

## **Department for Education and Ofqual consultation on alternative arrangements for the award of VTQs and other general qualifications in 2021**

### **Response of the Association of School and College Leaders**

*January 2021*

#### **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. 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.

ASCL welcomes the opportunity to contribute to this consultation. We have consulted widely with our members and provide the response below on their behalf.

#### **B. Key points**

ASCL believes the following key points must guide the alternative arrangements for exams and assessments for VTQs and other general qualifications in 2021:

1. Fairness for all
2. Consistency of approach between awarding organisations
3. An open and transparent appeals system

In addition, we believe strongly that the final outcome of the consultation must be delivered in a timely manner and with very clear guidance about the way forward for assessment and certification in 2021.

#### **C. Responses to specific questions**

##### ***Proposed qualifications in scope for alternative arrangements in 2021***

1. Are there any other written exams due to take place from April onwards this academic year, that should be in scope and therefore not go ahead? The actual programmes in scope for these alternative arrangements needs to be clear so that Awarding organisations ensure all programmes are included appropriately.

**We believe EPQs are in scope, but this is not made entirely clear in the consultation and needs clarification.**

2. Do you agree that written exams for other general qualifications that are not GCSEs, AS or A levels due to take place from April onwards this academic year, should be subject to alternative arrangements similar to that taken for GCSEs, AS and A levels, as addressed in part B of this consultation?

**Agree. There must be consistency of approach between all similar qualifications included in the alternative arrangements, in the adaptations used and between awarding organisations.**

3. Do you agree assessments for Functional Skills qualifications should be permitted to go ahead where they can be delivered in line with public health measures, including remotely, from April onwards, and otherwise be awarded through alternative arrangements set by Ofqual?

**Agree. However, there should be parity of approach between English and maths GCSEs and Functional Skills. There should also be a recognition that not all learners find online assessment suitable. The arrangements must be clear and take account of individual characteristics.**

#### ***T Levels – core component assessment***

4. Do you agree that T Level core component exams should not go ahead this summer and should be taken in the second year, but that students should still have the option to take the employer-set project?

**Agree. However, T Levels involve a large number of assessments and it is important that students can continue to complete assessments as and when possible. There should not be a situation where all exams and assessments are delayed until the second year. T Levels differ and it is important for all providers and students that approaches used are timely and consistent.**

#### ***Proposed qualifications not in scope of alternative awarding arrangements***

5a. Do you agree that practical exams required for employment and apprenticeships should continue to go ahead throughout the academic year, where they can be delivered in line with public health measures, or otherwise will need to be delayed?

**Agree. However, in line with public health arrangements, students need access to facilities and resources to prepare for practical exams. This needs additional time and teaching input in many cases, which will need to be funded.**

5b. If you do not agree, which practical, occupational competence exams do you think should not go ahead?

**N/A. However, we believe practical exams related to occupational competence and employment should not be cancelled, if possible.**

### ***Level 4 and 5 qualifications***

6. What, if any, important differences of approach do you think need to be taken to exams for Ofqual-regulated L4 and L5 quals?

**Where possible, the same approaches should be used as for those with Level 3 and below.**

7. Are there any qualifications in scope of alternative awarding arrangements where a form of teacher assessment is not appropriate?

**License to practice courses do not always have internal assessments.**

8. Do you agree that internal assessment should continue, where relevant, for all students and other learners where possible?

**Agree. Internal assessment is a good indicator of progress and can take account of motivation.**

### ***Qualifications not in scope of this consultation***

**We agree with the sentiments included in the consultation about equalities considerations, characteristics of the VTQ cohort, the impacts on individuals with protected characteristics and the impacts on VTQ students as compared to students taking GCSEs, AS and A levels.**

9. Do you agree with the impacts we have identified and are there any other impacts, including equalities impacts, of the policy set out in Part A that should be considered?

**Agree. This consultation recognises that the types of learner taking these qualifications may come from disadvantaged backgrounds; they are more likely to be older, include learners with SEND and may come from BAME backgrounds. However, this is not always the case and the consultation should refrain from stereotyping. Students on these courses have, however, been doubly disadvantaged as they have not had access to practical activities onsite for large parts of their programme.**

### ***Alternative regulatory arrangements***

10. To what extent do you agree/disagree that the alternative regulatory arrangements should only apply to the qualifications identified in Part A of this document?

**Neither agree or disagree. Until the full list of qualifications is published, it is not possible to answer this question fully.**

### ***Learners in scope of the alternative regulatory arrangements***

11. To what extent, do you agree/disagree that the alternative regulatory arrangements should apply to all learners expecting to sit exams or assessments in the academic year 2020/2021 for the qualifications identified as in scope in Part A of this consultation?

**Agree. The application of the alternative regulatory arrangements must be consistent with GCSE and A levels and fairly applied.**

12. Should other general qualifications such as Pre-U, AEA, Core maths and the International Baccalaureate be included under the measures proposed for GCSEs, AS and A levels or under the alternative arrangements for awarding VTQs we propose to put in place?

**The Pre-U, AEA, Core Maths and IB should be applied under the VTQ alternative arrangements as these arrangements most reflect the nature of assessment on this type of qualification. Where general qualifications are more similar in assessment to GCSEs and A-levels, these should be covered under those arrangements.**

### ***January exams***

13. For learners expecting to sit assessments in January, are there any particular factors that would need to be taken into account in the development of the alternative regulatory arrangements to seek to ensure fairness?

