

Consultation response

The assessment and awarding of Vocational, Technical and other General Qualifications in 2020 to 2021
August 2020

Question 1: To what extent do you agree or disagree with our proposed approach to mitigating the longer-term impacts of the pandemic in 2020/21 by permitting awarding organisations to adapt assessments and qualifications?

Agree

Question 2: To what extent do you agree or disagree with our proposed approach to take an objectives-based approach, supported by additional guidance to develop consistent approaches, rather than prescribing a single approach to adaptation?

Agree

Question 3: Do you have any comments on the objectives we have proposed to underpin awarding organisations' decisions about the adaptation of assessments and qualifications?

Only comment, not for Ofqual, is that in relation to objective (g) AQA is not exploiting the modular arrangements for L1/L2 Tech Award in Performing Arts, as it is not proposed to offer an exceptional winter opportunity. So perhaps we need to take care with our answer to this question.

We would welcome further guidance to ensure they are applied as intended, particularly on what manageability looks like in practice.

We are mindful that any adaptations in non-GQ may have synergies with those in GQ with focus in particular required on any specialised equipment, group activity, workplace engagement and health and safety considerations.

We agree that a set of principles underpinning the process will help support a consistent and objective approach. We appreciate that given the nuances across the diverse range of VTQ qualifications, it will not be possible to be prescriptive. However, we do feel it essential that any objectives are clearly understood across all AOs and that any guidance provided has tangible exemplars upon which we can base our adaptation.

Question 4: Do you have any comments on our plans to develop and consult on additional statutory guidance and on any changes to the Extended ERF later in August, to support the interpretation and implementation of these objectives?

The ERF needs to ensure appropriate coverage of new ways of working, given CAGs won't be a feature of 2021 outcomes. An end-of-August date to consult on the additional guidance feels late in the day, ie we will need to be in a position to finalise our recommended approaches prior to September, particularly for a January 2021 series.

Question 5: Do you have any comments on the issues we should consider in any guidance we develop around Special Consideration?

Special consideration usually should not be allowed for whole cohorts in the case that a whole cohort or group of learners has not been able to complete the assessment. Current policies ensure individual learners who have been affected, eg by a death in the family, personal illness and missed school can have estimated grades. Whilst we believe this principle still stands, there are complications around how feasible this is, in the light of continued impact from COVID and potential lockdowns at a local level. It is important that there is clarity for the centres and for AOs in considering how to manage requests. Allowing it due to 'factors outside their control' will need to be worked through at a detailed level, and there will certainly be a need to ensure guidance specifically focusses on the impact of local lockdown, which could be considered 'outside of their control'. Guidance and the corresponding approach here will also need to support those who were not able to be in centre or have access to the specialised equipment to complete the IA and/or EA aspects of their assessment.

For individual candidates affected by specific events caused by the pandemic, special consideration will be appropriate in the usual way. However, it may not be an appropriate method for all cases. Special consideration is a percentage adjustment which goes some way to compensate a candidate for the impact of an event on their overall performance. Alternatively, providing that some of the assessment has been completed, a calculation is made for a missed component. However, special consideration is not given for teaching difficulties which might include not being able to access facilities, or if no assessment components have been completed because the impact of these is likely to be more complex and would need the involvement of subject specialists to analyse. A solution may include analysing alternative evidence or a change to the mark scheme. This process would be considered a marking solution and not special consideration.

Depending on the submission date(s), which is likely to be May, a centre will have effectively six to seven months to complete non-examination assessment components. There will of course be exceptional circumstances and for such cases we would encourage a centre to request an extension to the deadline to enable completion.

Question 6: To what extent do you agree or disagree with our proposed approach to qualifications taken internationally?

Neither agree nor disagree

Question 7: To what extent do you agree or disagree with our proposed approach to certification?

Agree

Question 8: To what extent do you agree or disagree with our proposed approach to appeals in 2020/21?

Neither agree nor disagree

Question 9: To what extent do you agree or disagree with our proposed approach to record keeping and regulatory oversight?

Neither agree nor disagree

Question 10: To what extent do you agree or disagree with our proposal to develop the Extended ERF to take account of our proposed approach for 2020/21?

Agree but...

Agree

Question 11: Do you have any comments on the new conditions, requirements and guidance for 2020/21 set out in the Extended ERF?

Agree that certification, ie the issuing of results, needs to endeavour to resemble 'normal' arrangements. Issuing any certificates on the basis of an ERF would potentially suggest the qualifications are 'exceptional', when the aspiration is to ensure assessment continues, following the same principles and need for validity as in a normal series.

We would need to understand more whether the use of term appeals in 20/21 relates to a post-results service in the usual way (ie appealing after a remark / moderation) or whether 2021 will still see appeals only being on the grounds of error by AO or by centre.

We concur that some form of mechanism for recording and monitoring mitigations is needed, but seek further guidance. What would the conditions be that would lead Ofqual to request the document? What can we expect from Ofqual if they do request the document? Will they come back to us with their view on it? If so, in what kind of timescales and with what kind of expectations?

We agree that ERF needs to be developed to reflect the approach that will be in place for 2020 to 2021. There is a risk of some confusion, in the case where AOs have a mixture of adapted qualifications (which will sit under the ERF) and non-adapted qualifications (ERF / GCOR).

We would – however – question the ease with which we can deliver Principle 5, which requires AOs to be consistent across similar types of qualifications. Given the timeframes, it feels wholly unrealistic to expect AQA to have the opportunity or bandwidth to recommend, agree and work collaboratively with our plans. It feels to me like the majority of AOs will be working independently of each other. I would add that during the Ofqual meeting of 7 October, there was clearly some joined up thinking being presented by OCR and Pearson so AQA should consider its position to recommend and own our decisions quickly, as well as getting a suitable level of clarity on what the other larger AOs (with VTQs that follow a GQ model) are proposing.

Question 12: Are there other potential positive or negative equality impacts that we have not explored? If yes, what are they?

There is an expectation that the centres will need to mitigate disruption within their own practices and approaches to teaching and learning provision for 2020 to 21. There will still remain some challenge in ensuring any meaningful online teaching provision, particularly in the case where a local lockdown requires some immediate response. Our adaptations are

likely to be based on current provision and, by nature, may fall short of the wide range of online teaching and assessment needed.

Question 13: Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

The adaptations we make can only go some way to mitigate negative impacts on groups of learners. We however need to balance any adaptations with the need to ensure the qualification remains valid. Ofqual were keen to explore at VTQ Ob the extent to which AOs could 'prescribe' the order in which centres teach content from September. There was general agreement from AOs that Year 1 and Year 2 learners will complete materials at differing times and it would not be possible to mitigate easily in the event some content cannot be completed.

After initial discussions, involving stakeholder input, the JCQ Special Requirements Committee have provided additional guidance for June 2021 and have made some changes to the provision and processing of Reasonable Adjustments to mitigate the potential negative impacts on particular groups of learners (publication due August 2020). This includes remote assessment of learners, extending the deadline for applications and additional support for FE colleges. We welcome further discussions and we move forward.

Question 14: Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are not identified in this consultation? If yes, what are they?

No comments additional to what is set out elsewhere in our response.

Question 15: What additional costs do you expect you will incur through implementing our proposals? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

There will be operational impact based on adaptations put forwards. Likely cost savings may occur around movement to online standardisation (no face to face) and removal of associated travel and expense costs. Postal verification (if approved) across all subjects will remove travel and overnight accommodation costs. The reduction in direct costs however will be offset potentially by any reprinting and rework required on examination papers and materials for 2021 already in train.

Question 16: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

None