

Consultation response

Regulating performance table qualifications

26 November 2019

1. Do you have any comments on our proposed approach to regulating Technical Awards?

We would note that there would need to be discussions regarding co-ordination of communications to centres regarding the management of the transition period from qualifications that are regulated under the current framework to those same qualifications that have required changes in order to meet the regulatory requirements.

2. Do you have any comments on the general purpose statements for Technical Awards, and the guidance supporting those statements, that we propose to include in our rules?

No.

3. To what extent do you agree or disagree with our requirement that awarding organisations should define specific qualification purposes in the context of the general purposes and explain how their qualification will fulfil the purposes they set out?

Agree.

4. To what extent do you agree or disagree with our proposals to disapply General Conditions E1.1 and E1.2?

Agree.

5. Do you have any comments on our proposal to introduce a bespoke Condition for guided learning and TQT that requires Technical Awards guided learning to be at least 120 hours?

No.

6. Do you have any comments on our proposal to require an awarding organisation to ensure the appropriateness of its Technical Award qualification content in relation to purpose, level, size and assessment methods?

No.

7. To what extent do you agree or disagree with our proposals that Technical Awards should be assigned either at level 1 or 2 or both?

Agree.

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- 8. To what extent do you agree or disagree with our proposal relating to synopticity that awarding organisations should design their assessments to demonstrate how their qualifications promote a holistic understanding of the content and provide opportunities for students to demonstrate a broad understanding across the qualification content?**

AQA agrees to some extent, but feels it will be important not to create barriers in the assessment for students at whom the qualifications are aimed. For example, for some qualifications, being able to complete different aspects of the qualification at different times may be a good preparation for work, while requiring a broad understanding may not be necessary.

- 9. To what extent do you agree or disagree with our proposals to disapply General Condition E7 and General Condition E9?**

Agree.

- 10. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?**

AQA disagrees to some extent – the impact of these changes could require an unduly burdensome additional workload for awarding organisations in redeveloping specifications to meet the synopticity requirement.

- 11. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings?**

No.

- 12. To what extent do you agree or disagree with our proposal to require that Technical Award assessment by examination is in the form of a written test or tests?**

Agree.

- 13. Do you have any comments on our proposal that of the total marks available for a Technical Award, an awarding organisation must ensure that at least 40% of those marks are made available through an assessment by examination that is normally in the form of a written test (or tests) set by the awarding organisation?**

Agree.

- 14. Do you have any comments on our proposals that awarding organisations should set and mark their assessments for examination and specify conditions for sitting the assessment by examination?**

No.

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- 15. To what extent do you agree or disagree that there should be two set dates in each academic year to take the assessment by examination? Please include in your comments your thoughts on whether or not it would be appropriate for us to set the windows for those set dates, and whether January and May/June would be suitable.**

AQA disagrees. Ofqual confirmed on 5 November that the intention was that there should be a *maximum* of two windows, suggesting that offering only one window per year would be compliant. AQA feels this should continue to be the case, in order to (1) encourage the likely provision of assessments and (2) maximise controls over standards and security by ensuring larger numbers of candidates in each sitting.

- 16. To what extent do you agree or disagree with our proposal that the assessment by examination should be taken in the assessment series immediately prior to a student's certification?**

Agree.

- 17. Do you have any comments on our intention not to put in place any specific limitation on resitting assessments by examination?**

No.

- 18. Do you have any comments on our intention that an awarding organisation should be able to apply for exemptions from some of the requirements? Please provide any views as to when an awarding organisation might think it appropriate to apply for exemption.**

AQA has concerns about exemptions – especially as these might differ between qualifications assessing the same subject. At a meeting Ofqual held on 5th November, 2019, it was noted that the first phase of work would ensure consistency over time within individual qualifications – and that the intention was to look across qualifications in a later phase. This could, however, have a significant impact on comparability between qualifications in this first phase. For example, if one awarding organisation applied successfully to limit the need for an external assessment in a qualification, this could limit its comparability with a different qualification from a different awarding organisation in the same subject.

- 19. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?**

Agree – subject to our comments in reply to question 18, above.

- 20. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.**

No additional comments, beyond those in our response to question 15.

- 21. Do you have any comments on our proposal that awarding organisations must explain and justify in their assessment strategy their approach to non-exam**

assessment including methodology, availability, marking, delivery requirements and controls?

No.

22. To what extent do you agree or disagree with the limits we propose to include on adaptations allowed to be made to awarding organisation-set non-exam assessments by centres? Please include in your comments your thoughts on whether guidance on adaptation would be useful for us to provide?

We agree that guidance on adaptation would be useful, if only to ensure that the extent of adaptation corresponds with the controls put in place to manage the delivery of non-exam assessments, and the checking of those controls.

23. To what extent do you agree or disagree with our proposal that non-exam assessments should be mark-based? Please include in your comments your thoughts on whether awarding organisations should be allowed to apply for exemption for this requirement.

