

## **Ofqual consultation on arrangements for the assessment and awarding of vocational, technical and other general qualifications: 2021 to 2022**

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

#### **A. Introduction**

1. 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.
2. ASCL welcomes the opportunity to contribute to this consultation.

#### **B. General points**

3. ASCL welcomes these proposals, and the fact that the Department for Education and Ofqual have accepted that adaptations need to be made to both general and vocational and technical qualifications this year, to recognise the ongoing impact of the pandemic. It is helpful that this consultation has come out earlier than last year, but disappointing that these decisions have again not been made in time for schools and colleges to plan their approach to teaching, learning and assessment for September. The decision to delay confirming adaptations to the summer 2021 exam series (had it gone ahead) until the autumn term placed considerable stress, anxiety and workload on school and college leaders, teachers, students and parents. All these key stakeholders need to know the proposed adaptations before the start of the academic year.
4. With this in mind, we are also disappointed that this consultation does not seek views on specific contingency plans in the event that public exams are deemed untenable in 2022. Throughout autumn 2020, the sector was told repeatedly by ministers and government officials that exams would go ahead in summer 2021, and that contingency plans therefore weren't required, only for that to change on 4 January 2021. As late as 8 December 2020, the Chief Regulator advised Parliament that schools and colleges did not need to collate any formal evidence of students' performance. This remark, and the subsequent government u-turn three weeks later, resulted in considerable and unnecessary workload and anxiety for leaders, teachers, students and parents.
5. It is important to learn lessons from the past year. We know that, alongside this consultation, Ofqual is running a survey into the strengths and weakness of the process

of awarding teacher-assessed grades this year. However, the failure to properly consult on contingency arrangements for 2022 exams means that, as last year, schools, colleges and learners will be returning this autumn unclear about the government's plans for how they will be assessed in crucial public exams. Our Association finds that unacceptable, and is deeply disappointed that our members and their communities have been put in this position again.

6. We are also very concerned that allowance does not appear to have been made for the fact that some learners on level 3 vocational and technical programmes will have to sit some externally set exams for some units. These learners have not experienced external exams for some time, and will need a great deal of support in terms of exam skills. We say more about this in our answer to Question 2 below.
7. With regards the specific proposals put forward in the consultation, ASCL broadly welcomes them. As we suggested in autumn 2020, we would have liked greater consideration to have been given to more topic and paper level optionality.
8. We broadly welcome the suggestion of advanced notice in most qualifications. This allows Ofqual to set a regulatory framework, and the Department a policy direction, which is responsive to the public health situation in the autumn. Advanced notice allows for awarding organisations to provide this information sooner or later, and for the detail of the information given to be responsive. This is helpful.
9. We agree with the proposed changes to the VCRF as a result of declassification of Category B qualifications.
10. We agree that national adaptations are the correct approach. Although regions have been affected differently by the pandemic, the effect of those differences on individual centres and candidates is too complex to be reflected in a national grading process. There needs to be a series of options available which recognises the complexity of situations arising for those who were impacted to the greatest extent by Covid
11. If exams are able to go ahead next summer, the timetable for these must be given careful consideration to ensure that exams for the same qualification are spaced out as much as possible. ASCL strongly advocates a return to the normal exam window, and to the normal results days.
12. Overall, we welcome these proposals, but do not think they go far enough in mitigating the differential impact of lost learning, nor, as outlined above, include a robust contingency plan that could be communicated to schools and colleges before the start of the academic year. The outcomes of the consultation must, therefore, be communicated as early as possible before the start of the new academic year. This would alleviate some of the stress associated with the assessment changes for staff in 2020-21.
13. We have responded separately to the parallel consultation on the assessment of GCSEs, AS and A levels in 2022, based on the same principles.

### **C. Answers to specific questions**

#### **Question 1: Are there any other equalities impacts that we have not identified and should consider?**

14. While there is an acknowledgement in the proposed approach that those with protected characteristics, who are more likely to take vocational and technical qualifications, may be impacted, there are some groups who may be more impacted than others. This is particularly true for those students who are part way through their programme. This group is also more likely to be undertaking functional skills over the whole period of their programme. T level students who are part way through their course may also be impacted through varying experiences with a new course.
15. Our concern is therefore that the proposals may impact on those currently undertaking the first year of a two-year course who have had TAGs in 2021 based on limited assessment due to isolation.
16. Consideration should also be given to the fact that the government intends to stop funding some general qualifications where there are overlapping T levels from 2023, as any changes to assessment now may impact on those who later (within the next year or two) need to re-sit or catch up.

#### **Question 2: Do you have views on how any potential negative impacts on particular groups of students could be mitigated?**

17. Those who have only received teaching and been assessed on part of their programme will experience very different approaches in 2022 to those in 2020 or 2021. Those taking resits may also experience very different approaches. Any negative impact on those students could be mitigated by introducing adaptations which take account of those different experiences. Awarding organisations must be mindful of this possibility.
18. It is important that regard is given to parity with academic qualifications. For example, if a learner is taking functional skills qualifications, they must have the same opportunity for optional subjects as they would in an equivalent GCSE.
19. There may also be a negative impact on level 3 learners who will be taking exams again after a long break during Covid isolation and they will need additional study skills support to take these exams.
20. The approach to these groups should be to treat their assessments in 2022 in the same way as at the start of their course. Alternatively, if the individuals concerned have had limited teaching and assessment, to the extent to which the integrity of the award is impacted, they should be fully funded to re-sit their programme.
21. For learners taking new qualifications such as T levels, where their programmes have not been fully tested, there must be careful consideration given to the impact of limited placements and experience on standards required in the occupational specialisms concerned. This is particularly true where liaison with providers prior to the academic year is limited.

