

# Secure Storage Procedures

LMETB has adapted the following Assessment procedure from the work carried out by the ETBI National Assessment Working Group. This assessment procedure has been approved and adopted for use by all LMETB Further Education and Training Services by the LMETB Quality Assurance Governance Management Committee (QAGMC).

June 2019.

NOTE: Procedure reviewed, changes made and approved by the QAGMC

September 2021

## LMETB ASSESSMENT PROCEDURES

### GLOSSARY OF TERMS

<p>Appeals Examiner</p>	<p>The Appeals Examiner refers to the individual who examines the learner assessment appeal evidence and makes a decision on the appeal.</p> <p>An Appeals Examiner is appointed by the ETB and is a person who <b>MUST</b> be:</p> <ul style="list-style-type: none"> <li>▪ A subject-matter expert</li> <li>▪ External to the original assessment process</li> <li>▪ Has no conflict of interest with the learner or Learning Practitioner(s)</li> <li>▪ External to the provider or to the original assessment process</li> </ul> <p>Ideally, the Appeals Examiner should be an External Authenticator</p>
<p>Assessment Appeals Facilitator</p>	<p>The Assessment Appeals Facilitator or designated person refers to the individual who facilitates the learner assessment appeal. The Assessment Appeals Facilitator must have a working knowledge of assessment and quality assurance procedures; ensure that no conflict of interest exists; and have had no prior involvement in the assessment processes relating to the particular piece of assessment.</p>
<p>Centre</p>	<p>The Centre refers to any ETB College or ETB Education/Training Centre.</p>
<p>Centre Manager</p>	<p>The Centre Manager refers to the Centre Manager, Centre Director, Principal or the manager of any ETB College or ETB Education/Training Centre. In the event of the absence of a Centre Manager, an appropriate designated person should be assigned.</p>
<p>ETB</p>	<p>Education and Training Board</p>
<p>ETB Manager</p>	<p>The ETB Manager refers to any manager within the ETB.</p>

<p>Independent Appeals Committee</p>	<p>The Independent Appeals Committee refers to the committee which examines the assessment process appeals. The committee is appointed by the ETB and MUST:</p> <ul style="list-style-type: none"> <li>▪ Consists of a minimum of two ETB senior personnel who are external to the Centre</li> <li>▪ Have knowledge of QA procedures</li> </ul> <p>The Independent Appeals Committee should be supported by internal QA personnel.</p> <p>Depending on the nature of the appeal, personnel from outside the ETB may be required. This is at the discretion of the ETB.</p>
<p>Invigilator</p>	<p>The Invigilator refers to the individual who supervises an examination.</p> <p>Ideally, an alternative invigilator other than the Learning Practitioner should supervise an examination.</p> <p>The Invigilator (appointed by the Programme Co-ordinator) must:</p> <ul style="list-style-type: none"> <li>▪ sign a declaration of impartiality</li> <li>▪ be appointed in line with the specific guidelines of the awarding body, if such guidelines exist.</li> </ul>
<p>Learning Practitioner</p>	<p>The Learning Practitioner refers to any teacher, tutor, instructor or assessor.</p>
<p>Programme Co-ordinator</p>	<p>The Programme Co-ordinator refers to Programme Co-ordinator, Programme Manager or other relevant manager of course or programme. In the event of the absence of a Programme Manager, an appropriate designated person should be assigned.</p>
<p>RPL Mentor/ Facilitator</p>	<p>The RPL Mentor/Facilitator refers to an individual who:</p> <ul style="list-style-type: none"> <li>▪ is familiar with RPL policies</li> <li>▪ has received training in RPL</li> <li>▪ is a subject matter expert</li> </ul>

## SECURE STORAGE OF ASSESSMENT MATERIALS, RECORDS AND LEARNER ASSESSMENT EVIDENCE

### Principles of assessment in relation to secure storage of assessment material and learner evidence

Quality assured assessment ensures that in criterion referenced assessment “learners are assessed and the assessment judgment is made based on whether the learner has reached the required national standards of knowledge, skill and competence for the award” (QQI, Revised 2018 p.5). Central to quality assured assessment is the assumption that learners are assessed in a fair and consistent manner in line with the award standard. Quality assured assessment ensures adherence to the principles of assessment.

The following sets forth the principles of assessment which apply to this document: these principles are based on the QQI (Revised 2018) principles for assessment.

#### Validity

Validity is a fundamental assessment principle ensuring that an assessment measures what it is designed to measure: the relevant standard of knowledge, skill or competence required for an award should be assessed.

Validity in assessment occurs when:

- Assessment is fit for purpose (i.e. a practical assessment assesses a practical skill)
- Learners can produce evidence which can be measured against the award standard
- Assessors can make accurate assessment decisions
- Assessment is accessible to all candidates who are potentially able to achieve it

#### Reliability

Reliability in assessment ensures that assessment measurement is accurate: the knowledge, skills and competence which the assessment measures should produce reliable and accurate results. Reliability in assessment ensures that results are consistent under similar conditions.

