

ENFIELD GRAMMAR SCHOOL



EXAMS POLICY

Agreed:	July 2024
Review Date:	July 2025
Approved by:	Standards Committee

Key staff involved in the Policy

Role	Name(s)
Head of centre	Chris Lamb
Exams officer line manager (Senior leader)	Jenny McCall
Exams officer	Naleni Naidoo
ALS lead/SENCo	Jenny McCall
Senior leader(s)	Michael Collins
	David Wragg
	Chamile Marshall

Purpose of the 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, procedures and plans are signposted to
- the workforce is well informed and supported
- all centre staff involved in the exams process clearly understand their roles and responsibilities
- all exams and assessments are conducted according to JCQ and awarding body regulations, guidance and instructions, thus maintaining the integrity and security of the exam/assessment system at all times
- exam candidates understand the exams process and what is expected of them

This policy is reviewed annually to ensure ways of working in the centre are accurately reflected and that exams and assessments are conducted to current JCQ (and awarding body) regulations, instructions and guidance.

This policy will be communicated to all relevant centre staff.

Policy will be available on the shared drive and also emailed round to SLT staff

Roles and responsibilities overview

The head of centre is the individual who is accountable to the awarding bodies for ensuring that the centre is always compliant with the published JCQ regulations and awarding body requirements to ensure the security and integrity of the examinations/assessments.

The examinations officer is the person appointed by the head of centre to act on behalf of, and be the main point of contact for, the centre in matters relating to the general administration of awarding body examinations and assessments.

The head of centre may not appoint themselves as the examinations officer. A head of centre and an examinations officer are two distinct and separate roles.

Head of centre responsibilities

The **head of centre** is the individual who is accountable to the awarding bodies for ensuring that the centre is always compliant with the published JCQ regulations and awarding body requirements to ensure the security and integrity of the examinations/assessments. **It is the responsibility of the head of centre to ensure that all staff comply with the instructions in this booklet.** Failure to do so may constitute malpractice as defined in the JCQ publication *Suspected Malpractice: Policies and Procedures, 1 September 2024 to 31 August 2025*:

<https://www.jcq.org.uk/exams-office/malpractice> (ICE Introduction)

Head of centre

- Understands the contents, refers to and directs relevant centre staff to annually updated JCQ publications including:
 - [General Regulations for Approved Centres](#) (GR)
 - [Instructions for conducting examinations](#) (ICE)
 - [Access Arrangements and Reasonable Adjustments](#) (AA)
 - [Suspected Malpractice - Policies and Procedures](#) (SM)
 - [Instructions for conducting non-examination assessments](#) (NEA) (and the instructions for conducting coursework)
 - [A guide to the special consideration process](#) (SC)
- Ensures the centre has appropriate accommodation to support the size of the cohorts being taught including appropriate accommodation for candidates requiring access arrangements and/or practical assessments
- Where/if using a third party to deliver any part of a qualification (including its assessments) 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 relevant members of staff respond promptly to actions raised by the JCQ Centre Inspection Service, understanding that failure to do so could result in the same penalties as listed in the previous bullet point
- Ensures that the centre promptly reports any incidents to the relevant awarding body/bodies which might compromise any aspect of assessment delivery such as a cyber-attack
- Ensures other relevant centre staff where they may be involved in the receipt and dispatch of confidential exam materials are briefed on the requirements for maintaining the integrity and confidentiality of the exam materials
- Ensures members of centre staff do not forward emails and letters from awarding body or JCQ personnel without prior consent to third parties or upload such correspondence onto social media sites and applications
- Ensures members of centre staff do not advise parents/candidates to contact awarding bodies/JCQ directly nor provide them with addresses/email addresses of awarding body examining/assessment personnel or JCQ personnel

