

# Centre Policy - The Manchester College (LTE Group)

---

FOR A/AS LEVELS AND GCSES FOR SUMMER 2021

## Centre Policy for determining teacher assessed grades – summer 2021: The Manchester College (LTE Group).

### Statement of intent

This section outlines the purpose of this document in relation to our centre.

#### **Statement of Intent**

This section provides details of the purpose of this document, as appropriate to our centre:

*The purpose of this policy is:*

- *To ensure that teacher assessed grades are determined fairly, consistently, free from bias and effectively within and across departments.*
- *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 Joint Council for Qualifications guidance.*
- *To ensure the consideration of historical centre data in the process, and the appropriate decision making in respect of, teacher assessed grades.*
- *To support a high standard of internal quality assurance in the allocation of teacher assessed grades.*
- *To support our centre in meeting its obligations in relation to equality legislation.*
- *To ensure our centre meets all requirements set out by the Department of Education, Ofqual, and the Joint Council for Qualifications and awarding organisations for summer 2021 qualifications.*
- *To ensure the process for communicating to candidates and their parents/carers how they will be assessed is clear, in order to give confidence.*

## Roles and responsibilities

This section of our Centre Policy outlines the personnel in our centre who have specific roles and responsibilities in the process of determining teacher assessed grades this year.

### **Roles and Responsibilities**

This section gives details of the roles and responsibilities within our centre:

#### **Head of Centre**

- *Our Head of Centre, Jeremy Harrison, will be responsible for approving our policy for determining teacher assessed grades.*
- *Our Head of Centre has overall responsibility for the college as an examinations centre and will ensure that clear roles and responsibilities of all staff are defined.*
- *Our Head of Centre will confirm that teacher assessed grade decisions represent the academic judgement made by teachers and that the checks in place ensure these align with the guidance on standards provided by awarding organisations.*
- *Our Head of Centre will ensure a robust internal quality assurance process has been produced and signed-off in advance of results being submitted.*

#### **Senior Leadership Team and Heads of Department**

*Our Senior Leadership Team and Heads of Departments will:*

- *provide training and support to our other staff.*
- *support the Head of Centre in the quality assurance of the final teacher assessed grades.*
- *ensure an effective approach within and across departments and authenticating the preliminary outcome from single teacher subjects.*
- *be responsible for ensuring staff have a clear understanding of the internal and external quality assurance processes and their role within it.*
- *ensure that all teachers within their department make consistent judgements about student evidence in deriving a grade.*
- *ensure all staff conduct assessments under the appropriate levels of control with reference to guidance provided by the Joint Council for Qualifications.*
- *ensure teachers have the information required to make accurate and fair judgments.*
- *ensure that a Head of Department Checklist is completed for each qualification that they are submitting.*

#### **Teachers/ Specialist Teachers / SENCo**

*Our teachers, specialist teachers and SENCo will:*

- *ensure they conduct assessments under our centre's appropriate levels of control and have sufficient evidence, in line with this Centre Policy and guidance from the Joint Council for Qualifications, to provide teacher assessed grades for each student they have entered for a qualification.*
- *ensure that the teacher assessed grade they assign to each student is a fair, valid, and reliable reflection of the assessed evidence available for each student.*
- *make judgements based on what each student has been taught and what they have been assessed on, as outlined in the section on grading in the main JCQ guidance.*

- *produce an Assessment Record for each subject cohort that includes the nature of the assessment evidence being used, the level of control for assessments considered and any other evidence that explains the determination of the final teacher assessed grades. Any necessary variations for individual students will also be recorded.*
- *securely store and be able to retrieve sufficient evidence to justify their decisions.*

### **Examinations Officer**

*Our Examinations Officer will:*

- *be responsible for the administration of our final teacher assessed grades and for managing the post-results services.*

## Training, support, and guidance

This section of our Centre Policy outlines the training, support, and guidance that our centre will provide to those determining teacher assessed grades this year.

