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	NEA Policy
Committee:	Teaching & Learning
Approved by Committee on	11 <sup>th</sup> October 2023
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Date of next review:	November 2024
Responsible Officer	E. Hart

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### 1. **What does this policy affect?**

This policy affects the delivery of all GCSE, GCE & BTEC qualifications that have one or more non examination components in their subject specification, which contribute/s to the main qualification grade.

The regulators' definition of an examination is very narrow. In effect, any type of assessment that is not:

- set by an awarding body
- designed to be taken simultaneously by all relevant candidates at a time determined by the awarding body, and taken under conditions specified by the awarding body (including conditions relating to the supervision of candidates during the assessment and the duration of the assessment)
- is classified as non-examination assessment (NEA).

'NEA' therefore includes, but is not limited to, internal assessment. Externally marked and/or externally set practical examinations taken at different times across centres are classified as 'NEA'.

### 2. **Purpose of the policy**

The purpose of this policy, as defined by JCQ, is to:

- cover procedures for planning and managing non-examination assessments
- define staff roles and responsibilities for non-examination assessments
- manage risks associated with non-examination assessments

### 3. **What is a Non-Examination Assessment (NEA)?**

"A Non-Examination Assessment (NEA) measures subject-specific knowledge and skills that cannot be tested by timed written papers. Non-examination assessment applies control over internal assessment at three points:

Task setting

Task taking

Task marking"

#### **4. Procedures for planning and managing non-examination assessments identifying staff roles and responsibilities**

##### **Head of Centre:**

- Returns a declaration (managed as part of the National Centre Number Register annual update) to confirm awareness of, and that relevant centre staff are adhering to, the latest version of NEA
- Ensures the centre's Non-examination Assessment Policy is fit for purpose and covers all types of non-examination assessment
- Ensures the centre's Internal Appeals Procedures clearly details the procedure to be followed by candidates (or their parents/carers) appealing against internal assessment decisions (centre assessed marks) and requesting a review of the centre's marking.

##### **Senior leaders**

- Ensure the correct conduct of non-examination assessments (including endorsements) which comply with NEA and awarding body subject-specific instructions.
- Ensure the centre-wide calendar records assessment schedules by the start of the academic year

##### **Quality assurance (QA) lead/Lead internal verifier**

- Confirms with subject heads that appropriate awarding body forms and templates for nonexamination assessments (including endorsements) are used by teachers and candidates
- Ensures appropriate procedures are in place to internally standardise/verify the marks awarded by subject teachers in line with awarding body criteria
- Ensures appropriate centre-devised templates are provided to capture/record relevant information given to candidates by subject teachers
- Ensures appropriate centre-devised templates are provided to capture/record relevant information is received and understood by candidates
- Where not provided by the awarding body, ensures a centre-devised template is provided for candidates to keep a detailed record of their own research, planning, resources etc.

##### **Head of Department (Subject Leader)**

- Ensures subject teachers understand their role and responsibilities within the non-examination assessment process
- Ensures NEA and relevant awarding body subject specific instructions are followed in relation to the conduct of non-examination assessments (including endorsements)
- Works with the QA lead/Lead internal verifier to ensure appropriate procedures are followed to internally standardise/verify the marks awarded by subject teachers
- Understands the arrangements that the centre needs to put in place where the centre might

accept private candidates (including distance learners and home educated students) for components of non-examination assessment

- In collaboration with the Examinations Officer, to submit non-examination assessment marks to the relevant awarding body, dispatch candidates' assessments for moderation and to make the appropriate arrangements for the security of the non-examination assessment materials.

#### **Subject teacher**

- Understands and complies with the general instructions as detailed in NEA
- Where these may also be provided by the awarding body, understands and complies with the awarding body's specification for conducting non-examination assessments, including any subject-specific instructions, teachers' notes or additional information on the awarding body's website
- Marks internally assessed work to the criteria provided by the awarding body
- Ensures the exams officer is provided with relevant entry codes for subjects (whether the entry for the internally assessed component forms part of the overall entry code or is made as a separate unit entry code) to the internal deadline for entries
- Discuss any assistance required for the administration and management of access arrangements with the SENCO and the Examinations Officer.

