request.
- Where the request for review highlights any irregularities in the centre's procedures, the awarding body will be made aware immediately.
- All centre-assessed marks must be submitted to the Examinations Officer for submission to the appropriate awarding body by the deadline provided.

### **Internal Appeals Procedure relating to Internal Assessment Decisions**

Appeals may be made to the School regarding the procedures used in internal assessment. Appeals may also be made regarding the arrangements for any special access that may be required.

- If at any stage during the exam courses students have concerns about the procedures used in assessing their internally marked work for public exams (e.g. NEA / portfolio / projects / performance), they should first speak with their subject teacher and/or form tutor and discuss the matter fully with him/her. A pupil or parent still wishing to appeal against the procedures used in internal assessments should contact the Examinations Officer as soon as possible to discuss the appeal, and a written appeal must be received by the office of the Director of Studies at least two weeks before the date of the last external exam in the subject.
- On receipt of a written appeal, an enquiry into the procedures used in the internal assessment will be conducted by the Examinations Officer and the Headmaster. This enquiry will consider whether the procedures used in the internal assessment conformed to the published requirements of the Awarding Body.
- The appellant will be informed in writing of the outcome of the appeal, including details of any relevant communication with the Awarding Body and of any steps taken to further protect the interests of the candidates.

## **RISK ASSESSMENT POLICY 2025-2026 – GCE/GCSE NEA**

See Appendix 1 for detailed risk assessment policy plans and actions.

### **Roles & Responsibilities**

#### **Head of Centre**

The Head of Centre has the overall responsibility for ensuring that NEA work is conducted in accordance with JCQ regulations and Awarding Body specifications.

#### **Heads of Department**

Decide on the awarding body and specification for a particular GCE/GCSE and ensure that assessments comply with JCQ guidelines and awarding bodies' subject-specific instructions.

Where appropriate, develop new assessment tasks or adapt sample awarding body assessment tasks to meet local circumstances, in line with the awarding body's specification and control requirements. Ensure that controlled assessment tasks issued to candidates are appropriate to the year in which the assessment is submitted to the awarding body.

Provide training to staff and ensure access to the guidelines as contained in the JCQ publication Instructions for conducting controlled assessments circulated at the start of the Academic Year.

Ensure that individual teachers fully understand the requirements of the awarding body's specification, are familiar with the relevant teachers' notes and any other subject specific instructions.

Standardise internally the marking of all teachers involved in assessing a centre assessed component.

Where applicable, request a suitable supervisor for any session where the teacher/assessor is not supervising, ensuring the recording of the date and time of assessments with details such as the name of the supervisor and pupils involved both present and absent and log any incidents which occur during the course of the assessment.

Ensure that the examination entry for the candidates satisfy the terminal assessment requirement in accordance with the awarding body specification taken in the exam series in which the qualification is certificated.

Ensure the provision of adequate secure storage is available and communicated to staff and that assessment materials and candidates' work is kept in secure conditions at all times. In the case of work stored electronically, this will include protection from corruption. If work is saved on memory sticks these should be backed up and locked away after each session.

Maintain records of NEA sessions within the Department.

Ensure that any IT equipment, IT support and other relevant resources are booked in a timely fashion.

### **Teaching staff**

Understand and comply with the general guidelines detailed within the JCQ publication Instructions for conducting controlled assessments circulated at the start of the academic year.

Issue to candidates the up-to-date JCQ instructions 'Information for candidates – coursework' and/or 'Information for candidates – NEA' prior to starting an assessment.

Understand and comply with the awarding body's specification for conducting NEA, 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.

Supply dates to the LS department to ensure ALL candidates who have approved EAA are supported (minimum of 7 days' notice required).

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.

Complete an attendance list for each controlled assessment session, indicating the date, time, duration, supervision arrangements and details of any incidents. This should be passed to the Head of Department who will retain these records.

Supervise assessments (at the specified level of control). Undertake the tasks required under the regulations, only permitting assistance to candidates as the specification allows.

Ensure that candidates and supervising teachers sign authentication forms on completion of an assessment.

Record details of the nature of any feedback or guidance given to the candidates, including any advice given to the individual candidates over and above that given to the class as a whole.

Mark internally assessed components using the mark scheme provided by the awarding body. Submit marks to the Exams Officer by the published deadline, 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.

