

## **Consultation on the detail of the new contingency regulatory framework for VTQs in 2021 – the VCRF technical assessment**

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

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 21,000 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.
2. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. Responses to consultation questions**

##### **Question 1: Do you have any comments on our proposed overall approach to the determination of results in the VCRF?**

3. Yes. The approach is appropriate given the range of VTQ qualifications.
4. It is also important that consideration is given to looking at what should happen in the following year and setting out the principles of the likely approach to be used in 2021-22.
5. The point we have made previously in all our VTQ consultation responses is that it is important to be consistent in approach across all types of VTQ courses and year groups when focussing on VTQ qualifications.

##### **Question 2: To what extent do you agree or disagree with our proposal that we should bring the ERF and Extended ERF to a close?**

6. We agree. It makes sense to bring to a close, as soon as practically possible, both the ERF and extended ERF and to use one consistent approach going forward.

##### **Question 3: Do you have any comments on the two proposed categories of qualifications within the VCRF?**

7. Yes. The two categories of qualification are helpful. It is important to have agreement about the categories of qualification to help stakeholders understand the difference between them. It is also important that awarding bodies have the same arrangements in place to ensure parity of approach. There should be a transparent process agreed by all awarding bodies.
8. The current disparity of approach between GCSEs and Functional Skills is confusing for some students and adds to the difference in value placed on the two types of award.

9. The challenge for some qualifications has already been identified. There now needs to be guidance for schools and colleges to enable them to support those wishing to progress to higher level qualifications or work.

**Question 4: To what extent do you agree or disagree with our proposal to have separate principles for qualifications in Category A and Category B?**

10. Agree. As stated above, consistency of approach is very important to ensure fairness and parity.

**Question 5: To what extent do you agree or disagree with the proposed principles for qualifications in Category A set out above and in the VCRF?**

11. Agree. Students have had a long period of disrupted and, in some cases lost, learning. Consideration must be given to how these students can be supported going forward.

**Question 6: To what extent do you agree or disagree with the proposed principles for qualifications in Category B set out above and in the VCRF?**

12. Agree. It is crucial that awarding bodies approaches are consistent in all stages of the assessment process.

**Question 7: Do you have any comments on our expectation that the approach to awarding for qualifications in Category B aligns with the approach to awarding for GCSEs, AS and A levels, where possible and appropriate?**

13. Yes. We agree this is a pragmatic approach and will ensure that students taking VTQs alongside academic qualifications will benefit from the same approaches being used to assess their work.

**Question 8: To what extent do you agree or disagree with our proposed approach to the determination of results and the role of the minimum evidential threshold?**

14. Agree.

**Question 9: To what extent do you agree or disagree with our proposed approach to internal assessment?**

15. Agree. We agree that internal assessment should go ahead, where it is possible to do so and that where not, alternative approaches should be taken.

**Question 10: To what extent do you agree or disagree with our proposed approach to issuing results to January learners?**

16. Agree. The approach to issuing the January results is fair for those who undertook those exams and for those who did not sit the exams. The student gets to decide on this issue.

**Question 11: To what extent do you agree or disagree with our proposal to permit but not require awarding organisations to issue alternative results for banked assessments based on a Teacher Assessed Grade?**

17. Neither agree nor disagree. It is not clear why awarding bodies should be permitted to issue banked alternative results and not required to issue them. It is not clear under

what circumstances this would be appropriate. This point requires more detail for teachers and students.

**Question 12: To what extent do you agree or disagree with our proposal not to require awarding organisations to issue a result for each unit and to instead only issue qualification level results?**

18. Neither agree nor disagree. It is not clear why awarding bodies would not be required to issue each unit level result as unit results go to make up qualification level results. They are sometimes required by organisations to which the student is due to progress and may add helpful detail when applying to the next stage organisation.

**Question 13: To what extent do you agree or disagree with our proposed approach to the issue of results for non-certificating learners?**

19. Agree. Students on the first year of a two-year programme this year, for example, will need to know the progress they have made and what this might mean for assessment in 2021-22.

**Question 14: To what extent do you agree or disagree with our proposed approach to the eligibility window for learners to receive results for qualifications in Category B?**

20. Agree. The approach seems reasonable and fair.

**Question 15: Do you have any comments on the statutory guidance on appeals in the draft VCRF?**

21. Yes. It is very important that guidance on appeals is clear and transparent and is implemented consistently across all awarding bodies. If an incorrect grade were given, the correct grade must subsequently be awarded. Appeals on the basis of maladministration must be absolutely clear and transparent.