Reliability in assessment occurs when:

- The assessment is based on valid assessment techniques
- Assessment conditions are consistent
- Learner evidence is reliable
- Results are consistent across various assessors, contexts, conditions and learners over time.

#### Fair

Fairness in assessment supports the validity and reliability principles and provides equal opportunity to all learners. Fairness in assessment ensures learners have access to appropriate resources/equipment in assessment; assessment design and implementation are fair to all learners; and policies and procedures exist to ensure fair assessment of learners.

## Quality

Quality in assessment ensures that all assessment processes are quality assured.

## Transparency

Transparency in assessment ensures that assessment policy and procedures provide clarity to all relevant stakeholders.

Based on QQI Principles for Assessment (QQI, Revised 2018)

Assessment is underpinned by the **principles of assessment** including the **fair** principle (equal opportunity for all learners) and **consistent** principle (consistency in approach to assessment across ETBs, programmes and modules). As such, in order to ensure the fair and consistent assessment of learners, the following procedures should be followed in relation to the secure storage of assessment materials and learner assessment evidence. The provider's Quality Assurance System overarches these principles and ensures learner achievement is assessed in a fair and consistent way in line with the award standards.

## Definitions

### Assessment Materials

This refers to any documentation associated with the planning of an assessment (pre-assessment).

Examples of assessment material include (but are not limited to):

- Assessment briefs<sup>1</sup>
- Examination papers
- Solutions/marking schemes/model answers
- Practical/Skills Demonstration instructions
- Assessment related documentation (attendance records, room layout, invigilator's report etc.)

### Assessment Records

This refers to any documentation which demonstrates evidence that the assessment has taken place (post-assessment).

Examples of assessment records include (but are not limited to):

- Completed attendance sheets
- Completed Invigilator report
- Completed seating plan
- Tutor verification
- Photo/audio evidence
- Signed assessment submission documentation
- Internal Verification reports
- External Authentication reports
- Appeals documentation (application forms, appeals outcomes, etc.)

### Learner Assessment Evidence

This refers to any assessment evidence, created by the learner, which forms part of a module or programme assessment.

Examples of learner assessment evidence include (but are not limited to):

- Learner examination scripts
- Hard/soft copy of assessment evidence
- Artefacts

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<sup>1</sup>This assessment brief is the set of clear instructions given to the learner outlining the requirements and assessment/performance criteria of each piece of assessment.

## Security and Storage Roles and Responsibilities

### The Programme Co-ordinator /Centre Manager

The Centre Manager must ensure that:

- Staff is compliant with the assessment procedures of the provider, which reflects the requirements of the awarding body
- Assessment storage facility is secure with authorised access only
- A storage system is put in place which ensures that the location of assessment materials and evidence is known
- The secure storage and disposal of assessment evidence and materials is managed effectively.

### The Programme Co-ordinator/ Centre Manager

The Programme Co-ordinator Centre Manager / must ensure that the:

- Learning Practitioners understand and are compliant with the assessment procedures of the provider (which reflect the requirements of LMETB's QA requirements to awarding body)
- Learning Practitioners are made aware of their responsibilities in relation to the secure storage of both assessment material and learner assessment evidence
- Learners are made aware of their responsibilities for their assessment evidence and submission process for same

### The Learning Practitioner

The Learning Practitioner is responsible for:

- The understanding of and compliance with the assessment procedures of the provider, which reflects the requirements of the awarding body
- PRE-ASSESSMENT:
  - Secure storage of assessment material (related to programme delivery).
  - Ensuring due care in the secure storage, printing and photocopying of assessment briefs and examination papers (where applicable) so that assessment integrity is not compromised
  - Compliance with provider arrangements for receipting of learner evidence
- POST-ASSESSMENT:
  - Compliance with arrangements for the retention and secure storage of assessment materials and learner assessment evidence (see relevant definitions)
  - Compliance with provider arrangements on timely return or secure disposal of assessment evidence following certification



## The Learner

The learner is responsible for the:

- Submission of assessment evidence in accordance with the assessment deadlines
- Retention of any receipting evidence in line with Centre policies and procedures
- Management of and the security and integrity of their own assessment work in advance of submission. At Levels 1-3, support will be provided by the Learning Practitioner.
- Retention of backup copies of assessment evidence. In the case of original artefacts, it is advisable to ensure photographs are taken as backups are not possible.

It is recommended that learners should keep copies of all work submitted, where appropriate.

## Secure storage of assessment material by staff

**PRE-ASSESSMENT:** Assessment material (assessment plan, assessment briefs, examination papers, solutions, marking schemes and model answers) are stored securely by the Learning Practitioner or a designated member of staff for each programme module being taught in advance of the assessment/examination date. Additionally, relevant documentation (invigilator report, seating plan if required, attendance/sign in register etc), other relevant examination material and the correct number of examination papers are stored securely, with authorised access only.