### **Examinations Office Staff**

Ensure they are familiar with the JCQ Instructions for Conducting Coursework.

Enter students for individual units, whether assessed by controlled assessment, external exam or on-screen test before the deadline for final entries.

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.

Where applicable, download and distribute marksheets for teaching staff to use, collect and return to Awarding Bodies before published deadlines.

Submit marks to the Awarding Body by the published deadline, keeping a record of the marks awarded.

Keep a central record of the dispatch of NEA including recipient details and date/time sent.

In exceptional circumstances where NEA cannot be conducted in the classroom, arrange suitable accommodation where controlled assessments can be carried out at the direction of the Senior Management Team.

### **Head of Learning Development/additional learning support**

Ensure access arrangements have been applied for.

Work with teaching staff to ensure requirements for support staff are met.

### **Absence**

Subject teachers / Heads of Department will accommodate the occasional absence of a candidate by ensuring that an opportunity is given to them to make up missed controlled assessment. An alternative supervised session will be organised for such candidates. Should a candidate miss controlled assessment sessions persistently and/or without prior notice her parents will be contacted to discuss the situation.

### **Repeat Submission**

Candidates who wish to re-do their submission of a controlled assessment before the marks have been sent to the awarding body may do so, at the discretion of the Centre, under specified conditions.

Accountable for the safe and secure conduct of NEA.

The Examinations Officer, on behalf of the Director of Studies, must:

- At the start of the academic year, begin coordinating with Heads of Department/subject to schedule NEAs. (It is advisable that NEAs are spread throughout the academic years of Key Stage 4.)



- Map overall resource management requirements for the academic year. As part of this resolve:
  - clashes/problems over the timing or operation of controlled assessments;
  - 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

### **Missed Deadlines**

Subject teachers and Heads of Department will make every effort to support candidates so that they submit work to meet published internal deadlines. Where there is a danger of a deadline being missed, the school will contact parents to discuss the matter. However no NEA will be accepted by the school after published final deadlines. In such cases the candidate will be given either a mark for any incomplete work submitted or a zero mark if no work is submitted.

### **Internal Marks**

All candidates have a right of access to the marks awarded to them by the Centre for internal assessment. Whether these are shared routinely with candidates is a matter of choice: the centre may inform candidates of the marks which have been submitted to the awarding body, but in doing so must make it clear that those marks are subject to change through the moderation process.

### **Retention and Return of NEA**

In most cases, awarding bodies return centre-assessed work to centres after the publication of results, although they reserve the right to retain samples and also retain work which has been the subject of irregularities or malpractice investigation.

The school holds NEA securely when it has been returned by the awarding body up to and including the deadline for the submission of enquiries about results and until any enquiry or malpractice investigation has been resolved.

Any work no longer required will be disposed of in a confidential manner by the school.

Candidates wishing to reclaim their work must do so in person from the Head of Department by a specified date which will be notified to them when submitting the controlled assessment. After this date all unclaimed controlled assessment will be destroyed as detailed above.

### **Malpractice**

Candidates must not:

- submit work which is not their own;
- lend their own work to others or allow their work to be copied;
- submit work that is comprised of material derived through the use of AI, unless it is clearly referenced;
- allow others access to, or the use of, their own independently sourced material;
- use any books, the internet or other sources without acknowledgement or attribution;
- submit work word processed by a third party without acknowledgement.

These actions constitute malpractice, for which a penalty, (e.g. disqualification from the assessment) will be applied.

It is the responsibility of the Examinations Officer to inform candidates of the JCQ regulations concerning malpractice, as detailed in the JCQ booklet Suspected Malpractice in Examinations and Assessments: Policies and Procedures.

If irregularities in controlled assessments are discovered prior to the candidate signing the declaration of authentication this will be dealt with under the School's internal procedures. Any work which is not the

candidate's own will be recorded on the authentication form supplied by the awarding body or other appropriate place.

If irregularities in NEAs are identified by a centre after the candidate has signed the declaration of authentication, the Head will submit full details of the case to the relevant awarding body at the earliest opportunity.

The Joint Council for Qualifications Code of Practice requires schools to have a published appeals procedure relating to internal assessment decisions.

### **Use of Artificial Intelligence**

The School recognises that education and training around the way in which the use of AI can represent serious malpractice on the part of candidates is necessary to avoid retrospective measures to counteract its use in NEA work. Teachers, through the Head of Department, are clear of their responsibility to promote best practice.

