



**CDG Centre Policy
Summer 2021**

Responsibility:	D L Davies
Review:	April 2022

Centre policy on assessment and quality assurance processes for the summer 2021 alternative arrangements

When submitting their policy as outlined in WJEC requirements and guidance booklet, centres must ensure that the seven areas identified are included in their submission. Centres do not have to structure their policy using the WJEC headings for each of the seven areas. The only requirement is that the seven areas are covered within the policy. However, some centres may wish to complete this Word template, but they are not obliged to do so.

Centre Name: Llantwit Major School	Centre Number: 68775
Policy adopted by Board of Governors on (insert date): 19 March 2021	Policy issued to staff on (insert date): 22 March 2021
Member of staff responsible for the policy: Mr D L Davies	

Statement of Intent

The purpose of this Centre Policy is:

- to ensure that Centre Determined Grades (CDG) are conducted fairly, consistently, free from bias and effectively within and across departments and maintained throughout the process
- to ensure the operation of effective processes with clear guidelines and support for staff
- to ensure that all staff involved in the processes clearly understand their roles and responsibilities
- to support teachers to take evidence-based decisions in line with Qualification Wales requirements
- to achieve a high standard of internal quality assurance in the allocation of CDGs
- to ensure the centre meets its obligations in relation to equality and disability legislation
- to ensure we meet all requirements set out in the Special Regulatory Conditions, Joint Council for Qualifications and Awarding Organisation instructions for Summer 2021 qualifications.

It will be the responsibility of everyone involved in the generation of Centre Determined Grades to read, understand, and implement the policy.

1. Roles and responsibilities

As far as possible to capitalise on the range of knowledge and experience available, existing roles/responsibilities within the school community with regards to qualifications including examinations will remain.

It is crucial Llantwit Major School will endeavour to support all students without compromising the integrity of staff/ centre and exam body guidelines.

However, for awards in 2021, the following roles and responsibilities apply in terms of the determination of grades

- **Chair of Governors** – the governing body of Llantwit Major School will take responsibility for approving the policy for how centre determined grades will be determined across the KS4 and post 16 curriculum
- **Headteacher** - overall responsibility for the school/college as an examinations centre. The Headteacher will work towards ensuring clear and separate roles and responsibilities are distributed to the staff at Llantwit school; to ensure that the assessment frameworks have been utilised appropriately and internal quality assurance process has been completed effectively; on successful completion of the assessment process for the designated examination year groups the Headteacher will authorise/ sign the Head of Centre declaration
- The Headteacher will work closely with the member of the leadership team responsible for examinations, who acts as Internal Lead Verifier, to ensure that quality assurance processes at school level are followed. This includes ensuring that each qualification has successfully completed internal moderation of evidence, while all decisions are recorded in line with WJEC protocols. The Headteacher will also be responsible for overseeing internal processes, where a concern is raised by

staff, regarding the authenticity of students' work provided and/or where a student wishes to review a Centre Determined Grade