**Yes. Some will have taken exams in January and some not, depending on their circumstances and centre. Alternative arrangements must be fair whilst replicating as closely as possible the content of the exams taken by some learners in January.**

### ***Assessment by exam***

14. Do you have any comments on how exams could be defined for qualifications in scope of the alternative regulatory arrangements?

**Yes. Exams must be defined as exams, and assessments as assessments, whether internal or external. It is important that qualifications reflect the assessments taken this year. Certification must reflect that the individual has met a particular standard through completion of relevant tasks, as this certification will stay with them throughout their career.**

15. To what extent do you agree/disagree with our proposal to permit awarding organisations to make awards when not all internal assessments have been completed in qualifications in scope of the new regulatory arrangements?

**Agree. Individual learners have been differently impacted by Covid. For those most impacted by not being able to access all internally assessed learning, alternatives to that assessment must be found.**

### ***A principles-based approach***

16. Do you have any comments on what should be the guiding principles for awarding organisations for the award of qualifications where exams do not take place and/or where learners cannot complete all internal assessments?

**Yes, with the guiding principles of the ERF.**

**The guiding principles for all awarding bodies, which we set out in the introduction to this response, must be fairness for all, consistency of approach and an open and transparent appeals system.**

17. Do you have any comments on how Principle 2 might apply for in scope qualifications in light of the new approach to assessment proposed for GCSEs, AS and A levels?

**We agree that Principle 2 is correct in that adaptations made should not advantage or disadvantage any learners. Evidence which counts towards certifications should be the same for all similar qualifications covered in this consultation.**

18. Do you have any comments on whether Principle 4 is still appropriate for in scope qualifications, awarded where exams do not take place and/or all internal assessments cannot be completed?

**We agree with Principle 4 that standards must be maintained in line with previous years, although we believe that not all trends from all providers are relevant in 2021 and previous year trends should reflect 2017-2018, 2018-19 and 2019-20.**

***Arrangements for awarding qualifications where exams do not take place and/or learners cannot complete all internal assessments***

19. Do you have any comments on our proposed approach to arrangements for awarding in scope qualifications where exams do not take place and/or learners are unable to complete all internal assessments?

**Where there is insufficient evidence because of disrupted learning to certificate, learners must be able to retake that learning and that learning must be funded.**

***Learner eligibility***

20. Do you have any comments on the arrangements that should be put in place to authenticate the eligibility of candidates or claims for the award of in scope qualifications?

**Yes. We propose that evidence should be collected from all forms of communication to demonstrate learning, including a portfolio of evidence. Adaptations should be used in all cases where missed learning has impacted on potential to be assessed. Awarding bodies must be clear and consistent in their messaging in order to maintain standards and details of what arrangements are possible.**

***Guidance to teachers and learners***

21. Do you have any comments on the guidance that should be put in place to support teachers and learners to implement the new arrangements?

**Guidance must be clear and transparent and presented in a variety of formats. Adaptations, alternative arrangements for assessments and special considerations to reflect the special circumstances of 2020-21 must be absolutely clear to all concerned.**

***Special Consideration***

22. To what extent do you agree/disagree with our proposed approach to Special Consideration?

**Agree**

### ***Appeals***

23. To what extent do you agree/disagree that we should supplement General Condition I1 with additional guidance around appeals for qualifications in scope?

**Neither agree nor disagree. This condition needs further consideration. The appeals process in 2020 was complex and misunderstood by many learners and parents. It became a burden to many centres. This must be avoided in 2021.**

### ***Certificates***

24. To what extent do you agree/disagree with our approach to certification for qualifications in scope?

**Agree where there is sufficient evidence to gain certification. Where there is insufficient evidence, information needs to be made clear to all concerned, including what more the learner needs to do to gain certification.**

### ***Private candidates/learners***

25. To what extent do you agree/disagree with our proposed approach for private candidates/learners?

**Agree where the candidate has sufficient evidence to achieve certification.**

### ***Qualifications also taken internationally***

26. To what extent do you agree/disagree with our approach to awarding for qualifications in scope which are also taken internationally?

**Agree. These are reasonable approaches to take.**

### ***Regulatory oversight***

27. To what extent do you agree/disagree with our approach to regulatory oversight and record keeping?

**Agree. However, it would make sense for all awarding bodies to use the same systems this year to avoid confusion and burdensome duplication for centres.**

### ***Equalities Impact Assessment***

28. Are there other potential positive or negative equality impacts which we have not explored? If yes, what are they?

**Yes. As mentioned earlier, learners taking VTQS and other general qualifications may have special characteristics which mean they could not attend practical subjects and**

**have missed learning. In addition, they may need access to practical resources to complete.**

29. Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

**Yes. Centres should be able to request special considerations but these may need to be funded when extra costs are incurred.**

30. Are there any regulatory impact, costs or benefits associated with the implementation of our proposals that are not identified in the consultation ?

**Yes. The cost to centres of public health measures, adaptations, additional evidence gathering, deal with special circumstances, marking, training of staff, dealing with enquiries and appeals all have a cost attached.**

31. Are there any regulatory impact, costs or benefits associated with the implementation of our proposals that are specific to teachers not identified in the consultation?

**Yes. Additional workload associated with regulations and costs of implementing the proposals including administration and training.**

32. What additional costs do you expect you will incur through implementation of our proposals?

**Additional public health measures associated with adaptations; overtime claims; some additional equipment; more access to IT for some students; staff time to help students to catch up.**

33. Are there any additional and alternative approaches we could take to minimise the regulatory impact of our proposals?

**Yes. Clear and concise information about approaches to adaptations; avoiding disadvantaging any learners; training for centre staff.**

## **D. 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.

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