AI use in this context refers to the use of AI tools to obtain information and content which might be used in work produced for assessments, which contributes to the award of qualifications. When properly referenced, this can be acceptable, although students cannot be credited for any work they produce for assessment which is not their own so the benefit to them of using AI is likely to be limited and they risk committing malpractice if AI is misused.

To ensure that they are aware of when AI is not appropriate, the Centre provides clear and unambiguous guidance to candidates. This includes:

- Copying or paraphrasing sections of AI-generated content so that the work submitted for assessment is no longer the student's own.
- Copying or paraphrasing whole responses of AI-generated content.
- Using AI to complete parts of the assessment so that the work does not reflect the student's own work, analysis, evaluation or calculations.
- Failing to acknowledge use of AI tools when they have been used as a source of information. • Incomplete or poor acknowledgement of AI tools.
- Submitting work with intentionally incomplete or misleading references or bibliographies.

Assessors are advised to be vigilant when marking NEA work, focusing on aspects of writing where the student voice feels less authentic, or where there is a change in the way sentences are constructed and vocabulary utilised. Furthermore, candidates are made aware that the school uses Turnitin to verify the authenticity of work that is submitted for assessment.

Candidates are also made aware that, in the event of AI being used, it must be acknowledged clearly. This must include the AI source used and the date the content was generated. A copy of both the prompts used and the content generated must be included within the submission of work.

Where AI is detected, or suspected, and is not acknowledged, the Centre will compare the work submitted with other work completed by that candidate and the issue will be referred to the Director of Studies. Malpractice will be escalated in line with the policy.

Where word processors are used to accommodate EAAs within the context of the exam room, devices are confirmed as unable to access AI.

## **COMPLAINTS & APPEALS PROCEDURE - QUALIFICATIONS**

This procedure confirms Cokethorpe School's compliance with JCQ's General Regulations for Approved Centres 2020-2021, section 5.8e that the centre has in place "...a written complaints and appeals procedure which will cover general complaints regarding the centre's delivery or administration of a qualification."

The School's 'Complaints Procedure Policy' should be referred to by any candidate (or his/her parent/carer) who is dissatisfied or wishes to make a complaint regarding the delivery or administration of a qualification. Candidates may wish to make a complaint on the grounds below (this is not an exhaustive list).

### **Teaching and learning**

- Quality of teaching and learning, for example
  - Non-subject specialist teacher without adequate training/subject matter expertise utilised on a long-term basis
  - Teacher lacking knowledge of new specification/incorrect core content studied/taught
  - Core content not adequately covered
  - Inadequate feedback for a candidate following assessment(s)
  - Pre-release/advance material/set task issued by the awarding body not provided on time to an exam candidate
  - The taking of an assessment, which contributes to the final grade of the qualification, not conducted according to the JCQ/awarding body instructions
  - The marking of an internal assessment, which contributes to the final grade of the qualification, not undertaken according to the requirements of the awarding body – see Controlled Assessments section above for details on requests of review of marking and internal assessment appeals procedures.
- Centre fails to adhere to its internal assessment mark/procedure review procedure
- Candidate not informed of his/her centre assessed marks prior to marks being submitted to the awarding body
- Candidate not informed of his/her centre assessed marks in sufficient time to request/appeal a review of marking prior to marks being submitted to the awarding body
- Candidate not given sufficient time to review materials to make a decision whether to request a review of centre assessed marks

### **Access arrangements**

- Candidate not assessed by the centre's appointed assessor
- Candidate not involved in decisions made regarding his/her access arrangements
- Candidate did not consent to personal data being shared electronically (by the non-acquisition of a signed Data Protection Notice)
- Candidate not informed/adequately informed of the arrangements in place and the subjects or components of subjects where the arrangements would not apply
- Exam information not appropriately adapted for a disabled candidate to access it
- Adapted equipment put in place failed during exam/assessment
- Approved access arrangement(s) not put in place at the time of an exam/assessment
- Appropriate arrangements not put in place at the time of an exam/assessment as a consequence of a temporary injury or impairment

### **Entries**

- Failure to clearly explain a decision of early entry for a qualification to candidate (or parent/carer)
- Candidate not entered/entered late (incurring a late entry fee) for a required exam/assessment
- Candidate entered for a wrong exam/assessment
- Candidate entered for a wrong tier of entry