Recruitment, selection and training of staff

- Retains a workforce of an appropriate size and competence, including sufficient managerial and other resource, to undertake the delivery of the qualification as required by an awarding body. This includes taking reasonable steps to ensure occupational competence where this is required for the assessment of specific qualifications
- Provides fully qualified teachers to mark non-examination assessments, and/or fully qualified assessors for the verification of centre-assessed components
- Enables the relevant senior leader(s), the examinations officer (EO) and the ALS lead/SENCo to receive appropriate training and support in order to facilitate the effective delivery of examinations and assessments within the centre, and ensure compliance with the published JCQ regulations

- Appoints an ALS lead/SENCo who will determine appropriate arrangements for candidates with learning difficulties and disabilities
- Ensures that the ALS lead/SENCo has sufficient time to both manage the access arrangements process within the centre and familiarise him/herself with the JCQ publication *Access Arrangements and Reasonable Adjustments*
- Ensures that the examinations officer is line managed and actively supported by a member of the senior leadership team who has a good working knowledge of the examination system

Internal governance arrangements

- Has in place a written escalation process should the head of centre, or a member of the senior leadership team with oversight of examination administration, be absent
- Has in place a member of the senior leadership team who will provide support and guidance to the examinations officer and ensure that the integrity and security of examinations and assessments is maintained throughout an examination series
- Ensures centre staff undertake key tasks within the exams process and **meet internal deadlines set by the EO**
- Makes sure that a teacher, a tutor or a senior member of centre staff who teaches the subject being examined, is not an invigilator during the examination

Delivery of qualifications

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

Public liability

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

Security of assessment materials

- Takes all reasonable steps to maintain the integrity of the examinations/assessments, including the security of all assessment materials, by ensuring:
 - the location of the centre's secure storage facility in a secure room for the purpose of administering secure examination materials
 - the secure room only contains exam-related material
 - there are between two and six key holders only, each of whom must fully understand their responsibilities as a key holder to the secure storage facility
 - access to the secure room and secure storage facility is restricted to the authorised two to six key holders and staff approved by the head of centre are accompanied by a key holder at all times
 - appropriate arrangements are in place to ensure that confidential examination materials are only handed over to authorised members of centre staff
 - appropriate arrangements are in place for handling secure electronic materials
 - the relevant awarding body is immediately informed if the security of question papers or confidential supporting instructions is put at risk
 - that when it is permitted to remove question paper packets from secure storage, and to avoid potential breaches of security, arrangements are in place to carefully check and record that the correct question paper packets are opened
(If it is ever subsequently identified following this check that the wrong question paper packet has been opened, it will be resealed and the incident reported to the relevant awarding body's Malpractice Investigation Team immediately)
- Makes arrangements to receive, check and store question papers and examination material safely and securely at all times and for as long as required in accordance with the current JCQ publication *Instructions for conducting examinations*

- Makes arrangements to receive and issue material received from the awarding bodies to staff and candidates, and notify them of any advice and instructions relevant to the examinations and assessments
- Allows candidates access to relevant pre-release materials on, or as soon as possible after, the date specified by the awarding bodies

Malpractice

- Through taking an ethical approach and working proactively to avoid malpractice among students and staff takes all reasonable steps to prevent the occurrence of any malpractice/maladministration before, during and after assessments have taken place
- Ensures any person involved in administering, teaching or completing examinations/assessments is advised that where malpractice is suspected, or alleged, personal data about them will be provided to the awarding body (or bodies) whose examinations/assessments are involved. Personal data about them may also be shared with other awarding bodies, the qualifications regulator or professional bodies in accordance with the JCQ publication *Suspected Malpractice – Policies and Procedures*
- Ensures irregularities are investigated and informs the awarding bodies immediately of any alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, by completing the appropriate documentation
- As required by an awarding body, ensures evidence of any instances of alleged or suspected malpractice (which includes maladministration) is gathered in accordance with the JCQ publication *Suspected Malpractice - Policies and Procedures* and provides such information and advice as the awarding body may reasonably require

Policies/procedures

- Ensures risks to the exam process are assessed and appropriate risk management processes/contingency plans are in place (that allow the senior leadership team to act immediately in the event of an emergency or staff absence)

