Orbis Education Trust



Optimism Resilience Balance Individuality Synergy

Policy Name: Examinations Policy

Policy Type: Statutory **To Be Reviewed:** Annually

Approved by: The Board of Trustees

Date: 7th March 2024 **Review Date:** 7th March 2025

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- 2. The statutory tests and qualifications offered
- 3. Exam seasons and timetables
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Purpose of Policy

The centre is committed to ensuring that the exams management and administration process is run effectively and efficiently and in compliance with the published JCQ regulations and awarding body requirements.

This exam policy will ensure that:

- All aspects of the Centre's exam process is documented, supporting the exams contingency plan, and other relevant exams-related policies and procedures
- The workforce is well informed and supported

- All Centre staff involved in the exams process clearly understand their roles and responsibilities
- All exams and assessments are conducted according to JCQ and awarding body regulations, guidance and instructions, thus maintaining the integrity and security of the exam/assessment system at all times
- Exam candidates understand the exams process and what is expected of them

This exam policy will be reviewed annually.

1. Exam Responsibilities

Head of Centre

Overall responsibility for the school as an exam centre including:

- Understands the contents, refer to and direct relevant centre staff to annually updated Joint Council for Qualifications) JCQ publications including:
 - General Regulations for Approved Centre
 - Instructions for conducting examinations
 - Access Arrangements and Reasonable Adjustments
 - Suspected Malpractice Policies and Procedures
 - Instructions for conducting Non Examination Assessments
- Ensures that the centre has appropriate accommodation to support the size of cohorts being taught, including appropriate accommodation for candidates requiring access arrangements and/or practical assessments
- Takes responsibility for responding to the National Centre Number Register Annual Update by the end of October each year.
- Ensures that centre staff undertake key tasks within the examination process and meet internal deadlines set by the Exams Officer.
- Ensures that security within the examination process is managed according to JCQ and awarding body regulations, guidance and instructions including;
 - Location of secure storage unit.
 - The relevant awarding body is informed immediately if the security of question papers is put at risk.
 - That arrangements are in place to check correct question papers are opened on the correct date and time.
 - Where/if using a third party to deliver any part of a qualification at the Centre:
 - Maintains oversight of, and responsibility for, the delivery of the qualification in accordance with JCQ regulations and awarding body requirements
 - Has in place a written agreement with the third party to ensure there is a shared understanding of the arrangement and will manage the risk of failure by the third party to deliver the expected service
 - Ensures that a copy of the written agreement is available for inspection if requested by the awarding body
- Ensures that any risk to examination processes are assessed and appropriate risk management/contingency plans are in place.
- Ensure that all relevant policies are in place.
- Ensure that the appropriate steps are taken where a candidate being entered for exams is related to a member of staff.
- Ensures that a named member of staff acts as the Special Educational Needs Co-Ordinator (SENCo).
- Ensures that centre staff are supported and appropriately trained to undertake key tasks within the examination process.

- Takes all reasonable steps to prevent the occurrence of any malpractice before, during and after the examinations.
- Ensures that irregularities are investigated and informs the awarding bodies of any
 cases of alleged, suspected or actual incidents of malpractice or maladministration,
 involving a candidate or member of staff, are reported to the awarding body
 immediately.
- Ensures that relevant awarding bodies are informed of any declaration/conflict of interest where a candidate is being taught, prepared, and entered or sitting examinations where a relevant member of staff has a personal connection to the candidate.

Exams Officer

Manages the administration of public and internal exams and conducts analysis of exam results; including:

