



ASSOCIATION  
OF COLLEGES

## **AoC draft response to Ofqual consultation on vocational and technical qualification awarding, summer 2020**

May 2020

# Part A Scope and Approach

**Note: Responses in plain font. Bold font text taken from the Ofqual consultation document to provide context. Closing date, 8 May.**

## Scope

### **1. To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?**

Colleges offer a wide range of qualifications to an even wider range of people; not all of them will be directly progressing to further or higher education. Therefore, it is difficult to answer this question without clarity on which qualifications fall outside the extraordinary regulatory framework. The consultation outlines that qualifications from entry Level to Level 6 are included. At the same time the documents states that 'some qualifications at lower levels, which are more generic in nature, are not in scope of the direction'. Colleges have expressed concerns that independent living skills for example may be out of scope. It would be helpful to know the approach to be taken with these qualifications which are crucial to the success of some of the most vulnerable students in the education system.

### **2. To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?**

We agree that if a qualification falls within scope of the direction, then all learners, no matter their age or the setting within which they are taking their assessments, should be able to access a result or an adapted assessment where that is made available by their awarding organisation. We ask for clarity on the scope of the direction as per question 1.

### **3. To what extent do you agree or disagree with the balance we are proposing to strike across the 3 elements of: delegation to awarding organisations; flexibility; and consistency?**

We agree with this approach as long as there is on emphasis on consistency between awarding organisations. We would ask for as much co-operation and consistency as possible between awarding organisations in their approaches in terms of evidence and documentation required so as to ensure clarity to centres. Lack of consistent approaches and communication will lead to confusion for colleges which work with a number of different awarding organisations.

### **4. To what extent do you agree or disagree with the key principles we have set out?**

We agree with the principles to:

- issue results to as many learners as possible in spring/summer 2020, provided that those results are based on evidence which ensures that they are sufficiently valid and reliable
- ensure that each result it issues is as reliable as possible

- ensure that its approach minimises burden and maximises deliverability as far as possible
- maintain standards, as far as possible, within the same qualification in line with previous years
- maintain standards, as far as possible, across similar qualifications made available by the awarding organisation and by other awarding organisations

### **5. To what extent do you agree or disagree with our proposal to allow awarding organisations to deliver their qualifications as normal where they are able to?**

This proposal requires clarity regarding the circumstances where this might be possible and the methods to be used – does this mean online assessment of Functional Skills, practical assessments, written assessments? Any approach needs to be consistent across awarding organisations to ensure fairness to learners.

It is crucial that any arrangements to deliver qualifications as normal do not rely on technologies which not all students can access.

## Categories of qualification

**Qualifications falling within scope of the direction serve different purposes. The ministerial direction recognises that different types of qualification will likely require different approaches, with a blanket approach for all qualifications simply not being feasible. In recognition of this, the direction sets out the qualifications in scope in three categories:**

- **qualifications used for progression to further or higher education**
- **qualifications serving a mixed purpose**
- **qualifications signalling occupational competence.**

**The direction also sets out the approach that should be taken to getting learners results in each of the categories. The options are between providing learners with calculated results, or with adapted assessments; with the delay of assessment opportunities presented as a last resort, given the impact of this on a learner’s progression. This section focuses on the approach that should be taken in each category (that is, whether the assessment result for a qualification in a particular category should be calculated, or the assessment adapted).**

### **6. To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?**

Agree

The categories of qualification seem sensible and pragmatic. However, in the current climate and timeframe for awarding results to students, exceptions to calculate and adapt

must be kept to a minimum unless there are health and safety implications. It is crucial that communications and any additional administration is streamlined and consistent across awarding organisations. The overriding principle to enable as many learners as possible to receive a result in summer 2020, provided that those results are sufficiently valid and reliable should be adhered to as a starting point.

## Aims of calculated results

The proposed aims of providing calculated results are as follows:

- to provide learners with the grades that they would have most likely have achieved had they been able to take their assessments in summer 2020
- to enable the maximum possible number of learners to receive grades based on a principled evidence-based approach, such that in similar situations, similar approaches to calculated results would be used
- to protect, as far as is possible, learners from being systematically advantaged or disadvantaged, notwithstanding their socio-economic background or whether they have a protected characteristic
- for the methods to be sufficiently transparent and easy to explain to promote confidence
- to be deliverable by awarding organisations with sufficient oversight from Ofqual

**7. To what extent do you agree or disagree with the aims of our proposed approach to calculating results?**

Agree

It is important that the methods are transparent and easy to explain to key stake holders including students, parents/carers and employers.

