

## INTERNAL ASSESSMENT & VERIFICATION POLICY

### Part A - Internal Assessment & Verification Policy

### Part B – Internal Assessment Appeals Procedure

### Part C – Malpractice in Assessment

## INTERNAL ASSESSMENT & VERIFICATION POLICY - Part A

### 1. Introduction

The South Thames Colleges Group is committed to providing learners with an assessment process that is fair and addresses the basic principles of authenticity, consistency, transparency, validity, reliability, currency and sufficiency. It aims to promote learning and achievement by providing access to assessment and accreditation services, ensuring equality of opportunity for all learners within a clear structure.

The Internal Assessment and Internal Verification Policy provides a framework which covers all internal initial, formative and summative assessment, accreditation of prior learning, work-based assessment, internal verification, moderation, and standardisation procedures, from entry through to final achievement.

### 2. Scope

This policy applies to all teaching staff, assessors, internal verifiers and learners at the Group. This Policy applies to all further education delivered by the Group.

### 3. Definitions

The following definitions apply to all practices covered by this policy:

- **Assessment** is the measurement or evaluation of learners' knowledge and understanding, skills, attitudes and values, against explicitly stated criteria for success.
- **Internal Quality Assurance/Internal Verification** is the process whereby internally set and marked assessment carried out by assessors is checked for consistency and quality by other teachers or managers within the Group. External quality assurance/external verification is the same check carried out by professionals nominated by awarding authorities for vocational qualifications
- **Internal Moderation** is the process whereby internal marking of externally set assessment carried out by teachers is checked for consistency and quality by other teachers or managers. External moderation is the same check carried out by professionals nominated by awarding authorities.
- **Standardisation** is the process whereby it is ensured that all assessment decisions made by assessors and internal verifiers are made to the same standards and meet awarding body requirements

### 4. Aim

The aim of this policy is to give quality assurance in assessment processes by establishing quality control mechanisms for assessment through a system of internal quality assurance, verification, moderation and standardisation.

## 5. Principles

Assessment procedures will ensure that:

- Learners are informed of their progress and maximise their chances of success in their learning
- Assessment feedback to learners is explicit in relation to assessment content and criteria and how learners may improve their performance within the assessment rules and regulations as laid down by the awarding body
- Assessed work of all types is returned to learners within a reasonable, effective and pre-determined timescale (normally two weeks)
- Teaching staff are informed of the effectiveness of their teaching and learners' learning
- Learners' ethnic and cultural differences are taken into account and those with learning difficulties are supported, in accordance with the regulations of awarding bodies
- The assessment process is valid, reliable, current, sufficient, authentic, safe and fair and meets the requirements of the qualification
- Assessment decisions, including grades where appropriate, are recorded regularly, accurately and systematically, using Pro-Monitor
- Records are sufficient to allow audit of assessment and are retained for the period of time as directed by awarding bodies
- Communication within assessment teams and awarding bodies is effective
- Communication to learners about assessment content, assessment criteria, mark schemes and grade boundaries is clear, explicit, and where helpful, uses standard formats
- Grading criteria regarding marking and submission conforms to Group and awarding body guidelines including compliance with guidelines regarding work that is submitted after the submission date and work that is re-submitted following a referral/resubmission decision
- Equipment and accommodation for assessment comply with health and safety regulations and meet awarding body qualification approval requirements
- Learners are aware of their rights and responsibilities
- Learners can gain unit accreditation/certification where appropriate
- There is adequate monitoring and reviewing of procedures
- All programmes offered have a sufficient number of teachers, assessors and internal quality assurers/verifiers/moderators who meet the qualification requirements as set by the awarding body. Changes of staff are communicated to awarding bodies as required under their rules and regulations
- Assessors and internal quality assurers/verifiers or moderators and teaching staff undertake appropriate continuous professional development and updating activities including those required to maintain compliance with the requirements of an awarding body
- At induction learners receive adequate assessment plans or individual learning plans, which are regularly reviewed
- For all types of courses an appropriate range of assessment methods are used, supported by a well-planned and comprehensive sampling process as well as appropriate standardisation activities
- Assessors, quality assurers/verifiers as well as moderators and staff undertaking standardisation, have sufficient time, resources and authority to perform their role
- There are no conflicts of interest which would impact on the ability of assessors and quality assurers/verifiers to make assessment decisions
- Qualified assessors and verifiers countersign decisions of unqualified assessors and verifiers as required by the awarding body
- Rigorous efforts are made to prevent plagiarism or other forms of deception by learners

