

# Consultation response

Exceptional arrangements for assessment and grading in 2020  
6 May 2020

**1. To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?**

AQA agrees. Awarding organisations are well placed to determine if a calculation of results, adaptation or delay is appropriate. It will be important for awarding organisations to have clear understanding and guidance from Ofqual to support any decisions being made and, where possible, ensure the approach being adopted aligns with approaches elsewhere.

**2. To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?**

AQA agrees – and it would be helpful where possible to have consistency across GQ and VTQ. The framework needs to be explicit around learners that are included, in particular, it will be important to have clarity around Year 10 and 12 learners.

**3. To what extent do you agree or disagree with the balance we are proposing to strike across the 3 elements of: delegation to awarding organisations; flexibility; and consistency?**

AQA disagrees. Standardisation between awarding organisations should be enforced through regulation, to ensure consistency. There are unacceptable risks around the level of delegation being passed to awarding organisations for these qualifications.

**4. To what extent do you agree or disagree with the key principles we have set out?**

AQA agrees, although we note that ‘as many students as possible’ and ‘as reliable as possible’ are somewhat vague, and that the best possible outcomes will not always be possible for all students. We would seek further clarity on the tension between the approach of being flexible and that of being consistent.

**5. To what extent do you agree or disagree with our proposal to allow awarding organisations to deliver their qualifications as normal where they are able to?**

AQA agrees. There should, however, be safeguards in place to ensure unreasonable expectations are not made which might put students, teachers and deliverers at risk.

**6. To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?**

AQA agrees. There should, however, be safeguards in place to ensure unreasonable expectations are not made which might put students, teachers and deliverers at risk.

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**7. To what extent do you agree or disagree with the aims of our proposed approach to calculating results?**

AQA agrees.

**8. To what extent do you agree or disagree with our proposal that the minimum evidential threshold is that any approach to providing calculated results needs to be based upon at least one source of trusted evidence along with a sufficiently robust basis for quality assurance?**

AQA agrees that at least one source of evidence should be used to calculate results, while noting that there will be different levels of evidence available for learners within different centres and there may be challenges in ensuring levels of trusted evidence are comparable and do not introduce bias into the approach to calculating results.

For example, for our large-entry Functional Skills qualifications, we are able to replicate the secure statistical approach which will be used to provide estimates for GCSE awards. For our Level 3 Tech Levels, and Personal and Social Education awards, secure statistical data are not always available; quality assurance would normally be achieved by comparison with historic levels of verified/moderated results.

**9. Do you have any other comments on the approach to providing learners with calculated results?**

AQA does not think that awarding organisations should be required “to issue results for units even where a learner was not due to be awarded their qualification this summer”.

First, doing so would require a large increase in the number of centre assessment grades to be collected, which would be burdensome both for centres and for awarding organisations’ systems. Moreover, the latter burden embodies certain risks, for example, the need to calculate (uniform) marks for units in some qualifications, which could not be done reliably – we feel issuing marks in the absence of assessment information represents a spurious level of precision.

Second, whilst this approach may be defensible for qualifications where unit grades are directly aggregated to qualification level (ie there are no unit marks and the principle of compensation does not apply), for qualifications which employ a UMS system, such as our Applied General awards, the approach is inappropriate. This is because, for these latter qualifications, compensation is embodied in the assessment design, which aggregates unit performance to qualification level via a UMS. By the same token, estimated unit grades which were not used for certification this summer, could not be used in future series where they would be combined with “bona fide” units with UMS marks.

With respect to this summer’s awards, the situation is further complicated for the Applied General awards, as the recently installed “safety net mechanism” would be inoperable.

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**10. To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?**

AQA does not believe it would be possible for us to adapt our assessments in time for this summer; however, we do not believe any of our qualifications fall into this category.

**11. To what extent do you agree or disagree that delaying or rescheduling assessments should be the option of last resort?**

AQA agrees. Wherever possible, awarding organisations should ensure that students receive grades in the summer in order to support progression; however, we appreciate that in some cases this may not be possible and delay may be the only option.

**12. To what extent do you agree or disagree with our proposals around decision making and record keeping?**

AQA agrees.

**13. To what extent do you agree or disagree with our proposed approach to oversight of awarding organisations?**

AQA notes and welcomes Ofqual's proposed "flexible regulatory framework" and that Ofqual "will be proportionate in [its] response" (consultation document, page 32). AQA welcomes too Ofqual's pragmatic recognition that "the crisis might increase the risk of malpractice or other misconduct", and expects that Ofqual's risk tolerance is correspondingly adjusted.