AQA does not hold a strong view, but feels that moving all non-exam assessments to a mark-based approach could mean that qualifications may fail to meet employers' needs where they will require students to be able to demonstrate certain skills. There should be flexibility to offer competence-based or compensatory approaches depending on the needs of the end user of the qualification.

24. Do you have any comments on our intention to place performance table qualifications on the list of those qualifications that should always be subject to moderation (subject to the closure of the consultation)?

AQA supports the proposal for these qualifications to be subject to moderation, but we would note that it could create difficulties for those components which are competency-based where they are taken in large numbers in centres and this will need to be accommodated.

25. To what extent do you agree or disagree with our proposal that awarding organisation should put in place two windows each academic year for the submission of our outcomes from non-exam assessments? Please include in your comments your thoughts on whether or not it would be appropriate for us to set the windows.

AQA disagrees. At a meeting on 5 November 2019, Ofqual noted that the intention was there should be a *maximum* of two windows, such that offering one window would be compliant. AQA feels this should continue to be the case, in order to (1) encourage the likely provision of assessments and (2) maximise controls over standards and security by ensuring larger numbers of candidates in each sitting.

26. Do you have any comments on our proposal not to set requirements around resubmitting or retaking non-exam assessments, but to require awarding organisations to explain the controls they have in place to manage their chosen approach in their assessment strategies?

No.

27. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree – subject to our comments in reply to questions 21–26, above.

28. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

No.

29. To what extent do you agree or disagree with our proposal that Technical Awards: all have a minimum of three grades; for level 1 or 2 a maximum of four grades and for a Technical Award across level 1 and 2 a maximum of seven grades; and an unclassified or ungraded outcome?

Agree.

30. Do you have any comments on the potential for us to require a common grading scale for Technical Awards in the future, including any benefits or risks you think such an approach might bring?

AQA believes this is a good idea and would further enhance the validity of these qualifications – as there would be greater public and employer understanding of their value and what each grade means.

31. To what extent do you agree or disagree with our proposal to require a compensatory approach to generating individual assessment scores for individual assessments? Please include in your comments your thoughts on whether awarding organisations should be allowed to apply for exemption from this requirement.

AQA agrees to a degree, but has concerns it could undermine the validity of external assessment.

32. To what extent do you agree or disagree with our intention not to require a specific approach to aggregation of outcomes across assessment opportunities to calculate the final grade?

AQA disagrees to a degree, as we have concerns about the comparability issues between awarding organisations this could cause.

33. To what extent do you agree or disagree with our proposal not to prescribe any must-pass requirements?

AQA agrees – please see our response to question 31.

34. To what extent do you agree or disagree with our proposal that awarding organisations should not publish details around setting specified levels of attainment in advance of assessments being marked?

Agree.

35. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree – subject to our comments in reply to questions 31–34, above.

36. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

No.

37. To what extent do you agree or disagree with our proposed approach for setting standards?

AQA agrees, but in the future it would be useful to have the ‘range of evidence’ stipulated to ensure comparability between awarding organisations.

38. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree – subject to our comments in reply to question 37, above.

39. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

No.

40. To what extent do you agree or disagree that we propose to put in place Conditions that require awarding organisations to comply with any notice we issue in relation to the provision of data about performance table qualifications?

Agree.

41. Do you have any comments about our proposals to require awarding organisations to specify clearly within an event notification that the event relates to a Technical Award?

No.

42. Do you have any comments on our proposed approach to managing the withdrawal of qualifications from the Performance Table Qualification QLCs, requirements and guidance?

No.

43. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree.

44. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

No.

45. Do you have any comments on our considerations around introducing requirements in line with those we have in place for the reviews of marking moderation and appeals in GCSEs?

This would clarify the process for centres and would be a consistent approach.

46. Do you have any comments on our considerations on introducing requirements around the marketing or branding of Technical Awards?

No.

47. To what extent do you agree or disagree with our proposal to require awarding organisations to develop an assessment strategy for each qualification they submit to be considered for inclusion as Technical Awards in performance tables?

Agree.

48. Do you have any comments on the areas of detail we propose should be included in each assessment strategy?

No.

49. To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Due to the nature of these qualifications and, in particular, considering that some qualifications need to assess a range of practical skills, the development on an assessment strategy to show compliance across all conditions may be more time-consuming and burdensome than for, for example, Functional Skills.

50. Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

No.

51. Do you have any comments on our proposed Performance Table Qualification QLCs requirements and guidance for Technical Awards?

No.

52. Are there any regulatory impacts that we have not identified arising from our proposals? If yes what are they and are there any additional steps we could take to minimise the regulatory impact of our proposals?

Awarding organisations will require a clear process to be documented and timescales set to ensure any redevelopment work required can be planned and resourced appropriately.

53. Is there any additional information associated with our proposals which we have not identified? Please provide estimated figures if related to costs or savings.

No.

54. Do you have any comments on the impact of our proposals on innovation by awarding organisations?

No.

55. Are there any potential impacts (positive or negative) on students who share protected characteristics that we have not identified?

None that we have identified.

56. Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on students who share a protected characteristic?

None that we have identified.

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

No.