



LIVERPOOL
JOHN MOORES
UNIVERSITY

Guidance for External Verification of Apprenticeships

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Academic Registry

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Glossary

APFP	Academic Planning and Fees Panel
AQSC	Academic Quality and Standards Committee
EPAO	End-Point Assessment Organisation
FHEQ	Frameworks for Higher Education Qualifications
HMRC	HM Revenue and Customs
LJMU	Liverpool John Moores University
PSRB	Professional, Statutory or Regulatory Body
UKVI	UK VISA and Immigration Service

Chapter 1: Introduction

1. The Guidance for External Verifiers details the processes relating to the engagement of External Verifiers to oversee the university's apprenticeship programmes. It also provides guidance for External Verifiers, programme teams and stakeholders with regard to the operation of the role.
2. External Verifiers are engaged by Liverpool John Moores University (LJMU) to complement the work of programme-level External Examiners, by providing oversight of the operation, management and quality assurance of the university's apprenticeships.
3. External Verifiers are engaged against a specific Apprenticeship Standard rather than at programme-level. Consequently, an External Verifier will be required to provide oversight of all of the LJMU apprenticeship programmes that are aligned to the applicable Apprenticeship Standard.
4. External Verifiers are engaged for a period of five academic years.
5. Further guidance on External Verification can be obtained from the [Academic Quality and Standards Team](#).

Chapter 2: Nomination, Engagement and Period of Engagement of External Verifiers

Criteria for Eligibility of External Verifiers

6. In order to be eligible to be engaged as an External Verifier, the university requires that nominees:
 - Are qualified to at least the Framework for Higher Education Qualifications (FHEQ) level of the apprenticeship programme(s).
 - Are currently employed by an institution delivering apprenticeship provision, and have experience of being actively involved in the delivery, operation and management of a Higher Education apprenticeship programme(s).
 - Have a proven track record of achieving consistent improvements in relation to Higher Education apprenticeships.
 - Have demonstrable expertise, competence and experience in the fields covered by the applicable apprenticeship, including work-based aspects.
 - Have a robust knowledge and understanding of the applicable Apprenticeship Standard(s) and the requirements of applicable funding bodies and regulators.
 - Have an ability to challenge effectively.
 - Have an awareness of current changes taking place in relation to Higher Education apprenticeships, and an ability to keep up to date with developments in an ongoing way.
 - Have an understanding of the key stakeholders involved in Higher Education apprenticeships.
 - Have an understanding and experience of current practice and developments in the teaching, learning and assessment of Higher Education apprenticeships.
 - Are clear communicators.
7. In addition to the above criteria, External Verifiers are required to comply with applicable legislation, including safeguarding, and, as applicable, meet the requirements set by Professional, Statutory or Regulatory Bodies (PSRB).
8. Should a programme team(s) seek to nominate an External Verifier who does not satisfy all of the above criteria, a rationale should be provided to the External Examiner Panel, who will make a risk-based decision based on this rationale and an assessment of the nominee's overall profile.

9. Nominations for External Verifiers should not be progressed if the nominee:

- Is a member of a governing body or committee, or an employee of one of the university's current partners.
- Has a close professional, contractual or personal relationship with a member of staff, apprentice or employer involved with one of the university's apprenticeships.
- Is required to assess colleagues who are recruited as apprentices to one of the university's apprenticeships.
- Is, or knows they will be, in a position to influence significantly the future of apprentices on one of the university's apprenticeships.
- Is significantly involved in recent or current substantive collaborative research activities with a member of staff closely involved in the development, delivery, management or assessment of one of the university's apprenticeships.
- Is a former member of LJMU staff (within the past 5 years).
- Is a former LJMU apprentice (within the past 5 years).
- Is a former LJMU External Examiner (within the past 5 years).
- Has acted as External Advisor/External Panel Representative for the validation/periodic programme review of any of the apprenticeships aligned to the Apprenticeship Standard for which they have expressed an interest.
- Has acted, or currently acts, as an independent assessor of one of the university's integrated End-Point Assessments.