### **Conducting examinations**

- Failure to adequately brief candidate on exam timetable/exam regulations prior to exam/assessment taking place
- Room in which exam held did not provide candidate with appropriate conditions for taking the exam
- Inadequate invigilation in exam room

- Failure to conduct exam according to the regulations
- Online system failed during (online) exam/assessment
- Disruption during exam/assessment
- Alleged, suspected or actual malpractice incident not investigated/reported
- Eligible application for special consideration for a candidate not submitted/not submitted to timescale
- Failure to inform/update candidate on the outcome of a special consideration application

### **Results and Post-results**

- Before exams, candidate not made aware of the arrangements for post-results services and the accessibility of senior members of centre staff after the publication of results
- Candidate not having access to a member of senior staff after the publication of results to discuss/make decision on the submission of an enquiry
- Candidate request for return of work after moderation and work not available/disposed of earlier than allowed in the regulations
- Candidate (or parent/carer) unhappy with a result (complainant to refer via exams officer to awarding body post-results services)
- Candidate (or parent/carer) unhappy with a centre decision not to support a clerical check, a review of marking, a review of moderation or an appeal (complainant to refer via the Examinations Officer to the centre's internal appeals procedure)
- Centre applied for the wrong post-results service/for the wrong exam paper for a candidate
- Centre missed awarding body deadline to apply for a post-results service
- Centre applied for a post-results service for candidate without gaining required candidate consent/permission/

## GENERAL DATA PROTECTION REGULATION (GDPR) POLICY (EXAMINATIONS)

This policy details how Cokethorpe School ensures compliance with the regulations as set out by the Data Protection Act (DPA) and General Data Protection Regulation (GDPR) in relation to exams management and administration.

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 Examinations 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 no longer than is absolutely necessary
- handled according to people's 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 and GDPR, all candidates' exam information – even that which is not classified as personal or sensitive – is covered under this policy.

### Examinations related information

There is a requirement for the Examinations Officer to hold exams-related information on candidates taking external examinations. For further details on the type of information held please contact the School Bursar.

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

- Awarding bodies
- Joint Council for Qualifications
- HM Department for Education
- The Local Authority
- The Independent School's Inspectorate

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

- Hard copy
- Email
- Secure extranet sites (e.g. eAQA; OCR Interchange; Pearson Edexcel Online; Cambridge International Education extranet).
- The school's MIS (WCBS's PASS) sending/receiving information via electronic data interchange (EDI) using A2C to/from awarding body processing systems

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

Cokethorpe School ensures that candidates are fully aware of the information and data held. All candidates are informed via the Schools 'Privacy Notice' which is available to pupils on SharePoint.

### Dealing with data breaches

Although data is handled in line with DPA/GDPR regulations, a data breach may occur for any of the following reasons:

- loss or theft of data or equipment on which data is stored
- inappropriate access controls allowing unauthorised use

- equipment failure
  - human error
  - unforeseen circumstances such as a fire or flood
  - hacking attack
  - 'blagging' offences where information is obtained by deceiving the organisation who holds it
- If a data protection breach is identified, the following steps will be taken:

### **Stage 1: Containment and recovery**

The School's Bursar will lead on investigating the breach.

It will be established:

- Who needs to be made aware of the breach and inform them of what they are expected to do to assist in the containment exercise. This may include isolating or closing a compromised section of the network, finding a lost piece of equipment and/or changing the access codes
- Whether there is anything that can be done to recover any losses and limit the damage the breach can cause. As well as the physical recovery of equipment, this could involve the use of back-up hardware to restore lost or damaged data or ensuring that staff recognise when someone tries to use stolen data to access accounts
- which authorities, if relevant, need to be informed

### **Stage 2: Assessment of ongoing risk**

The following points will be considered in assessing the ongoing risk of the data breach:

- What type of data is involved?
- How sensitive is it?
- If data has been lost or stolen, are there any protections in place such as encryption?
- What has happened to the data? If data has been stolen, it could be used for purposes which are harmful to the individuals to whom the data relates; if it has been damaged, this poses a different type and level of risk
- Regardless of what has happened to the data, what could the data tell a third party about the individual?
- How many individuals' personal data are affected by the breach?
- Who are the individuals whose data has been breached?
- What harm can come to those individuals?
- Are there wider consequences to consider such as a loss of public confidence in an important service we provide?