- Understands the contents of the annually updated JCQ publications including:
 - General Regulations for Approved Centres
 - Instructions for Conducting Examinations
 - Suspected Malpractice Policies and Procedures
 - Post-results service
 - A guide to the special consideration process
- Completes/submits the National Centre Number Register annual update (administered on behalf of the JCQ member awarding bodies by OCR), by the end of October each year
 - Confirms the details or informs the awarding bodies of any changes to the Centre's contact details through the National Centre Number Register
 - Informs the National Centre Number Register Team **immediately** if any changes occur after the National Centre Number Register annual update has taken place
 - Informs the National Centre Number Register Team immediately of any other changes in circumstances that could affect the Centre's status
- Is familiar with the contents of annually updated information from awarding bodies on administrative procedures, key tasks, key dates and deadlines
- Ensures key tasks are undertaken and key dates and deadlines are met
- Recruits, trains and deploys a team of external invigilators and keeps a record of the content of training provided to invigilators for the required period
- Works with the SENDCo to ensure invigilators supervising access arrangement candidates and those acting as a facilitator supporting access arrangement candidates fully understand the respective role and what is and what is not permissible in the exam room
- Supports the head of Centre in ensuring that awarding bodies are informed (where required) of any conflict of interest declared by members of Centre staff and in maintaining records that confirm the measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected before the published deadline for entries for each examination series
- Briefs other relevant Centre staff where they may be involved in the receipt and dispatch of confidential exam materials on the requirements for maintaining the integrity and confidentiality of the exam materials
- Advises the leadership team, subject teachers and relevant support staff on annual exam timetables and application procedures as set by the various exam boards
- Oversees the production and distribution to staff and candidates of an annual calendar for all exams in which candidates will be involved and communicates regularly with staff concerning imminent deadlines and events
- Ensures that candidates and their parents/carers are informed of and understand those aspects of the exam timetable that will affect them

- Consults with teaching staff to ensure that necessary non-examination assessment (NEA) is completed on time and in accordance with JCQ guidelines
- Provides and confirms detailed data on estimated entries (where awarding bodies request these).
- Receives, checks and stores securely all exam papers and completed scripts.
- Identifies and manages exam timetable clashes
- Accounts for income and expenditures relating to all exam costs/charges.
- Submits candidates' NEA marks and tracks despatch to appropriate awarding bodes on schedule.
- Arranges for the dissemination of exam results and certificates to candidates and forwards, in consultation with the subject teachers, any appeals/review requests
- Maintains systems and processes to support the timely entry of candidates for their exams

Teachers

Responsibilities of teacher include:

- Accurate completion of NEA marks and declaration sheets
- Check all exam entry documents provided by the Exam Officer to ensure all exam entries are accurate and advise of any amendments
- Understands key tasks, as detailed in this policy, within the examinations process and meet internal deadlines set by the Exam Officer and SENCo.
- Keep updated with awarding bodies subject and teacher specific information to confirm effective delivery of qualifications.
- Attend awarding body training and update events.

SENDCo

The responsibilities of the SENDCO include:

- Understands the contents of, refers to an directs relevant centre staff to annually updated JCQ publications including;
 - Access Arrangements and Reasonable Adjustments
- Works with the appointed Assessor on all matters relating to assessing candidates and ensures the correct procedures are followed
- Presents, when requested by a JCQ Inspector, evidence of the Assessor qualification
- Leads on the access arrangements and reasonable adjustments process
- Identification and testing of candidates' requirements for access arrangements
- Provision of additional support, with spelling, reading, mathematics, dyslexia or essential skills, hearing impairment, English for speakers of other languages, IT equipment, to help candidates achieve their course aims

Invigilators

The responsibilities of invigilators include:

- Providing information as requested on their availability to invigilate
- Attend training (on the current regulations), annual update, briefing and review sessions as required
- Confirm whether they have any current maladministration/malpractice sanctions applied to them

Candidates

The responsibilities of candidates include:

- Make themselves familiar with the Candidate Handbook (emailed to all candidates)
- Return a signed plagiarism form to the Exam Officer
- Confirmation of entries, contact the Exam Office if any queries
- Understanding NEA regulations and signing a declaration that authenticates their work as their own.

2. The statutory tests and qualifications offered

The statutory tests and qualifications offered at this centre are decided by the Leadership Team.

The statutory tests and qualifications offered are;

- ELC
- GCSE and GCE
- BTFC
- Cambridge National
- Cambridge Technical
- AQA Applied General
- WJEC Applied
- Project qualification

The subjects offered for these qualifications in any academic year may be found in the centre's published prospectus for that year. If there has been a change of syllabus from the previous year, the exams office must be informed by July of the previous academic year.