Exam Contingency Plan

See Exam Contingency Plan Document

- Internal appeals procedures is in place and drawn to the attention of candidates and (where relevant) their parents/carers

Internal Appeals Procedure

See Exam Internal Appeals Procedure document

Refer to [GR](#) (section 5.7) **Centre assessed work**, (section 5.13) **Post-results services and appeals**, (section 5.3) **Policies available for inspection**)

- Ensures the centre's equalities policy demonstrating the centre's compliance with relevant legislation is in place and details the processes followed in respect of identifying the need for, requesting and implementing access arrangements

Equalities Policy

See Exam Equalities Policy

Refer to [GR](#) (section 5.3) **Policies available for inspection**) and (5.4) **Access arrangements and reasonable adjustments**

- Ensures a complaints and appeals procedure covering general complaints regarding the centre's delivery or administration of a qualification is in place and drawn to the attention of candidates and their parents/carers

Complaints and Appeals Procedure (Exams)

See Exam Complaints and Appeals Procedure document

Refer to [GR](#) (section 5.8) **Candidate information**

- Ensures the centre has a child protection/safeguarding policy in place, including Disclosure and Barring Service (DBS) clearance, which satisfies current legislative requirements

Child Protection/Safeguarding Policy (Exams)

See Child Protection & Safeguarding Policy

Refer to [GR](#) (section 5.3) **Policies available for inspection**

- Ensures the centre has a data protection policy in place that complies with General Data Protection Regulation and Data Protection Act 2018 regulations

Data Protection Policy (Exams)

See Schools Data Protection Policy

Refer to [GR](#) (section 5.3) **Policies available for inspection** and (5.8) **Candidate information**

Consideration may also need to be given to the centre's policy on sharing candidates' results and other exams related information with those with parental responsibility and third parties

Legislation on sharing information

Under the principles of the General Data Protection Regulations 2018 and the Data Protection Act 2018, children and young adults can assume control over their personal information and restrict access to it from the age of 13. This suggests that candidate consent should be sought to share results or other exams-related information with a third party.

Other legislation and guidance may need to be taken into account regarding sharing information with parents, as example information from the DfE for schools regarding parental responsibility and school reports on pupil performance:

- Understanding and dealing with issues relating to parental responsibility
www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility
- School reports on pupil performance: guidance for headteachers
www.gov.uk/guidance/school-reports-on-pupil-performance-guide-for-headteachers

Publication of exam results

Refer to ICO (Information Commissioner's Office) [Schools, universities and colleges](#) information and [Exam results](#)

- Ensures the centre has a whistleblowing policy in place

Whistleblowing Policy (Exams)

See Whistleblowing procedure for Exams

Refer to [GR](#) (section 5.3) **Policies available for inspection**

- Ensures the centre has documented processes in place relating to access arrangements and reasonable adjustments

Conflicts of interest

- Ensures the relevant awarding bodies are informed before the published deadline for entries for each examination series of any potential conflict of interest where:
 - a member of centre staff is taking a qualification at the centre which includes internally assessed components/units (noting that being entered by the centre must be as a last resort where unable to find an alternative centre)
 - a candidate is being taught and prepared for a qualification which includes internally assessed components/units by a member of centre staff with a close relationship to the candidate
- Maintains clear records that confirm the measures taken/protocols in place to mitigate any potential risk to the integrity of the qualifications affected by the above, and where:
 - a member of exams office staff has a close relationship to a candidate being entered for exams and assessments at the centre or at another centre

- a member of centre staff is taking a qualification at the centre which does not include internally assessed components/units (noting that being entered by the centre must be as a last resort where unable to find an alternative centre)
- a member of centre staff is taking a qualification at another centre

