

Consultation response

Awarding organisation controls for centre assessments

6 December 2019

1. Do you have any comments on our proposed definition for Centre Assessment Standards Security?

The definition uses the term “periodically”. We feel this is unnecessarily vague, and centres would welcome more clarity. For example, “at least annually” this would specify a maximum time period and link into the annual delivery cycle of many qualifications in schools and colleges.

The consultation itself and the conditions might be confusing as by concatenating the moderation approach and other approaches to ensuring centres are managing and marking work appropriately, some centres may find it convoluted. Please see sections 5, 8 and 9 for further details

2. Do you have any comments on our proposed definition for Moderation?

The definition of moderation does not indicate that, where moderation is specified in the regulations as applying to a qualification, it must be carried out for every centre, in each submission cycle, and should not be a sample of centres. AQA would appreciate some clarification on this.

3. Do you have any comments on the qualifications we propose to specify where centre assessments must always be subject to Moderation?

Single-component internally assessed qualifications, such as project qualifications, present challenges with marking and conversion to grades, as seen in the ‘spikey’ mark distributions which occur, so specifying they must be moderated could limit opportunities to remedy this issue in future. As such, we would suggest that the list should not include project qualifications as this would limit the ability to innovate how these qualifications are designed and awarded, and stop any potential move away from marking to grading.

4. Are there any other qualifications which we should also specify?

It could be argued that the centre-based assessments should be subject to moderation in all qualifications where students compete directly with A-level students for university places. However, it is unlikely moderation would be feasible in some cases, given the nature of the assessments. Nevertheless, we believe that the applied general qualifications, which are used as direct equivalents to A-levels and will be in competition with T-levels, should also be included in order to ensure that they are subject to the same level of scrutiny. This would give greater confidence in the quality of the outcomes for applied generals (assuming they

continue in the light of the consultation on the future of Level 3 technical and vocational qualifications).

5. Do you have any comments on the factors we have set out that an awarding organisation might consider when determining the most effective Centre Assessment Standards Scrutiny approach?

With respect to those qualifications which the conditions stipulate must be moderated, many of the aspects are not relevant so it is confusing to have moderation and other forms of Centre Assessment Standards Scrutiny included together. For example, reference to some activities taking place in person and to observations of assessments being taken and marked. It should be made clear whether these aspects relate to moderation or not in the consultation document.

We believe that where results are issued by a centre prior to the Centre Assessment Standards Scrutiny, it should be made clear that such results are provisional. This would minimise the concern likely to be caused to students and parents, should the marks or grades change in the light of the Centre Assessment Standards Scrutiny. This should be stipulated in the conditions to ensure consistent practice across qualifications.

We believe it is problematic to expect the Centre Assessment Standards Scrutiny to collect data on who has assessed which work in a centre. It would be challenging to devise sampling regimes to cover this to ensure consistency of marking by different assessors and is disproportionately burdensome on centres and boards. It would probably require significant IT system changes and could create very unbalanced samples which might make any adjustments less valid. As such, we would suggest it would be preferable to require boards to ensure centres standardised marking by their assessors and treat any breach in this as maladministration, or even malpractice, rather than expect the Centre Assessment Standards Scrutiny to be able to deal with it.

We believe that all work in a sample should be selected by the board and not by the centre, and should be selected once marks or grades have been submitted to ensure centres do not select candidates who are more favourable for the outcomes given.

In paragraph 2.13 another factor could be the value of the qualification and the use that may be made of it. For example, a low-level qualification which merely allows a student to progress to a further level might be considered to have less value, and therefore to need less rigorous control than a qualification which enables a student to gain employment or entry to university.

6. Do you have any comments on the controls an awarding organisation might put in place based on the factors set out above?

We assume the stem of paragraph 2.14 means 'We propose that our guidance will also set out the controls an awarding organisation may implement as a result of considering the factors in paragraph 2.13 ...'. Also, in the question itself, presumably the comments are to be on the controls listed in paragraph 2.14, and 'the factors set out above' means the factors listed in paragraph 2.13. If this is the

case, all but one of the controls (the number of learners sampled during each activity for each unit) listed in paragraph 2.14 would appear not to be relevant for qualifications which require moderation.

7. Do you have any examples of controls you may put in place for particular types of assessment?

No comments.

8. Do you have any comments on our proposed Conditions?

We would observe that there appears to be a contradiction in the conditions. Sections H2.3, H2.4 and H2.5 are headed moderation and relate to moderation in the body of the text so do not apply to other methods of Centre Assessment Standards Scrutiny; however, condition H2.7 states that the Centre Assessment Standards Scrutiny strategy should set out how the awarding organisation will comply with conditions H2.1-H2.5. Whilst H2.3 clearly relates to moderation only, sections H2.4 and H2.5 both look like they should relate to any form of Centre Assessment Standards Scrutiny and should be amended to reflect this. If it is not the case then there will be very few controls over other forms of Centre Assessment Standards Scrutiny compared to moderation.

Conditions H2.4 and H2.5 are the same as existing Conditions H2.2 and H2.3, and remain open to wide interpretation. Some associated guidance would be helpful. This could be provided in the accompanying guidance document or it could be provided more explicitly in relation to qualifications which require moderation. Otherwise, there is a risk of breaching those conditions simply through misunderstanding their intention.