#### **Question 3: Do you have any comments on the impact of our decision to withdraw the designation of Category B qualifications at this time and to move all qualifications under Category A?**

22. We understand the need to withdraw TAGs and welcome the decision to keep Category B mitigations. However, we feel that the approach should be a hybrid one for those who are already part way through a course.

23. Centres must be informed early if a contingency plan is to be put in place, as providers need to know what adaptations are to be introduced early on. If Category B needs to be re-introduced and calculated grades are used, centres must be informed of this very early on. There needs to be some flexibility about where and when learners can be assessed 'normally' as some subjects (sport and performing arts are examples) are more susceptible to Covid distancing measures than others.

**Question 4: Do you have any comments on the proposed changes to the drafting of the statutory guidance on adaptation in the revised VCRF?**

24. We acknowledge the need for some changes to statutory guidance in the revised VCRF. It is crucial that awarding organisation and centres understand what student success looks like in the new arrangement, how teachers can make this work in practice, that processes are streamlined and that there is clarity in any communications about the changes to leaders, teachers, students, parents and carers.

**Question 5: Do you have any comments on the proposed changes to arrangements for appeals in the revised VCRF?**

25. The proposed changes to arrangements for appeals must be aligned with the changes in arrangements for assessments and adaptations in 2021-22, and be flexible enough to take account of any contingency plan introduced during the year. The appeals system must be predicated on fairness for all with as little need for appeal as possible.

**Question 6: Do you have any comments on the proposed changes to the guidance on remote invigilation and the introduction of guidance on remote assessment in the revised VCRF?**

26. The proposed changes to the guidance on remote invigilation and the introduction of remote assessment in the revised VCRF seem reasonable. However, while remote assessment is possible in the large numbers which many centres operate, remote invigilation is very costly as it cannot be run in the same way as invigilation with large numbers in an exam room.

27. Remote assessment and remote invigilation are both useful as contingency arrangements, but remote invigilation is far less cost effective than invigilation in person with large numbers.

**Question 7: What factors do you think we may need to consider in developing any contingency plans?**

28. There must be plans in place for distancing and compliance with public health measures if necessary. Contingency plans could include the measures used in assessments in 2020 and in 2021 and a wide range of appropriate adaptations.

29. Contingency arrangements need to be in place as soon as possible, and they should be communicated to all key stakeholders well in advance of their implementation. Every element of the assessment process must be considered and lessons must be learned from 2020 and 2021.

30. This means that guidelines must be clear, adaptations must be piloted and communicated early on, contingency plans must be clearly worked through, awarding organisations must communicate early on with centres and, where licence to practice courses cannot be run due to public health issues, alternatives must be immediately communicated.

**Question 8: Are there any potential positive or negative equality impacts arising from our decision to withdraw the Category B qualification classification at this time and our proposed changes to the drafting of the VCRF, apart from those we have explored? If yes, what are they and how might they be mitigated?**

31. If there are any further disruptions caused to some groups, including vulnerable learners or people being cared for by learners, then alternative arrangements must be put in place. This may involve reclassification of Category B qualifications. These scenarios are many and varied and a suite of adaptations must take account of this.

**Question 9: Are there any regulatory impacts arising from our decision to withdraw the Category B qualification classification at this time and move all qualifications into Category A, apart from those we have explored? If yes, what are they and how might they be mitigated?**

32. Not at this time, but reclassification of Category B qualifications later on in the year will impact on schools, colleges, teachers and students and will have cost implications for centres.

**Question 10: What new activities do you expect to carry out as a result of your proposed approach to adaptations 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. We expect awarding organisations, where practical, to revert to their original approaches and only bring in adaptations when and where they are needed. However, new activities which are likely to emerge from the proposed approach to adaptations may include the need for training of teachers, administrators and invigilators; communication and support for leaders, teachers and students; increased staff workloads; working in new ways with awarding organisations; and managing expectations of students, parents and the public.

**Question 11: What savings do you expect to make as a result of your proposed approach to adaptations? 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 academic year 2020 to 2021.**

34. We do not expect schools and colleges to make any savings as a result of the changes. TAGs were a major additional expense over and above normal expenditure relating to assessments, and the removal of TAGs does not therefore mean that costs are reduced. This is especially true if new adaptations are needed which require more staffing and resources.

**Question 12: Are there any other regulatory impacts, costs or benefits associated with the implementation of your proposed approach to adaptations? If yes, what are they?**

35. There are costs associated with adaptations to assessments relating to possible extra equipment and staffing. These costs will bring benefits to learners for whom learning

was disrupted in 2020 and 2021, but it is unreasonable for centres to be expected to pick up these extra costs.

**Question 13: Do you anticipate any overall impact on qualification fees as a result of your proposed approach to adaptation? If so, what do you expect these might be?**

36. We do not agree with awarding organisations introducing fee increases when, in 2021, they took full fees and only refunded a fraction of the cost of TAGs. We anticipate that adaptations will be costly, but this extra cost is situated at the school or college level. If, as a result of public health measures, a contingency approach has to be implemented, we know from experience in 2020 and 2021 that this will increase costs at the provider level rather than for awarding organisations.

**D. Conclusion**

37. We appreciate that vocational and technical assessments require a wide variety of approaches. We hope that the outcome of this consultation will be announced as early as possible so that schools and colleges can start to plan early on. We also appreciate that this consultation builds on the approach used in 2021 and that this will allow awarding organisations to streamline assessments, provide revision guidance and make changes to invigilation. We hope the consultation outcomes will take note of our concerns about the cost of remote invigilation as it currently operates.

38. We make the point that, while education recovery is not the same for every student and that one size does not fit all, consistency of approach is important, especially where exams and assessments for occupational standards are concerned.

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

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