- **Senior staff** – Deputy Headteacher and two Assistant Headteachers – One Assistant Headteacher with specific responsibilities for exams, will be involved in quality assurance of assessment plans and final decisions as part of their normal line management duties. Through both formal and informal meetings to share and embed WJEC guidance the designated staff will provide training and support for staff; supporting the Head of Centre in the internal quality assurance of final CDGs; providing a clear centre policy on how records and evidence are stored securely; achieving a consistent approach across departments that will allow the school to meet equality standards
- **ALNCo:** our centre specialist will work with the designated Assistant Headteacher and Data Manager in respect of access arrangements to ensure up to date records are available including clear identifiers in the school MIS and arrangements are appropriately taken into account for fair judgments to be undertaken for each pupil. In addition, the ALNCo will help to coordinate the provision of additional support to help students achieve the course aims, as they would do in normal circumstances.
- **Curriculum / subject leaders:** responsible for ensuring processes within the department they lead meet the requirements of the publicised WJEC Qualification Assessment Framework. The Leader of Learning will make decisions on assessment plans, ensuring consistency in decisions within their curriculum/subject area, including identifying and recording how agreed adjustments are made and associated decision-making evidence for the qualification grade is collected. Leaders of learning will work with their subject staff to manage the storage of evidence and Learner Decision Records. Subject leaders will ensure that students entitled to access arrangements have these in place for the qualifications they oversee.
- **Teaching staff:** Using updated WJEC specification and assessment guides, teaching staff will work under the direction of Leaders of Learning to ensure evidence is gathered within the published schedule and assessments are completed under the centre's appropriate level of control. They will collect sufficient evidence in line with the centre policy to provide CDGs for each learner which are a fair, valid and reliable reflection of the assessed evidence available appropriate to the relevant assessment framework; teachers will ensure that reasonable adjustments for identified students are met. Teachers will take responsibility for completing Learner Decision Records, ensuring that each learners' work is stored securely and can be retrieved to support internal reviews and/or appeals. In carrying out any assessments, teachers must make students aware of the nature and criteria of the task set and ensure students understand when an activity will contribute towards the determination of a grade. Teachers must collect and store submitted work securely. Teachers will mark submitted work within the agreed timeframes, set by subject leaders. Teachers will not provide students with an opportunity to improve their work, once submitted. Teachers will work with relevant Leader of Learning to ensure that students entitled to access arrangements, within their designated classes, have these in place.
- **Examinations officer/ Data Manager** – responsible for managing the administration of qualifications, will work with the designated Assistant Headteacher and appropriate office staff to ensure accurate and timely entries; a key aspect of this, considering the dynamic nature of guidance for 2021 assessments, will be to ensure all information from WJEC is shared promptly with all relevant staff; and other key duties undertaken such as making applications for appeals. This will include assisting subject leaders and members of the leadership team, specifically those with responsibility for examinations, to ensure accurate submission of CDGs to WJEC is documented and is submitted within the permissible date range for uploading

2. Subject assessment plans

The centre assessment approach is designed to outline how the school, as an examination centre, will apply the 'Guidance on Alternative Arrangements for Approved GCSEs, AS and A levels' provided by [Qualifications Wales \(QW\)](#), the examination regulator, to help determine grades in 2021. The school will share its approach with students, staff and families to help provide a clearer picture of the process and rationale of how grades will be awarded.

Furthermore, to build confidence in all stake holders the school will work to provide an overview on the decisions teachers will make; how teachers will make these decisions; and identify the evidence teachers will be utilising to support the decision-making process. While this explanation is designed to provide a 'high-level' understanding of the approach, a copy will be made available to parents/carers and students.

Centre-Determined Grades

A Centre Determined Grade is the grade awarded by the school, as an examination centre, on the basis of attainment which has been demonstrated in the areas of the qualification content that a student has covered. For each qualification, teachers will make use of the WJEC Assessment Frameworks which include descriptors for key grades to support the accurate distribution of awards. Each grade awarded by the school must be underpinned by robust evidence to demonstrate a student's attainment across key themes and skills. These will vary as appropriate to the individual WJEC Qualification Assessment Frameworks guidance per qualification. As instructed by the QW guidance it will not be possible or permitted for teachers, or the school, to attempt to issue a Centre Determined Grade based on professional prediction or the potential of a student. Teachers are required to apply their professional judgement primarily on actual assessment evidence and decide whether the knowledge and skills demonstrated meets the usual standard for a specified grade.

In determining grades, the school and therefore departments will be required to make 'best-fit' judgements. This means that students are not required to demonstrate all aspects of a grade descriptor to be awarded the grade; students should be awarded a grade which supports evidence of attainment across sufficient breadth of content, within the specified qualification, as determined by WJEC guidance. It should be understood by all parties that during the determining of a CDG that students may achieve the same grades by demonstrating different combinations of knowledge, skills and understanding. This ensures that strengths in some areas counterbalance shortcomings in others when making the overall judgement. As a result, the 'best-fit' grade may be awarded. Where there is insufficient evidence that is not mitigated by clear appreciation of the learning barriers a student may have faced during this year, or where evidence suggest attainment is below that required of the lowest grade for a qualification (i.e. G grade at GCSE; E grade at AS/A level) then a student will be awarded a Centre Determined Grade of U.

The evidence used for Centre-Determined Grades

Centre Determined Grades will be generated using evidence of work completed by a student, using the adapted specification content as advocated in the specific Subject Assessment Frameworks. In determining a grade, the following types of evidence will be used in each qualification (in combination or in isolation as appropriate to the relevant subject area)

1. Adapted past-paper questions

The school will make use of WJEC adapted past-papers when setting tasks to help determine a grade for each qualification. The adapted past-papers have already been externally quality assured; are fully supported by clear mark schemes; and are familiar to staff. Teachers will ensure these past-papers, which will form a key part of the evidence where relevant to the subject assessment criteria, will be incorporated into the delivery of teaching and learning, in replacement of other activities undertaken in lessons.