For example, to what extent is it possible, through a sampling system, 'effectively to determine whether or not ... the criteria ... are being applied accurately and consistently by Assessors in different Centres'? Is it intended that sampling of each assessor should be carried out or is it sufficient to ensure centres have internally standardised marking? If it is the former, a process would be very difficult to apply: for example, because centres would have to submit the identity of the assessor, the assessor might change and more than one assessor might be involved in marking a student's work. The requirement to ensure centres apply standards consistently has potentially significant implications. If they are inconsistent between teachers then we would need to send the work back with guidance so marking can be undertaken again or for the board to mark it all in cases where a regression does not bring all students into tolerance (i.e. a measure of inconsistency). This would require centres to provide details of teaching sets etc and lead to problems pointed out in section 5.

We would also note that the submission deadlines would need to be brought forward to March at the latest to allow work to be moderated and if necessary sent back for remarking, or all work called in for marking before schools close in June or July. This means the issue dates for the NEA tasks would need amending in the subject level conditions. It would put an additional, disproportionate burden on centres and would create delivery issues for subjects like Art and Design and PE, and would increase significantly the burden on boards.

Condition H2.6, requiring Centre Assessment Standards Scrutiny strategies for reformed GCSEs and A-levels is overly bureaucratic given each qualification already has an assessment strategy which will cover much of the new Centre Assessment Standards Scrutiny strategy, and GCSEs and A-levels are already subject to a JCQ-agreed approach which is well defined and documented.

On I4.2, the board has a contract with the centre not the student so there is little that can be done once certificates have been issued to ensure they are returned and corrected. Indeed, it is not even possible to directly access the student contact details and exam boards rely on the centre to do this. If the student fails to respond or has moved then there is little exam boards can do, so we need guidance on expectations about what is reasonable.

On sampling and (b)(ii) (page 7 of the Conditions), it would make the process more robust if the centre did not select the sample, but the board selected it after marks or grades were submitted.

9. Do you have any comments on our proposed guidance?

There is little or no guidance on how the new conditions should be interpreted for those qualifications which are moderated. The fact that the guidance on minimum requirements does not cover moderation can easily be missed so this should be in a separate statement which is highlighted at the start of the document.

The third paragraph on page 5 of the Guidance indicates that the Centre Assessment Standards Scrutiny strategy 'must cover all forms of Centre Assessment Standards Scrutiny that the awarding organisation undertakes, including Moderation'. However, many of the requirements are irrelevant in the case of A-level, AS-level and GCSE: for example, 'why it considers marking by a Centre appropriate within a particular qualification or type of qualification', 'its approach to going beyond our minimum requirements and how it will have regard to the factors set out in Ofqual's guidance in this regard'. The merging of the guidance for different types of qualifications¹ into a single set of expectations can create confusion about what does and does not apply.

It is not clear where moderation is stipulated for a qualification if this in itself goes 'beyond our minimum requirements' or if something further would be required given moderation is already far more robust than the minimum verification requirements.

On page 3, collecting changes in staff responsible for marking work in centres is disproportionately burdensome and doing it in a timely manner to implement a different approach to dealing with the centre is unlikely to be possible. Nor is it likely to be possible to identify changes to the profile of entries for a centre – for instance, would prior attainment be used, and if so, how would it be gathered and what would be done with it? Exam boards would not know the number of entries in time to change the approach to managing the way the centre is dealt with – as the time frame from close of entries is too short.

On page 10, we would query the meaning of the phrase: 'accurately and completely reflect the marking of assessments'. This could be read as indicating that there is no place for tolerance or difference of professional opinion to be applied, as it may well

¹ ie some qualifications with specified conditions attached and others with no such pre-requisites

not completely reflect the moderator's view of a mark for a piece of work. We feel this should be made clearer.

It is not made clear in the guidance where it would be appropriate to observe centres carrying out marking as stated in the conditions: what would exam boards expect to see, and why would observing a teacher mark a piece of work be necessary, when exam boards can see the outcome?

10. What cost would you anticipate the development of a Centre Assessment Standards Scrutiny strategy for the relevant qualifications offered by your awarding organisation would be?

Again, because the Guidance conflates qualifications which require moderation with qualifications where the awarding body has to decide on the form of Centre Assessment Standards Scrutiny, it is not always clear how much of it applies to the former. Paragraph 2.25 of the consultation states that 'an awarding organisation may produce a strategy covering multiple qualifications' and that 'the strategy can refer to policies and procedures that exist in other documents', but it is not clear whether, for qualifications which require moderation, it will be sufficient to provide generic information about moderation procedures. The development of Centre Assessment Standards Scrutiny strategies will become disproportionately burdensome and costly if reference to subject-specific features is required.

11. Are there any regulatory impacts that we have not identified arising from our proposals? Please identify any additional impacts.

No, other than those specified above.

12. We have not identified any ways our proposals will prevent innovation by awarding organisations. Do you have any comments on this assessment? Please provide specific examples.

The requirement for project qualifications to be subject to moderation could limit innovative approaches to how they are assessed and awarded, for example the use of grading rather than marks.

13. We have set out our view of the impact of our proposals on people who share a particular protected characteristic. Are there any potential impacts that we have not identified?

Not that AQA has identified.

14. Are there any additional steps we could take to mitigate any negative impact you have identified that would result from our proposals, on people who share a protected characteristic?

No.

15. Do you have any other comments on the impacts of our proposals on people who share a protected characteristic?

No.