10. Should a programme team(s) seek to nominate an External Verifier where their engagement would create any of the above conflicts, a rationale should be provided to the External Examiner Panel, who will make a risk-based decision.

Nomination of External Verifiers

11. The process for nominating potential External Verifiers is as follows:

- a) The programme team(s) identifies a potential External Verifier. This is normally the result of an expression of interest being received or an informal approach by the programme team(s) to ascertain if a potential nominee would be willing to engage.
- b) Prior to proceeding with the nomination, the programme team(s) should check for possible conflicts of interest.

- c) A representative from the applicable programme team(s) should then complete the [External Verifier Nomination Form](#) and obtain the necessary School-level endorsement (as set out within the signatories section of the nomination form).
- d) Once School-level endorsement has been obtained, the nomination form and CV should be submitted to ExternalExaminers@ljmu.ac.uk for consideration by the university's External Examiner Panel. Prior to submitting a nomination form for consideration, proposers must ensure that the nominee's CV is sufficiently detailed to facilitate an informed judgement being made with regard to their suitability.
- e) There are three possible outcomes of the External Examiner Panel's consideration of External Verifier nominations:
- Approval, with or without conditions.
 - Deferral, pending further actions/clarification.
 - Rejection.
- f) Following consideration by the External Examiner Panel, Academic Registry will confirm the outcome to the programme team(s) and to the nominee.
- g) Should the nomination be approved by the External Examiner Panel, approval is only granted in principle, in the first instance (based on the Panel's assessment of the nominee's experience and expertise), and will be subject to successful verification that the nominee is eligible to work in the UK. **The External Verifier's engagement will not be considered to have been fully approved or to have commenced until this check has been satisfactorily completed.** Further details on the procedures and requirements for this verification check are sent to the External Verifier with the outcome from the External Examiner Panel.

Following successful verification of the External Verifier's eligibility to work in the UK, the External Verifier will be sent the following:

- A letter confirming the details of their engagement.
- Terms and Conditions.
- Information on applicable university regulations and procedures.

External Verifiers are required to return a signed copy of their Terms and Conditions to Academic Registry.

12. Once an External Verifier's engagement has been fully approved, the programme team(s) are required to provide them with the applicable information relating to the apprenticeships aligned to the Apprenticeship Standard for which they are engaged. The programme team(s) should also ensure that the External Verifier is made aware of what information they will be provided, and when, in order to enable them to verify that the apprenticeship(s) continues to operate in-line with applicable internal and external policies, procedures and regulations.

13. Programme teams are required to ensure that External Verifier coverage of the apprenticeship(s) remains uninterrupted. To this end, programme teams should ensure that a suitable External Verifier has been nominated and is fully approved prior to the end of the final year of engagement of the incumbent External Verifier.

UK VISAs and Immigration Service Requirements

14. The UK VISAs and Immigration Service (UKVI) Immigration Regulations, require the university to verify the 'right to work' in the UK of any person who undertakes work at LJMU. This is a compulsory requirement, and failure of the university to comply could result in the university being subject to a fine, being downgraded from a UKVIS Category A rating, or losing its sponsorship license altogether. A list of documents which are acceptable as proof of eligibility to work in the UK, is available [here](#).

15. In order to comply with UKVI requirements, External Verifiers are asked to present proof of eligibility to work in the UK.

16. Full approval of an External Verifier engagement by the university is subject to successful verification that the nominee is eligible to work in the UK (as described in Paragraph 11g). **Please note that the External Verifier's engagement will not be considered to have commenced until this verification is completed by a member of LJMU staff.**

Extensions to a Period of Engagement

17. Programme teams are permitted to apply to extend an External Verifier's engagement for one additional year¹. Examples of possible reasons for seeking to extend an External Verifier's period of engagement include:

- If the extension provides continuity or if there is a reason to allow a period of overlap between incoming and outgoing External Verifiers.
- If the extension provides continuity following a decision to close the recruitment to a programme(s).
- If the External Verifier has had a period of leave (for example, maternity leave, long-term illness or sabbatical leave) during which alternative arrangements have been agreed by the External Examiner Panel.