National Centre Number Register

- Provides contact details and an address to which all correspondence in connection with the administration of examinations and assessments can be directed which must be the registered address of the centre
- Ensures the National Centre Number Register annual update is responded to by the end of October
- Takes responsibility for confirming, on an annual basis, that they are both aware of and adhering to the latest version of the JCQ's regulations. This confirmation is managed as part of the National Centre Number Register (NCNR) annual update
- Understands that this responsibility cannot be delegated to a member of the senior leadership team or the examinations officer, and acknowledges that failure to respond to the NCNR annual update, and/or the head of centre's declaration, will result in:
 - the centre status being suspended
 - the centre not being able to submit examination entries
 - the centre not receiving or being able to access question papers
 and ultimately, awarding bodies could withdraw their approval of the centre

Centre inspections

- Co-operates with the JCQ Centre Inspection Service, an awarding body or a regulatory authority when subject to an inspection, an investigation or an unannounced visit, and takes all reasonable steps to comply with all requests for information or documentation made by an awarding body or regulatory authority as soon as is practical
- Allows all venues used for examinations and assessments, paperwork and secure storage facilities to be open to inspection
- Understands the JCQ Centre Inspector will identify him/herself with a photo ID card and **must** be accompanied throughout his/her tour of the premises, including inspection of the centre's secure storage facility

Exams officer

- Understands the contents of annually updated JCQ publications including:
 - [General Regulations for Approved Centres](#)
 - [Instructions for conducting examinations](#)
 - [Suspected Malpractice - Policies and Procedures](#)
 - [Post-Results Services](#) (PRS)
 - [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 <https://ocr.org.uk/administration/ncn-annual-update/>) 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** (e-mail address – ncn@ocr.org.uk) if any changes occur after the National Centre Number Register annual update has taken place
 - (Where it may be applicable) Informs the National Centre Number Register Team no later than 6 weeks prior to moving to a new address or a re-location of the secure storage facility
 - 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 met

- Recruits, trains and deploys a team of internal/external invigilators; appoints lead invigilators, as required and keeps a record of the content of training provided to invigilators for the required period
- Works with the ALS lead/SENCo to ensure invigilators supervising access arrangement candidates and those acting as a facilitator supporting access arrangement candidates fully understand the respective role and what is and what is not permissible in the exam room
- Supports the head of centre in ensuring that awarding bodies are informed (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

Senior leaders

- Are familiar with the contents, refer to and direct relevant centre staff to annually updated JCQ publications including:
 - [General Regulations for Approved Centres](#)
 - [Instructions for conducting examinations](#)
 - [Access Arrangements and Reasonable Adjustments](#)
 - [Suspected Malpractice - Policies and Procedures](#)
 - [Instructions for conducting non-examination assessments](#) (and the instructions for conducting coursework)
 - [A guide to the special consideration process](#)
- Ensure teaching staff undertake key tasks, as detailed in this policy, within the exams process (exam cycle) and meet internal deadlines set by the EO and ALS lead/SENCo
- Ensure teaching staff keep themselves updated with awarding body subject and teacher-specific information to confirm effective delivery of qualifications
- Ensure teaching staff attend relevant awarding body training and update events

Additional Learning Support (ALS) lead/Special educational needs co-ordinator (SENCo)

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

Teaching staff

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

Invigilators

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

Reception staff

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

Site staff

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

Candidates

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

The exam cycle

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

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

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

Planning: roles and responsibilities

Information sharing

Head of centre

- Directs relevant centre staff to annually updated JCQ publications including [GR](#), [ICE](#), [AA](#), [SM](#), [NEA](#) (and the *Instructions for conducting coursework*) and [SC](#)

Exams officer

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

Information gathering

Exams officer

- Undertakes an annual information gathering exercise in preparation for each new academic year to ensure data about all qualifications being delivered is up to date and correct
- Collates all information gathered into one central point of reference
- Researches awarding body guidance to identify administrative processes, key tasks, key dates and deadlines for all relevant qualifications
- Produces an annual exams plan of key tasks and key dates to ensure all external deadlines can be effectively met; informs key centre staff of internal deadlines
- Collects information on internal exams to enable preparation for and conduct of (insert the titles these internal exams are referred to in the centre)