### **Stage 3: Notification of breach**

Notification will take place to enable individuals who may have been affected to take steps to protect themselves or to allow the appropriate regulatory bodies to perform their functions, provide advice and deal with complaints.

### **Stage 4: Evaluation and response**

Once a data breach has been resolved, a full investigation of the incident will take place. This will include:

- reviewing what data is held and where and how it is stored
- identifying where risks and weak points in security measures lie (for example, use of portable storage devices or access to public networks)
- reviewing methods of data sharing and transmission
- increasing staff awareness of data security and filling gaps through training or tailored advice
- reviewing contingency plans

### **Third party access**

Permission will be obtained before requesting personal information on another individual from a third-party organisation.

Candidates' personal data will not be shared with a third party unless a request is accompanied with permission from the candidate and appropriate evidence (where relevant), to verify the ID of both parties, provided.

In the case of looked-after children or those in care, agreements may already be in place for information to be shared with the relevant authorities (for example, the Local Authority). The School's Bursar will confirm the status of these agreements and approve/reject any requests.

### **Other information**

For the purposes of this policy, all candidates' exam-related information – even that not considered personal or sensitive under the DPA/GDPR – will be handled in line with DPA/GDPR guidelines.

An information audit was conducted in 2018. The School Bursar will determine when the next update will be required. The audit details of the information used for examinations is held by the Bursar and is available to candidates on request. The audit details the type of candidate exams-related information held, and how it is managed, stored and protected.

Details of retention periods, the actions taken at the end of the retention period and method of disposal are contained in the School's 'Guidance on the Storage and Retention of Records Policy' which is available/accessible from the School's Bursar. With respect to examination related data, hard-copy information is held for seven years after the date of the examination.

Current and former candidates can request access to the information/data held on them by making a subject access request to the School's Bursar in writing.

## CONFLICT OF INTEREST

### **Policy with respect to staff involvement with public examinations**

As a registered examination centre, Cokethorpe School has a duty to uphold the integrity of public examinations. As with other instances of examination maladministration, the sharing of confidential material relating to any current or future ("live") public examination series by a member of staff is likely to constitute gross misconduct.

Centre staff must declare a conflict of interest to the Examination Officer by completing the Conflict of Interest Declaration Form sent out annually.

Conflict of interest occurs where any member of staff who has access to privileged information, or is responsible for preparing, making decisions about examination/assessment outcomes, could, potentially, use that information, or their position to give an unfair advantage to a close friend or relative entered for assessment/examination at the School or any other centre. A conflict of interest also occurs if a member of staff is entered for an examination/assessment.

In addition, the School recognises that current staff may be engaged by exam boards in various capacities for the setting, marking, moderating and reviewing of public examinations. However, those staff may also be involved in delivering the same examination specifications to pupils at the School. Such staff owe duties to the School to prepare pupils properly for their public examinations but also to the relevant examination board to preserve the integrity of public examinations. In fulfilling these potentially conflicting duties, staff must act with utmost integrity and take care to manage the potential conflict of interest by ensuring that examination security is not breached in any way, whether deliberately or otherwise. Such staff must remain neutral at all times both with their colleagues and pupils.

The School currently only permits staff to be engaged by the exam boards on the following basis:

- a member of staff must seek permission from the Head of Centre prior to undertaking any role for an examination board and must seek renewed annual permission thereafter
- a member of staff given permission must complete a declaration form for staff involved in public examinations and return it to the Examination Officer for retention
- a member of staff given permission must act with utmost integrity and take care to ensure that examination security is not compromised (deliberately or otherwise) and, if teaching pupils who will sit any examination of whose contents the staff member has, or will have, prior knowledge, the staff member must also sign and adhere to the School's internal procedures
- a member of staff given permission must declare any training he or she has received from the examination board concerned and must provide details of the examination board's applicable Conflict of Interests (or other relevant) policy.

Staff must treat as confidential the identity of fellow staff involved in examining and must not discuss or speculate on such topics with pupils.

Members of staff who are concerned that examination maladministration may have occurred must notify the Head of Centre immediately.