### **Training**

This section provides details of the approach our centre will take to *training, support and guidance in determining teacher assessed grades this year*

- *Teachers involved in determining grades in our centre will attend any centre-based training to help achieve consistency and fairness to all students.*
- *Teachers will engage fully with all training and support that has been provided by the Joint Council for Qualifications and the awarding organisations.*

### **Support for Newly Qualified Teachers and teachers less familiar with assessment**

This section provides details of our approach to *training, support and guidance for newly qualified teachers and teachers less familiar with assessment*

- *We will provide mentoring from experienced teachers to NQTs and teachers less familiar with assessment.*
- *We will put in place additional internal reviews of teacher assessed grades for NQTs and other teachers as appropriate.*

## Use of appropriate evidence

This section of our Centre Policy indicates how our centre will give due regard to the section in the JCQ guidance entitled: *Guidance on grading for teachers*.

### A. Use of evidence

This section gives details in relation to our use of evidence.

- *Teachers making judgements will have regard to the Ofqual Head of Centre guidance on recommended evidence, and further guidance provided by awarding organisations.*
- *All candidate evidence used to determine teacher assessed grades, and associated documentation, will be retained and made available for the purposes of external quality assurance and appeals.*
- *We will be using student work produced in response to assessment materials provided by our awarding organisation(s), including groups of questions, past papers or similar materials such as practice or sample papers.*
- *We will use non-exam assessment work (often referred to as coursework), even if this has not been fully completed.*
- *We will use student work produced in centre-devised tasks that reflect the specification, that follow the same format as awarding organisation materials, and have been marked in a way that reflects awarding organisation mark schemes.*
- *We will use substantial class or homework (including work that took place during remote learning).*
- *We will use internal tests taken by pupils.*
- *We will use mock exams taken over the course of study.*

*We provide further detail in the following areas:*

#### *Additional Assessment Materials*

- *We will use additional assessment materials to give students the opportunity to show what they know, understand, or can do in an area of content that has been taught but not yet assessed.*
- *We will use additional assessment materials to give students an opportunity to show improvement, for example, to validate or replace an existing piece of evidence.*
- *We will use additional assessment materials to support consistency of judgement between teachers or classes by giving everyone the same task to complete.*
- *As far as possible, we will combine and/or remove elements of questions where, for example, a multi-part question includes a part which focuses on an element of the specification that hasn't been taught.*

*Our centre will ensure the appropriateness of evidence and balance of evidence in arriving at grades in the following ways:*

- *We will consider the level of control under which an assessment was completed, for example, whether the evidence was produced under high control and under supervision or at home.*
- *As far as possible, we will ensure that we are able to authenticate the work as the student's own, especially where that work was not completed within the school or college.*
- *We will consider the limitations of assessing a student's performance when using assessments that have been completed more than once, or drafted and redrafted.*
- *We will consider the specification and assessment objective coverage of the assessment.*
- *We will consider the depth and breadth of knowledge, understanding and skills assessed, especially higher order skills within individual assessments.*

## Determining teacher assessed grades

*This section of our Centre Policy outlines the approach our centre will take to awarding teacher assessed grades.*

### Awarding teacher assessed grades based on evidence

We give details here of our centre's approach to awarding teacher assessed grades.

- *Our teachers will determine grades based on evidence which is commensurate with the standard at which a student is performing, i.e. their demonstrated knowledge, understanding and skills across the content of the course they have been taught.*
- *Our teachers will record how the evidence was used to arrive at a fair and objective grade, which is free from bias.*
- *Our teachers will produce an Assessment Record for each subject cohort and will share this with their Head of Department. Any necessary variations for individual students will also be shared.*
- *"Where student work completed before this guidance was published is no longer available, appropriate records should be included instead. For example, where mock exam scripts were returned to students for feedback, a copy of the mock exam paper and the grade boundaries used should be included alongside a record of the mark a student achieved. Any work produced by students after this guidance was published on 24 March 2021 should be retained by the school or college if it is to be used as part of the evidence to support the grade." Ofqual.*

### GCSE English and Mathematics

| Form of assessment           |   |
|------------------------------|---|
| Mock exam                    | Consideration will be given to student performance across a range of mock assessments they have had access to during term 2 and 3. This information will be used to produce a GCSE grade in comparison to the November 2020 UMS grade boundaries produced by AQA and Edexcel. This will ensure no students are disadvantaged. |
| Other significant assessment | Various relevant assessments or work that has been completed as homework which would capture any Century / Maths Watch information.   |
| Classwork                    | Performance in class tasks and assessed activities  |

