

Consultation response

Moderation and verification of centre assessment judgements

Question 1: To what extent do you agree or disagree with our proposed approach to providing separate definitions for moderation and verification? Please provide any comments.

1. AQA agrees with Ofqual's proposal to have separate definitions for moderation and verification. They are two separate processes. The distinction between them has sometimes been a grey area, and AQA would welcome a clear, working definition.

Question 2: Do you have any comments on our proposed definitions for moderation and verification? Please provide any comments.

2. Overall, the proposed definitions are a slight improvement, but arguably a missed opportunity. For example, AQA has some reservations about the reference to the marking of assessments, as this might imply numerical marks will be assigned. In fact, in verification and occasionally in moderation, grades rather than marks are assigned. Rather than 'marking of assessments', 'assessment of learner work' might be more suitable.
3. AQA would like to see the definition of moderation make clear that it must be carried out for every centre in every series.
4. Rather than 'result', AQA would like to see 'outcome' used, given that in most instances moderated units contribute to an overall result, rather than constitute a result in their own right.
5. The definition for verification only becomes clear – particularly for lay readers – by reading the definitions alongside paragraphs 2.13 and 2.14 of the consultation document, which is problematic if they do not form part of the final definition or context.

Question 3: Are there any alternative approaches we should consider for regulating the controls between awarding organisations and centres that we have not set out? Please provide any suggested alternatives.

6. Where the same qualification, or a very similar qualification, is offered by several awarding organisations (eg A-levels and GCSEs), AQA would recommend that, for consistency and fairness, Ofqual ensure that adjustments to a centre's proposed marks or results are made - or not made - by following similar criteria; and that, for comparable sets of centre marks and moderator marks, the size of any adjustments made is also consistent.



7. AQA would recommend that, where the nature of the work allows, it is made clear that it can be submitted by post or electronically for verification, as this could reduce the frequency of visits.

Question 4: Do you have any comments on our proposed approach to determining which qualifications should be subject to moderation?

8. For an awarding organisation to have to provide a rationale for using verification in every individual instance where it wishes to do so would represent a disproportionate burden. We recommend that Ofqual, in consultation with the awarding organisations, identify classes of qualifications or units where verification would be more appropriate and develop criteria for using verification rather than moderation.
9. We agree that where there is an endorsement that is additional to the final subject grade, as in GCSE English Language, it may be appropriate for this to be verified and not moderated.

Question 5: Do you have any comments on the qualifications we have identified that should always be subject to moderation?

10. If assessments have already been developed, it may be difficult to switch to moderation if the intended approach was verification. If an assessment is by its nature criterion-referenced (such as when it determines whether the candidate can or cannot perform certain tasks), then it does not lend itself to a continuous, linear scale and again moderation will be difficult. An insistence on moderation, particularly in instances such as these, might limit the validity of assessments.

Question 6: To what extent do you agree or disagree that qualifications should be subject to stronger verification controls in the circumstances set out above? Please provide any comments.

11. AQA agrees with this proposal. 'Enhanced verification' could involve closer monitoring of the type described in paragraph 1.22 (and proposed in the third bullet point of paragraph 2.22). It need not always involve checking a centre's assessment judgements before results are issued (as in moderation), as doing so may not be feasible for some types of assessments.

Question 7: Are there any other circumstances in which an enhanced verification approach should be required? Please provide details of any additional circumstances.

12. AQA has not identified specific circumstances, but we note that flexibility in the use of enhanced verification might be required during the first few years of a new qualification and reformed modes of assessment for existing qualifications. In this regard, we are reassured by paragraph 2.26 of the consultation document, which makes clear that Ofqual "will consider the burden on a case by case basis", and recommend that this phrase be included in the final rules set by Ofqual.



Question 8: To what extent do you agree or disagree with our assessment of the additional burden imposed by requiring moderation for the qualifications we have identified? Please provide any comments.

13. AQA can only agree provided our response to Question 5, above, is taken into account.

Question 9: To what extent do you agree or disagree with our assessment of the burden imposed in relation to the qualifications that are subject to verification? Please provide any comments.

14. AQA agrees with this assessment, but in order to make it proportionate and manageable, we would recommend that, where the nature of the learners' work allows it to be submitted by post or electronically for verification, this could replace visits or reduce their frequency.