Senior leaders

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

Access arrangements

Head of centre

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

ALS lead/SENCo

- Assesses candidates (or works with the appropriately qualified assessor as appointed by the head of centre) to identify access arrangements/reasonable adjustments requirements
- Gathers **evidence** to support the need for access arrangements for a candidate
- Liaises with teaching staff to gather evidence of **normal way of working** of an affected candidate
- Determines candidate eligibility for arrangements or adjustments that are centre-delegated
- Gathers signed **Personal data consent** forms from candidates where required and ensures **Data protection confirmation(s)** by the examinations officer or SENCo are completed
- Applies for **approval** through **Access arrangements online** (AAO) via the **Centre Admin Portal** (CAP), where required or through the awarding body where qualifications sit outside the scope of AAO
- Keeps a file for each candidate for JCQ inspection purposes containing all the required documentation (if documentation is stored electronically, an e-folder must be created for each individual candidate. The candidate's e-folder must hold each of the required documents for inspection)
- Employs good practice in relation to the Equality Act 2010
- Liaises with the EO regarding exam time arrangements for access arrangement candidates
- Ensures staff appointed to facilitate access arrangements for candidates are appropriately trained and understand the rules of the particular arrangement(s) and keeps a record of the content of training provided to facilitators for the required period
- Works with the EO to ensure invigilators and those acting as a facilitator fully understand the respective role and what is and what is not permissible in the exam room
- Liaises with the relevant member of the senior leadership team on the centre's policy on the use of word processors in examinations

Word Processor Policy (Exams)

See Word Processing Procedure

Refer to [GR](#) (section 5.3) **Policies available for inspection** and [AA](#) (section 5.8)

- Ensures criteria for candidates granted **separate invigilation within the centre** is clear, meets JCQ regulations and best meets the needs of individual candidates and remaining candidates in main exam rooms

Separate Invigilation

Refer to [AA](#) (sections 4.2, 5.16) and [ICE](#) (section 14.18)

Separate invigilation within the centre (sitting the examination outside of the main examination hall/room e.g. a room for a smaller group of candidates)

In certain circumstances, a candidate with 'an established difficulty' may be eligible to take exams under separate invigilation. Centres may also receive requests from candidates (and/or parents/carers) to take their exams under separate invigilation. Having a documented policy ensures:

- the criteria for candidates granted separate invigilation within the centre is clear and complies with JCQ regulations
- the centre can demonstrate the policy if asked/challenged by a candidate (and/or parent/carer)

Senior leaders, Teaching staff

- Support the ALS lead/SENCo in determining and implementing appropriate access arrangements/reasonable adjustments
- Provide a statement for inspection purposes which details the criteria the centre uses to award and allocate word processors for examinations

Internal assessment and endorsements

Head of centre

Controlled assessments, coursework and non-examination assessments

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

See Non-examination Assessment Procedure

Refer to [GR](#) (section 5.3) **Policies available for inspection**, (5.7) **Centre assessed work** and [NEA](#) (section 1)

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

Senior leaders

- Ensure teaching staff have the necessary and appropriate knowledge, understanding, skills, and training to set tasks, conduct task taking, and to assess, mark and authenticate candidates' work (including where relevant, private candidates)
- Ensure appropriate internal moderation, standardisation and verification processes are in place
- Ensure teaching staff delivering AQA Applied General qualifications, OCR Cambridge Nationals, Entry Level Certificate or Project qualifications (and CCEA GCE unitised AS and A-level qualifications follow JCQ [Instructions for conducting coursework](#) and the specification provided by the awarding body
- Ensure teaching staff delivering reformed GCE & GCSE specifications (which include components of non-examination assessment) follow JCQ [Instructions for conducting non-examination assessments](#) and the specification provided by the awarding body
- For other qualifications, 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

- Ensure appropriate instructions for conducting internal assessment are followed
- Ensure candidates are aware of JCQ and awarding body information for candidates on producing work that is internally assessed (coursework, non-examination assessments, social media) prior to assessments taking place

- Ensure candidates are informed of their centre assessed marks as a candidate may request a review of the centre's marking before marks are submitted to the awarding body

