Ofqual consultation on regulating performance table qualifications

Response of the Association of School and College Leaders

A. Introduction

1   The Association of School and College Leaders (ASCL) represents over 19,000 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 phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.

2   ASCL welcomes this consultation by Ofqual and the opportunity to respond. We appreciate the additional support offered by Ofqual to assist with the technicalities of this consultation and, in particular, the production of a synopsis of the consultation issues which makes it much easier for stakeholders outside the awarding organisations to engage. In this response we have addressed the thematic issues addressed by that Ofqual synopsis.

B. General considerations

3   School leaders greatly value being able to offer a broad range of technical qualifications to pupils at Key Stage 4, beyond just GCSEs. The DfE's research into the impact these types of qualifications can have with learners was published in its ad-hoc notice in March 2019. The findings in this research echo the views of school leaders – that pupils taking these qualifications demonstrate greater engagement, better attendance and improved behaviour as a result.

4   In recent years, starting particularly with the Wolf review in 2014, there has been considerable change to the nature, range and quantity of technical awards available to schools which have counted in performance measures. We believe that these qualifications are still potentially vulnerable to changes in the political climate, despite the evidence of their efficacy with learners cited earlier. For this reason we welcome Ofqual's intention to be more closely involved in their regulation. We believe that this will give politicians increased confidence in the rigour of the technical awards overall and hence it will be more likely that these types of qualifications will continue to remain part of the portfolio available to schools and students.

5   We see two further benefits of Ofqual's closer regulation of technical awards. Schools have complained bitterly and understandably about the frequent late publication of the list of qualifications which count in performance tables. At times this list has been published as late as the term when first teaching begins. This causes significant problems for schools, particularly when qualifications they have planned to teach end up being withdrawn. We believe tighter regulation should mean that the DfE's

confidence in new qualifications should increase and hence timescales become more appropriate and helpful for schools.

6   A second benefit would be the opportunity to improve the relative severity of grading across technical qualifications offered by different awarding organisations.

Research undertaken by FFT shows, for example, that the ICT Level 2 national qualification offered by OCR is around half a grade 'harder' when compared to students' average grade for English and mathematics, whereas Pearson's equivalent BTEC in ICT is around half a grade 'easier'.

We believe this is inappropriate, threatens to undermine fair competition between awarding organisations and needs to be addressed so that the qualifications landscape becomes more neutral, particularly given that schools are held to account largely via progress. We accept that these qualifications are different in nature from GCSEs but nevertheless there is a stark overall mismatch in relative difficulty.

C. Responses to specific questions

7   **Assessment strategies** (3.1-3.6)

We agree with the general purposes proposed in this section. In particular we agree with point (b), 'preparing learners for further study', as this supports our belief that applied general qualifications should continue to be an integral part of the post-16 landscape.

8   **Qualification design** (3.8 - 3.18)

The criteria for qualification design in this section seem appropriate and align with the equivalent requirements for GCSE. We believe there is merit in the qualifications covering both Level 1 and Level 2, with compensatory arrangement in place if candidates fell short of a Level 2 pass. This may be a good opportunity to reconsider the grading structure which is confusing; similar grade names are used at both Level 1 and 2.

9   **Assessment** (3.20 – 3.33)

The proposals for the required weightings of assessment are helpful, as is the proposal to allow awarding organisations to apply for exemption from a particular proportion requirement in the qualification. However, we would urge Ofqual to set parameters to ensure that qualifications of this nature continued to be viewed with rigour. We agree that removing any form of external assessment is likely to put the qualification in jeopardy when being considered for inclusion in performance tables by the DfE; nevertheless the nature of the subject should reflect overall weight of assessment types.

We agree with the proposal to make two sets of dates available for external assessment. We believe this supports learners very well and allows centres to take a flexible approach to curriculum planning.

10   **Non-exam assessment** (3.48 – 3.66)

ASCL supports Ofqual's proposal to allow a range of methods for external assessment. This is necessary to support the wide range of qualifications and their

differing natures. However, it is important to consider the implications for centres regarding workload when these assessments are moderated.

There is value in the proposal to ensure that non-exam assessments are mark-based. This would be necessary to provide sufficient granularity, particularly if there are long-term plans to change grading of these types of qualifications to align with GCSEs on a 9-1 scale.

The proposal to limit the submission of non-exam assessments to two windows is sensible, so long as this is consistent with the proposal to have two opportunities for external assessment.

11 **Setting specified levels of attainment** (3.72 – 3.96)

We disagree with the proposal not to impose a common grading scale. We believe this will undermine the status of technical awards within performance tables. There are already concerns associated with the grading and points allocated to technical awards; having a consistent model will assist with any work that Ofqual may wish to pursue regarding the alignment of grading across different awarding organisations, and between qualifications.

ASCL strongly supports Ofqual's view that there should be a presumption that qualifications are compensatory in nature, which in turn supports the case to use marks.

We fully support the proposal that awarding organisations should not publish specified levels of attainment in advance. The fallout from this summer when Pearson made this naïve mistake is sufficient reason alone to justify this.

We believe that the proposal set out in sections 3.90 to 3.96 to allow awarding organisations to determine their own approaches is too limited. It fails to address a key weakness in the oversight of these qualifications. As cited earlier, a risk to the integrity of technical awards is the difference in relative grading between awarding organisations for similar qualifications. We would strongly urge Ofqual to reconsider this proposal.

12 **Other requirements** (3.99 – 3.103)

We agree with the proposed requirement on data collection. This supports our view that data derived from similar qualifications across boards is essential for the investigation of the consistency of awarding.

We would like the proposals around withdrawal of qualifications to ensure that centres are given sufficient notice and, where possible, similar alternatives are highlighted to centres.

13 **Potential additional requirements** (3.112 – 3.115)

We agree with the broad intention to align reviews of marking, moderation and appeals with similar processes for GCSE qualifications. On the issue of branding, we believe that the general label of 'technical award' may not capture the spirit of breadth which is inherent in these qualifications. We believe the word 'vocational' is a more meaningful description.

D. Conclusion

14   I hope that this is of value to your call for evidence. ASCL is willing to be further consulted and to assist in any way that it can.

Duncan Baldwin

Deputy Director of Policy
Association of School and College Leaders

2 December 2019