- There is a well-planned and comprehensive sampling process which ensures that every unit, grade, assignment, assessor and learner (where possible) are sampled
- Assignment briefs are internally verified before issue to learners to ensure that they will achieve the intended outcome and offer sufficient challenge to all learners
- Appropriate standardisation activities take place at least once per term

For all centre-assessed GCE/GCSE coursework, non-examination assessments and portfolios the Group will:

- Notify awarding bodies of a consortium of centres with joint teaching arrangements for GCE and/or GCSE qualifications to allow the candidates for each specification to be treated as a single group for the moderation of centre-assessed work
- Use only current assessment materials/tasks to assess candidates' knowledge and skills when the awarding body provides such materials
- Before submitting marks to the awarding body inform candidates of their centre assessed marks and allow a candidate to request a review of the Group's marking

The Group will negotiate special arrangements with awarding bodies for candidates with special needs in securing adequate arrangements for access to and support in the assessment process.

All assessments are supported by a transparent assessment appeals procedure (see INTERNAL ASSESSMENT APPEALS PROCEDURE – Part B of this policy document).

In accordance with awarding body requirements, the South Thames Colleges Group has a Malpractice Policy (see MALPRACTICE IN INTERNAL ASSESSMENT POLICY - Part C of this policy document) which complies with guidance issued by the Joint Council for Qualifications (JCQ). The policy and the associated documents to which it relates together outline the rights and responsibilities of:

- Awarding bodies
- Group staff
- Learners

and the procedures to be followed in the event of breaches of policy, regulation or procedure.

## 6. Associated documentation

The following documentation provides guidelines for Group assessment practice:

- Staff guidance on Internal Verification, Standardisation and Moderation and associated paperwork from the relevant awarding bodies
- Examinations and Assessment Policy
- Suspected Malpractice in Examinations and Assessments (JCQ Policies and Procedures 2021/22). This document can be found at: JCQ Suspected Malpractice Policies and Procedures 2022/23

## 7. Responsibility for implementation

The Vice Principal Quality & Digital Innovation is responsible for the audit and monitoring of assessment practices across the Group.

Heads/Deputy Heads of School and Curriculum Managers are responsible for implementing and ensuring the quality of assessment practices in their areas and for ensuring there are enough sufficiently trained staff to carry out requisite assessment, verification, standardisation and moderation activities.

### **8. Monitoring and Review of the policy**

The implementation of the Assessment and Internal Verification Policy is monitored by quality assurance audit, the Meeting Our Targets (MOT) process and External Verifier and Moderation reports.

College Vice Principals will monitor the implementation of the policy at curriculum level.

The policy will be reviewed annually by the Group Leadership Team.

### **9. Breach of the policy**

Each College will take seriously any instances of non-adherence to the Group's policy by its staff or management.

Any instance of breach of the policy will be investigated and, where appropriate, action may be considered under the Group's Disciplinary Code for staff.

### **10. Access to the policy**

The Policy will be published on the Group website.

## INTERNAL ASSESSMENT APPEALS PROCEDURE (non GCSE, GCE qualifications) - Part B

### 1. Introduction

The South Thames Colleges Group is committed to providing learners with an assessment process that is fair and addresses the basic principles of authenticity, consistency, transparency, validity, reliability, currency and sufficiency.

### 2. Initiating an appeal

An appeal against an assessment decision is taken seriously by the Group. In order to attempt an informal resolution to an appeal, learners should, in the first instance, speak to the person who assessed their work in order that they can explain their judgement. If learners are unwilling or unable to speak to this person, they should submit their appeal in writing then pass it to the Head of School for their curriculum area. The assessed work, the assessment brief and the assessment decision should be attached to their statement.