### A Levels and EPQ Teacher Assessed Grades

**For A Levels without NEA (6 courses): Biology, Chemistry, Maths, Physics, Psychology, and Sociology**

#### Year 1/Lower Sixth

|       |  |
|-------|--|
| Y1 AP | Average of first year formal assessment grades |
|-------|--|

#### Year 2/Upper Sixth

|        |   |
|--------|---|
| Y2 AP1 | Term 1 key assessment <b>completed in class under exam conditions</b> |
|--------|---|

|        |  |
|--------|--|
| Y2 AP2 | Term 2 common assessment <b>completed in class under exam conditions</b>   |
| Y2 AP3 | Final mock exam <b>completed under exam conditions, centrally timetabled</b>   |
| CWHW   | An overall appraisal of classwork and homework completed by the student during the two year period studying the A Level, guided by the grade descriptors and assessment objectives in the relevant exam board qualification. |

***For A Levels with NEA worth 20% (3 courses): English Language, English Literature, and History***

|                           |  |
|---------------------------|--|
| <b>Year 1/Lower Sixth</b> |  |
| Y1 AP                     | Average of first year formal assessment grades   |
| <b>Year 2/Upper Sixth</b> |  |
| Y2 AP1                    | Term 1 key assessment <b>completed in class under exam conditions</b>  |
| Y2 AP2                    | Term 2 common assessment <b>completed in class under exam conditions</b>   |
| Y2 AP3                    | Final mock exam <b>completed under exam conditions, centrally timetabled</b>   |
| CWHW                      | An overall appraisal of classwork and homework completed by the student during the two year period studying the A Level, guided by the grade descriptors and assessment objectives in the relevant exam board qualification. |
| NEA                       | Complete or unfinished non-examined assessment, weighted to reflect requirements of specification.   |

***For A Levels with NEA worth 30% (1 course): Media Studies***

|                           |  |
|---------------------------|--|
| <b>Year 1/Lower Sixth</b> |  |
| Y1 AP                     | Average of first year formal assessment grades   |
| <b>Year 2/Upper Sixth</b> |  |
| Y2 AP1                    | Term 1 key assessment <b>completed in class under exam conditions</b>  |
| Y2 AP2                    | Term 2 common assessment <b>completed in class, under exam conditions</b>  |
| Y2 AP3                    | Final mock exam <b>completed under exam conditions, centrally timetabled</b>   |
| CWHW                      | An overall appraisal of classwork and homework completed by the student during the two year period studying the A Level, guided by the grade descriptors and assessment objectives in the relevant exam board qualification. |
| NEA                       | Complete or unfinished non-examined assessment, weighted to reflect requirements of specification.   |



**For Extended Project Qualification – 100% NEA:**

|     |   |
|-----|---|
| NEA | Complete or unfinished non-examined assessment work |
|-----|---|

**Important notes for TAGs of all A Levels and EPQ:**

- At all stages of the process final teacher assessed grades must remain confidential and cannot be discussed with parents, students or agencies outside of the college (as with exam marking, this could be deemed malpractice) The overall combination of assessments and judgements we are using reflects the specification assessment objectives and academic skills, whether complete or unfinished.

On occasions where students have missed any of the assessment points and there are mitigating circumstances for their absence (e.g.: illness, isolation) then they will not be penalised as a result and a grade will be entered based on their performance in similar assessments or the grade they received in the assessment that they missed when they subsequently completed it after their peers – “Where illness or other personal circumstances might have affected performance in assessments used in determining a student’s standard of performance, we will take account of this when making judgements.” JCQ Summer Policy 2021, page 12.

## Internal quality assurance

This section of our Centre Policy outlines the approach our centre will take to ensure internal standardisation of teacher assessed grades, to ensure consistency, fairness, and objectivity of decisions.

### *Head of Centre Internal Quality Assurance and Declaration*

#### **Internal quality assurance**

This section gives details of our approach to internal standardisation, within and across subject departments.