**POST-ASSESSMENT:** On completion of an examination or supervised assignment all learner assessment evidence together with relevant assessment documentation must be stored securely, with authorised access only. Any breaches to the integrity of assessment evidence (e.g. loss/damage etc.) should be disclosed to the Centre Manager immediately.

## Submission of Learner Evidence

**Each centre should ensure that a protocol exists for Learning Practitioners to confirm the submission of work by a learner to a Learning Practitioner: this protocol should be evidence based.** For example, once work has been submitted, the learner may sign an assessment submission document which is countersigned in the presence of by the Learning Practitioner.

- Where learner assessment evidence is submitted via email, email receipts should be provided by the Learning Practitioner
- Where learner assessment evidence is submitted electronically via an online platform which automatically generates a confirmation email (e.g. Turnitin), the Learning Practitioner is not responsible for receipting of this learner assessment evidence
- Where learner assessment evidence is submitted via an online platform which does not automatically generate a confirmation email (e.g. Google docs, cloud etc.), the Learning Practitioner is not responsible for receipting of this learner evidence. The receipt may be issued electronically (e.g. email).

Records of learners' assessment progress are held individually by each learning practitioner.

## Secure storage of learner assessment evidence by staff

Learner assessment evidence is **the personal data of the learner**. Storage arrangements for both hard and soft copy evidence must have regard to LMETB's Data Protection Policy and Procedures. Learners have a right of access to their personal data. Right of access to assessment evidence is in addition to an appeal of an assessment result or assessment process as per centre policy. Learners do not have a right to correct errors in their assessment answers. However, they do have the right to have processing errors corrected.

### Learner assessment evidence: hard copy and practical/artefact

In order to ensure best practice exists, providers must provide a secure room or secure locked facilities, with authorised access, to facilitate the storage of all hard copy learner assessment evidence over the course of the programme and until after all assessment QA procedures have been carried out. Learning practitioners must comply with LMETB's Data Protection Policy and Procedures while they are in possession of assessment evidence.

### Learner assessment evidence: Soft copy

In order to ensure best practice exists, centres are expected to provide storage for learner assessment evidence on a computer network or online platform (with backup capacity) which is accessible to the Programme Co-ordinator and Learning Practitioners. The learner assessment evidence is then made available for the Internal Verifier and the External Authenticator. Appropriate security should be in place for networks and online platforms and login details made available for the IV and EA with live/active accounts that can be accessed even after the programme has ended. Instructions on how to access said accounts may also need to be provided for IV and EA. Assessment evidence stored on mobile devices must comply with LMETB's Data Protection Policy on Use of Mobile Devices.

## Marking and grading

In order to ensure best practice exists, where possible, space should be made available for Learning Practitioners to mark and grade assessment evidence in a secure location within the Centre. The Learning Practitioner is responsible for assessment evidence.

## Internal Verification/External Authentication

**On completion of Internal Verification,**

**In preparation for the Internal Verification process,** the Centre Manager or Programme Coordinator must ensure that learner assessment evidence is documented and stored as per centre guidelines.

**During the Internal Verification process,** all Learning Practitioners must adhere to the centre guidelines so that learner assessment evidence is stored securely at all times.

**On completion of the Internal Verification,** learner assessment evidence is moved into the allocated rooms / storage facilities with authorised access for relevant programme in order for external authentication to take place.

**During the External Authentication process,** only authorised staff should have access to the allocated rooms / storage facilities.

**On completion of External Authentication,** learner assessment material should be moved to the appropriate secure storage space using the provider's tracking process, to facilitate ease of access in the event of learner appeals.

## Duration of Storage

### Duration of storage of learner evidence

On completion of the appeals process and when results can no longer be challenged all assessment evidence must be returned to learner (if Centre/College practice) or be safely destroyed<sup>2</sup> (shredded or deleted from relevant drive) within 3 months of submission of assessment material unless otherwise agreed between the learner, the provider, and the internal assessor and the relevant certification body. All learner evidence must be retained for the maximum term in line with current legislation and GDPR (General Data Protection Regulation).

Any work that is being kept as exemplars for future learners must be anonymised before being distributed.

### Duration of storage of assessment material

All assessment material (including application forms, learner contracts, exam sign-in sheets, course evaluations, etc.) will be retained until after the appeals process concludes unless stated otherwise by the awarding body or due to a funding requirement (eg ESF funded programmes), after which it will be disposed of securely (e.g. shredded/deleted from the relevant drive) by the Provision. All records retained must be retained in line with current legislation and GDPR (General Data Protection Regulation)

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<sup>2</sup> Case C-434/16 *Nowak v Data Protection Commissioner* [2017] ECLI:EU:C:2017:582 Opinion of AG Kokott, para 65

## References

QQI (2018 Revised) Quality Assuring Assessment Guidelines for Providers. Ireland: QQI. Available from: [QQI Quality Assuring Assessment Guidelines \(2013, Revised 2018\)](#)