18. Requests to extend an External Verifier's period of engagement should be made via the Extension of Period of Engagement form. All requests to extend the period of engagement of an incumbent External Verifier should follow the same approval route as new nominations (as described in paragraph 11).

Amendment to Duties

19. As the appropriateness of External Verifiers' experience and expertise are considered against the Apprenticeship Standard, rather than at programme-level,

¹ Any requests to extend an External Verifier's period of engagement for more than one year will normally **not** be approved.

if a new programme(s) is subsequently validated against that Standard, further approvals from the university's External Examiner Panel are not required to enable an incumbent External Verifier's oversight of their assigned Apprenticeship Standard to include a focus on the new programme(s).

20. As a result, following the engagement of an External Verifier, should a new programme(s) be validated against the Apprenticeship Standard overseen by that External Verifier, in the first instance, the Apprenticeship Quality Assurance and Administration Officer will liaise with the applicable programme team to establish their plans with regard to External Verifier oversight. To this end, the Apprenticeship Quality Assurance and Administration Officer will seek to establish if the new programme(s) will form part of the existing External Verifier's oversight or if its inclusion in their remit would generate a sufficient amount of extra work to necessitate an additional External Verifier to be engaged.
21. Should the programme team want the incumbent External Verifier's oversight of the Apprenticeship Standard to include a focus on the new programme(s), then they should liaise with the External Verifier and secure their agreement. The outcome of this discussion should be confirmed to the Apprenticeship Quality Assurance and Administration Officer.
22. If the External Verifier agrees for their oversight of the Apprenticeship Standard to include the new programme(s), a letter confirming the updated arrangement will be issued by the Apprenticeship Quality Assurance and Administration Officer.
23. Should the incumbent External Verifier confirm that they are not content/able to take on the additional oversight, then the programme team will be required to source an additional External Verifier.

Administrative Amendments

24. Occasionally, amendments may be made to an External Verifier's engagement, which are purely administrative. Administrative amendments of engagement are amendments that do not materially affect the tasks carried out by the External Verifier, or the nature of the activities associated with their engagement.
25. Administrative amendments are not required to be considered through a formal approval route. External Verifiers will receive written confirmation from Academic Registry of an administrative amendment to their engagement. All administrative amendments are noted by the External Examiner Panel.
26. A judgement as to whether a change to an External Verifier's engagement can be classed as "administrative" or whether it requires approval by the External Examiner Panel will be made by the Head of Academic Quality and Standards.

Termination of Engagement

27. An engagement may normally be terminated by the university for the following reasons:

- If an External Verifier is not carrying out the minimum requirements of their engagement (as set out in the letter of engagement/Terms and Conditions, and in Chapter 4 of this guidance). For example, non-submission of the annual External Verifier report.
- If a conflict of interest arises that cannot be resolved.

28. The above instances will first be brought to the attention of the programme team(s), the Director of School, and the Head of Academic Quality and Standards. If the matter remains unresolved, the engagement may be terminated. In these circumstances, applications to terminate an External Verifier's engagement should be made via the 'Termination of Engagement' form.

29. Requests to terminate the engagement of an External Verifier follow the same approval route as nominations (as described in Paragraph 11) and are approved by the External Examiner Panel. Following this approval, the External Verifier concerned will be informed in writing by Academic Registry.

30. In line with their Terms and Conditions, if an External Verifier wishes to resign before the agreed end date of their engagement, they must inform the university in writing, and a formal acknowledgement is provided by Academic Registry.