Exams officer

- Identifies relevant key dates and administrative processes that need to be followed in relation to internal assessment
- Signposts teaching staff to relevant JCQ [Information for candidates documents](#) that are annually updated

Invigilation

Head of centre

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

Exams officer

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

Entries: roles and responsibilities

Estimated entries

Exams officer

- Requests estimated or early entry information, where this may be required by awarding bodies, from HoDs in a timely manner to ensure awarding body external deadlines for submission can be met
- Makes candidates aware of the JCQ **Information for candidates – Privacy Notice** at the start of a course leading to a vocational qualification or when entries are submitted to awarding bodies for processing for general qualifications

Senior leaders

- Provide entry information requested by the EO to the internal deadline
- Inform the EO immediately of any subsequent changes to entry information

Final entries

Exams officer

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

Senior leaders

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

Late entries

Exams officer

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

Senior leaders

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

Candidate statements of entry

Exams officer

- Provides candidates with statements of entry for checking

Teaching staff

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

Candidates

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

Pre-exams: roles and responsibilities

Access arrangements and reasonable adjustments

ALS lead/SENCo

- 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

- Allocates appropriately trained centre staff to facilitate access arrangements for candidates in exams and assessments (ensuring that the facilitator appointed meets JCQ requirements and fully understands the rule of the access arrangement)
- Where relevant, ensures the necessary and appropriate steps are undertaken to gather an appropriate picture of need and demonstrate normal way of working for a private candidate (including distance learners and home educated candidates) and that the candidate is assessed by the centre's appointed assessor

Briefing candidates

Exams officer

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

Dispatch of exam scripts

Exams officer

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

Estimated grades

Senior leaders

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

Exams officer

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

Internal assessment and endorsements

Head of centre

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

ALS lead/SENCo

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

Teaching staff

- Support the ALS lead/SENCo in implementing appropriate access arrangements for candidates undertaking internal assessments and practical endorsements
- Assess and authenticate candidates' work

- Assess endorsed components
- Ensure candidates are informed of centre assessed marks prior to marks being submitted to awarding bodies

Senior leaders

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

Exams officer

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

Candidates

- Authenticate their work as required by the awarding body

Invigilation

Exams officer

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

ALS lead/SENCo

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

Invigilators

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

JCQ Centre Inspections

Exams officer or Senior leader

- Will accompany the Inspector throughout a visit

ALS lead/SENCo or relevant Senior leader (in the absence of the ALS lead/SENCo)

- Will meet with the inspector when requested to provide documentary evidence regarding access arrangement candidates and address any questions the inspector may raise
- Ensures that information is readily available for inspection at the venue where the candidate is taking the exam(s)

Seating and identifying candidates in exam rooms

Exams officer

- Ensures a procedure is in place to verify the identity of all candidates

Candidate Identification Procedure

Printed cards with candidate numbers and photographs are placed on the exam desk for each candidate.

Refer to [GR](#) (sections 5.6, 5.9) and [ICE](#) (section 16)

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

Invigilators

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

Security of exam materials

Exams officer

- Confirms appropriate arrangements are in place to ensure that confidential materials are only handed over to those authorised by the head of centre
- Ensures access to the secure room is restricted and staff approved by the head of centre are accompanied by a keyholder at all times. There must be between two and six keyholders only, each of whom must fully understand their responsibilities as a key holder to the secure storage facility
- Has a process in place to demonstrate the receipt, secure movement and secure storage of confidential exam materials within the centre
- Ensures a log is kept at the initial point of delivery recording confidential materials received and signed for by authorised staff within the centre and that appropriate arrangements are in place for confidential materials to be immediately transferred to the secure storage facility until they can be removed from the dispatch packaging and checked in the secure room before being returned to the secure storage facility in timetable order
- Carefully checks question paper packets when they are removed from the dispatch packing and keeps a log of the check
- Ensures the secure storage facility contains only current and live confidential material (ensuring that past examination question papers, internal tests and mock examinations are not kept in the centre's secure storage facility)
- Ensures that examination stationery, e.g. answer booklets and formula booklets are stored in the secure room (attempting to store this material in the secure storage facility, when sufficient space allows)
- Ensures the integrity and security of any electronic question paper is maintained during the downloading, printing and collating process (ensuring printing is carried out in an area that can be controlled to prevent unauthorised personnel accessing live assessment materials and ensuring only authorised members of centre staff have access to electronic question papers)

