

Ofqual consultation on arrangements for the assessment and awarding of vocational, technical and other general qualifications in 2020-2021

Response of the Association of School and College Leaders

A. Introduction

The Association of School and College Leaders (ASCL) represents over 20,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary and further education and skills phases. The association is, therefore, in a strong position to consider the issue of arrangements for assessment and awarding of qualifications in 2020-2021 from the viewpoint of the leaders of schools and colleges of all types.

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?

We agree.

We agree with Ofqual's consideration of the potential for reducing the unnecessary assessment burden and for reducing the risks around making reductions in the content of qualifications which could undermine their validity and reliability.

We also agree with the need for flexibility of assessments, the need for manageable changes, the need to mitigate disruption to teaching, learning and assessment, the move away from the calculation of results used in the summer 2020 assessments and the need to ensure assessment leads to qualifications which are valid and reliable.

However, we have some concerns that the approach proposed for 2020-2021, which will allow Awarding bodies to make tailored decisions about what to do with their qualifications, albeit under statutory regulations. We believe this may impact on some of the complex assessments which are about practical competence and are part of the complex landscape of vocational and technical qualifications. A one size fits all model is, quite rightly, not necessarily the best approach for all VTQs in 2020-21, but there is a

risk of inconsistency in the proposed approach, which the arrangements, nonetheless, recognise. Such risk should be mitigated given the uncertainty of the Covid virus impact in 2020-21.

Whilst most Awarding bodies have been able to successfully adapt their assessments in the summer 2020, some have been more accommodating to learners and centres than others. We are aware of some problems in the summer 2020, for example, raised by our members, where social distancing has not been possible, where assessment is needed on demand and where Awarding bodies have responded differently to the collection of evidence for some VTQ qualifications.

There may not be the need for calculated grades or delayed assessment in 2020-21 but VTQs will need to be flexibly assessed depending on the continuing changes to teaching and learning over the year.

Learners and teachers may also be working both online and face to face and need preparation for the proposed changes in 2020-21. Invigilation may also need to be different. Training will be needed here too. Work experience may also need to change in 2020-21 and so assessment for some qualifications will need very careful consideration.

All this change suggests that we need Awarding bodies to be working as closely with centres as possible to understand local situations, including the impact of local lockdown.

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

The VTQ landscape is complex so the objectives-based approach is a sensible way of dealing with the issues faced in managing assessments in 2020-21. However, it is important that Awarding bodies interpret the objectives in the same way and are in tune with Government guidance.

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?

Please see above in our answer to questions 1 and 2.

Learners taking VTQs in 2020-21 should receive fair results, standards must be maintained and adaptations to assessments should not undermine the validity and reliability of the qualifications. However, these are unusual times and teaching and learning has been significantly disrupted for some teachers and learners so it is important that Awarding bodies are mindful of the range of situations which may impact on outcomes during the year.

We **agree** that all of these objectives are the right ones to take in developing guidance on adaptations to assessments and qualifications in 2020-21 and we welcome the intention of Ofqual and Awarding bodies to work with centres and representatives groups such as ASCL.

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?

We **agree** that it is important to consult on the statutory guidance and any changes to the extended ERF.

It is also very important to have clear information about assessments at the start of the academic year so teachers and learners know what is required of them.

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

YES

The important thing to consider in any guidance is that all students and all centres have been disadvantaged by Covid-19. On top of this, disadvantaged students have been further disadvantaged by the compulsory closure of schools and colleges. We should not forget that any changes will impact on the whole cohort of students forever, so mitigation for changes in local and national situations may be needed throughout the year.

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

Agree

Qualifications taken internationally may need to be adapted by awarding organisations for the international market. However, it is very important that the validity of qualifications and risks around malpractice, which may occur, are taken into consideration and addressed immediately.

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

Agree

The proposed approach to certification seems practical, although the proposal is rather vaguely worded and could be misunderstood. Awarding bodies already have the flexibility to manage the reissue and collection of certificates.

These processes must be acceptable following appeals.

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

Agree

Appeals should be by exception. The reason for an appeal, i.e. if the process was not followed correctly by an Awarding body, is a fair and consistent approach. We also agree that the appeals process needs to accommodate situations where Awarding organisations have delivered adapted assessments.

Adapted results must be perceived to be, and actually be, reliable.

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

Agree

It is very important that Awarding organisations are required to maintain records of their decisions. There must be a high degree of trust in the decisions of Awarding organisations.

There may be a need for mitigation and to ensure consistency between Awarding bodies.

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.

We agree that the proposed approach to assessment of VTQs in 2020-21, requires an extended ERF as any adaptations undertaken by Awarding organisations must only be undertaken if they are necessary.

However, again, mitigation may be necessary if a local or the national situation changes during the year.

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

YES

In terms of the extended regulatory framework (ERF), published in May 2020, and the adaptations permitted in the current framework, we believe that the proposed second version of the ERF, the extended version, is important as we would not want Awarding organisations making adaptations to assessments which are not necessary.

Ofqual must have appropriate oversight of all Awarding body decisions regarding adaptations to assessments and these need to be transparent to centres and to learners.

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

YES.

See also answers to questions 13 and 14.

Learners with SEND and disadvantaged young people are amongst those most impacted by the Covid crisis. This has equality impacts which need to be mitigated by positive discrimination.

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

YES

As stated in response to question 14, the changes may have a negative impact on learners with SEND and those who are disadvantaged, who are amongst those most impacted by the Covid crisis.

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?

YES

In terms of regulatory impacts, cost or benefits associated with the proposals which are not identified, we would highlight the fact that little attention appears to have been given to the impact on learners with SEND and those who are disadvantaged. These learners are much more likely to undertake VTQs than academic qualifications.

Adaptation to assessment is likely to have cost implications with extra costs for training, resources and staff.

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 are a wide range of additional costs for centres in implementing the changes. Some associated with social distancing have already been identified and other costs associated with staff training in the changes and remote with invigilation are yet to be quantified.

It is unlikely that centres will save on any costs as 2020-21. Centres already have both autumn resits and summer 2021 assessments to consider in 2020-21, alongside the cost of social distancing measures.

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

The consultation does not really give attention to what we regard as the most serious issue, namely how to mitigate against the ongoing but unknown impact of Covid-19 through the remainder of 2020 and throughout 2021.

Conclusion

We are grateful for the opportunity to contribute to this consultation.

We hope that this response is of value to the process. ASCL is willing to be further consulted and to assist in any way that it can.

Duncan Baldwin, Deputy Director of Policy, ASCL

Anne Murdoch, Senior Advisor, College Leadership, ASCL