Programme Closures

31. Where an apprenticeship(s), aligned to the Apprenticeship Standard for which the External Verifier is engaged, is closed, both the External Verifier(s) and the programme-level External Examiner(s) should be consulted prior to the closure being considered at School and Faculty-levels and subsequently presented to the Academic Planning and Fees Panel (APFP).

32. If the closure of the programme(s) is approved by APFP, the External Verifier will be notified by Academic Registry.

Chapter 3: External Verifier Induction

33. The applicable programme team(s) in conjunction with the Apprenticeship Quality Assurance and Administration Officer and a representative from Academic Registry's Degree Apprenticeship Team are required to facilitate an introductory meeting with their newly engaged External Verifier.
34. Where multiple apprenticeships are aligned to the Apprenticeship Standard for which the External Examiner is engaged, the induction must cover all programmes, and input from each applicable programme team must be provided.
35. These meetings should cover, as a minimum:
- An overview of the overall design and structure of the apprenticeship(s).
 - The approach to teaching, learning and assessment on the apprenticeship(s) and, with regard to the latter, how this aligns with the Assessment Plan.
 - An overview of the sites and facilities utilised to deliver the apprenticeship(s).
 - A summary of the academic calendar, including dates of Boards of Examiners.
 - Opportunities to attend Boards of Examiners.
 - Contact protocols and details for key staff.
 - How and when opportunities will be facilitated for the External Verifier(s) to meet with apprentices and employers and/or to review their feedback.
 - How and when opportunities will be facilitated for the External Verifier(s) to meet with programme-level External Examiners.
 - How the university collaborates with employers with regard to the management and quality assurance of the apprenticeship(s).
 - What information will be provided, and when, to enable them to judge and report upon the standards, effectiveness and compliance of the apprenticeship(s) aligned to the Apprenticeship Standard for which they are engaged.
 - Onboarding arrangements.
 - Mandatory qualifications.
 - Mechanisms/systems to capture and report on data relating to the operation and performance of LJMU apprenticeships.

- PSRB requirements.
- The management and operation of the apprenticeship(s), including in the context of any requirements from applicable external funding bodies and regulators.
- Mechanisms to facilitate pre-entry assessment of apprentices' existing knowledge, skills and behaviours.
- The operation of assessment.
- How opportunities will be facilitated to enable External Verifiers to make an informed judgement that assessments are reliable and comparable across employers, places, times and assessors.
- The operation of off the job learning and how an appropriate balance between on and off the job training is managed.
- Mechanisms to verify the appropriateness of apprentices' working environment.
- The operation of tripartite reviews.
- Mechanisms for gateway review analysis.
- Workplace mentoring.
- How apprentices are supported to undertake the End-Point Assessment.
- End-Point Assessment (whether it is integrated or not), including its format, management and operation.
- The accessibility of the End-Point Assessment and the management of reasonable adjustments.

In addition, for External Verifiers of apprenticeships with integrated End-Point Assessments, induction meetings should confirm:

- How and when they will receive a sample of assessments to inform their judgements on the university's effectiveness as an End-Point Assessment Organisation (EPAO) and that the content and context of assessments are occupationally relevant.
- How and when they will be enabled to make informed judgements on the operation and outputs of independent assessor standardisation and/or moderation meetings.

- When and how² they will be required to visit the university, in relation to each cohort of apprentices completing the End-Point Assessment, during each year of their period of engagement.
- The size of the pool of independent assessors deployed to assess the End-Point Assessment and the criteria governing their selection and appointment.
- How employers are engaged in the decisions regarding apprentices' readiness to undertake the End-Point Assessment.
- When and how opportunities to meet with independent assessors or other EPAO staff will be facilitated.

36. On an annual basis, External Verifiers will be asked to confirm, via their annual report, that they have received appropriate information on the apprenticeship(s) for which they have been engaged.

Creation of a Staff IT Account / Access to VLE

37. Following the commencement of engagement, Academic Registry will liaise with External Verifiers to arrange for them to be given access to the university's IT facilities.

