

Ofqual's consultation on reform of the Exam Procedures Review Service

Response of the Association of School and College Leaders

1. The Association of School and College Leaders (ASCL) represents nearly 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 agree with the proposal to hold meetings instead of formal hearings in all cases that are not filtered out at the triage and review stages and which cannot be decided on the papers. It is important that our members have the opportunity to articulate a grievance face-to-face with Ofqual, and in a timely manner. Unnecessary delay can contribute to stress and anxiety, and we support the proposal to speed up the process, recognising that this is also a resource-efficient solution. (Question 1)
3. Whilst we understand the resource implications of employing external panellists for the EPRS, we do not agree with the proposal to remove these panellists and so make the EPRS an internal Ofqual process. ASCL members believe that the inclusion of independent representation on the panel ensures accountability, fairness and appropriate and relevant challenge.
4. Whilst accepting that Ofqual is an independent regulator and that these incidences are rare, it is precisely because they are unusual that an additional degree of independence is desirable to guarantee high quality decision making. The opportunity for independent representatives on the panel to question decisions provides a degree of consistency, fairness and transparency.
5. We are also aware that, as Ofqual's appeal process is widened, we are likely to see more appeals go to Stage 2. This may lead to an increase in this sort of formal hearing. The need for a different level of independence here is desirable for the reasons outlined above. (Questions 2 & 3)
6. We do not agree that these proposals should be implemented for the 2019 series. (Question 3)
7. ASCL supports Ofqual's proposal to extend the EPRS to include Technical Qualifications where these are subject to the same requirements around reviews and appeals as A level, AS, GCSE and Project qualifications. We support the drive for parity among this group of qualifications in order to bolster public confidence in all technical qualifications.

8. We support Ofqual's assessment of the regulatory impact of these proposals, and have no further comments on this assessment.
9. 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.

Duncan Baldwin
Deputy Director of Policy
Association of School and College Leaders
March 2019