**14. To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?**

AQA disagrees – *if* there is already an opportunity for these to be taken in January 2021, this should be sufficient. In the cases for Tech Level qualifications, an exam series exists in January, an exceptional series taking place 8 weeks prior would have a detrimental effect on our operational ability to deliver a safe January 2021 series. This would impact, further and heavily, on any Year 12 cohorts working towards certification in summer 2021. We would expect the demand for an autumn series to be low. Offering an autumn series in any qualification where it is not already offered may not be deliverable for operational, centre manageability or financial reasons.

**15. To what extent do you agree or disagree with our proposed approach to appeals?**

AQA agrees – and feels there should be consistency in the appeals process for GQ and VTQ. Appeals should be based on procedural failings as opposed to subjective objection to individual learner results. We have some concern around the suggestion that appeals may be warranted from learners directly and would want confirmation and assurances that awarding organisations can prescribe and uphold our own appeals processes for VTQs to follow the GQ appeals process.

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**16. To what extent do you agree or disagree with our proposed position in relation to certificates?**

AQA agrees.

**17. To what extent do you agree or disagree with our proposed approach in relation to private learners?**

AQA agrees – and believes there should be consistency in the approach for GQ and VTQ.

**18. To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?**

AQA agrees if this is in relation to the existing May entry window. For awarding organisations to be required to contact centres by telephone could, however, be a significant burden. AQA would further note we cannot chase entries about which we have no knowledge.

Any learner who intended to register and/or enter for an assessment should be given the opportunity to do so for 2020. It should be noted that AQA VTQ-related qualifications do not fit the ‘on demand’ or distance learning model and entries are made, in the majority, around the standard 21 February entry submission deadline. We would not intend to contact centres individually to clarify entry details held to date. We do however seek to minimise the risk of opportunistic entries during this period and will ensure any predetermined extension of entry window will be fully monitored to confirm eligibility of learner entries.

An exception exists in our Tech Level qualification whereby the internally assessed units form the basis of a centre’s qualification registration but not entered in an exam series. In this case, centres would need to notify us of their intention to enter learners for IA units, to ensure entry data can be captured accordingly. Contact would be established directly with centres affected and extended entry deadlines would be agreed and communicated accordingly.

**19. To what extent do you agree or disagree with our intention to not require any particular approach for adapting assessments and/or issuing results to international learners?**

AQA agrees.

**20. Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?**

No comments.

**21. To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners?**

AQA agrees. AQA’s approach to Functional Skills is closely aligned to our GQ offer. We believe this offers a robust approach to help maintain standards, but we also appreciate that other awarding organisations are not in a position to award

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calculated grades in this way. We are supportive of Ofqual's work in Functional Skills to ensure that students are able to have grades this summer, but want to make sure that accommodations made for other awarding organisations do not inadvertently prevent us from calculating grades using an approach similar to that determined in GQs.

**22. Do you have any comments on the proposed regulatory framework?**

Section 3.11.4, on issuing results in summer 2020, suggests that awarding organisations would need to issue results for units (not just qualifications) including where a learner will not be certificating. This has significant implications and we have significant concerns about this. For some types of qualifications this will be appropriate, however it would be inappropriate and operationally undeliverable for unitised qualifications based on UMS, which are aggregated to produce the final qualification result. Calculating grades for such units would not produce a UMS, meaning these units could not be used in the final qualification grade; as such it would not be appropriate to issue unit-level grades for qualifications of this type.

More generally, AQA queries, and would welcome further guidance on, how Ofqual will reconcile its proposed "flexible regulatory framework" and its proposal to keep in force all current Conditions plus the additional VTQ Covid-19 framework<sup>1</sup>.

**23. Are there other potential equality impacts that we have not explored? If yes what are they?**

Further consultation with civil society organisations representing people who share a protected characteristic would be appropriate, particularly in light of coverage in traditional and online media, and in Westminster, about the prospects from black and minority ethnic students being disadvantaged this year. This check would be appropriate regardless of any practicalities that initially appear to preclude any adjustments being feasible.

**24. Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?**

No further comments.

**25. Are there any regulatory impacts costs or benefits associated with the implementation of this framework that are not identified in this consultation? If yes what are they?**

No comments.

**26. What additional costs do you expect you will incur through implementing this framework? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.**

AQA is currently calculating this, and in the meantime has stated publicly that it would never want to gain financially from this summer's extraordinary

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<sup>1</sup> Ofqual consultation document, page 44: "We propose that our General Conditions of Recognition and any relevant Qualification Level Conditions and Subject Level Conditions remain in force, but that the conditions, requirements and guidance contained in the proposed VTQ Covid-19 Framework will sit above them and will take priority."

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circumstances, and if the agreed arrangements for this summer series lead to any savings, AQA will look to pass these back to centres.

**27. Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?**

No comments.