

Consultation on the terms of reference for EPRS in summer 2021

Response of the Association of School and College Leaders

A. Introduction

The Association of School and College Leaders (ASCL) represents over 21,500 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.

ASCL welcomes the opportunity to contribute to this consultation.

B. Key points in answer to questions

Question 1: To what extent do you agree or disagree with our proposal that AEA qualifications awarded in summer 2021 should be in scope for the EPRS?

Agree. AEA qualifications have been included in the GQAA framework in summer 2021 and should therefore be in scope and part of the EPRS.

Question 2: To what extent do you agree or disagree with our proposal that for summer 2021 EPRS should consider only those qualifications awarded under the GQAA framework?

Disagree. All qualifications, including those issued under the VTQ framework, should be included so that all learners are treated consistently by awarding organisations.

Question 3: To what extent do you agree or disagree with our proposal for the GQ qualifications awarded in summer 2021, EPES should consider:

- a. Whether the awarding organisation followed its own process to issue the learner's results?**

Agree. This is an important principle when considering appeals. The AO should take into account whether or not it has followed its own process to issue results.

- b. Whether that process was capable of securing compliance with GQAA conditions – issuing the results which reflected the TAG submitted by the Centre (GQAA3.2(a)(i) or the awarding organisations decision to issue a corrected result following a review or an appeal (GQAA4.10)?**

Agree. Again, this is an important principle this year when considering appeals. The AO should take into account whether the process was capable of securing compliance with the conditions.

- c. Whether the awarding organisation followed its own process to consider an appeal on the basis that the awarding organisation made an administrative error in connection with the learner's results?**

Agree. As above, this is an important principle which should be adhered to. The AO should take account of whether or not it has followed its own process.

- d. Whether the process was capable of securing the outcome required by condition GQAA 4.1 (b)(ii)?**

Agree. An AO should take account of whether the process was capable of securing the outcome required and, if an administrative error occurred, taking this into account.

Question 4: To what extent do you agree or disagree with our proposal that for GQ qualifications, awarded in summer 2021, EPRS should consider:

- a. Whether the awarding organisation followed its procedure properly and consistently in the management of an appeal on procedural grounds?**

Strongly agree. The EPRS must have considered that procedure was followed properly.

- b. Whether the process was capable of securing outcomes required by condition GQAA 4.1 (b)(i)?**

Agree. The EPRS must be capable of securing outcomes required.

- c. Whether that process was capable of securing the outcomes required by condition GQAA4.1(b)(i)**

Agree. The EPRS must be capable of securing outcomes required.

Question 5: To what extent do you agree or disagree with our proposal that for GQ qualifications awarded in summer 2021, EPRS should consider:

- a. Whether the awarding organisation followed its procedure properly and consistently in the management of an appeal on the grounds of unreasonable academic judgement**

Agree. AOs must have followed procedures properly in appeals on the grounds of unreasonable academic judgement.

- b. Whether that process was capable of securing the outcomes required by Condition GQAA4.1(b)(ii)?**

Agree. AOs must consider whether the process was capable of securing the required outcomes.

Question 6: To what extent do you agree or disagree with our proposal that for GQ qualifications awarded in summer 2021, EPRS should consider:

- a. **Whether the awarding organisation followed its procedure properly and consistently in deciding whether to correct an incorrect result which it discovered through the reviews and appeals process?**

Agree. The EPRS should ensure AOs follow correct procedure in correcting incorrect results.

- b. **Whether that process was capable of securing the outcome required by Condition GQAA4.10?**

Agree. The EPRS should ensure the process used secures the required outcome.

Question 7: To what extent do you agree or disagree with our proposal that in summer 2021 EPRS should accept applications from learners as well as from Centres?

Neither agree nor disagree. Agree, where the Centre does not know the candidate or their history of assessments, such as with private candidates. Otherwise, applications should be from Centres only.

Question 8: Do you consider that there are any equalities impacts arising from our proposed temporary changes to the Terms of Reference for EPRS which we have not otherwise identified?

No, not to the terms of reference involving the GQAA framework. However, we feel that the VTQ framework and appeals process should use the same principles.

We are unsure whether the proposed EPRS will impact unfairly on private candidates, and suggest this point is given further consideration.

Question 9: Do you consider there are any regulatory impacts arising from our proposed temporary changes to the Terms of reference for EPRS which we have not otherwise identified?

No.

C. Conclusion

We hope that this response is of value to your consultation. ASCL is willing to be further consulted and to assist in any way that we can.

Dr Anne Murdoch
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