### 3. Assessment Appeals Procedure

There are two procedures described in this document:

- Appeals against internal assessment
- An appeal by the complainant where they are dissatisfied with the way in which their appeal has been dealt with

### 4. Appeals against internal assessment

A learner is entitled to appeal against an assessment decision if they feel that the work has not been accurately assessed. Wherever an assessment appeal is lodged, the College Vice Principal should be notified by the person to whom the assessment appeal was made. Any appeal should be lodged within 10 working days (2 weeks) of the notification of the assessment decision.

The following stages should be followed:

#### Stage 1 - Informal

Where possible, the disagreement should be settled informally. The learner should, wherever possible, discuss the assessment decision with the person who assessed the work, who should explain the decision made or the marks awarded and consider the learner's objections.

#### Stage 2 - Written

In the event that a mutually agreeable decision is not reached or the learner is unable or unwilling to talk to the assessor, the learner should submit a written appeal to the Head of School.

The Head of School will instruct their Deputy/Curriculum Manager to investigate and hold a meeting with the Internal Verifier for the programme, a Head of Quality and the assessor who marked the work. This group will review the work and the Head of School should provide written feedback within 5 working days (1 week) after receiving the appeal.

The Deputy Head of School/Curriculum Manager may involve another member of staff to carry out this role if they do not have the correct subject specialism to make a judgement on the assessment of the learner work.

### Stage 3 - Formal

If no resolution has been reached at Stage 2, the College Vice Principal will convene a formal Assessment Appeals Panel consisting of:

- College Vice Principal
- The Head of School
- The Internal Verifier/Lead Internal Verifier or another suitable member of teaching staff in the subject area (not the assessor)

The panel may seek advice from a Head of Quality or the Awarding Body and call for the work to be re-marked by a third party if required. A written decision should be given within 15 working days of the appeal to Stage 3 of the process.

### Stage 4

Where no resolution is achieved, learners can require the Group to submit the work to the Awarding Body who will reassess the work under dispute.

### Stage 5

Where a learner is not satisfied, they can contact the Appeals Tribunal of the given Awarding Body.

There is no further stage of appeal to Qfqual, but you may submit a complaint to Qfqual about the way the Awarding Body dealt with the appeal.

## 6. Complaints regarding the appeals process

Where a learner is dissatisfied with the way in which the appeal has been dealt with, they may complain in writing to their College Principal who will review the investigation and provide a written response to the complainant within 20 working days. The response will provide a written explanation and information on how the Group will deal with the matter if the appeal is upheld.

## 7. Monitoring and Review

The Appeals Procedure is monitored by the Vice Principal Quality & Digital Innovation  
The College Vice Principal will monitor the implementation of the procedures at curriculum level.

The procedures will be reviewed bi-annually by the Vice Principal Quality & Digital Innovation.

## 8. Access to the Procedure

The Procedure will be published on the Group website.

## MALPRACTICE IN INTERNAL ASSESSMENT POLICY - Part C

### 1. Policy Statement

The South Thames Colleges Group is committed to ensuring that issues of malpractice in internal examinations and assessments are addressed. This policy will supplement the guidance of awarding/accrediting bodies to centres. It complies with guidance issued by the Joint Council for Qualifications (JCQ). For internally set and assessed work these guidelines form the policy for staff and learners to comply with, and supplement other relevant Group policies.

This policy draws on and refers to the 'Suspected Malpractice in Examinations and Assessments' (JCQ Guidelines 2020/21). This document can be found at: [JCQ Suspected Malpractice Policies and Procedures 2020/21](#)

Note: Non JCQ awarding bodies have their own reporting forms and these would be used where appropriate.

### 2. Scope

This policy applies to all teaching staff, assessors, internal quality assurers/internal verifiers/internal moderators and learners at the Group. This policy applies to all further education delivered by the Group. It underpins the complementary guidelines, policies and procedures of the awarding bodies and the Group. This policy and the associated documents to which it relates together outline:

- The specific regulations of the awarding bodies under which relevant internal examinations and assessments operate
- Definitions of malpractice by learners and staff in internal examinations and assessment
- The rights and responsibilities of awarding bodies, Group staff and learners
- The procedures to be followed in the event of breaches of policy, regulation or procedure.