2. Non-Examination Assessment (NEA)

The school has a number of subjects where non-examination assessment exists as a component part of the qualification. Where non-examination assessments are part of an adapted qualification, teachers will use the performance of students in this element to help contribute towards the determination of a grade by considering the weighting of the element, as part of the qualification as a whole, to ensure the grade awarded accurately reflects the overall standard. To clarify, in a qualification where the weighting of non-examination assessment is equivalent to proportion of the overall grade, teachers will take this into account against the other evidence that constitutes the rest of the assessment percentage makeup when determining the grade.

3. Other contributing evidence

The School has two other types of contributing evidence that may be used to support the determination of a grade;

- a) Teachers may seek to use evidence from previously completed WJEC past-paper questions where they have been completed under controlled conditions; and
- b) Assessments undertaken prior to the publication of the centre approach e.g. Mock Examinations and/or other assessed work. These, if utilised, will only be used to help confirm a judgement. This contributory evidence may not be used in isolation to determine grades since, at the time of completion, it is possible that students would not have been aware of the importance of these tasks. They can be used to support judgements if the performance of a student in an adapted past paper is different to the indications provided in prior assessments. This is designed to ensure fairness and equity to all students

To facilitate the process decision making evidence will be utilised within departments and will then be shared with line managers to enable discussion and review. A fuller account of this is noted in section 5

3. Centre devised assessments

Llantwit Major School has decided not to use centre- devised assessments. Departments will be using WJEC devised assessments as advised in the relative Qualification Assessment Framework for Summer 2021.

4. Assessment delivery

For each qualification, WJEC will provide subject staff with access to their subject Qualification Assessment Framework, which will set out the requirements to support the evidence to inform a Centre Determined Grade.

The Centre Determined Grade will be generated using evidence of work completed by a student, using the adapted specification content. The evidence to arrive at a judgement stems from the 3 evidence points identified in Section 2; adapted past paper questions; NEA; other contributing evidence.

As per the identified WJEC timeline the school will inform Years 11,12 and 13 students how they will be assessed and graded in each subject area during the phased return period 15-26 March 2021.

To ensure students understand how CDGs are determined and which work will be used as evidence, the school will ensure students are advised in advance of the schedule that indicates when the production of evidence will take place. This will also ensure the production of work is evenly distributed over the identified timescale.

Determining a grade will vary per qualification as will the number of pieces of evidence required. Teachers will ensure there is sufficient opportunity for students to provide clear evidence to demonstrate competency against the key themes and skills, as conveyed in each WJEC Qualification Assessment Framework. It may be that relatively few pieces of clear evidence would be sufficient to demonstrate attainment across overarching key themes for many qualifications. Teachers will ensure that the generation of evidence does not create unnecessary duplication of work/ undue stress for the students.

The vast majority of assessments are planned to take place in the classroom in the Half Term after the Easter Holiday period 12th April – 28th May, 2021, where following a review of the assessment framework all departments have planned face-to-face teaching and some additional assessments. These assessments will include utilising appropriate questions / tasks from the identified past papers - based on the skills required to ensure progression and the course content covered.

NEA tasks- Departments should look to continue with established procedures related to non-examination assessments (NEA) delivery that are already in place to ensure as far as is feasible the completion of the required units, and due care vigilance should be taken particularly in relation to ensuring the authenticity of each learner's work. The latter may involve comparing work produced in supervised conditions to that completed without supervision and in conducting a brief question and answer session with the learner to confirm authenticity.

Assessment tasks are test based activities departments will have selected from the past papers advocated in the Assessment Framework, and agreed the questions/ task selection that will fulfil the progression of skills criteria. The department will carefully consider the questions used and time required to complete the questions based on normal exam content/ exam duration - as a consequence a proportionate amount of time should be set for the set task. At the time of writing this policy all departments are looking to work within the 1 hour time constraints of lessons to ensure students can follow a normal timetable programme. Inevitably this will mean students may undertake more than 1 assessment to ensure the appropriate areas are covered.