## Different sources of evidence

For each qualification, awarding organisations should identify both the available evidence and other useful evidence that can be collected. Some evidence might be already held within the awarding organisation, and some may be information or evidence could be collected from centres. This evidence falls into 6 types of sources.

1. 'Banked component marks or grades' for learners' completed assessments in qualification components to date.
2. Internal assessment grades for completed work but not yet externally moderated or verified.

**3. Centre assessment grades or other centre sourced information about learners including student work.**

**4. Historical data about qualification functioning.**

**5. Centre data and information.**

**6. Prior attainment data.**

**8. To what extent do you agree or disagree with our proposal that the minimum evidential threshold is that any approach to providing calculated results needs to be based upon at least one source of trusted evidence along with a sufficiently robust basis for quality assurance?**

Agree

It would be helpful if as far as possible the approaches taken by awarding organisations are as consistent as possible to ensure transparency and build confidence. Lack of consistency risks the proposals becoming unfair to candidates.

**9. Do you have any other comments on the approach to providing learners with calculated results?**

Consistency of approach is a priority. This section makes reference to ranking of students which may be challenging for large cohorts, taught by a number of staff across a college, e.g. Functional Skills. There should be an agreed method for centres to adopt where this is the case. In this instance we suggest agreed descriptors for a very strong pass, strong pass, close pass, narrow fail etc.

## Provision of adapted assessments to learners

**It will not be possible to issue calculated results for some vocational and technical qualifications because such results cannot be awarded reliably or safely. Where this is the case, we propose that awarding organisations should consider whether they are able to suitably and manageably adapt their assessments and related processes in order that learners might complete their qualifications. This might include:**

- **changing the way in which assessments are delivered, for example using an online rather than paper-based test, or carrying out an assessment remotely rather than face to face**
- **adapting assessment methods, for example using a practical simulation in place of an observation, or professional discussion in place of a practical demonstration**
- **changing invigilation requirements, for example allowing the use of on-line invigilation (also known as remote invigilation or proctoring) so that assessments can take place in a wider range of settings**

- waiving or adjusting work experience or placement requirements, for example allowing candidates to undertake a shorter period of work experience
- changing the way in which a qualification is quality assured, for example allowing for standardisation or moderation to take place remotely or on-line. In some cases, these adaptations would be compliant with our current regulatory framework.

However, in other cases, such adaptations might ordinarily not be compliant with our General Conditions, Qualification or Subject Level Conditions, or an awarding organisation's assessment strategy. For this reason, we propose to include a set of requirements within the extraordinary regulatory framework which awarding organisations must apply when making judgements about whether and how to adapt assessments

We propose to introduce technical requirements around adaptation which set out that:

- awarding organisations must take all necessary steps to minimise risks to reliability and validity by ensuring that coverage of the key areas of the construct of the qualification is retained within the adapted assessment
- awarding organisations must act only within the limits of their capacity and capability and take all necessary steps to minimise the burden on centres and learners resulting from the introduction of adaptations to assessments.

Awarding organisations should also look to ensure, as far as possible, that any adaptations minimise any disadvantage to learners with special education needs or a protected characteristic. However, where an awarding organisation can offer an adapted assessment but only in a way that, despite their best efforts, does disadvantage some learners, the awarding organisation should still offer the adapted assessment. We think that this is in line with the overall aim of the government's policy of ensuring that as many learners as possible are provided with results

For qualifications which act specifically as licences to practise or give access to a particular profession, there is an important balance to be struck between maintaining the validity of the qualification – aligned to its purpose – and permitting flexibility to allow learners to receive a result this summer. It is our view that in some cases it is more likely that this balance will swing towards maintaining greater validity (and avoiding unnecessary risks) and that this may prompt an awarding organisation to determine that adaptation may not be possible. We recognise that professional and sector regulatory/oversight bodies will also play a key role here as they may potentially set other parameters around any permissible adaptations or other approaches to be taken to assessment and the issue of results.