**Question 16: To what extent do you agree or disagree with our proposed approach to correcting incorrect results following an appeal?**

22. Agree. As stated above, incorrect results must be corrected on appeal. It is unclear under what circumstances this should not be the case.

**Question 17: Do you have any comments on the arrangements we should put in place for the provision of assessment opportunities in autumn 2021?**

23. Yes. It is important that students who wish to retake qualifications in the autumn can do so, including to improve their grade.

24. The autumn arrangements must follow a similar pattern to those used at this time of year in previous years but also take account of the unusual circumstances surrounding 2020 and 2021 assessments.

**Question 18: To what extent do you agree or disagree with the proposed changes made to the requirements and proposed statutory guidance on adaptation?**

25. Agree. It is important that students demonstrate the competencies required of a qualification and that sufficient assessment should take place. If assessment needs to be delayed there should be consideration as to how schools and colleges manage delayed assessment as well as preparation for that assessment. Qualifications in

category B, which are competency-based and provide progression to higher education, require clear and transparent guidance for teachers, students, parents and employers.

**Question 19: Do you have any comments on the proposed provisions in the VCRF related to these decisions?**

26. Yes. The additional work for teachers and examination staff should be kept to a minimum. The approach must be clear and transparent to all. Sufficient time should also be given before results are published so that centres can upload results and prepare for student queries on results days.
27. Where functional skills assessments are concerned, students may be on different types of programme undertaking these awards. We note the flexibility to meet the needs of these different groups but there must be absolute clarity around assessed grades and awarding bodies must be consistent in their approach.
28. Likewise, there should be a clear and transparent process to teacher assessed grades agreed by all awarding bodies.

**Question 20: Do you have any other comments on any other proposed provisions in the VCRF?**

29. Yes. All processes must be clear, transparent and consistent and communicated in a timely way. Centres should know who to contact for queries, information and when contact can take place.

**Question 21: To what extent do you agree or disagree that it would be helpful to provide VTQ centres with information about making objective judgements?**

30. Agree. It will be helpful for VTQ centres to have as much information as possible about all the processes being used this year. Centres also want to know that all awarding bodies are responding in the same way.

**Question 22: Do you have any comments on the information that should be included in the proposed information for centres about making objective judgements to meet the needs of VTQ centres and learners?**

31. Yes. As mentioned above, information is needed on all processes and must be clear, transparent and communicated in a timely way to ensure centres can make objective judgements. Online training sessions and sharing good practice between centres will be helpful. Details from awarding bodies must be clear and consistent. All guidance must be easily accessible to centres.

**Question 23: Are there any potential positive or negative equality impacts arising from the proposed provisions in the VCRF, apart from those we have explored? If yes, what are they and how might they be mitigated?**

32. Yes. Teacher assessed grades should be available in all cases as an alternative to online assessments offered for functional skills and other assessments in that group of courses.

**Question 24: What new activities do you expect to carry out as a result of these proposals and what additional costs will you incur across the range of qualifications you offer? Please give monetised values for these additional costs where possible,**

**covering, for example, direct delivery; people and staff; equipment and administration.**

33. It is difficult to give meaningful estimates at this stage, but it is likely that there will be considerable additional costs for quality assurance, awarding body fees and invigilation. Centre staff will also need training in the proposed approaches. There will also be additional administration time in obtaining and disseminating guidance and other details from the awarding bodies and Ofqual at a time when centres are very busy with everyday activity with all student groups.

**Question 25: What savings do you expect to make as a result of your proposed approach? Please give monetised values where possible for any savings you may realise, compared with a normal qualification year and also compared with qualification delivery in 2020.**

34. None. It is unlikely that savings will be made this year as staff and resources are still needed to operate the day-to-day work of centres. Registration, quality assurance and assessment costs are still required as in a normal year and the assessment arrangements add to that cost.

**Question 26: Are there any other regulatory impacts, costs or benefits associated with the implementation of our proposals that have not already been identified? If yes, what are they?**

35. Yes. There is a cost to helping students who have lost learning during the pandemic to augment that learning which is not covered by catch up funding. Students want and need to meet the standard required, particularly in terms of practical experience, which is significant.

**Question 27: Do you anticipate any overall impact on qualification fees as a result of these proposals? If so, what do you expect these might be?**

36. Yes. The impact is likely to result in increased awarding body fees and other increased costs. This is as a result of the alternative arrangements requiring continuing Public Health measures, such as testing, extra cleaning and distancing.

**Question 28: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?**

37. Yes. Ensure that awarding body approaches are fully consistent and that sampling and quality assurance are not overly burdensome to centres.

## **C. Conclusion**

38. Our response, as mentioned above, relies heavily on feedback from our members and others in the sector.

39. 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 it can.

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