### 3. Definition

"Malpractice" means any act, default or practice which is a breach of the regulations or which:

- Gives rise to prejudice to candidates; **and/or**
- Compromises public confidence in qualifications **and/or**
- Compromises, attempts to compromise or may compromise the process of internal assessment, the integrity of any qualification or the validity of a result or certificate; **and/or**
- damages the authority, reputation or credibility of any awarding body or the Group or any officer, employee or agent of any awarding body or the Group

Malpractice may or may not relate directly to sitting an examination. Awarding bodies are aware of the possibility of novel or unexpected forms of malpractice emerging as technologies and the nature and organisation of examination centres change.

A failure by the Group to notify, investigate and report to an awarding body all allegations of malpractice or suspected malpractice constitutes malpractice in itself (JCQ Guidelines 2022/23).

### 4. Centre Staff Malpractice

Centre staff malpractice means malpractice committed by:

- a member of staff, contractor (whether employed under a contract of employment or a contract for services) or a volunteer at the Group **or**

- an individual appointed in another capacity by the Group such as an invigilator, a Communication Professional, an Oral Language Modifier, a practical assistant, a prompter, a reader or scribe

Examples of staff malpractice are set out in Appendix A below

Staff who are found to have engaged in activities deemed to be malpractice or maladministration will be subject to the Group Disciplinary Procedures for teaching and support staff.

### **Learner Malpractice**

Learner malpractice means malpractice by a learner in connection with any internal examination or assessment, including the preparation and authentication of any controlled assessments or coursework or non-examination assessments, the presentation of any practical work and the compilation of portfolios of assessment evidence. Examples of learner malpractice are set out in Appendix B. Other instances of malpractice may be considered by the awarding bodies at their discretion.

Malpractice in a coursework component or a controlled assessment component of a specification discovered prior to the learner signing the declaration of authentication need not be reported to the awarding body, but must be dealt with in accordance with the Group Disciplinary Procedures for learners.

Learners who are found to have engaged in activities deemed to be malpractice after signing the declaration of authentication will be subject to the regulations and possible penalties as laid down by the specific awarding body. The Group is obliged to follow awarding body regulations and Curriculum Managers are responsible for providing this information for reporting via their College Vice Principal. Learners who are found to have engaged in such activities will also be subject to the Group Disciplinary Procedures for learners.

### **6. Investigation of Candidate/Learner Malpractice**

The Group Principal & CEO has delegated responsibility for the conduct of examinations and all concomitant activity to the College Principals.

A College Principal will instigate investigations and may delegate this to the appropriate senior member of the college management team. This will ensure that the investigation is independent of the School involved in the suspected malpractice. Appeals will be conducted as specified in the Assessment Appeals Procedure.

The awarding body will withhold the issuing of results until the conclusion of the investigation, or permanently, where the outcome of the investigation warrants it. (See JCQ Guidance 2022/23 for further detail and guidance).

### **7. Investigation of Alleged Malpractices by Staff**

Investigations will be conducted as for 6 above, with the addition of:

- Allegations against the Group Principal & CEO will be carried out by the Chair of the Governing Body
- College Principals/College Vice Principals or other senior managers may be involved in investigations at the discretion of the Group Principal & CEO



- Correspondence will be through a College Principal except when the allegation is against the Group Principal & CEO, and all such will be in writing and copied to the Group Principal & CEO
- Respondents will be entitled to correspond in writing
- Group procedures on discipline, grievance and appeals will also apply
- Awarding bodies have the right to be represented at interviews or hearings
- Staff members may be accompanied by a friend or union representative.

(See JCQ Guidance 2022/23 for further detail and guidance).

### 8. Rights of Accused Individuals

When an incident of suspected malpractice is reported to the awarding body, or on receipt of a report from the awarding body, an individual, whether a candidate or a member of staff, accused of malpractice must:

- be informed (preferably in writing) of the allegation made against him or her
- know what evidence there is to support that allegation
- know the possible consequences should malpractice be proven
- have the opportunity to consider their response to the allegations (if required)
- have an opportunity to submit a written statement
- have an opportunity to seek advice (as necessary) and to provide a supplementary statement (if required)
- know when the final outcome would be imparted to learner/member of staff
- be informed of the applicable appeals procedure, should a decision be made against him or her
- be informed of the possibility that information relating to a serious case of malpractice may be shared with other awarding bodies, the regulators, the police and/or professional bodies.