Decisions on whether candidates should not take an individual subject or all NCTs will be taken in consultation with the parents/carers, SENCO, subject teachers and the Head of Year.

At key stage 4 all candidates will be entitled, and enabled, to achieve an entry for qualifications from an external awarding body.

At post-16 all examinations will be taken at the end of the two-year course. There may be a small number of GCSE entries for Year 12 re-sitting English or Maths and a small number of AS entries for candidates leaving at the end of Year 12.

Any students wishing to take a qualification in another language (other than those studied at the centre) may do so when they reach Year 10.

- Students younger than Year 10 are not offered the opportunity to sit GCSE, A Level exams at Orbis Education Trust
- Students in Years 10 and 11 will be supported in sitting GCSE's provided that they have been studying for these externally. The school will fund the costs of entries and exam invigilation
- Students in Years 10 or 11 will not be supported for studying A Levels unless there are exceptional circumstances e.g. the specification coming to the end of its approval
- Students in Years 12 and 13 will be supported in sitting A Levels
- Students in Years 12 and 13 will not be supported to take additional GCSE's unless they are re-sitting English or maths as a requirement.

3. Exam seasons and timetables Exam seasons

External exams are scheduled in January (Btec, Cambridge Technicals/National and AQA Applied General), November (EPQ and GCSE English and mathematics re-sits only) and June. Which exam series are used in the centre is decided by the heads of department/subject teachers.

Timetables

The exams officer will circulate the exam timetables for both external and internal exams when these are confirmed.

4. Entries, late entries and resits

Entries

Candidates' exam entries are selected by the heads of department and the subject teachers. A candidate or parent/carer can request a subject entry, change of level or withdrawal. The centre does not accept entries from external candidates.

For BTEC registrations the exams officer will:

- Liaise with teaching staff to confirm student details and register them on the correct programme by the awarding body deadlines
- Inform awarding bodies of withdrawals, transfer and changes to student details in a timely manner

Late entries

Entry deadlines are circulated to heads of department via the staff noticeboard and email. Late entries are authorised by subject teachers.

Resits

- Candidates are allowed resit in GCSE at the discretion of the Head of Subject.
- Candidates are allowed resit in KS5.
- All resit fees are the responsibility of students/parents 'carers and must be paid before the entries are made.

Resit decisions will be made in consultation with the candidates and the subject teachers. (See, also, Section 5. Exam Fees).

5. Exam Fees

ELC, GCSE, Cambridge National, A Level, WJEC Applied and AQA Applied General initial exam entry fees are paid by the centre.

BTEC and Cambridge Technical initial registration fees are paid by the centre. Late entry or amendment fees are paid by the departments.

Candidates or departments will not be charged for changes of tier, withdrawals made by the proper procedures or alterations arising from administrative processes, provided that these are made within the time allowed by the awarding bodies.

Resit fees for first and any subsequent resits are paid by the candidates. (See also Section 4. Retakes).

Candidates must pay the fee for an enquiry about a result, should the centre not uphold the enquiry and the candidate insists on pursuing the enquiry. (See also Section 9. Enquiries about results (EARs)).

6. Managing invigilators and exam days Managing invigilators

External invigilators will be used for external exam supervision where appropriate.

The recruitment of invigilators is the responsibility of the Exam Officer.

Securing the necessary Disclosure and Barring Service checks (DBS) for new invigilators is the responsibility of the HR Department. DBS fees for securing such clearance are paid by the centre.

It is the responsibility of the Exams Officer to ensure that all new Invigilators are sufficiently trained and an update training session is held for existing invigilators. The Exams Officer is, also, responsible for timetabling invigilators. Invigilators' rates of pay are set by the centre.

Exam Days

The exams officer will book all exam rooms, after liaison with other users, and make the question papers, other exam stationery and materials available for the invigilators.

Site management is responsible for setting up the hall and other smaller examination rooms. The Exams Officer is to make the site staff aware of what is required.

The exams officer/Invigilator will start all exams in accordance with JCQ guidelines.

Subject staff may be present at the start of the exam, outside the exam room, to assist with the identification of candidates.

In practical exams subject teachers may be on hand in case of any technical difficulties, together with an invigilator.