### **Protocol for staff privy to Confidential Information relating to the contents of any Public Examination sat by any pupil of the School**

The sharing of confidential material relating to any current or future ("live") public examination series by a member of staff is likely to constitute gross misconduct. It is prohibited by School policy. It is also prohibited by the Conflict of Interests policies of the various exam boards. It is incumbent on any member of staff privy to confidential information about public examinations to ensure that they maintain a position of complete neutrality and do not either advantage or disadvantage pupils in the School. Staff must ensure the examination syllabus (specification) is covered in full but must also ensure that specific material used in upcoming public examinations is not used in their teaching at the centre or to guide departmental



schemes of work. The aim of this protocol is to put in place measures to prevent the accidental sharing of confidential public examination material within the School and, thereby, to protect both the staff member concerned and pupils from allegations of examination maladministration or malpractice.

When a member of staff knows in advance the content (in whole or in part) of any public examination which is to be sat by any pupil, that staff member must not:

- set any internal exam or revision material for that public examination
- save any confidential public examination material on any computer that the staff member uses for teaching or for any other school activity without ensuring that that material is stored in a password protected area
- bring into public areas within the School public examination related paper-work, products or materials on which the staff member has worked, or use departmental printers or photocopiers for such materials;
- use, in the creation of live public examination papers, specific content which the staff member or a member of his department has created for pupils in current or previous years, or which might be used by colleagues
- adapt his or her teaching to fit the questions that the staff member knows are coming up in a “live” public examination (e.g. by spending extra time on a topic, or by covering a topic with a particular slant). The member of staff must adhere to agreed departmental schemes of work
- engage in “question spotting” or make any predictions about the contents of the public examination to any pupil or colleague
- invigilate any examination in an examination series in respect of which he or she has knowledge
- divulge to pupils his or her role with the examination board.

## MALPRACTICE

This policy confirms Cokethorpe School's compliance with Joint Council for Qualifications (JCQ) Suspected Malpractice Policy and Procedures 2025; that the centre has in place a written malpractice procedure which covers irregularities within the delivery and administration of examinations.

Malpractice and maladministration are related concepts with the common theme that they involve a failure to follow the rules of an examination or assessment. Reasonable steps will be taken to inhibit the occurrence of malpractice and maladministration during the development and delivery of examinations.

This document uses the word 'malpractice' to cover both malpractice and maladministration and means any act, default or practice which is:

- a breach of the JCQ regulations; and/or
- a breach of awarding body requirements regarding how a qualification should be delivered; and/or
- a failure to follow established procedures in relation to a qualification

which:

- gives rise to prejudice to candidates; and/or
- compromises public confidence in qualifications; and/or
- compromises, attempts to compromise, or may compromise the process of assessment, the integrity of any qualification or the validity of a result or certificate; and/or
- damages the authority, reputation or credibility of any awarding body or centre.

Malpractice may or may not directly relate to sitting an examination. The possibility of unexpected forms of malpractice may emerge as technologies and the nature of the organisational practices of the centre change and can encompass:

### **Breach of security**

Any act which breaks the confidentiality and integrity of examination papers, candidates' scripts or materials, and their electronic equivalents will be immediately communicated to the relevant awarding body.

### **Deception**

Any act of dishonesty in relation to an examination or assessment including providing misleading, inaccurate, or fabricated information to an awarding body, candidates and/or parents will be dealt with by the Head of Centre following JCQ procedures.

### **Improper assistance to candidates**

Any act where assistance is given beyond that permitted by the regulations to a candidate or group of candidates, which results in an examination or assessment advantage will be investigated internally by the Director of Studies and subsequently communicated to the relevant awarding body.

### **Co-operation with an external investigation**

In order to fully comply with JCQ and Awarding Body inquiries, Cokethorpe School will:

- make available information requested by an awarding body in the event of an investigation
- investigate on request in accordance with awarding body instruction
- provide information according to agreed deadlines
- immediately report alleged, suspected or actual incidents of malpractice to awarding bodies.

### **Maladministration**

Cokethorpe School strives to adhere to the regulations regarding the conduct of controlled assessments, coursework, examinations and non-examination assessments. Any form of malpractice in the conduct of examinations/assessments and/or the handling of examination question papers, candidate scripts, mark sheets, cumulative assessment records, results, and certificate claim forms etc is dealt with, in the first instance, by the Examination Officer, before being escalated to the Head of Centre if appropriate.