The assessment evidence generated will not be completed in the form of a standard examination. However, students will produce work within a specified timeframe, to reflect the volume of work. It should be appreciated by staff that the time to produce evidence would not exceed the length of the unseen examination in the qualification. Evidence will be produced as stated over a series of identified lessons. The classroom teacher distributes/invigilates/collects papers at end of session ready for marking. Work will be completed independently by students, under similar 'control levels' to existing arrangements, which are

supervised by teachers, for non-examination assessment. This is to ensure evidence produced is the student's own. Wherever possible, this work will be completed in class in place of standard work, which is then assessed. Departments must retain papers securely beyond planned marking/ cross moderation. Teachers must not allow pupils to redo or improve any assessments to ensure there is a consistent approach that can be used when applying the evidence to support a centre assessed grade.

Where external factors prevent planned school assessments from happening, such as national lockdowns etc., then work will need to be completed at home. However, where this is the case, the school will ensure there is a degree of control and use mechanisms to support authenticity of student's work

- Tasks released digitally at a set time with a required submission time- student(s) can undertake a paper in a live meeting with the camera switched on to validate it is the student's work- student to submit paper at the end of the session to set time. The meeting can be recorded.
- In addition, the school will consider work produced against previously assessed work to verify authenticity, where the evidence submitted is atypical of the usual standard by the student.

Planned assessments will take place between 12th April and 28th May 2021. This flexible assessment window for the 7 weeks after the Easter holiday is to ensure departments have adequate time to deal with the reintegration process needed for the return to school and to be able to stage the assessment delivery - to spread the assessments and marking across the time frame. It is important to consider the wellbeing of the students at this point and avoid condensing the assessments into a more condensed calendar.

During the assessment window staff will be required to build up the decision making record using the relevant subject guidance on Key requirements to ensure progression in the Assessment Framework. This decision making record will include a process of moderation and standardisation within the department. Further to this, subject grades per pupil will be reviewed and discussed as part of line management meetings to cross reference expected pupil performance when compared to prior indicative assessment data for the individual student and a comparison in group terms to historical subject performance. Subject leaders will develop individual assessment plans for the qualifications they are responsible for, which will be shared with line managers, SLT team, prior to approval by the Headteacher, as Head of Centre. These plans will identify which specific pieces of evidence will be used, the quality assurance measures undertaken to authenticate the work of students, and measures to ensure any and all appropriate needs are met.

These steps should help to build clear evidence on which a learner's grade is based, including retained copies of the learner's work and any mark records, and final decision making records that are retained securely in departments to support the quality assurance, review and appeals processes should an issue be raised.

Where students have identified access arrangements these must be a consideration for the delivery of the assessment tasks (identified in the school MIS data sheets). Where candidates have agreed access arrangements or reasonable adjustments (for example a reader or scribe), we must make every effort to ensure that these arrangements are in place when assessments are being taken. Where, for some reason, that has not been possible, the judgements should be reflected in the final judgement and made clear on the Decision Record.

Given the variety of circumstance that may affect a student's performance the school will apply the WJEC published special considerations document to those students who meet the specified criteria.

As is standard, the school may require evidence to demonstrate that the student meets the criteria - Staff access information shared by the leader of progress and Pastoral support team for years 11,12 and 13 to help support judgements – this reasonable adjustment should be recorded in the Decision Record

If a conflict of interest exists; that is if centre staff are involved in assessing and/or internal quality assuring assessment/grading decisions of members of their family or close friends, all departts. will need to ensure the individual student's work must be assessed and moderated by other members of the department to ensure fairness to ensure the integrity of the grades awarded.

Learners will receive provisional Centre Determined Grades by 25th June and at this point will have the opportunity should the need arise to request a grade review. This will be an internal centre review to ensure the subject agreed assessment is a fair and valid one

5. Quality assurance of assessment and grading decisions

In November 2020, the Education Minister announced that there would be no summer examination series for students taking GCSEs, AS levels or A levels in 2021. In January 2021, it was confirmed that these qualifications would be awarded using Centre Determined Grades. This means that the staff at our school would determine the actual grades awarded for each qualification. Therefore it is paramount grading procedures are quality controlled prior to the release of grades to the WJEC and the associated declaration by the Headteacher.

Quality Assurance Processes

In line with usual practices, WJEC will require internal processes to be undertaken in the centre to promote consistency. The school will undertake quality assurance processes, within subjects and across subjects, to ensure the grades determined are valid, reliable, equitable and fair, while seeking to avoid discrimination.