**10. To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?**

This is a sensible and pragmatic approach. Every effort should be made to ensure that no student is disadvantaged. Particular consideration should be given to ensuring that the needs of students with learning difficulties and disabilities and or poor mental health who may struggle with adaptation, especially if needing to do this from home with no face to face support. 17% of college students have a disclosed learning difficulty or disability. In the 16 to 18-year-old age range this figure is 23%.

Remote proctoring is without doubt an approach which should be explored now and in the future. However, it may for example be challenging for students and staff who have not had training in this approach to assessment. Not all students will have the necessary environment and or confidence to carry out assessments in this way.

We recommend that adaptations are discussed with centres and representative organisations in advance to ensure that they are manageable. It is important that there is consistency of approach between awarding organisations where possible which should be supported through the Ofqual framework.

## Delaying assessments

**Delaying or re-scheduling assessments should be the option of last resort. There will however, be some qualifications in scope, where it will not be possible for awarding organisations to issue results, or where there are qualifications where results can be issued, but some learners to whom it will not be possible to give a result for that qualification – in such cases delay will unfortunately be the only option.**

**Where this happens learners who will not receive results this summer should, as far as possible, be offered opportunities to sit their assessments at a later date, and as soon as reasonably possible, ideally no later than in the autumn term.**

**11. To what extent do you agree or disagree that delaying or re scheduling assessments should be the option of last resort?**

Agree

Every effort should be made to ensure that the summer 2020 cohort, especially young people receive grades in line with their peers who are undertaking general qualifications. However, we agree that in some cases, such as safe to practise qualifications, it would not be appropriate or safe for the student, employers or the wider population if a level of competency cannot be reliably confirmed. Consideration will need to be given to the additional delivery and financial burden this will place on colleges and staff in the autumn term. It needs to be clear to colleges which skills still need to be taught and assessed in order to quantify resource implications.

## Decision-making and record keeping

**It is important that awarding organisations keep good records of the decisions that they take in line with the extraordinary regulatory framework, for example the reasoning behind the approach they are taking (calculating results, adapting assessments or delivery methods, or delaying assessments), or the evidence they are relying on in terms of their calculation approach.**

**12. To what extent do you agree or disagree with our proposals around decision making and record keeping?**

Agree

It would be helpful if the rationale for decision making could be shared with centres in order to help them explain to key stakeholders such as students, parents/carers, employers.

## Oversight of awarding organisations

**We have proposed a flexible regulatory framework that will allow awarding organisations to make sensible choices, based on evidence and in light of their own specific context in these exceptional circumstances. Using a risk-based approach means that we will prioritise our activities to target and mitigate the highest risks.**

**We will focus in particular on those qualifications in Goal 2 of our Corporate Plan – which we describe as ‘national technical and vocational qualifications and assessments’ – with particular attention on higher volume Level 3 qualifications that are used in the same way as A levels to progress onto higher education. We will also closely monitor the approaches taken to securing results for Functional Skills qualifications. For other qualifications our approach will be informed by risk and will be intelligence led. This allows us to operate flexibly in response to a changing situation.**

**13. To what extent do you agree or disagree with our proposed approach to oversight of awarding organisations?**

Disagree

In the current climate a risk-based approach is practical. However, the messaging that Level 3 qualifications will be prioritised risks undervaluing lower level qualifications which often act as a pipeline to Level 3 and beyond and are more often taken by those students who previous educational experiences have not been successful. We recommend a sampling approach across awarding organisations and levels as being more appropriate.

## Assessment opportunity in autumn

**The direction set out that it is government policy that learners who do not feel that their result reflects their ability should be afforded an opportunity to complete an assessment at the earliest available opportunity. We propose that where an awarding organisation**

normally provides an assessment opportunity between September and December, it should be obliged to continue to provide that opportunity. For some qualifications, awarding organisations do not normally provide an assessment opportunity in the autumn term. We recognise that a balance needs to be struck between making an assessment available at the earliest opportunity and the burden of providing additional assessments. We therefore propose that for most qualifications, additional assessment opportunities should be made available where sufficient demand exists and where meeting that demand would not create a disproportionate burden on awarding organisations or centres.