Responsibility for informing the accused individual rests with the College Principal.

### 9. Reporting

Reports of malpractice will be forwarded to the relevant authorities, internally and externally, which may include the Governing Body, Group Leadership Team, regulatory authority and awarding body.

Reports should be accompanied with evidence using the JCQ/MI (candidate malpractice) or JCQ/M2 (staff malpractice) form ( [JCQ Malpractice](#)) as specified in the JCQ Guidance 2021/22, or other awarding body forms where appropriate.

Reports will be authorised by the College Principal before being forwarded to the relevant authorities.

### 10. Sanctions

Awarding bodies will normally impose sanctions and penalties to individuals found guilty of malpractice. These will usually be the learner or the responsible member of staff. However, when the malpractice is judged to be the result of a serious management failure, the awarding body may apply sanctions against the whole curriculum area, college or Group. In these cases, the awarding body may make special arrangements to safeguard the interests of learners who might otherwise be adversely affected.

Awarding bodies will determine the application of a sanction according to the evidence presented, the nature and circumstances of the malpractice, and the type of qualification involved. Not all possible sanctions are applicable to every type of qualification or circumstance. Sanctions could include withdrawal of certification or loss of direct claim status for the curriculum area or disqualification from qualification for a learner. For further examples of possible sanctions refer to the JCQ Guidance 2022/23.

Actions required to lift sanctions as directed by awarding bodies or regulatory bodies will be complied with fully by the Group.

Sanctions applied by awarding bodies following malpractice by an individual member of staff may also lead to the implementation of the Group Disciplinary Procedures for Staff.

In cases of significant malpractice, the police may also be informed.

### **11. Appeals**

Awarding bodies must consider appeals against penalties arising from malpractice decisions. The following individuals have a right to appeal against decisions of the JCQ Malpractice Committee or officers acting on its behalf:

- The Group Principal & CEO, who may appeal against sanctions imposed on the Group or its staff, as well as on behalf of learners entered or registered by the Group
- Members of staff, who may appeal against sanctions imposed on them personally
- Learners and candidates

For further information, refer to the JCQ Guidance 2022/23

### **12. Access to the policy**

The Policy will be published on the Group website.

## Appendix A

### Examples of Staff Malpractice

The following are examples of staff malpractice. This is not an exhaustive list and other instances of malpractice may be identified and considered by the awarding bodies at their discretion.

#### Conflicts of interest

This is a situation in which an individual, or organisation has competing interests or loyalties. A failure to declare any conflict of interest between a personal, professional or business interest that will impact on assessment practice is deemed malpractice. Conflicts of interest can arise in a variety of circumstances in relation to assessment activity, for example:

- When an individual has a position in one organisation which conflicts with their interests in another organisation
- When an individual has personal interests that conflict with their professional position
- Where someone works for or carries out work on the Group's behalf, but who may have personal interests (paid or unpaid) in another business which uses the Group's services
- Where someone works for or carries out work on the Group's behalf, who has friends or relatives involved in receiving teaching/training or assessment from the Group
- Where learners are on work experience/industry placement and they may be a friend of or related to the person who writes an assessment on the learner's progress/performance whilst on work experience/industry placement

Every teacher/assessor has responsibility for ensuring that they are familiar with the above and most importantly that an individual discloses any activity if there is any doubt whether or not it represents a conflict of interest. This may be done in confidence.

It is an individual's responsibility to raise concerns relating to a conflict of interest with their Head of School in the first instance. The Head of School will ensure this is raised with the College Vice Principal and that the individual receives a response to their concerns.

Where there is a potential or actual conflict of interest, the College Vice Principal is responsible to ensuring that the issue is documented.

An individual must not take on any such activities that could be deemed to compete or conflict with Group activities.

Where awarding bodies require disclosure of a Conflict of Interest it is the responsibility of the staff member to comply with any required process.