Exam papers must not be read by subject teachers or removed from the exam room before the end of a session. Papers will be distributed to Curriculum Leaders at the end of the exam session after completed papers are securely packaged and stored away.

7. Candidates, clash candidates and special consideration

Candidates

The centre's published rules on acceptable dress, behaviour and candidates' use of mobile phones and all electronic devices apply at all times.

Candidates' personal belongings remain their own responsibility and the centre accepts no liability for their loss or damage.

Each exam room will have a completed seating plan to identify where each candidate sat during an exam. Any seating changes during an exam will be recorded on the seating plan.

All candidates will have an exam card on their desk which includes their name, candidate number and exam details.

Teaching staff are present outside the exam room as candidates enter to aid with identification.

Candidates must not wear any headwear when inside the exam room, this includes, hoods and caps; with the exception of religious headwear.

Disruptive candidates are dealt with in accordance with JCQ guidelines.

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

The Exam Officer/SLT will attempt to contact any candidate who is not present at the start of an exam. If a candidate arrives by 10:00 am (for morning session) and by 2:00 pm (for afternoon session), they will be allowed into the examination room and given the full exam time. If candidates arrive later than these times, they will be allowed to sit the exam but must be warned that the awarding body may not mark the paper.

If candidates are absent from their examination, despite the centres best efforts to contact them, they will be advised that no mark will be awarded for that paper.

Clash candidates

The exams officer will be responsible, as necessary, for identifying escorts, identifying a secure venue and arranging overnight stays.

Special consideration

Should a candidate be too ill to sit an exam, suffer bereavement or other trauma or be taken ill during the exam itself, it is the candidate's responsibility to alert the centre, or the exam invigilator, to that effect.

Any special consideration application must be supported by appropriate evidence within five days of the exam, for example a letter from the candidate's doctor.

The exams officer will then forward a completed special consideration form to the relevant awarding body within seven days of the examination.

8. Non-examination assessment of all qualifications (including BTEC)

Staff responsibilities

Curriculum Leaders

The responsibilities of the Curriculum Leaders include:

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

Teaching Staff

The responsibilities of teaching staff include:

- Ensure appropriate instructions for conducting internal assessment are followed
- Ensure candidates are aware of JCQ and awarding body information for candidates on producing work that is internally assessed (coursework, nonexamination assessments, social media) prior to assessments taking place
- Ensure candidate are informed of their Centre assessed marks as a candidate may request a review of the Centre's marking before the marks are submitted to the awarding body
- Obtain confidential materials/tasks set by awarding bodies in sufficient time to prepare for the assessments and ensure that such materials are stored securely at all times
- Ensure that candidates and supervising teachers sign authentication forms on completion of an assessment
- Retain candidates' work securely between assessment sessions if more than one
- Post-completion, retain candidates work securely until the closing date for review of results. In the event that an enquiry is submitted, retain candidates work securely until the outcome of the review and any subsequent appeal has been conveyed to the Centre
- Ask the appropriate SENDCo for any assistance required for the administration and management of access arrangements

Exams Office

The responsibilities of the exams office include:

- Identifies relevant key dates and administrative processes that need to be followed in relation to internal assessment
- Where confidential materials are directly received by the Exam officer, to be responsible for the receipt, safe storage and safe transmission
- Ensure teaching staff have access to the correct awarding body secure sites to be able to input Centre assessed marks by the deadline

SENDCo

The responsibilities of the SENDCo include:

- Ensure that access arrangements have been applied for before any nonexamination work has started
- Work with teaching staff to ensure that requirements access arrangements are met

BTEC Internal Verification

Orbis Education Trust will appoint an appropriate Lead Internal Verifier for each BTEC subject and ensure that they are registered with the exam board and complete the necessary standardisation processes.

For each unit of work, the assessor completes the assignment brief and the Lead Internal Verifier will sign to confirm that the unit meets the necessary requirement. On completion of each unit, the Lead Internal Verifier will standardise the completed work to ensure that all areas of the unit have been covered.

If students want to improve their work after their first submission, it is the responsibility of the Lead Internal Verifier to authorise a resubmission.

