

## **Ofqual consultation on moderation and verification of centre assessment judgements**

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

#### **A. Introduction**

- 1 The Association of School and College Leaders (ASCL) represents over 19,000 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 members value the availability of a range of qualifications, including those where centre-based assessments are a key component, which support particular learners, especially Technical Awards.
- 3 So, it seems, does the Department for Education, who recently made the following observation in their ad hoc notice *Non-GCSE qualifications in England: key stage 4 entries and absence and exclusions outcomes*:  
  
“For pupils in state-funded mainstream schools, taking a Technical Award is associated with pupils having lower absence rates, lower permanent exclusion rates and lower fixed exclusion rates, when compared to similar pupils who did not take a Technical Award.”
- 4 We welcome this consultation in that it seeks to improve the rigour of, and confidence in, all qualifications which include centre-based assessment, but particularly because it should lead to technical and vocational qualifications having a more secure place in the qualifications landscape.
- 5 We broadly welcome the ambition to improve rigour, but we have concerns stemming from the current financial climate which reflect the experience of ASCL members in school and college settings.
- 6 First, funding is at breaking point in all sectors, but particularly in the post-16 phase. Any proposition which leads to a net increase in demand on budgets in the current circumstances is highly unwelcome.
- 7 Second, DfE, Ofsted and school leaders are currently working to find ways to reduce teachers’ workload. Any changes to the administration of qualifications which increase workload burdens on teachers and school leaders are inappropriate.
- 8 Related to both of these is the extra capacity required to facilitate more moderation and verification. Much of this would need to be delivered by practising teachers in schools and colleges, and would therefore result in additional burden resulting from

managing their release to perform their duties. Whilst awarding organisations would compensate schools, any demand on staffing nevertheless creates problems when staffing is so constrained. We accept that any impact on centres and staff is likely to vary considerably, based on their current qualifications mix and existing numbers of staff currently engaged as moderators. However, where the number of qualifications with centre-based assessment is high, these proposals could cause great difficulty. Heads and principals are already increasingly reluctant for their staff to be away; increasing the demand for their time in this way could ultimately jeopardise the qualifications.

- 9 Taken together, these three issues make our wholesale support for these proposals difficult. We would therefore urge Ofqual to pay particular attention to the impact of these proposals in the light of the workload climate and funding pressures. It may be necessary to work with the awarding organisations to secure a commitment that additional costs are not passed on to schools or colleges and that any implementation of these proposals is subject to more rigorous impact assessment on workload than is apparent so far.
- 10 As several of the questions in the consultation relate to the financial impact and capacity of staff in centres, we would refer Ofqual to our generic response in paragraph 9 above, and address below only those questions which have a different focus.

## **B. With reference to some of your specific questions**

*Questions 1, 2 and 3:* We agree with the broad principle of the consultation and the new definitions proposed.

*Questions 4 and 5:* We agree that the high-stakes qualifications cited should continue to be subject to moderation rather than verification.

*Questions 6 and 7:* A focus on centres cited in these examples is appropriate. In addition to these we would suggest that qualifications which generate a licence to operate, where the safety and well-being of members of the public is paramount, should also be subject to moderation by default.

*Questions 15, 16 and 17:* A centre assurance strategy which includes approaches to moderation and verification is an appropriate measure, subject to our overarching concerns about workload and financial burden.

*Questions 19, 20 and 21:* Our support for the general ambition of this consultation to improve rigour and confidence was made clear earlier. However, we have serious concerns about the potential impact on candidates and the practicality of revoking certificates in some cases. Our view is that, if irregularities are uncovered which lead to uncertainty about the soundness of the award, the awarding organisation should keep the award in place but take steps to reassess the candidates concerned, rather than attempt to revoke a certificate.

*Question 23:* Our concerns here are that shorter timescales need to be viewed in light of the workload concerns cited earlier.

*Questions 32 to 34:* We do not see any equalities issues arising from these proposals.

## **C. Conclusion**

- 11 We are grateful for the opportunity to contribute to this consultation response.
- 12 I 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.

Duncan Baldwin

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Association of School and College Leaders

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