#### **Examination Officer**

- Signposts the annually updated JCQ publication Instructions for conducting non-examination assessments to relevant centre staff
- Carries out tasks where these may be applicable to the role in supporting the administration/management of non-examination assessment
- In collaboration with Heads of Department, to submit non-examination assessment marks to the relevant awarding body, dispatch candidates' assessments for moderation and to make the appropriate arrangements for the security of the non-examination assessment materials.

#### **SENCO**

- To be familiar with JCQ instructions for conducting non-examination assessment with reference to special access arrangements.
- In collaboration with the Examinations Officer co-ordinate requests for special access arrangements.

### **5. Task Setting**

#### **Subject teacher**

- Selects tasks from the list provided by the awarding body or designs tasks (where this is permitted) using the criteria set out in the subject specification
- Must ensure that students understand the assessment criteria for any given assessment task.

## **6. Task Issuing**

### **Head of Department (Subject teacher)**

- Must consult the relevant awarding body's specification to determine when set tasks are to be issued
- Identifies the date(s) when tasks should be taken by students
- Accesses set tasks in sufficient time to allow planning, resourcing and teaching and ensure that materials are stored securely at all times
- Must ensure that the correct task is issued.
- Ensures requirements for legacy specification tasks and new specification tasks are distinguished  
Between

## **7. Task Taking**

### **Supervision**

#### **Subject teachers**

- Checks the awarding body's subject-specific requirements ensuring candidates take tasks under the required conditions and supervision arrangements
- Ensures there is sufficient supervision to enable the work of a candidate to be authenticated
- Ensures there is sufficient supervision to ensure the work a candidate submits is their own
- Is confident where work may be completed outside of the centre without direct supervision, that the work produced is the candidate's own
- Where candidates may work in groups, keeps a record of each candidate's contribution and it must be possible to attribute assessable outcomes to individual candidates.
- Ensures candidates are aware of the JCQ documents Information for candidates - nonexamination assessments and Information for candidates - Social Media
- Ensures candidates understand and comply with the regulations in relevant JCQ documents  
Information for candidates

### **Advice and Feedback**

#### **Subject teacher**

- As relevant to the subject/component, advises candidates on relevant aspects before candidates begin working on a task
- When reviewing candidates' work, unless prohibited by the specification, provides oral and written advice at a general level to candidates
- Allow candidates to revise and re-draft work after advice has been given at a general level if allowed by the specification.
- Records any assistance given beyond general advice and takes it into account in the marking or submits it to the external examiner
- Ensures when work has been assessed, candidates are not allowed to revise it

- Must not provide model answers or writing frames specific to the task nor assess the work, allowing the student to then revise it.
- Must keep a record any assistance given beyond general advice and take it into account in the marking or submit it to the external examiner.
- Must not provide any type of assistance which is explicitly prohibited in the subject specification
- No assistance may be given unless it can be recorded and be reflected in the marking (failure to follow this procedure constitutes malpractice).

### **Resources**

#### **Subject teacher**

- Refers to the awarding body's specification and/or associated documentation to determine if candidates have restricted/unrestricted access to resources when planning and researching their tasks
- Ensures conditions for any formally supervised sessions are known and put in place
- Ensures conditions for any formally supervised sessions are understood and followed by candidates.
- Ensures appropriate arrangements are in place to keep the work to be assessed, and any preparatory work, secure between any formally supervised sessions, including work that is stored electronically
- Ensures candidates understand that they are not allowed to introduce augmented notes or new resources between formally supervised sessions
- Ensures that where appropriate to include references, candidates keep a detailed record of their own research, planning, resources etc.

### **8 Word and time limits**

#### **Subject teacher**

- Must refer to the awarding body's specification to determine where word and time limits apply/are mandatory.

#### **Collaboration and group work**

#### **Subject teacher**

- Unless stated otherwise in the awarding body's specification, and where appropriate, allows candidates to collaborate when carrying out research and preparatory work
- Ensures that it is possible to attribute assessable outcomes to individual candidates
- Ensures that where an assignment requires written work to be produced, each candidate writes up their own account of the assignment
- Assesses the work of each candidate individually