- *We will ensure that all teachers involved in deriving teacher assessed grades read and understand this Centre Policy document.*
- *In subjects where there is more than one teacher and/or class in the department, we will ensure that our centre carries out an internal standardisation process.*
- *We will ensure that all teachers are provided with training and support through the moderation process to ensure they take a consistent approach to:*
  - *Arriving at teacher assessed grades*
  - *Marking of evidence*
  - *Reaching a holistic grading decision*
  - *Applying the use of grading support and documentation*
- *We will conduct internal standardisation across all grades.*
- *We will ensure that the Assessment Record will form the basis of internal standardisation and discussions across teachers to agree the awarding of teacher assessed grades.*
- *Where necessary, we will review and reflect on individual grading decisions to ensure alignment with the standards as outlined by our awarding organisation(s).*
- *Where appropriate, we will amend individual grade decisions to ensure alignment with the standards as outlined by our awarding organisation(s).*
- *Where there is only one teacher involved in marking assessments and determining grades, then the output of this activity will be reviewed by the Director of Curriculum and the Head of Department for Quality.*
- *In respect of equality legislation, we will consider the range of evidence for students of different protected characteristics that are included in our internal standardisation.*

## Comparison of teacher assessed grades to results for previous cohorts

This section of our Centre Policy outlines the approach we will take to compare our teacher assessed grades in 2021 with results from previous cohorts.

### Comparison of Teacher Assessed Grades to results for previous cohorts

This section gives details of our internal process to ensure a comparison of teacher assessed grades at qualification level to results for previous cohorts in our centre taking the same qualification.

- *We will compile information on the grades awarded to our students in past June series in which exams took place (e.g. 2017 - 2019).*
- *We will consider the size of our cohort from year to year.*
- *We will consider the stability of our centre's overall grade outcomes from year to year.*
- *We will consider both subject and centre level variation in our outcomes during the internal quality assurance process.*
- *We will use Alps Connect and Power BI for Performance Monitoring to review student outcomes against historic data and, in the event of significant divergence from the qualifications-levels profiles attained in previous examined years, address the reasons for this divergence.*

*This section gives details of the approach our centre will follow if our initial teacher assessed grades for a qualification are viewed as overly lenient or harsh compared to results in previous years.*

- *We will compile historical data giving appropriate regard to potential mixtures of A\*-G and 9-1 grades in GCSEs. Where required, we will use the Ofqual guidance to convert legacy grades into the new 9 to 1 scale.*
- *We will bring together other data sources that will help to quality assure the grades we intend to award in 2021.*

*This section gives details of changes in our cohorts that need to be reflected in our comparisons.*

- *We will omit subjects that we no longer offer from the historical data.*

## Access Arrangements and Special Considerations

This section of our Centre Policy outlines the approach our centre will take to provide students with appropriate access arrangements and take into account mitigating circumstances in particular instances.

### **Reasonable adjustments and mitigating circumstances (special consideration)**

This section gives details of our approach to access arrangements and mitigating circumstances (special consideration).

- *Where students have agreed access arrangements or reasonable adjustments (for example a reader or scribe) we will make every effort to ensure that these arrangements are in place when assessments are being taken.*
- *Where an assessment has taken place without an agreed reasonable adjustment or access arrangement, we will remove that assessment from the basket of evidence and alternative evidence obtained.*
- *Where illness or other personal circumstances might have affected performance in assessments used in determining a student's standard of performance, we will take account of this when making judgements.*
- *We will record, as part of the Assessment Record, how we have incorporated any necessary variations to take account of the impact of illness or personal circumstances on the performance of individual students in assessments.*
- *To ensure consistency in the application of Special Consideration, we will ensure all teachers have read and understood the document: [JCQ – A guide to the special consideration process, with effect from 1 September 2020](#)*

## Addressing disruption/differential lost learning (DLL)

### **B. Addressing Disruption/Differentiated Lost Learning (DLL)**

This section gives details of our approach to address disruption or differentiated lost teaching.

- Teacher assessed grades will be determined based on evidence of the content that has been taught and assessed for each student.

## Objectivity

This section of our Centre Policy outlines the arrangements in place to ensure objectivity of decisions.

### **Objectivity**

This section gives a summary of the arrangements in place within our centre in relation to objectivity.