**14. To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?**

This is an exceptional year. We are all working under exceptional circumstances. Calculated and adapted results should be considered valid and allow for students to progress in education and or employment whatever the level of the qualification they are undertaking.

Colleges may have to deliver additional general, vocational and technical and HE assessment in an autumn term which will be far from 'normal'. The impact of multiple additional assessment requirements should not be under-estimated. Assessment opportunities should be prioritised for those students who have not been able to receive a result because the qualification they are undertaking requires a level of competency.

We recommend emphasis is placed on increased use of diagnostic assessment to encourage appropriate progression where possible.

## Appeals

The Secretary of State said in his direction that learners should have access to a right of appeal if the relevant process was not followed correctly by the awarding organisation. This should be focused upon whether the process was followed and, where applicable, should not involve second-guessing the judgement of teachers, tutors or trainers, who know their learners best. The direction recognises that the requirements in our current General Conditions of Recognition already provide for such an appeal, although these requirements could, if we considered it necessary, be supplemented with specific guidance on appeals for these learners. We consider that our existing rules are in line with government policy as set out in the direction.

We do not consider that we could prescribe a single approach to appeals. We are concerned that given the number of awarding organisations across such a broad range of qualifications that we might create an unduly rigid system that doesn't reflect the different contexts and would be disproportionately burdensome for both awarding organisations and centres to implement. We are also concerned that imposing a new system would be vulnerable to unintended consequences as each awarding organisation might have to implement wholly new policies and procedures, and communicate those to

centres. We think this heightens the risk of mistakes being made. Therefore, as far as possible, our proposed approach expects awarding organisations to build on their existing policies and procedures and only to adapt those where it is necessary to do so..

We do consider that awarding organisations' approaches to appeals should, as far as possible, be consistent. We also recognise that the decisions that may be appealed this year are novel and that some changes to approach are likely to be necessary. We would encourage awarding organisations and their representative bodies to collaborate in relation to delivering as coordinated an approach to appeals as possible, with a particular mind to reducing burdens on centres who may have to submit appeals through multiple different processes.

In light of this we consider that additional guidance for awarding organisations is necessary. We therefore propose that we should introduce statutory guidance to sit alongside General Condition of Recognition I1 to promote consistency in approach and to make clear what awarding organisations should consider in relation to the conduct of appeals this year. We propose that pending decisions in response to the consultation on GCSEs and A Levels that awarding organisations should be able to implement those same arrangements for vocational and technical qualifications should that be appropriate in their specific context.

**15. To what extent do you agree or disagree with our proposed approach to appeals?**

Agree

Appeals should be made in exceptional circumstances where appropriate administrative processes have not been followed. Calculated and adapted results should be considered reliable and valid.

## Certificates

We do not consider that we need to put in place any specific requirements around certificates in the event of an appeal, or a subsequent re-assessment opportunity.

**16. To what extent do you agree or disagree with our proposed position in relation to certificates?**

Agree

## Private learners

Where learners are registered for a qualification and have engaged sufficiently with the awarding organisation or school/college/provider, then there is the potential that there may be appropriate understanding of a learner's potential assessment performance to be able to provide a calculated grade, although awarding organisations will have to be alert

to any potential increased risks relating to receiving centre assessment grades for learners not actually taught by any centre. Where a private learner has banked some assessments, this will further influence whether calculated results can be provided. Where private learners have not engaged with a provider or an awarding organisation and have not yet been awarded any marks for assessment, the challenge for an awarding organisation to be able to calculate a result may increase. However, we know that the design of assessments in some qualifications enable a learner to put together evidence of understanding throughout the duration of the qualification, and that where this is the case a private learner might still be able to submit their work as expected to awarding organisations or centres in line with normal practices.

**17. To what extent do you agree or disagree with our proposed approach in relation to private learners?**

Agree.

If there is sufficient evidence or assessments can be carried out remotely (if technology is accessible), private candidates should be treated in the same way as college-based candidates.

## Learners not yet registered for assessment this summer

We propose that where an awarding organisation believes it might have learners who were not yet entered for assessments this summer, it should contact all learners registered to take their qualification to ascertain whether or not they intended to take an assessment in coming weeks/months. This would most suitably be done through the learners' centres, colleges or training providers, in order that the awarding organisation can better assure themselves around the learner's intention to sit assessments.