## **Candidate Malpractice**

Candidates must not:

- breach JCQ notices, e.g. Information for candidates, non-examination assessments, coursework, on-screen tests, written examinations, social media, plagiarism, candidate warning and prohibited items are distributed to candidates prior to assessments/examinations taking place
- submit work which is not their own
- lend their own work to others or allow their work to be copied
- allow others access to, or the use of, their own independent sourced material
- use any books, the internet, or other technological sources without acknowledgment and attribution
- submit work word processed by a third party without acknowledgement
- submit work that is comprised of material derived through the use of AI, unless it is clearly referenced.

These actions constitute malpractice, for which a penalty (e.g, disqualification) will be applied

It is the responsibility of the Examinations Officer to:

- inform candidates of the JCQ regulations concerning malpractice. This is done through face to face/group cohort meetings and detailed in the Candidate Examination Handbook distributed in the Michaelmas term.
- communicate awarding body and JCQ information updates and guidance to relevant staff members, as appropriate.

Suspected or alleged candidate malpractice will be investigated and subsequently escalated within the centre. If irregularities in controlled assessments are discovered prior to the candidate signing the declaration of authentication this will be dealt with under the School's internal procedures. Any work which is not the candidate's own will be recorded on the authentication document supplied by the awarding body or other appropriate place.

If irregularities in NEAs are identified by a centre after the candidate has signed the declaration of authentication, the Head of Centre will submit full details of the case to the relevant awarding body at the earliest opportunity.

## **Centre staff malpractice and maladministration**

The School will take reasonable steps to prevent internal malpractice. These will include but are not limited to:

- ensure that staff involved with the delivery of examinations understand JCQ and awarding body requirements for conducting examinations, including key dates and deadlines
- ensure that the examination officer is appropriately trained, resourced and supported
- examinations held at alternative sites are conducted in accordance with JCQ requirements
- staff responsible for special consideration and access arrangements are aware of requirements and are appropriately trained, resourced and supported
- confidential information relating to examination and assessment materials are not communicated
- examination clash arrangements are planned and managed effectively
- staff delivering and assessing coursework or NEAs have robust processes in place for identifying and reporting plagiarism or other candidate malpractice.

## **Responsibilities**

The Head of Centre has the overall responsibility for ensuring that JCQ procedures in the identification and reporting of allegations of centre, candidate, awarding body or 'other' occurrences of malpractice, as identified in JCQ's *Suspected Malpractice Policies and Procedures* document, section 4.1 – 5.4, are fully met.

## Appendix 1 - Risk management policy - GCE/GCSE Non-Examination Assessments.

Last updated: 30/09/2020

last updated: 30/03/2020

Risks and issues	Remedial action		Staff
	Forward planning	Action	
Timetabling			
Controlled assessment schedule clashes with other activities	Plan/establish priorities well ahead (e.g. at the start of the academic year)	Plan dates in consultation with school calendar – negotiate with other parties	Exams Officer Director of Studies Heads of Department
Too many controlled assessments close together across GCSE subjects	Plan controlled assessments so they are spaced over the duration of the course	Space NEAs to allow candidates time between them	Exams Officer Director of Studies Heads of Department
Accommodation			
Insufficient space in classrooms for candidates	Once the size of the cohort is known at the start of the year, flag instances where regular classroom space may not be suitable to conduct controlled assessments	Use more than one classroom or multiple sittings where necessary	Exams Officer Heads of Department
Insufficient facilities for all candidates	Careful planning ahead and booking of rooms / centre facilities		Exams Officer Heads of Department
Downloading awarding body set tasks			
IT system unavailable on day of assessment	Download tasks well ahead of scheduled assessment date in all cases	Book IT equipment well ahead and download tasks before scheduled date of assessment	Heads of Department IT Department
Teaching staff unable to access task details	Test secure access rights ahead of NEAs schedule every year and every session	Ensure teaching staff have access rights for the correct area of awarding body secure extranet sites well ahead of the NEA schedule	Exams Officer Heads of Department Teaching staff
Loss of task details in transmission	Download tasks well ahead of scheduled assessment date	Contact awarding body and ask for replacement task; download again	Exams Officer Heads of Department IT Department