### **Authentication procedures**

#### **Subject teacher**

- Where required by the awarding body's specification ensures candidates sign a declaration confirming the work they submit for final assessment is their own unaided work  
signs the teacher declaration of authentication confirming the requirements have been met
- Keeps signed candidate declarations on file until the deadline for enquiries about results has passed or until any appeal, malpractice or other results enquiry has been completed, whichever is later
- Provides signed candidate declarations where these may be requested by a JCQ Centre Inspector (Electronic signatures are acceptable)
- Where there may be doubt about the authenticity of the work of a candidate or if malpractice is suspected, follows the authentication procedures and malpractice information in NEA and informs the exams officer
- Understands that if, during the external moderation process, it is found that the work has not been properly authenticated, the awarding body will set the mark(s) awarded by the centre to zero

### **Presentation of work**

#### **Subject teacher**

- Obtains informed consent at the beginning of the course from parents/carers if videos or photographs/images of candidates will be included as evidence of participation or contribution
- Instructs candidates to present work as detailed in NEA unless the awarding body's specification gives different subject-specific instructions
- Instructs candidates to add their candidate number, centre number and the component code of the assessment as a header/footer on each page of their work
- Ensures if candidates' work is to be submitted electronically, that it meets the awarding body's specified requirements

### **9. Keeping materials secure**

#### **Subject teacher**

- When work is being undertaken by candidates under formal supervision, ensures work is securely stored between sessions (if more than one session)
- When work is submitted by candidates for final assessment, ensures work is securely stored
- Follows secure storage instructions as defined in NEA 4.8
- Takes sensible precautions when work is taken home for marking
- Stores internally assessed work, including the sample returned after awarding body moderation, securely until the closing date for enquiries about results or until the outcome of an enquiry or any subsequent appeal has been conveyed to the centre
- If post-results services have not been requested, returns internally assessed work to candidates

(if requested by a candidate) after the deadline for requesting a review of results for the relevant series

- If post-results services have been requested, returns internally assessed work to candidates (if requested by a candidate) once the review of results and any subsequent appeal has been completed
- Reminds candidates of the need to keep their own work secure at all times and not share completed or partially completed work on-line on social media or through any other means (Reminds candidates of the contents of the JCQ document Information for candidates – Social Media)
- Where work is stored electronically, liaises with the IT Manager to ensure the protection and back-up of candidates' work and that appropriate arrangements are in place to restrict access to it between sessions
- Liaises with the IT Manager to ensure that appropriate arrangements are in place to restrict access between sessions to candidates' work where work is stored electronically
- Understands that during the period from the submission of work for formal assessment until the deadline for requesting a review of results, copies of work may be used for other purposes, provided that the originals are stored securely as required

#### **IT Manager**

- Ensures appropriate arrangements are in place to restrict access between sessions to candidates' work where work is stored electronically
- Restricts access to this material and utilises appropriate security safeguards such as firewall protection and virus scanning software
- Employs an effective back-up strategy so that an up to date archive of candidates' evidence is maintained
- Considers encrypting any sensitive digital media to ensure the security of the data stored within it and refers to awarding body guidance to ensure that the method of encryption is suitable

### **10. Task marking – Externally Assessed Components**

Conduct of externally assessed work

#### **Subject teacher**

- Liaises with the exams officer regarding arrangements for the conduct of any externally assessed non-examination component of a specification which must be conducted within a window of dates specified by the awarding body and where applicable, according to JCQ Instructions for conducting examinations
- Liaises with the Visiting Examiner where this may be applicable to any externally assessed Component

### **Exams officer**

- Arranges timetabling, rooming and invigilation where this is applicable to any externally assessed non-examination component of a specification
- Conducts the externally assessed component within the window specified by the awarding body
- Conducts the externally assessed component according to the JCQ publication Instructions for conducting examinations

### **Submission of work**

#### **Subject teacher**

Pays close attention to the completion of the attendance register, if applicable

#### **Exams officer**

- Provides the attendance register to the subject teacher where the component may be assessed by a Visiting Examiner
- Ensures the awarding body's attendance register for any externally assessed component is completed correctly to show candidates who are present and any who may be absent
- Where candidates' work must be despatched to an awarding body's examiner, ensures the completed attendance register accompanies the work
- Keeps a copy of the attendance register until after the deadline for enquiries about results for the exam series
- Packages the work as required by the awarding body and attaches the examiner address label
- Ensures that the package in which the work is despatched is robust and securely fastened
- Despatches the work to the awarding body's instructions by the required deadline

### **SENCO**

- Arranges invigilation for students with access arrangements. (if appropriate)