Question 10: Are there any other regulatory burdens which we have not identified in relation to these proposals? If so, how could these be mitigated or reduced?

15. None other than those AQA has identified in our other responses to this consultation.

Question 11: To what extent do you agree or disagree with the minimum requirements we propose for awarding organisations' controls with centres? Please provide any comments.

16. An unannounced verification visit could be problematic (for example, relevant staff might not be available and it might not be possible to see assessment in progress). A blanket rule of three visits per year seems disproportionate, particularly if additional checks (for example, remote verification of samples of learner evidence) are conducted. It is, moreover, unclear how an awarding organisation would know which other awarding organisations are used by the centre.

17. AQA would suggest replacing the word 'visit' with 'monitoring event' to encompass both visits and evidence submitted by post or electronically.

Question 12: Are there any additional controls that should be in place where third parties are involved in the delivery of qualifications on behalf of approved centres?

18. No.

Question 13: Are there any other requirements we should set? Please explain any additional requirements you have identified.

19. No.



Question 14: What do you anticipate the burden will be on awarding organisations and centres of requiring an awarding organisation to meet the minimum verification requirements relating to centre controls that we have set out?

20. AQA believes the burden for awarding organisations will include factors such as:

- i. Increased costs, which even awarding organisations with charitable status, and no shareholders to satisfy, will ultimately have to pass on to centres.
- ii. Recruitment challenges around finding suitably qualified verifiers that are not employed full time. This will place particular burdens on large-entry subjects, as well as on the continued sustainability of some small-entry, niche subjects.

21. In terms of centres, it increases stress to learners to have increased visits – both scheduled and unannounced. It may also not be appropriate timing to ensure the validity of any assessment made during a visit.

22. The scale involved in two centre visits plus one unannounced visit per year would be enormously burdensome. To take just one qualification, GCSE English Language: AQA is offering this in 4,199 centres in 2019. This would represent 12,597 visits in a single year to meet the minimum requirements in just one subject in one qualification.

Question 15: To what extent do you agree or disagree with our proposal to require an awarding organisation to set out its moderation and verification approach as part of a centre-assurance strategy? Please provide any comments.

23. There is a risk that documentation of this nature becomes a bureaucratic exercise which has little practical use or relevance. The flexibility outlined in paragraph 2.42 regarding the nature of the centre-assurance strategy is welcome. However, it is important to acknowledge that it is not possible to provide definitive procedures for all eventualities, because in some situations a professional judgement may need to be made about the most appropriate course of action or outcome.

Question 16: To what extent do you agree or disagree that the centre-assurance strategy an awarding organisation produces should meet the requirements we have set out? Please provide any comments.

24. As alluded to in our answer to Question 15 in this consultation, this would depend on how much detail is expected. For example, an awarding organisation could set out its general approach, but it would be a major undertaking to identify every situation which has occurred or might occur and the different approaches which were taken or would be taken in each case.

Question 17: Are there any other factors that our guidance should cover? Please explain any additional factors you have identified.

25. No.

Question 18: What do you anticipate the burden will be of requiring an awarding organisation to produce a centre-assurance strategy? Are there any ways we could minimise this burden?

26. Ofqual could minimise the burden by supplying a few exemplars, perhaps for qualifications which are no longer available in order to avoid commercial sensitivities. These exemplars would, ideally, be short, relevant, clearly set out under sub-headings and applicable to groups of qualifications rather than a single qualification. Awarding organisations would not then be left to guess at Ofqual's expectations, with the risk of unnecessarily producing far more detail than is required. This level of detail would ideally include a general approach, rather than a need to identify all possible occurrences.

Question 19: To what extent do you agree or disagree with our proposal to put in place guidance about the actions an awarding organisation should take where it discovers incorrect results have been issued for a qualification subject to verification? Please provide any comments as well as any other factors that we should include as part of this guidance.

27. It is not clear how wide-ranging the amended guidance will be. Presumably (like the existing guidance) it will relate to more than just verification. If, for example, an administrative error was discovered several months after a candidate's grade had been issued, it would be inappropriate to lower that grade. Similarly, it would be inappropriate to lower a grade if shortcomings in verification were identified several months after the grade had been issued. AQA hopes Ofqual will consider instances such as this.