**18. To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?**

Agree.

This would allow centres to double check that all students have been entered for assessment as intended.

## Qualifications taken internationally

We propose to take a permissive approach around the assessment and/or awarding of results for international learners taking regulated qualifications. We would expect awarding organisations to determine whether they need to calculate results or adapt assessments based not just on the purpose served by the qualifications, but also on the

needs of the market in which they are operating overseas – this may include requirements set out by other regulatory authorities in other countries.

**19. To what extent do you agree or disagree with our intention to not require any particular approach for adapting assessments and/or issuing results to international learners?**

Agree

This seems a pragmatic approach.

## Awarding organisations facing financial difficulties

Many stakeholders have told us that the crisis is creating unprecedented financial pressures and operational challenges on both awarding organisations and centres and that this is a situation that is likely to get worse. We already know that some centres have closed and that there is a material risk that some awarding organisations will find themselves facing significant financial difficulties. Our proposed extraordinary regulatory framework also asks much of our awarding organisations. We are grateful for how positively they have engaged with us and the work that they are all doing in the interests of the wider system and in protecting their learners. We recognise that our proposals add burden on them at an already difficult time. This has heavily informed our approach for a permissive and flexible framework. We do not however consider that additional regulatory provisions are necessary.

Awarding organisations must ensure that they have and will have sufficient financial resources and facilities available to enable them to develop, deliver and award qualifications, until all learners have had the chance to complete their qualifications.

Where awarding organisations identify that they are facing financial difficulties and that they are at risk of not having sufficient financial resources they must promptly notify us through an Event Notification.

Awarding organisations must also promptly notify us if they find themselves vulnerable to insolvency or bankruptcy proceedings.

In all cases we will work with awarding organisations to find the best way forward to support them and to protect the availability of their provision and the interests of learners.

**20. Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?**

We welcome the comment that both awarding organisations and centres are under financial pressure. We agree that effective communication between awarding organisations and Ofqual is essential at this time, as is consistency of approach to centres. We also agree that student results are a priority and their interests must be protected.

Transparency regarding costs will be welcomed by colleges.

## Functional Skills Qualifications

**Our proposal is that awarding organisations should work towards providing a calculated result for those Functional Skills learners where they are able to provide a safe and valid result which reflects what the candidate would have received had they been able to complete the assessment component or the qualification. For those learners where the awarding organisation can demonstrate that this is not possible, we will permit awarding organisations to offer adapted assessments.**

**This applies to Functional Skills qualifications at all levels (Entry to Level 2), to all 3 subjects (English, maths and ICT), and to both the legacy and reformed English and maths qualifications. The regulation end date for legacy Functional Skills qualifications will be extended to 31 December 2020 to allow learners who are currently on these qualifications, but who are yet to certificate, an opportunity to complete their qualification.**

**Our expectation is that awarding organisations should devise and implement approaches for calculating results for Functional Skills qualification learners in line with our three high level requirements:**

- 1. identifying available and potentially available evidence;**
- 2. appraising the level of trust in each source of evidence;**
- 3. maximising the most-trusted evidence.**

**Any approach devised should contain three important elements:**

- a method of obtaining a grade for each learner (either through a centre assessment grade or an awarding organisation calculated grade)**
- quality assurance of the approach,**
- a check on the grade profile, and that it is in line with expectations.**

**21. To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners?**

Agree

We agree with the approach outlined in the consultation document to the awarding of grades for Functional Skills. Many students will have already achieved part of the assessment. College progress monitoring and tracking systems mean that teachers and managers can award reliable centre assessment grades.

We appreciate that in some cases, where students undertake block functional skills sessions, e.g. in apprenticeships there may not be sufficient evidence to award a grade and

welcome the flexibility of remote assessment opportunities if suitable and accessible for the centre and student.

It will be important to clarify how 'expectations' will be defined when checking the grade profile.

## Part B – The VTQ Covid-19 Framework

### 22. Do you have any comments on the proposed regulatory framework?

We agree with the overarching principles of fairness and consistency. We also agree with that the proposed VTQ Covid-19 Framework will:

1. require awarding organisations to take all reasonable steps to issue a result to as many learners as possible
2. describe the approaches that should be used to secure calculated results or make an adaptation (either to the assessment or delivery approaches for the qualification) and set the minimum evidential threshold that must be met
3. require that awarding organisations do all they can to meet the five key principles unless by meeting a higher principle, it means that it cannot meet a lower one
4. explain that if there is a conflict between Ofqual's normal regulations, and the VTQ Covid-19 Framework, then the VTQ Covid-19 Framework takes precedence.