Internal moderation processes will assist in verifying standards to ensure fairness and equity for all students. The school will apply the following approach to the assessment of evidence:

- The teacher will assess the students' work using WJEC mark schemes and grade descriptors to support the accurate award of grades. Moderation, to establish standardisation of subject assessments will take place as soon as is reasonable and practicable, once the evidence has been collected.
- Leaders of learning will ensure that the sample of work to be moderated covers the full spectrum of grades and all teachers who have assessed work; For options subjects where a learner group is 1 class or less than at least half the group should be moderated and for groups under 10 all students should be moderated. For larger samples, such as a core subject in KS4 the leader of learning must ensure that evidence is considered from a range of student profiles.
- Moderation activities can involve a number of teachers. Therefore, where a piece of evidence is moderated, additional comments to verify the agreed standard should be easily distinguishable (for example different colour pen this could also be recorded in the Decision Record);

At all stages, forms - either provided by WJEC or school developed must be developed as part of the evidence to support the final CDG.

In departments where teachers work in isolation, the school will look to provide the support of another member of staff for example a Leader of Learning from another dept. or a line manager to provide an opportunity for evidence to be moderated/ quality assured, and could be also verified through working with another school.

Similarly, any staff who have a conflict of interest (e.g. Teacher who is relative or known to a student), will need to be declared, and suitable justification is in place to ensure the process is not compromised (e.g. Additional teacher(s) involved in assessment or verification of work assessment of standard).

Furthermore, to assist in validating assessments the school and therefore each department will consider information on previous cohorts' qualification performance - as well as the assessed student's prior performance from their GCSE journey - as part of the quality control procedures, bearing in mind that overall outcomes tend not to vary significantly year on year where the ability of the cohort is similar. It should be appreciated there will be no external moderation of Centre Determined Grades. However, grades submitted to WJEC may be reviewed and investigated where performance profiles are atypical.

Recording Decisions

The school and therefore each subject area will keep a record to document clearly the rationale for grade decisions for Years 11, 12 and 13. This will include clarity of explanation which students and their parents/carers will understand should queries/ appeals arise. Decision records will detail who assessed the evidence and when; the determined grade decided upon; identification of any reasonable adjustments or special considerations applied. To support this, departments will also be required to safely store the assessment evidence once gathered- both digital and physical formats.

Class teachers will share and develop assessment processes with the relevant leader of learning and as part of the quality control process leaders of learning will share assessment details with respective line managers as part of the QA process. Line managers will then be able to liaise with the Head of Centre to validate department process and practise. This is to ensure on submission of a Centre Determined Grade, the Headteacher will be able to make an overall declaration in relation to the processes being appropriately and fairly carried out.

In order to facilitate the effective undertaking of fair and valid assessment processes the school will ensure

staff are made aware of/given access to training and guidance information provided by the WJEC through WJEC email services and online training accessible via the secure site service to centre staff. This includes quality assurance processes, and ensuring objectivity in assessment decisions, including avoiding bias and discrimination.

The school and by association individual departments will keep a record to document clearly the rationale for grade decisions. This will include clarity of explanation which students and their parents/carers will understand.

Decision Records will follow WJEC guidelines and detail who assessed the evidence and when; the decision taken; identification of any reasonable adjustments/special considerations applied which will stem from ALNCo guidance and the information available in the school MIS; and where the evidence is safely stored.

Records will also be kept as part of internal moderation to standardise work and verify performance, as described in section 5.

The school will record the reviews requested by students and the outcome of these, along with reasons for the decision.

On submission of a Centre Determined Grade, the school via the Headteacher declaration will be required to make an overall affirmation in relation to the processes carried out.