*Staff will fulfil their duties and responsibilities in relation to relevant equality and disability legislation.*

*Senior Leaders, Heads of Department and Centre will consider:*

- *sources of unfairness and bias (situations/contexts, difficulty, presentation and format, language, conditions for assessment, marker preconceptions)*
- *how to minimise bias in questions (and marking) and hidden forms of bias in teacher assessed grades.*

*To ensure objectivity, all staff involved in determining teacher assessed grades will be made aware that:*

- *unconscious bias can skew judgements*
- *the evidence presented should be valued for its own merit as an indication of performance and attainment*
- *teacher assessed grades should not be influenced by candidates' positive or challenging personal circumstances, character, behaviour, appearance, socio-economic background, or protected characteristics*
- *unconscious bias is more likely to occur when quick opinions are formed*

*Our internal standardisation process will help to ensure that there are different perspectives to the quality assurance process.*

## Recording decisions and retention of evidence and data

This section of our Centre Policy outlines our arrangements to recording decisions and to retaining evidence and data.

### **C. Recording Decisions and Retention of Evidence and Data**

This section outlines our approach to recording decisions and retaining evidence and data.

- *We will ensure that teachers and Heads of Departments maintain records that show how the teacher assessed grades process operated, including the rationale for decisions in relation to individual marks/grades.*
- *We will ensure that evidence is maintained across a variety of tasks to develop a holistic view of each student's demonstrated knowledge, understanding and skills in the areas of content taught.*
- *We will put in place recording requirements for the various stages of the process to ensure the accurate and secure retention of the evidence used to make decisions.*
- *We will comply with our obligations regarding data protection legislation.*
- *We will ensure that the grades accurately reflect the evidence submitted.*
- *We will ensure that evidence is retained electronically or on paper in a secure centre-based system that can be readily shared with our awarding organisation(s).*

## Authenticating evidence

### **D. Authenticating evidence**

This section of our Centre Policy details the mechanisms in place to ensure that teachers are confident in the authenticity of evidence, and the process for dealing with cases where evidence is not thought to be authentic.

- *Robust mechanisms, which will include systems such as Turnitin, alongside standardisation and moderation activities will be used to ensure students' work is authentic and their own. These processes will be in place to ensure that teachers are confident that work used as evidence is the students' own and that no inappropriate levels of support have been given to students to complete it, either within the centre or with external tutors.*
- *It is understood that awarding organisations will investigate instances where it appears evidence is not authentic. We will follow all guidance provided by the appropriate awarding organisations to support these determinations of authenticity.*
- AQA <https://www.aqa.org.uk/>.
- Pearson Edexcel <https://www.pearson.com/en-gb.html>
- OCR <https://www.ocr.org.uk/>



## Confidentiality, malpractice, and conflicts of interest

### Confidentiality

*This section of our Centre Policy outlines the measures in place to ensure the confidentiality of the grades our centre determines, and to make students aware of the range of evidence on which those grades will be based.*

#### **A. Confidentiality**

*This section details the measures in place in our centre to maintain the confidentiality of grades, while sharing information regarding the range of evidence on which the grades will be based.*

- *All staff involved have been made aware of the need to maintain the confidentiality of teacher assessed grades.*
- *All teaching staff have been briefed on the requirement to share details of the range of evidence on which students' grades will be based, while ensuring that details of the final grades remain confidential.*
- *Relevant details from this Policy, including requirements around sharing details of evidence and the confidentiality requirements, have been shared with parents/guardians.*

### Malpractice

This section of our Centre Policy outlines the measures in place to prevent malpractice and other breaches of exam regulations, and to deal with such cases if they occur.

#### **B. Malpractice**

*This section details the measures in place in our centre to prevent malpractice and, where that proves impossible, to handle cases in accordance with awarding organisation requirements.*

- *Our general centre policies regarding malpractice, maladministration and conflicts of interest have been reviewed to ensure they address the specific challenges of delivery in summer 2021.*
- *All staff involved have been made aware of these policies and have received training in them as necessary.*
- *All staff involved have been made aware of the specific types of malpractice which may affect the Summer 2021 series including:*
  - *breaches of internal security*
  - *deception*
  - *improper assistance to students*
  - *failure to appropriately authenticate a student's work*
  - *over direction of students in preparation for common assessments*

- *allegations that centres submit grades not supported by evidence that they know to be inaccurate*
- *centres enter students who were not originally intending to certificate a grade in the Summer 2021 series*
- *failure to engage as requested with awarding organisations during the External Quality Assurance and appeal stages*
- *failure to keep appropriate records of decisions made and teacher assessed grades.*
  
- *The consequences of malpractice or maladministration as published in the JCQ guidance: [JCQ Suspected Malpractice: Policies and Procedures](#) and including the risk of a delay to students receiving their grades, up to, and including, removal of centre status have been outlined to all relevant staff.*

### *Conflicts of Interest*

This section of our Centre Policy outlines the measures in place to address potential conflicts of interest.