Reception staff

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

Teaching staff

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

Timetabling and rooming

Exams officer

- Produces a master centre exam timetable for each exam series
- Identifies and resolves candidate exam timetable clashes according to the regulations (only applying overnight supervision arrangements as a last resort, once all other options have been exhausted and according to the centre's policy)

Overnight Supervision Arrangements

Refer to [ICE](#) (section 8)

Allowing a candidate to take an exam paper the following morning due to an eligible overnight supervision arrangement is at the discretion of the centre. Having a documented policy ensures:

- the correct procedure is followed
- appropriate arrangements are put in place
- candidates (and/or parents/carers) understand when, or indeed if, appropriate arrangements can/will be made

- Identifies exam rooms and specialist equipment requirements
- Allocates invigilators to exam rooms (or where supervising candidates due to an exam timetable clash) according to required ratios
- Liaises with site staff to ensure exam rooms are set up according to JCQ and awarding body requirements
- Liaises with the ALS lead/SENCo regarding rooming of access arrangement candidates

ALS lead/SENCo

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

Site staff

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

Alternative site arrangements

Exams officer

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

Centre consortium arrangements

Exams officer

- (Where/if applicable to the centre) Processes applications for Centre Consortium arrangements using CAP to the awarding body deadline (or through the awarding body where a qualification may sit outside the scope of CAP)

Senior leaders

- (Where/if applicable to the centre) Inform the EO of any joint teaching arrangements in place and where the centre is acting as the consortium co-ordinator

Transferred candidate arrangements

Exams officer

- (Where/if applicable to the centre) Liaises with the host or entering centre, as required
- Processes requests for Transferred Candidate arrangements using CAP to the awarding body deadline (or through the awarding body where a qualification may sit outside the scope of CAP)
- Where relevant (for an internal candidate) informs the candidate of the arrangements that have been made for their transferred candidate arrangement

Internal exams

Exams officer

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

ALS lead/SENCo

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

Teaching staff

- Provide exam papers and materials to the EO
- Support the ALS lead/SENCo in making appropriate arrangements for access arrangement candidates

Exam time: roles and responsibilities

Access arrangements

Exams officer

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

Candidate absence

Candidate Absence

Candidates are advised about absence in assembly, by letter and in the candidate handbook.

Refer to [ICE](#) (section 22)

- candidates are aware of what they need to do if they are likely to be absent from an exam
- staff involved in the exams process understand how absent candidates who have not contacted the centre regarding their absence will be managed at the time of the exam

Invigilators

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

Candidates

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

Candidate behaviour

See *Irregularities* below.

Candidate belongings

See *Unauthorised items* below.

Candidate late arrival

Exams officer

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

Invigilators

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

Candidate Late Arrival

Late arrivals are taken into the exam rooms by the Exams Officer or member of the Senior Leadership Team. Depending on how late the candidate is, they will sit the paper and get the time they have missed.

Refer to [ICE](#) (section 21)

Permitting candidates who arrive after the start of an exam to enter the exam room and sit the exam is at the centre's discretion

- candidates are aware of what will or won't happen should they arrive late
- staff involved in the exams process understand how this will be managed at the time of the exam

Conducting exams

Head of centre

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

Exams officer

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

Dispatch of exam scripts

Exams officer

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

Exam papers and materials

Exams officer

- Organises exam question papers and associated confidential resources in date order in the secure storage facility
- Attaches erratum notices received to relevant sealed question paper packets
- Collates attendance registers and examiner details in date order
- Regularly checks mail or email inbox for updates from awarding bodies
- In order to avoid potential breaches of security, ensures care is taken to ensure the correct question paper packets are opened by ensuring a member of centre staff, additional to the person removing the papers from secure storage, e.g. an invigilator, checks the day, date, time, subject, unit/component and tier of entry, if appropriate, immediately before a question paper packet is opened
- Ensures this additional/second check is recorded