Public Sector Equality Duty and Data Processing

In developing an approach to centre determined grades in 2021, the school has taken steps to ensure it meets its Public Sector Equality Duty. This is a legal requirement and forms part of the Equality Act (2010), which ensures due regard to the need to:-

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act (2010);
2. Advance equality and opportunity between people who share a relevant protected characteristic and those who do not; and
3. Foster good relations between people who share relevant protected characteristics and those who do not.
4. The school will ensure it works to meeting data protection and processing regulations as part of the process. This may result in modifications to existing policies and practices. However, it is anticipated that joint examination regulators may coordinate this to provide assurances that data is handled appropriately and for the intended purpose.
5. The evidence gathered by the school to support the determination of grades will make use of standardised materials, produced by WJEC. This includes the use of adapted past-paper questions, and mark schemes. These materials have already been through a robust QA process. This approach, and the individual subject assessment plans, ensure that arrangements for those students entitled to allowances are met. Moderation activities will ensure that a broad range of students in each subject area are included. This is to enable the school to ensure that its approach contributes to the equality of opportunity.
6. The school will ensure it meets data protection and processing regulations. This may result in modifications to existing policies and practices for this year. It is anticipated that joint examination regulators will coordinate this requirement for modification if it occurs to provide assurances that data is handled appropriately and for the intended purpose.

6. Learner and parents/carers communication

The school will look to release QIW/ WJEC learner letters as they are released to the centre and will look to inform/ update guidance to parents/ pupils as appropriate to support their appreciation of the process to awarding Centre Assessed Grades Summer 2021.

All communications sent to parents by the school are held on the school website

<http://www.llantwitschool.org.uk/Coronavirus-Update-History/>

Communication will also include sharing the Complaints Policy, Appeals Guidance and the Centre Policy to assessment Summer 2021

7. Internal reviews and complaints

As per the identified timeline, Llantwit Major school will endeavour to inform Years 11,12 and 13 students how they will be assessed and graded in each subject area during the phased return period 15-26 March

2021.

Planned assessments will take place between 12th April – 28th May 2021. The final assessment grades being determined in late May / June from the assessment and other associated and agreed evidence indicators.

At this point, students will be informed of the provisional grades awarded. Where a student is satisfied with the grades determined by the school, there is no further action.

A student who is not satisfied with their grade will be able to appeal their grade. This was initially conveyed in the Minister for Education's announcement on 20th January 2021. At the time of writing this policy, the process of reviewing centre grades and the appeals process has not been fully finalised. However, it is anticipated to facilitate this, the appeal process has three stages:

Stage 1 – In June, prior to the 25th June 2021 deadline, departments will share provisional Centre Determined Grade for the designated subject area with students. A student can ask the Leader of Learning/Centre to review it on the grounds of judgement and/or a procedural error has been made. This will be completed before the submission of Centre Determined Grades to WJEC. Where a student is satisfied with the grades determined by the school, there is no further action.

Stage 2 – After results day, a student can appeal to WJEC through the school via the data manager, if it is felt that the judgement made by the school is unreasonable and/or an error in the process has been made. The process undertaken by the school will be similar to the internal moderation process. Where a review has been requested, it will be considered by a member of staff who was not the original assessor. The Headteacher will also review that the school's processes have been followed in terms of associated decision-making records etc. New or additional evidence will not be considered as part of the review process. Where a review has been upheld, the Centre Determined Grade will be amended. If WJEC decide there has been an error or that the grade is unreasonable the student will be awarded a new grade.

Stage 3 – Following completion of a Stage 2 review, a student can request an Exam Procedures Review Service (EPRS) from Qualifications Wales to check whether WJEC has followed the required procedures. This is the final stage in an appeal process.

At each stage of the review/appeal process, students will need to be aware that a Centre Determined Grade may be improved or be lowered.

As part of standard requirements as outlined in the JCQ, General Regulations for Approved Centres (Section 5.7f) Llantwit Major School has a written internal appeals procedure relating to internal assessment decisions. Candidates and their parents/carers should follow the guidance provided in the complaints policy/ appeals guidance document

http://www.llantwitschool.org.uk/docs/Policies/Policies_2020/Complaints_procedure_2020_LMS.pdf

http://www.llantwitschool.org.uk/docs/Policies/Policies_2020/Appeals_against_Internal_Assessments_of_Work.pdf

the written complaints procedure covers general complaints regarding the centre's delivery or administration of qualifications.

WJEC's internal review and appeals guidance, due for publication week commencing 26th April 2021, will provide further guidance. For the purpose of the centre policy, the centre staff will endeavour to use the updated alternative arrangements document, dated 4th March 2021, its high level requirements of internal reviews to be undertaken by centres, and the appeals process that will be undertaken by WJEC. Our staff will utilise and take into account this guidance and to review and update the centre's complaints and internal appeals procedure(s) accordingly for this year as necessary.