## **11. Task marking – internally assessed components**

Marking and annotation

### **Head of centre**

- Makes every effort to avoid situations where a candidate is assessed by a person who has a close personal relationship with the candidate, for example, members of their family (which includes step-family, foster family and similar close relationships) or close friends and their immediate family (e.g child)
- Where this cannot be avoided, ensures the possible conflict of interest is declared to the relevant awarding body and the marked work is submitted for moderation whether or not it is part of the moderation sample

### **Subject teacher / Head of Department**

- Sets timescales for teachers to inform candidates of their centre-assessed marks that will allow sufficient time for a candidate to appeal an internal assessment decision/request a review of the centre's marking prior to the marks being submitted to the awarding body external deadline



- Accesses awarding body training/updates as required to ensure familiarity with the mark scheme/marking process
  - Marks candidates' work in accordance with the marking criteria provided by the awarding body
  - Annotates candidates' work as required to facilitate internal standardisation of marking and enable external moderation to check that marking is in line with the assessment criteria
  - Informs candidates of their marks which could be subject to change by the awarding body moderation process
  - Ensures candidates are informed of the timescale indicated in the centre's internal appeals procedure to enable an internal appeal/request for a review of marking to be submitted by a candidate and the outcome known before final marks are submitted to the awarding body
- Internal standardisation

#### **Quality assurance (QA) lead/Lead internal verifier**

- Ensures that internal standardisation of marks across assessors and teaching groups takes place as required and to sequence
- Supports staff not familiar with the mark scheme (e.g. NQTs, supply staff etc.)
- Ensures accurate internal standardisation - for example by
  - obtaining reference materials at an early stage in the course
  - holding a preliminary trial marking session prior to marking
  - carrying out further trial marking at appropriate points during the marking period
  - after most marking has been completed, holds a further meeting to make final adjustments
  - making final adjustments to marks prior to submission
  - retaining work and evidence of standardisation

#### **Subject teacher**

- Indicates on work (or cover sheet) the date of marking
- Marks to common standards
- Keeps candidates work secure until after the closing date for review of results for the series concerned or until any appeal, malpractice or other results enquiry has been completed, whichever is later.

#### **Submission of marks and work for moderation**

##### **Head of Department (Subject teacher)**

- Inputs and submits marks online via the awarding body secure extranet site, keeping a record of the marks awarded to the external deadline/Provides marks to the exams officer to the internal deadline
- Where responsible for marks input, ensures checks are made that marks for any additional candidates are submitted and ensures mark input is checked before submission to avoid transcription errors

- Submits the requested samples of candidates' work to the awarding body moderator by the external deadline, keeping a record of the work submitted/Provides the moderation sample to the exams officer to the internal deadline
- Ensures that where a candidate's work has been facilitated by a scribe or practical assistant, the relevant completed cover sheet is securely attached to the front of the work and sent to the moderator in addition to the sample requested
- Ensures the moderator is provided with authentication of candidates' work, confirmation that internal standardisation has been undertaken and any other subject-specific information where this may be required
- Submits any supporting documentation required by the awarding body/Provides the exams officer with any supporting documentation required by the awarding body

#### **Exams officer**

- Inputs and submits marks online via the awarding body secure extranet site, keeping a record of the marks submitted to the external deadline/Confirms with subject teachers that marks have been submitted to the awarding body deadline
- Where responsible for marks input, ensures checks are made that marks for any additional candidates are submitted and ensures mark input is checked before submission to avoid transcription errors
- Submits the requested samples of candidates' work to the moderator by the awarding body deadline, keeping a record of the work submitted/Confirms with Subject teacher that the moderation sample has been submitted to the awarding body deadline
- Ensures that for postal moderation work is dispatched in packaging provided by the awarding body moderator label(s) provided by the awarding body are affixed to the packaging proof of dispatch is obtained and kept on file until the successful issue of final results
- Through the subject teacher, ensures the moderator is provided with authentication of candidates' work, confirmation that internal standardisation has been undertaken and any other subject-specific information where this may be required
- Through the subject teacher, submits any supporting documentation required by the awarding body

#### **Storage and retention of work after submission of marks**

##### **Head of department (Subject teacher)**

- Keeps a record of names and candidate numbers for candidates whose work was included in the moderation sample
- Retains all marked candidates' work (including any sample returned after moderation) under secure conditions until after the deadline for enquiries about results
- In liaison with the IT Manager, takes steps to protect any work stored electronically from corruption and has a back-up procedure in place

- Retains evidence of work where retention may be a problem (for example, photos of artefacts etc.)