Risks and issues	Remedial action		Staff
	Forward planning	Action	
Absent candidates			
Candidates absent for all or part of assessment (various reasons)	Plan alternative session(s) for candidates		Exams Officer Heads of Department Teaching staff
Absent Head of Department / key Teaching staff			
Head of Department or key teaching staff responsible for supervision are absent for all or part of the assessment (various reasons)	Plan alternative supervision for candidates		Exams Officer Senior Administrator Director of Studies
Control levels for task taking			
The assessment is undertaken under incorrect level of control (time, resources, supervision and collaboration)	Ensure teaching staff know what level is applicable and understand what is involved. Provide training if required	Seek guidance from the awarding body	Heads of Department Exams Officer Director of Studies
Supervision			
Student study diary/plan not provided or completed*	Ensure teaching staff are aware of the need for study diary/plans to be completed early in course	Ensure candidates start, continue and complete study diary/plans that are signed after every session	Heads of Department Teaching staff
Teaching staff do not understand that the supervision of controlled assessments is their responsibility	Ensure teaching staff fully understand the nature of NEAs and their role in supervising assessments		Heads of Department
A suitable supervisor has not been arranged for an assessment where teaching staff are <b>not</b> supervising	A suitable supervisor must be arranged for any NEA session where a teacher is not supervising, in line with the awarding body's specification. This is to be arranged well in advance of the assessment period.		Exams Officer Heads of Department

Risks and issues	Remedial action		Staff
	Forward planning	Action	
Task setting			
Teaching staff fail to correctly set tasks	Ensure teaching staff fully understand the task setting arrangements as defined in the awarding body's specification**	Seek guidance from the awarding body	Heads of Department
Assessments have not been moderated in line with the awarding body's specification	Check specification and plan required moderation appropriately	Seek guidance from the awarding body	Heads of Department
Security of materials			
Assessment tasks not kept secure before assessment	Ensure teaching staff fully understand the importance of task security	Contact the awarding body to request/obtain different assessment tasks	Heads of Department Teaching Staff
Candidates' work not kept secure during or after assessment	Define the appropriate level of security, in line with the awarding body's requirements, for each department as necessary	Seek guidance from the awarding body	Teaching Staff Exams Officer
Insufficient or insecure storage space	Look at provision for suitable storage at the start of the GCSE course	Find alternative storage within the centre	Heads of Department Teaching Staff Exams Officer
Security of assessment material	All assessment material made available at Cokethorpe School is to be used solely and exclusively for the proper assessment of students at the School and for no other purpose	The Headmaster will decide if any matter needs to be investigated, by whom and over what timeframe. On reviewing the evidence, the Headmaster will decide if any external body needs to be informed.	The Headmaster
Deadlines			
Deadlines not met by candidates	Ensure all candidates are briefed on deadlines and the penalties for not meeting them	Mark what candidates have produced by the deadline	Heads of Department Teaching Staff

Risks and issues	Remedial action		Staff
	Forward planning	Action	
		Seek guidance from awarding body on further action	
Deadlines for marking and/or paperwork not met by teaching staff	Ensure teaching staff are given clear deadlines (prior to the awarding body deadline) to complete marking/paperwork (Marks can then be processed and submitted ahead of awarding body deadlines)	Seek guidance from awarding body	Heads of Department Exams Officer
<b>Authentication</b>			
Candidate fails to sign authentication form	Ensure all candidates have authentication forms to sign  Ensure that the authentication form is securely attached to their work when it is completed and handed in for marking	Find candidate and ensure authentication form is signed	Teaching Staff Exams Officer
Teaching staff fail to complete authentication forms or leave before completing the authentication process	Ensure teaching staff fully understand the importance of authentication forms and the requirement of a signature	Return the authentication form to the teacher for signature  Ensure authentication forms are signed as work is marked	Teaching Staff Exams Officer
<b>Marking</b>			
Teaching staff interpret marking descriptions incorrectly	Ensure appropriate training and practicing of marking  Plan for sampling of marking during the practice phase	Arrange for re-marking  Consult the awarding body's specification for appropriate procedures	Heads of Department
Centre does not run the standardisation activity as required by the awarding body	Plan against the awarding body's requirements for standardisation, i.e. when and how this activity must be conducted	Check with the awarding body whether a later standardisation event can be arranged	Heads of Department

\* Not all GCSE NEAs will require the completion of a study diary or study plans

\*\* All tasks whether set by the awarding body or the centre **must** be developed in line with the requirements of the specification