The BTEC team; teaching staff and Quality Nominee, meet three times a year to share information and best practice.

Standards Verification

The standards verifier is an external individual assigned to the centre, by the exam board. Each subject will submit their assessment plans and unit marks to the standards verifier, annually. The standards verifier returns a request for a sample of student work to moderate before final grades are awarded.

9. Results, Enquires About Results (EAR), Review of Results (ROR) and Access to Scripts (ATS)

Results

Candidates will receive individual results slips on results days in person at the centre, by post to their home addresses (candidates to provide a SAE) or by email.

Arrangements for the school to be open on results days are made by the Head of Centre. Senior members of staff will be available to candidates immediately after publication of results.

Enquires About Results (EAR)

If a result is queried, the Exam Officer, teaching staff and head of centre will investigate the feasibility of asking for a review of marking at the centre's expense.

Review of Result (ROR)

RORs may be requested by centre staff or candidates if there are reasonable grounds for believing there has been an error in marking.

ATS

After the release of results, candidates may ask subject staff to request the return of papers.

- Centre staff may also request scripts for investigation or for teaching purposes.
- The consent of candidates must be obtained in all cases.
- A review of marking cannot be applied for once an original script has been returned.

10. Certificates/BTEC Certification

The Exam Officer is responsible for auditing candidate certificates on delivery. Each grade is checked against a results broadsheet before they are released to candidates. Any errors found will be dealt with by the Exam Officer.

For BTEC certification, teaching staff are responsible for providing the internal unit result to the Exams Officer by the specified deadline. The Exams Officer will submit the results to the exam board by the deadline of 5 July and confirm to teaching staff that this has been done.

Certificates are posted upon payment of £3.00 (for recorded delivery postage) or collected and signed for.

Certificates may be collected on behalf of a candidate by a third party, provided that they have authorization in writing to do so.

The centre safely and securely retains all certificates for two years.

11. Exams Disability

The Equality Act 2010 definition of disability

A definition of The Equality Act 2010 definition of disability is provided on page 7 of the current JCQ publication *Access Arrangements and Reasonable Adjustments.* This publication is further referred to in this policy as AA

Access arrangements and reasonable adjustments

SENDCo

- Ensures appropriate arrangements, adjustments and adaptations are in place to facilitate access to exams/assessments for candidates where they are disabled within the meaning of the Equality Act (unless a temporary emergency arrangement is required at the time of an exam)
- Ensures a candidate is involved in any decisions about arrangements, adjustments and /or adaptations that may be put in place for him/her
- Ensures exam information (JCQ information for candidates documents, individual exam timetable etc.) is adapted where this may be required for a disabled candidate to access it

Please refer to Orbis Education Trust's Equalities Policy (exams) for full details of how access arrangement and reasonable adjustments are identified, requested and implemented.

Use of a Word Processor at Southfield School

The *normal way of working* for exam candidates, as directed by the head of centre, is that candidates handwrite their exams. An exception to this is where a candidate may

have an approved access arrangement in place, for example, the use of a scribe/speech recognition technology.

Awarding word processors

There are, also, exceptions where a candidate may be awarded the use of a word processor in exams where they have a firmly established need, it reflects the candidate's normal way of working and by not being awarded a word processor would be at a substantial disadvantage to the candidate.

Exceptions might include where a candidate has, for example:

- A learning difficulty which has a substantial and long term adverse effect on their ability to write legibly.
- A medical condition.
- A physical disability.
- A sensory impairment.
- Planning and organisational problems when writing by hand.
- Poor handwriting.

Allocating word processors

- Appropriate exam-compliant word processors will be allocated by the IT department in liaison with the SENDCo and the exams officer.
- All word processed work will be printed in presence of the candidate.

12. Fair Assessment

Statement of Assessment

- We aim to provide a variety of qualifications which provide all students with the opportunity to achieve their full potential by the most appropriate and direct route.
- Our Assessment Policy is based on the concepts of equality, diversity, clarity, consistency and openness.
- We will endeavour to ensure that the assessment processes are implemented in a way which is fair and non-discriminatory.