#### **Exams officer**

- Ensures any sample returned after moderation is logged and returned to the subject teacher for secure storage and required retention

#### **External moderation – process & feedback**

##### **Subject head/lead**

- Ensures that awarding body or its moderator receive the correct samples of candidates' work
- Where relevant, liaises with the awarding body/moderator where the moderator visits the centre to mark the sample of work
- Complies with any request from the moderator for remaining work or further evidence of the centre's marking
- Checks the final moderated marks when issued to the centre when the results are published
- Checks moderator reports and ensures that any remedial action, if necessary, is undertaken before the next exam series

##### **Exams officer**

- Accesses or signposts moderator reports to relevant staff
- Takes remedial action, if necessary, where feedback may relate to centre administration

## **12. Access arrangements**

### **Subject teacher**

- Works with the SENCO to ensure any access arrangements for eligible candidates are applied to assessments

### **SENDCo**

- Follows the regulations and guidance in the JCQ publication Access Arrangements and Reasonable Adjustments in relation to non-examination assessments including Reasonable Adjustments for GCE A-level sciences – Endorsement of practical skills
- Where arrangements do not undermine the integrity of the qualification and is the candidate's normal way of working, will ensure access arrangements are in place and awarding body approval, where required, has been obtained prior to assessments taking place
- Makes subject teachers aware of any access arrangements for eligible candidates which need to be applied to assessments
- Works with subject teachers to ensure requirements for access arrangement candidates requiring the support of a facilitator in assessments are met
- Ensures that staff acting as an access arrangement facilitator are fully trained in their role

### **13. Special consideration**

#### **Head of Department (Subject teacher)**

- Understands that a candidate may be eligible for special consideration in assessments in certain situations where a candidate
  - is absent
  - produces a reduced quantity of work
  - work has been lost
- Liaises with the exams officer when special consideration may need to be applied for a candidate taking assessments
- Liaises with the exams officer to report loss of work to the awarding body

#### **Exams officer**

- Refers to/directs relevant staff to the JCQ publication A guide to the special consideration process
- Where a candidate is eligible, submits an application for special consideration via the awarding body's secure extranet site to the prescribed timescale
- Where application for special consideration via the awarding body's secure extranet site is not applicable, submits the required form to the awarding body to the prescribed timescale
- Keeps required evidence on file to support the application

### **14. Malpractice**

#### **Head of centre**

- Understands the responsibility to immediately report to the relevant awarding body any alleged, suspected or actual incidents of malpractice involving candidates.
- Ensures any irregularity identified by the centre before the candidate has signed the authentication statement (where required) are dealt with under its own internal procedures, with no requirement to report the irregularity to the awarding body (The only exception being where the awarding body's confidential assessment materials has been breached, the breach must be report to the awarding body)
- Is familiar with the JCQ publication Suspected Malpractice in Examinations and Assessments: Policies and Procedures
- Ensures that those members of teaching staff involved in the direct supervision of candidates producing non-examination assessment are aware of the potential for malpractice and ensures that teaching staff are reminded that failure to report allegations of malpractice or suspected malpractice constitutes malpractice in itself

#### **Subject teacher**

- Is aware of the JCQ Notice to Centres - Teachers sharing assessment material and candidates' work

- Ensures candidates understand what constitutes malpractice in non-examination assessments
- Ensures candidates understand the JCQ document Information for candidates - non-examination assessments
- Ensures candidates understand the JCQ document Information for candidates - Social Media
- Escalates and reports any alleged, suspected or actual incidents of malpractice involving candidates to the head of centre

#### **Exams officer**

- Signposts the JCQ publication Suspected Malpractice in Examinations and Assessments: Policies and Procedures to the head of centre
- Signposts the JCQ Notice to Centres - Sharing NEA material and candidates' work to subject heads
- Signposts candidates to the relevant JCQ information for candidates documents
- Where required, supports the head of centre in investigating and reporting incidents of alleged, suspected or actual malpractice

