

Consultation on regulating digital functional skills

Response of the Association of School and College Leaders

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 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.
3. ASCL's position on assessment is set out in '[A Great Education for Every Child: A Blueprint for a Fairer Education System](#)'. Recommendation 10 proposes a reduction in the burden of assessment at 16, partially through the greater use of technology. We are particularly interested in adaptive approaches, which we believe could make assessment more targeted, reduce bureaucracy and costs, increase the accuracy of grading, and enable more young people to demonstrate and be recognised for what they can do.

Key points in answer to questions

Question 1: To what extent do you agree or disagree with our proposals to:

- a) set rules around the weighting of marks which could be gained through questions assessing practical digital skills and those gained through questions assessing knowledge?**

Agree. The weighting of marks is important in any assessment and, in assessments which are likely to be practical, it is especially important to ensure consistency in marking and standardisation of qualifications outcomes.

- b) set a minimum weighting of 70% of marks to be gained through the assessment of practical digital skills at both Entry level 3 and Level 1?**

Agree. 70% of marks to be weighted on practical assessment at this level is appropriate.

- c) require awarding organisations to provide a rationale for their interpretation of subject content statements, together with their weightings, in their assessment strategy?**

Agree. Awarding organisations should provide a rationale and details of how they have interpreted subject content assessment along with weightings in their assessment strategy so approaches of different AOs are clear and consistent.

Question 2

To what extent do you agree or disagree with our proposals to require at both qualification levels that:

- a) the design of the assessment must be able to cover all subject content statements, over time?**

Neither agree nor disagree. In the current climate, when teaching may be disrupted due to further strains of the pandemic, a prudent approach to covering subject content statements should be taken. This may mean limiting coverage of subject content statements.

- b) assessments may sample the subject content statements and the bracketed subject content in the subject content statements?**

Agree. This approach is sensible in the context of the above proposal.

- c) assessments must cover as many of the subject content statements as possible?**

Agree, with the caveat set out in 2a above.

- d) assessments must cover subject content statements from each skill area?**

Agree. This is preferable, if it is possible.

Question 3

To what extent do you agree or disagree that we should issue guidance to support consistency between awarding organisations when differentiating between qualification levels?

Strongly agree. This is the only way that consistency will be achieved between different AOs for the same qualification.

Question 4

- a) To what extent do you agree or disagree with our proposal to issue guidance that assessment tasks are authentic and relevant to the workplace and everyday life and require the use of digital devices?**

Agree. Assessments should be relevant to everyday life and require the use of digital devices. However, during the pandemic, many students missed large amounts of teaching and learning, including work placements. This means that, whilst the relevance to the workplace would be helpful, it may not be a fair means of assessing learners who, through no fault on their part or that of the education provider, have had no work experience or volunteering over the last two years.

- b) To what extent do you agree or disagree with our proposal to expect that assessments are delivered on-screen and online, but to allow paper-based assessments materials to be made available as an exception, where this can be justified?**

Agree. There may be a justifiable reason, such as a disability, as to why an individual cannot use a digital device, so the use of paper-based assessment must be possible in exceptional cases.

- c) To what extent do you agree or disagree with our proposal to set out in guidance that we would expect awarding organisations to ensure that any of their centres who wish to offer assessment materials in a paper-based format can justify that there is a need for them to do so and explain to us in their assessment strategy how they will be so assured?**

Agree. Any use of paper-based assessment within a digital qualification must be justified and explained in an assessment strategy.

- d) To what extent do you agree or disagree with our proposals to require awarding organisations to explain how they will manage any risks relating to where paper-based assessment materials are made available on-demand in their assessment strategy?**

Agree. AOs should explain how they will manage risks relating to paper-based assessment materials available on demand.

- e) Do you have any comments on the proposed definitions for on-screen and online?**

No. The definitions for on-screen and online assessment are clear. The important point is that teachers and students understand which of these are available to them and under what circumstances.

Question 5

To what extent do you agree or disagree with our proposals to:

- a) require awarding organisations to design qualifications at both qualification levels with a single component?**

Neither agree nor disagree. It will depend on which single component is used in the design.

- b) permit a maximum of 2 assessments within a component, at both qualification levels?**

Agree. This seems a sensible and proportionate approach as learners at this level may not be accustomed to large numbers of assessments.

Question 6

To what extent do you agree or disagree with our proposals:

a) to set a requirement on the minimum and maximum overall assessment time?

Agree. This will ensure the mark awarded is based on the same timely approach. Any learners entitled to extra time should be able to apply for this via their centre's Access Policy.

b) for minimum and maximum overall assessment time to be set at 90 to 120 minutes, at both qualification levels? Please also provide any comments on whether using paper-based assessment materials could mean that additional time is necessary.

Neither agree nor disagree. We suggest that assessment sessions at this level should normally be of 60 minutes duration. Some learners at this level may be overwhelmed by 90 minutes or 120 minutes of assessment.

However, if paper-based assessment is used, it may be necessary to increase the time allowed by 15-20 minutes, depending on the rationale for the paper-based assessment to be used in the first place.

Question 7

To what extent do you agree or disagree with our proposals to introduce a qualification level condition to ensure that awarding organisations will not be able to make FSQs in ICT at any level available after the 12-month transitional period?

Disagree. There may be some learners "mid-flight" on longer ICT FSQs and they should be given time to complete these qualifications, given the longevity of the current pandemic.

Question 8

Do you have any comments on our proposed conditions and requirements?

Yes. The conditions and requirements are very detailed. It is very important that the guidance is, therefore, clear to staff and students.

Question 9

Do you have any comments on our proposed guidance?

Yes. The proposed guidance itself is clear but is published in another document. This could lead to confusion. The conditions, requirements and guidance should be set out alongside each other, so both are absolutely clear.

Question 10

Are there any regulatory impacts that we have not identified arising from our proposals? If yes, what are the impacts and are there any additional steps we could take to minimise the regulatory impact of our proposals?

No. The regulatory impacts are comprehensive.

Question 11

Are there any costs, savings or other benefits associated with our proposals which we have not identified? Please provide estimated figures where possible.

No. We do not believe there will be any savings but we do believe there may be additional costs in using digital devices, such as the need to purchase more devices.

The benefit is the availability of on-demand assessment.

Question 12

Is there any additional information we should consider when evaluating the costs and benefits of our proposals?

Yes. Please see our answer to question 11 above. We believe that there may be additional costs as well as benefits from using digital assessments for functional skills at entry and at level 1.

The cost of adaptive technologies is open-ended.

Question 13

Do you have any comments on the impact of our proposals on innovation by awarding organisations?

No. These proposals should not impact on AO's proposals for innovation.

Question 14

Are there any potential positive or negative equality impacts arising from our consultation proposals, apart from those we have explored? If yes, what are they and how might they be mitigated?

Yes. It is likely that a wide range of young people and adults will be taking these qualifications; many of them will have been impacted by the pandemic and some may have disabilities or mental health concerns. The proposals must ensure that the end assessments are as inclusive as possible and that they cater for all characteristics and needs of learner.

There is also a need to ensure that, in the case of a cyber attack on an exam centre, Awarding Organisations have contingencies in place to compensate candidates where online testing may have been impacted.

Conclusion

4. 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.

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