38. Academic Registry will also send a Staff Card to External Verifiers. This is essential for access to university buildings, and for unlocking lapsed/locked IT accounts. **Please note, it is important that External Verifiers activate their university IT account within 60 days of issue, and that they continue to access their account at least once every 60 days afterwards.** If there is no activity on their account after this period, it will be locked.

39. The Apprenticeship Quality Assurance and Administration Officer, Degree Apprenticeship Team and programme team(s) will confirm which systems External Verifiers require access, and for what purpose, and following creation of their LJMU IT account will arrange this access.

² I.e. in-person or virtually.

Chapter 4: The Roles and Responsibilities of External Verifiers

40. Through oversight of the operation and management of LJMU's apprenticeships, External Verifiers play a key role in helping the university to maintain their rigour and quality, ensuring that they continue to operate in-line with applicable internal and external policies, procedures and regulations.
41. External Verifiers are engaged in relation to a particular Apprenticeship Standard, rather than on a programme-by-programme basis, and are required:
- To provide external oversight of the university's processes for the management, operation and quality assurance of its apprenticeships (including, but not limited to, onboarding, management of on and off the job training, and apprentices' progress), supporting the university to ensure that they are rigorous, fair, in-line with LJMU policies, procedures and regulations, and comply with the requirements of external funding bodies and regulators.
 - To identify areas for improvement, relating to the operation, management and/or quality assurance of the university's apprenticeships to the Degree Apprenticeship Strategic Group, Schools and programme teams.
 - To review and comment on apprenticeship performance data, identifying to LJMU Schools, and/or the Degree Apprenticeship Strategic Group, areas for investigation and/or improvement.
 - To advise the Degree Apprenticeship Strategic Group of identified areas of good practice.
 - To advise on the effectiveness of apprenticeship programmes in enabling apprentices to achieve the required knowledge, skills and behaviours.
 - To advise on how effectively off the job learning aligns with apprentices' day to day work activities.
 - To monitor and advise on the effectiveness of the university's apprenticeships to prepare apprentices to progress to timely completion of the End-Point Assessment.
 - To review and comment on employer and apprentice feedback, recommending, as applicable, areas of improvement for inclusion within institutional and programme-level Enhancement and Development Plans.
 - To advise on the comparability of apprenticeship support and management with those at other institutions with which you are familiar.
 - To advise on the effectiveness of the collaboration between the university and employers in supporting apprentice progress and outcomes.

- To advise on the effectiveness of mechanisms for pre-entry assessment of apprentices' existing knowledge, skills and behaviours.
- To advise on the effectiveness of tripartite progress reviews.
- To comment on the design of new apprenticeships and/or changes to existing apprenticeship programmes.
- To attend, upon invitation, meetings of the Degree Apprenticeship Strategic Group and/or LJMU Boards of Examiners.
- To pro-actively and collegiately engage with programme-level External Examiners.
- Through the above activities, and through other identified mechanisms, to inform the university's approaches to evaluation of its apprenticeship portfolio, both holistically and at a programme-level, and contribute to the ongoing development and management of Enhancement and Development Plans, both at institutional and programme-level.
- To undertake external assessor monitoring (for integrated apprenticeships, only). This will require External Verifiers to visit the university³ for each cohort of apprentices completing the End-Point Assessment and to moderate a sample of the assessments (including live assessments, if applicable).

42. The minimum duties of all External Verifiers are set out in the letter of engagement and Terms and Conditions.

Meeting with Stakeholders

43. All External Verifiers must be offered opportunities to meet with apprentices and employers. These meetings can be held virtually or in-person.

44. Where it is not possible for a meeting to take place, programme teams should make appropriate arrangements for External Verifiers to consider apprentices' and employers' feedback in lieu of a meeting.

45. In addition, External Verifiers for integrated apprenticeships must also be offered the opportunity to meet with independent assessors and/or other EPAO staff. Again, these meetings can be held virtually or in-person.