- Where allowed by the awarding body, only releases exam papers and materials to teaching departments for teaching and learning purposes after the published finishing time of the exam, or until any timetable clash candidates have completed the exam

Exam rooms

Head of centre

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

Food and Drink (Exams)

No food is allowed during exams, apart from candidates with medical needs e.g. diabetes. Only water in a clear bottle with no label is allowed in the exam rooms.

Refer to [ICE](#) (section 18)

Leaving the Examination Room

If a candidate leaves an exam room unsupervised, they will not be able to re-enter the room to carry on doing the exam.

Exams officer

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

Senior leaders

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

Emergency Evacuation (Exams)

Document for Emergency evacuation will be in each exam room

Refer to [ICE](#) (section 25)

Site staff

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

Invigilators

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

Candidates

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

Irregularities

Head of centre

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

Malpractice Procedure

To be reported to the Exams Officer and Head of Centre for investigation. Exams Officer to fill out the required forms within the timescale set out by the awarding body. Candidates and Parents will be informed of the potential outcomes and exam board decision.

Investigation will take place by the school, forms to be done and sent to the Awarding Body

Senior leaders

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

Exams officer

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

Invigilators

- Record any incidents or irregularities on the exam room incident log (for example, late/very late arrival, candidate or centre staff suspected malpractice, candidate illness or needing to leave the exam room temporarily, disruption or disturbance in the exam room, emergency evacuation)

Malpractice

See *Irregularities* above.

Special consideration

Senior leaders

- Provide signed evidence to support eligible applications for special consideration

Exams officer

- Processes eligible applications for special consideration to awarding bodies
- Gathers evidence which may need to be provided by other staff in centre or candidates

- Submits requests to awarding bodies to the external deadline

Special Consideration procedure

Exams Officer to be informed by SENDCO/invigilators/DHT Curriculum/Wellbeing Team of any candidates requiring Special Consideration or may be contacted directly by parents or candidates in which case evidence is requested to keep on file. Parents and candidates are informed in writing of the eligibility criteria.

Candidates

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

Unauthorised items

Arrangements for unauthorised items taken into the exam room

Unauthorised items are collected and put into a box and kept in the main office.

Invigilators

- Are informed of the arrangements through training

Internal exams

Exams officer

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

Invigilators

- Conduct internal exams as briefed by the EO

Results and post-results: roles and responsibilities

Internal assessment

Senior leaders

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

Managing results day(s)

Senior leaders

- Identify centre staff who will be involved in the main summer results day(s) and their role
- Ensure senior members of staff are accessible to candidates immediately after the publication of results so that results may be discussed and decisions made on the submission of any requests for post-results services and ensure candidates are informed of the periods during which centre staff will be available so that they may plan accordingly

Exams officer

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

Site staff

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

Accessing results

Head of centre

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

Exams officer

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

Post-results services

Head of centre

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

Exams officer

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

Teaching staff

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

Candidates

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

Analysis of results

Data Manager

- Provides analysis of results to appropriate centre staff
- Provides results information to external organisations where required
- Undertakes the DfE School and College Checking Exercises (where applicable to the centre)
<https://tableschecking.education.gov.uk>

Certificates

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

Certificate Issue Procedure and Retention Policy

Certificates are given directly to students staying in the Sixth Form; parent emails are used to contact those who have left to request collection by the students; or posted 1st class recorded delivery if not collected.

Candidates

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

Exams review: roles and responsibilities

Exams officer

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

Senior leaders

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

Retention of records: roles and responsibilities

Exams officer

- Keeps records as required by JCQ and awarding bodies for the required period
- Keeps records as required by the centre's records management policy
- Provides an exams archiving policy that identifies information held, retention period and method of disposal