### **15. Enquiries about results (Post-results service)**

#### **Head of centre**

- Is familiar with the JCQ publication Post-Results Services
- Ensures the centre's internal appeals procedures clearly detail the procedure to be followed by candidates (or their parents/carers) appealing against a centre decision not to support a clerical check, a review of marking, a review of moderation or an appeal

#### **Head of Department**

- Provides relevant support to subject teachers making decisions about enquiries about results  
Subject teacher
- Provides advice and guidance to candidates on their results and the post-results services available
- Provides the exams officer with the original sample or relevant sample of candidates' work that may be required for an enquiry about results to the internal deadline
- Supports the exams officer in collecting candidate consent where required

#### **Exams officer**

- Is aware of the individual post-results services available for externally assessed and internally assessed components of non-examination assessments as detailed in the JCQ publication Post Results Services (Information and guidance to centres...)
- Provides/signposts relevant centre staff and candidates to post-results services information
- Ensures any requests for post-results services that are available to non-examination assessments are submitted online via the awarding body secure extranet site to deadline
- Collects candidate consent where required

## **16. Practical Skills Endorsement for the A Level Sciences**

### **Head of centre**

- Provides a signed declaration as part of the National Centre Number Register Annual Update, that all reasonable steps have been or will be taken to ensure that all candidates at the centre have had, or will have, the opportunity to undertake the prescribed practical activities
- Ensures new lead teachers undertake the required training provided by the awarding body on the implementation of the practical endorsement
- Ensures relevant centre staff liaise with all relevant parties in relation to arrangements for and conduct of the monitoring visit

### **Head of Department**

- Confirms understanding of the Practical Skills Endorsement for the A Level Sciences designed for use in England
- Ensures a response is provided to JCQ indicating which awarding body the centre intends to use for its entries in A level Biology, Chemistry and Physics.
- Ensures where the centre intends to enter candidates for the first time for one or more of the A level subjects, the relevant awarding body will be contacted at the beginning of the course
- Undertakes training provided by the awarding body on the implementation of the practical endorsement
- Disseminates information to subject teachers ensuring the standards can be applied appropriately
- Liaises with all relevant parties in relation to arrangements for and conduct of the monitoring visit

### **Subject teacher**

- Ensures all the JCQ/awarding body requirements/instructions in relation to the endorsement are known, understood and followed
- Ensures the required arrangements for practical activities are in place
- Provides all the required centre records
- Ensures candidates provide the required records
- Provides any required information to the subject lead regarding the monitoring visit
- Assesses candidates using Common Practical Assessment Criteria (CPAC)
- Applies for an exemption where a candidate cannot access the practical endorsement due to a substantial impairment
- Follows the awarding body's instructions for the submission of candidates Pass or Not Classified assessment outcome

### **Exams officer**

- Accepts contact with the monitor and passes information to the subject lead for a visit to be

arranged with at least two weeks notice

- Confirms with the subject teacher that assessment outcomes have been submitted to the awarding body to the external deadline/Follows the awarding body's instructions for the submission of candidates Pass or Not Classified assessment outcome.

## **17. Spoken Language Endorsement for GCSE English Language specifications**

### **Head of centre**

Returns an online 'Head of Centre declaration' at the time of the National Centre Number Register annual update, confirming that all reasonable steps have been or will be taken to ensure that all candidates at the centre have had, or will have, the opportunity to undertake the Spoken Language endorsement

### **Quality assurance (QA) lead/Lead internal verifier**

- Ensures the appropriate arrangements are in place for internal standardisation of assessments

### **Head of Department**

- Confirms understanding of the Spoken Language Endorsement for GCSE English Language specifications designed for use in England
- Ensures the required task setting and task taking instructions are followed by subject teachers
- Ensures subject teachers assess candidates, either live or from recordings, using the common assessment criteria
- Ensures for monitoring purposes, audio-visual recordings of the presentations of a sample of candidates are provided

### **Subject teacher**

- Ensures all the requirements in relation to the endorsement are known and understood
- Follows the required task setting and task taking instructions
- Assesses candidates, either live or from recordings, using the common assessment criteria
- Provides audio-visual recordings of the presentations of a sample of candidates for monitoring purposes
- Follows the awarding body's instructions for the submission of grades (Pass, Merit, Distinction or Not Classified) and the storage and submission of recordings

### **Exams officer**

- Follows the awarding body's instructions for the submission of grades and the storage and submission of recordings