³ Opportunities to conduct these visits online can be considered.

Chapter 5: The External Verifier Report Process

46. External Verifiers are required to report annually to the university, utilising the agreed template. Through this report, External Verifiers are able to confirm their judgements with regard to the standards, effectiveness and compliance of the university's apprenticeships, as well as identifying features of good practice and areas for improvement.
47. In addition, for integrated apprenticeships, External Verifiers are required to provide their judgements regarding the university's effectiveness as an EPAO as well as the operation, management and outcomes of integrated End-Point Assessments.
48. The report also facilitates opportunities for External Verifiers to raise any serious issues that they wish to bring to the attention of the university's senior management.
49. The deadline for submission of External Verifiers' annual reports, relating to 2024-25, is **5 September 2025**. For provision that operates non-standard timescales, reports should be returned within 1 month of the Board of Examiners. All reports should be submitted to ExternalExamining@ljmu.ac.uk
50. External Verifiers should consider the Data Protection Act and the General Data Protection Regulation when completing their reports, and must not refer to apprentices, staff, employers, External Examiners or other External Verifiers by name, nor include matters of a confidential/sensitive nature. Matters of a serious, sensitive, or confidential nature or matters which reflect serious concerns about the standards of compliance of the university's apprenticeships should be conveyed separately to the Academic Registrar (or, in very exceptional circumstances, to the Vice-Chancellor, as set out below).
51. All External Verifiers have the right to raise issues directly with the Vice-Chancellor, and to receive a timely response outlining any actions to be taken.

Receipt and use of reports by the university

52. External Verifiers' annual reports are considered public documents and will, subject to any relevant exemption under the Freedom of Information Act (2000) and consultation with the External Verifier, be disclosed upon request.
53. External Verifiers' annual reports will be shared internally within the university, with apprentices, with employers and, as required externally, with PSRBs.

Obtaining late reports

54. External Verifiers who have not submitted their report within one month of the deadline will be sent a reminder. For reports, which are not submitted after this initial reminder, and are still outstanding three months after the original deadline, a second reminder will be sent to the External Verifier. Failure to submit the annual report, following these reminders, may lead to the termination of an External Verifier's engagement.

Considering and responding to reports

55. Each External Verifiers' report will be responded to by the applicable programme team(s) and Director(s) of School. Where more than one apprenticeship is aligned to the Apprenticeship Standard for which the External Verifier is engaged, the applicable programme teams and Directors of School should collaborate to produce a single response.
56. Responses will be provided within the designated sections of the External Verifier annual report template.
57. Completed responses should be submitted to Academic Registry, via ExternalExamining@ljmu.ac.uk, who will conduct a final review and send to the External Verifier.
58. Programme teams are responsible for sharing External Verifier reports and responses with employers and apprentices, and should ensure that they obtain a copy of the final version from the Apprenticeship Quality Assurance and Administration Officer.
59. Should it be necessary to share External Verifier reports and responses more widely, for example to PSRBs, in the event of a PSRB accreditation visit or part of the normal reporting process to PSRBs, again, a copy of the final report and response should be obtained from the Apprenticeship Quality Assurance and Administration Officer.
60. At institutional level, an overview of the operation and outputs of External Verifier reports will be received by the Academic Quality and Standards Committee (AQSC) on an annual basis.
61. Where an External Verifier has raised issues that they feel can only be addressed at institutional level, a response will normally be provided by either the Head of Academic Quality and Standards or the Head of Apprenticeships⁴. Should issues of this nature be raised by External Verifiers, they are also considered by AQSC.
62. For the 2024-25 reporting cycle, programme teams and Directors of School should complete their responses to External Verifiers no later than **31 October 2025**. For programmes with a non-standard timescale, programme teams should complete their responses within six weeks of receipt of the report.

⁴ To be determined based upon the nature of the issue raised.