#### Deception

Any act of dishonesty in relation to any internal examination or assessment, but not limited to:

- Inventing or changing marks for internally assessed components (e.g. non-examination assessment and/or assignments) where there is no actual evidence of the learners' achievement to justify the marks/grades given
- Manufacturing evidence of competence against national standards
- Fabricating assessment and/or internal quality assurance/moderation/verification records or authentication statements

- Entering fictitious learners for examinations or assessments, or otherwise subverting the assessment or certification process with the intention of financial gain (fraud)
- Substituting one learner's controlled assessment, coursework or non-examination assessment for another's
- Providing misleading or inaccurate information to an awarding body, learners and/or parents

### **Improper assistance to learners**

Any act where assistance is given beyond that permitted by the specification, regulations and/or awarding body assessment regulations to a learner or group of learners, which results in a potential or actual advantage in an internal examination or assessment. For example:

- Assisting learners in the production of internal examinations, assignments or other evidence of achievement, beyond that permitted by the regulations and awarding body rules
- Sharing or leading learners' internal examinations, assignments or other evidence of achievement with other learners in a way which allows malpractice to take place
- Assisting or prompting candidates with the production of answers
- Permitting learners in the production of internal examinations, assignments or other evidence of achievement to access prohibited materials (e.g. dictionaries, calculators etc.)
- Prompting learners in the production of internal examinations, assignments or other evidence of achievement by means of signs, or verbal or written prompts
- Assisting learners granted the use of a Communication Professional, an Oral Language Modifier, a practical assistant, a prompter, a reader, or a scribe beyond that permitted by the regulations

### **Maladministration**

Failure to adhere to the regulations regarding the conduct of internal examinations, assignments or other evidence of achievement, assessment records, results and certification claim forms. For example:

- Failing to ensure that learners' work to be completed under controlled conditions is adequately monitored or supervised
- Inappropriate members of staff assessing learners for access arrangements who do not meet the criteria as detailed within Chapter 7 of the JCQ publication [Access Arrangements and Reasonable Adjustments](#)
- Failure to use the correct tasks/assignments for assessments
- Failing to retain candidates' controlled assessments, coursework or non-examination assessments securely after the authentication statements have been signed or the work has been marked
- Failing to notify the appropriate awarding body immediately of all alleged, suspected or actual incidents of malpractice

## Appendix B

### Examples of Learner Malpractice

The following are examples of malpractice. This is not an exhaustive list and other instances of malpractice may be identified and considered by the awarding bodies at their discretion. For example:

- The alteration or falsification of any results document, including certificates
- Failing to abide by the conditions of supervision designed to maintain the security of the examinations or assessments
- Collusion: working collaboratively with other learners, beyond what is permitted
- Copying from another learner (including the use of technology to aid copying)
- Allowing work to be copied, e.g. posting work on social networking sites prior to an examination/assessment
- The deliberate destruction of another learner's work
- Disruptive behaviour in the examination room or during an assessment session (including the use of offensive language)
- Making a false declaration of authenticity in relation to the authorship of assessment evidence or the contents of a portfolio
- Allowing others to assist in the production of controlled assessment, coursework, non-examination assessment or assisting others in the production of controlled assessment, coursework, non-examination assessment
- Bringing into the internal examination room notes in the wrong format (where notes are permitted) or inappropriately annotated texts (in open book internal examinations)
- The inclusion of inappropriate, offensive, obscene, homophobic, transphobic, racist or sexist controlled assessment, coursework, non-examination assessment or portfolios
- Plagiarism; unacknowledged copying from, or reproduction of, published sources or incomplete referencing
- Theft of another learner's work
- Bringing into the external examination room or assessment situation unauthorised material, for example: notes, study guides and personal organisers, own blank paper, calculators (when prohibited), dictionaries (when prohibited), instruments which can capture a digital image, electronic dictionaries (when prohibited), translators, wordlists, glossaries, iPods, mobile phones, MP3/4 players, pagers, Smartwatches or other similar electronic devices
- The unauthorised use of a memory stick or similar device where a candidate uses a word processor
- Facilitating malpractice on the part of other candidates
- Behaving in a manner so as to undermine the integrity of the assessment evidence or the contents of a portfolio