We also agree with the five principles:

Principle 1 – An awarding organisation must seek to issue results in spring and summer 2020 that – a) meet the requirements of the VTQCov Conditions, and b) in particular, are based on evidence (whether from an assessment or otherwise) which ensures that they are sufficiently valid and reliable, to as many Learners as possible who are taking a VTQ Qualification which it makes available.

Principle 2 – An awarding organisation must seek to ensure that each result that it issues is as reliable as possible and reflects, as far as possible – a) the Learner's potential level of attainment in summer 2020, where that result is calculated, and b) in all other cases, the Learner's level of attainment as demonstrated in an assessment for the qualification

Principle 3 – An awarding organisation must seek to ensure that its approach – a) minimises burdens as far as possible, and b) is as deliverable as possible, including by Centres and Teachers, with appropriate oversight by Ofqual

Principle 4 – An awarding organisation must seek to maintain standards, as far as possible, within the same qualification in line with previous years.

Principle 5 – An awarding organisation must seek to maintain standards, as far as possible, across similar qualifications made available by the awarding organisation and by other awarding organisations.

We also recognise that this process will require a great deal of unexpected work for both centres and awarding organisations. Transparency and clarity will be key. Expectations of all key stakeholders need to be managed with as much consistency across awarding organisations as possible. Based on the variety of qualifications, assessments, centres and awarding organisations we suggest that there are named points of contact/ email contacts with expected time frames for responses to queries and clearly signposted FAQs on awarding organisation websites.

AoC is willing to work with awarding organisations and Ofqual in whatever way we can to provide timely updates to our members.

We have the following comments:

1. Scope and some entry level qualifications – it is unclear why some entry level qualifications often taken by students with more moderate and profound learning difficulties are not within scope.
2. Timing of results – the consultation document indicates that some results may be delayed. This requires clear messaging to centres.
3. Payment of fees for relevant information – there needs to be clarity regarding awarding organisations only providing relevant information to centres on payment of a fee. Is this the registration fee or an additional fee?

## Equality impact

### **23. Are there other potential equality impacts that we have not explored? If yes what are they?**

The equality impact assessment set out in the consultation document is thorough and comprehensive. It recognises that students taking vocational and technical qualifications are often more disadvantaged than their peers. Thus, it is incumbent upon all interested parties to work together to ensure that they are not further disadvantaged through this process.

### **24. Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?**

There needs to be clarity on the reasons why some entry level qualifications are outside of scope bearing in mind they are often taken by students with more moderate and profound learning difficulties.

The emphasis on Level 3 qualifications appears to be in contrast to the desire for fairness and consistency and mitigating against inequality. Sampling across all levels and awarding organisations would go some way to counter this messaging.

## Regulatory impact assessment

### **25. Are there any regulatory impacts costs or benefits associated with the implementation of this framework that are not identified in this consultation? If yes what are they?**

We agree with the costs for centres as identified in the consultation as:

- familiarisation with guidance issued by awarding organisations, communicating this to staff and training as them required
- communication and ongoing support to learners in relation to measures in place
- enabling and supporting the delivery of adapted assessments, and the provision of completed assessments and, where relevant, outcomes to awarding organisations
- enabling the required information to be gathered and provided to awarding organisations to allow for calculated grades
- managing high volumes of enquiries from learners and parents
- familiarisation with the guidance we will provide on appeals

There will also be costs associated with additional delivery and assessment required in the autumn term for students who cannot receive a calculated or adapted assessment grade.

### **26. What additional costs do you expect you will incur through implementing this framework? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.**

There will be substantial additional costs incurred by colleges in providing additional support during 2020/21 for students, both current and new, affected by the disruption in 2020.

### **27. Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?**

Clear and co-ordinated communication and messaging to centres is crucial to this process. Where possible joint messaging will ensure clarity and reduce the burden of multiple questions.

AoC is willing to do whatever possible to support this process.