Chapter 6: External Verifier personal details, fees and expenses

External Verifier personal details

63. The university holds External Verifiers' personal data securely, and processes it with care. For full details, please see [LJMU's Privacy Statement for External Examiners and External Verifiers](#).

External Verifier fees and expenses

64. The annual fee is paid by the university on receipt of the completed fee claim form and following receipt of the External Verifier's annual report. External Verifiers are also able to claim all reasonable expenses incurred whilst undertaking their duties. Information on the current annual fee, and the regulations governing External Verifier expenses is available [here](#).

65. Payment of External Verifiers' annual fee will be processed through an external payroll provider on behalf of the university. Deductions will be applied to the annual fee for Tax and National Insurance in accordance with current HM Revenue and Customs (HMRC) guidance.

66. In order to comply with UKVI regulations, the engagement of a new External Verifier will not be considered to have commenced until their 'right to work' has been verified.

Chapter 7: General Data Protection Regulation, Data Protection Act (2018) and the Freedom of Information Act (2000)

67. The university collects, stores and processes a wide range of data about individuals during the course of its day-to-day business, and the use of personal data is an integral aspect of many of the university's activities. The university's Privacy Statement for External Examiners and External Verifiers: Taught Programmes is available [here](#).
68. External Verifiers should be aware of the university's obligations under the Freedom of Information Act 2000, the Data Protection Act 2018 and the General Data Protection Regulation, and also of their own responsibilities. External Verifiers are responsible for the personal data that they process as part of their role. The university's Data Protection Officer can be contacted by email at DPO@ljmu.ac.uk or by phone on 0151 904 6134.
69. All External Verifiers and staff (including those engaged in the marking of examination scripts) have a duty to ensure that they comply with the data protection principles (set out in the [university's Data Protection Policy](#)), and should note the following:
- Marks, comments and opinions expressed by an External Verifier about individual apprentices during the assessment process may be disclosed to the apprentice concerned, if the apprentice makes a Subject Access Request under the Data Protection Act/General Data Protection Regulation.
 - Information recorded by candidates during examinations (e.g. examination scripts) is expressly exempted from the data subject (i.e. the apprentice) access rules. This means that the university is under no obligation to permit examination candidates to have access to either original scripts or copies of scripts. However, comments by External Verifiers about an individual, both internal and external, whether made on the script or in another form that allows them to be held and applied to the original script (e.g. in a coded table) are covered by the Act.
 - Should an apprentice request to see the External Verifier's comments, they may be made available. A data subject has the right to request that a copy or summary 'in intelligible form' of information about them is provided within the stipulated timescale (see below).
 - All External Verifiers need to be aware that the university may be obliged to make their comments available (upon formal request) to individual apprentices. To ensure compliance and to simplify the process, should requests be made, External Verifiers are advised to write their comments on a separate sheet which they should attach to the script.
 - Where External Verifiers' comments have been made directly onto scripts the annotated script itself is exempt in the event of a Subject Access Request (though may be provided at the discretion of the university).

However, if an annotated script is withheld, all comments must be reproduced onto a separate form, which is available to the subject as a minimum requirement.

- All External Verifiers should be reminded that their comments will be provided to apprentices if requested, and should therefore ensure that all comments can be justified and that no careless remarks are made on exam scripts, in emails/correspondence to colleagues, or on mark sheets. Any informal notes passed between Examiners/Verifiers in the course of marking an examination script or piece of coursework should be disposed of securely once the final mark has been agreed and there is genuinely no need for the notes to be retained.
- Staff, including External Verifiers, are advised that examination board minutes can include the personal data of individual apprentices and therefore may be accessible to apprentices on request.

70. All requests for personal information must be directed to the Data Protection Officer without delay and should be dealt with in accordance with university's [Data Subject Rights Request Policy](#). The standard response time for requests is 1 month, but may, in limited circumstances, be extended to three months.

71. Any requests received by the university for the disclosure of External Verifier reports, or the personal information of External Verifiers, will be treated on a case-by-case basis.