#### **C. Conflicts of Interest**

*This section details our approach to addressing conflicts of interest, and how we will respond to such allegations.*

- *To protect the integrity of assessments, all staff involved in the determination of grades must declare any conflict of interest such as relationships with students to our Head of Centre for further consideration.*
- *Our Head of Centre will take appropriate action to manage any conflicts of interest arising with centre staff in accordance with the JCQ documents - [General Regulations for Approved Centres, 1 September 2020 to 31 August 2021](#).*
- *We will also carefully consider the need to separate duties and personnel to ensure fairness in later process reviews and appeals.*

## External Quality Assurance

This section of our Centre Policy outlines the arrangements in place to comply with awarding organisation arrangements for External Quality Assurance of teacher assessed grades in a timely and effective way.

### **A. External Quality Assurance**

*This section outlines the arrangements we have in place to ensure the relevant documentation and assessment evidence can be provided in a timely manner for the purposes of External Quality Assurance sampling, and that staff can be made available to respond to enquiries.*

- *All staff involved have been made aware of the awarding organisation requirements for External Quality Assurance as set out in the **JCQ Guidance**.*
- *All necessary records of decision-making in relation to determining grades have been properly kept and can be made available for review as required.*
- *All student evidence on which decisions regarding the determination of grades has been retained and can be made available for review as required.*
- *Instances where student evidence used to decide teacher assessed grades is not available, for example where the material has previously been returned to students and cannot now be retrieved, will be clearly recorded on the appropriate documentation.*
- *All staff involved have been briefed on the possibility of interaction with awarding organisations during the different stages of the External Quality Assurance process and can respond promptly and fully to enquiries, including attendance at Virtual Visits should this prove necessary.*
- *Arrangements are in place to respond fully and promptly to any additional requirements/reviews that may be identified as a result of the External Quality Assurance process.*
- *Staff have been made aware that a failure to respond fully and effectively to such additional requirements may result in further action by the awarding organisations, including the withholding of results.*

## Results

This section of our Centre Policy outlines our approach to the receipt and issue of results to students and the provision of necessary advice and guidance.

### **A. Results**

*This section details our approach to the issue of results to students and the provision of advice and guidance.*

- *All staff involved have been made aware of the specific arrangements for the issue of results in summer 2021, including the issuing of A/AS and GCSE results in the same week.*
- *Arrangements will be made to ensure the necessary staffing, including exams office and support staff, to enable the efficient receipt and release of results to our students.*
- *Arrangements will be in place for the provision of all necessary advice, guidance and support, including pastoral support, to students on receipt of their results.*
- *Such guidance will include advice on the appeals process in place in 2021 (see below).*
- *Appropriate staff will be available to respond promptly to any requests for information from awarding organisations, for example regarding missing or incomplete results, to enable such issues to be swiftly resolved.*
- *Parents/guardians have been made aware of arrangements for results days.*

## Appeals

This section of our Centre Policy outlines our approach to Appeals, to ensure that they are handled swiftly and effectively, and in line with JCQ requirements.

### **A. Appeals**

*This section details our approach to managing appeals, including Centre Reviews, and subsequent appeals to awarding organisations.*

- *All staff involved have been made aware of the arrangements for, and the requirements of, appeals in summer 2021, as set out in the **JCQ Guidance**.*
- *Internal arrangements will be in place for the swift and effective handling of Centre Reviews in compliance with the requirements.*
- *All necessary staff have been briefed on the process for, and timing of, such reviews, and will be available to ensure their prompt and efficient handling.*
- *Leaners have been appropriately guided as to the necessary stages of appeal.*
- *Arrangements will be in place for the timely submission of appeals to awarding organisations, including any priority appeals, for example those on which university places depend.*
- *Arrangements will be in place to obtain the written consent of students to the initiation of appeals, and to record their awareness that grades may go down as well as up on appeal.*
- *Appropriate information on the appeals process will be provided to parents/carers.*

**All teachers and managers have signed a declaration to state they have read, understood, and agreed to abide by the TMC centre policy.**