Question 20: To what extent do you agree or disagree with our proposal to put in place a provision for an awarding organisation to revoke a certificate where it discovers it has been issued on the basis of an incorrect result? Please provide any comments.

28. Except in extreme circumstances, it would not seem appropriate or feasible to revoke a certificate if several months had elapsed. In more appropriate and feasible circumstances, AQA agrees that all reasonable steps should be taken to revoke a certificate.

Question 21: What do you think the impact will be, on awarding organisations or centres, of any requirement to capture and retain evidence of assessments for the purpose of correcting results following verification?

29. The impact on awarding organisations would be reduced if there were a retention period of no more than 12 months and the amount of evidence was not too great. There would, however, be an impact for centres – and this would need to be understood. For some qualifications, such as GCSE English Language, we run a three-year verification cycle – here, the impact could be considerable

Question 22: How would the proposed approach impact upon the reviews and appeals procedures currently in place at awarding organisations or centres?

30. There would be no impact on moderation, which is used by AQA for the majority of its internally assessed components and units. There might however be an impact on Tech Levels, where the internally assessed units use verification.



Question 23: Do you have any views on the timescale for implementing the approach set out in this consultation? Please provide any comments.

31. It might be difficult to produce centre-assurance strategies for all existing qualifications in order to be compliant by January 2021. There would be a particular problem if an awarding organisation's proposal (eg to use verification rather than moderation) was unacceptable to Ofqual. In this regard, we are again reassured by Ofqual's reference to flexibility we discuss in our response to Question 15.

Question 24: For awarding organisations: Do you agree that the average cost of a single centre visit is in the region of £280? If not, what figure would you consider to be more representative?

32. AQA has competition law concerns about sharing the exact figure, but we consider the cost of a visit to be slightly higher than this.

Question 25: For centres: Are you able to estimate current costs of visits?

33. N/A

Question 26: Would awarding organisations be likely to pass on a proportion of any incremental cost of these proposals to centres, in the form of increased centre fees?

34. While AQA with charitable status, and no shareholders to satisfy, will ultimately have to pass on to does not automatically pass on increased costs to centres, we do sometimes charge varying fee levels for different modes of moderation and verification. Music, dance and drama, for instance, entail a visit and this is reflected in the costs when compared to subjects for which moderation and verification can be done by post. Modern foreign languages have two sets of variable fees, which apply depending on whether a centre's moderation is done by visit or by post.

Question 27: What impacts might centres expect as a result of increased visits, including the requirement for unannounced visits, by awarding organisations?

35. A burden would be placed on centres which may be challenged to accommodate the number of visits required as part of this proposal. We know that ensuring current levels of visits are accommodated to schedule is already challenging. We would also consider whether attractiveness of the qualification would be affected if this was an additional consideration for centres to make when embarking on the specification delivery.

36. AQA would also once again like Ofqual to allow for 'monitoring event' to be used in its guidance and regulations, to allow for both visits and for evidence submitted by post or electronically.



Question 28: For awarding organisations: What cost would you anticipate the development of a centre-assurance strategy document for the relevant qualifications offered by your awarding organisation would be?

37. AQA is happy to discuss this further with Ofqual after further analysing the hours of staff time required and other costs.

Question 29: Do you have any views on how centre-assurance strategies should be implemented for existing qualifications? Please provide your views.

38. We would share any updated centre-assurance strategies using the existing channels available to us, namely CRM mailing, exams officer support and dedicated web pages.

Question 30: Are there any regulatory impacts that we have not identified arising from our proposals? Please identify any additional impacts.

39. AQA is not aware of any potential impacts other than those raised above.

Question 31: We have not identified any ways in which our proposals will prevent innovation by awarding organisations. Do you have any comments on this assessment? Please provide specific examples.

40. The determination that verification checks must take place at a visit does limit the creative ways in which the work can be shared.

Question 32: We have set out our view that our proposals would not impact (positively or negatively) on people who share a particular protected characteristic. Are there any potential impacts that we have not identified?

41. We believe this would be in line with JCQ arrangements, but the unannounced visits may have disproportionate impact on people with protected characteristics.

Question 33: Are there any additional steps we could take to mitigate any negative impact you have identified would result from our proposals, on people who share a protected characteristic?

42. AQA recommends not requiring too many unannounced visits.

Question 34: Do you have any other comments on the impacts of our proposals on people who share a protected characteristic?

43. No.