What students can expect from us

- We aim to ensure that all assessment of work is carried out fairly and in keeping with the awarding body's requirements
- All portfolio-based work will be assessed fairly against the qualification standards and teachers involved will be fully trained
- Internal assessments will be carried out fairly and according to awarding body instructions
- Externally marked tests and exams will be carried out according to the requirements of the awarding body

Students can also expect:

- To be fully inducted onto a new course and given information that can be shared with parents and carers.
- Learning outcomes, performance criteria and other significant elements of learning and assessment are to be made clear at the outset of the course and when assignments are set

- To be given appropriate assessment opportunities during the course with feedback provided on the quality of the work
- All work to be marked within the required deadlines
- Where equivalents and exemptions can be applied, we will ensure this is pursued with the relevant awarding body

Cheating and Plagiarism

A fair assessment of student's work can only be made if that work is entirely the student's own. Therefore, students can expect an awarding body to be informed if:

- They are found guilty of copying and giving or sharing information or answers, unless part of a joint project
- They use an unauthorised aid during a test or examination
- They copy another student's answers during a test or examination
- They talk during a test or examination

All allegations of cheating and plagiarism will lead to a full investigation which will follow the guidance of the relevant awarding body.

If a student feels that they have been wrongly accused of cheating or plagiarism, they should be referred to the Complaints Policy.

13. Emergency Evacuation

Responsibilities of the invigilator

The invigilator must take the following action in an emergency such as a fire alarm/emergency evacuation:

When a fire alarm sounds students must not leave straight away, they must wait for the invigilator to give instructions.

Site Staff or the Examinations Officer will determine whether the alarm is a false alarm and will inform the invigilator if evacuation is needed (all exam rooms have a copy of emergency evacuation instructions in the exam box).

If evacuation is needed the instructions below should be followed:

- Stop the candidates from writing making a note of the time of the interruption.
- Advise candidates to leave all question papers and scripts in the examination room together with all other equipment. Candidates must not attempt to collect bags or coats.
- Collect the attendance register and evacuate the examination room in line with the instructions given below:
- Candidates must leave the room in silence from the appointed fire exits.
- Candidates must be supervised as closely as possible while they are out of the examination room to make sure that there is no discussion about the examination. The examinations officer/additional staff will assist in this if at all possible. Make a note of the time of the interruption and how long it lasted.

- Candidates must not have contact with other pupils and must not have mobile phones in their possession.
- At the end of the emergency the Examinations Officer or a senior member of staff will inform invigilators when to return to the examination room.
- If candidates are able to return to the examination room; allow the candidates the full working time set for the examination once candidates return to the exam room. If there are only a few candidates it may be possible to take the candidates (with question papers and scripts) to another place to finish the examination.
- If candidates are unable to return to the examination room to complete the examination, the relevant awarding body will be contacted immediately for advice.

The examinations officer will make a full report of the incident and of the action taken and send this information to the relevant awarding body.

School Closure

If the school is closed due to unforeseen circumstances external examinations will still continue as far as practicable and students should do everything they can to be in school.

Arrangements are in place to ensure that the examinations are run correctly.

Invigilators will be contacted by the examinations officer to ascertain whether or not they are able to get into school (the emergency rota of local staff will cover set up and invigilation if necessary).

14. BTEC Blended Learning

The purpose of this section is:

- To ensure that blended learning delivery meets the guidelines set by the awarding body;
- To ensure that assessment methodology is valid, reliable and does not disadvantage any group or individual learners.

In order to do this, Orbis Education Trust will:

- Ensure that teaching and assessment staff are timetabled to support blended learning when learners are working remotely using Microsoft 'Teams' and the school Outlook system;
- Ensure that there is a process to manage feedback in a timely manner and that students are given the opportunity to respond.
- Ensure that the setting of assignments is undertaken in 'face-to-face' sessions where possible. Where this is not possible, a live Microsoft 'Teams' lesson will take place;
- Ensure that when learners submit work, measures are taken to ensure that the work is authentic and has been completed by the student. Students who complete unsupervised work may be questioned about it to ensure its credibility.
- Maintain and store securely all assessment and internal verification records in accordance with the Pearson Centre Agreement.