



ASSOCIATION
OF COLLEGES

The General Qualifications Alternative Awarding Framework for 2021. Technical consultation

AoC response

11 March 2021

The General Qualifications Alternative Awarding Framework

Technical consultation on Conditions and Requirements for GCSE, GCE, AEA and Project qualifications in summer 2021

AoC Response - 11 March 2021

The Association of Colleges (AoC) represents over 90% of the 238 colleges in England incorporated under the Further and Higher Education Act 1992.

Condition GQAA1: Application, interpretation and definitions

Question 1. Do you have any comments on proposed Condition GQAA1?

No

Condition GQAA2: Assessments under the GQAA Framework

Question 2. Do you have any comments on proposed Condition GQAA2?

No

Condition GQAA3: Results for GQ qualifications

Question 3. Do you have any comments on proposed Condition GQAA3?

a. Eligibility

b. Determining results

We are concerned about the time available for the external quality assurance between submission of grades and publication, given the early results days. This will have a significant impact on staff workload and staff leave over the summer.

c. Guidance for Centres

All such guidance should be common across all awarding organisations for clarity and consistency.

d. Quality assurance

Sufficient information should be provided to centres about the operation of external quality assurance including how concerns will be raised and how it is intended that they be resolved.

e. Confidentiality

Awarding organisations will need to be very clear about the difference between staff feeding back results of assessments to students and sharing with them which assessments will contribute to a grade on the one hand and not sharing the centre judgement of the final grade on the other.

Condition GQAA4: Appeals

Question 4. Do you have any comments on proposed Condition GQAA4 in relation to:

a. The centre review

b. Appeal to the awarding organisation

Where a 'case by case' review concludes that a centre's use of academic judgement was unreasonable, this may have implications for other candidates who have not appealed. The process quality assurance process which flows from this needs to be clearly explained.

c. Grade protection

Information to candidates will need to make it clear that awarding organisations is able to lower results following routine quality assurance processes, if this is the case.

d. Guidance

The Proposed GQAA3.2(a)(i) Requirements

Question 5. Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to:

a. Teacher Assessed Grades

We recommend the use of a different term eg: Centre Assessed Grade, to emphasise that grades have been through a centre-level moderation process.

b. Additional assessment materials

Centres will need clear, detailed and consistent guidance on grade descriptors with exemplars of student work at different grades. These materials should not relate only to the awarding organisation produced assessment materials.

c. Internal quality assurance

This guidance needs to be common across all awarding organisations for clarity and consistency.

d. External quality assurance

Clear common criteria for sampling need to be provided to centres.

Question 6. Do you have any comments on our proposed document: 'Information for heads of centre, heads of department and teachers on the submission of teacher assessed grades: summer 2021', in relation to:

a. Standards in 2021

b. Sources of evidence (other than in relation to private candidates)

c. Sources of evidence (private candidates)

d. Internal sign-off within the centre

There needs to be clarity about how internal quality assurance arrangements will be signed off by awarding organisations and we recommend that, as far as possible, this should be done once only by awarding organisations working together.

Question 7. Do you have any comments on our proposed document 'Making objective judgements', in relation to:

a. Objectivity in grading judgements

b. Unconscious effects on objectivity

c. Using previous data to check on the objectivity of judgements being made

It needs to be made very clear that the evidence-based grading process in 2021 is very different to that of any previous year and that different grade profiles are not necessarily a reflection of a change in standards or 'grade inflation'.

d. Reviewing judgements

This needs to incorporate an understanding of the impact the various unconscious effects on objectivity might have on the internal quality assurance process.

Equality impact assessment

Question 8. Do you consider there are any equalities impacts arising from our technical proposals which we have not previously identified?

There are many possible equality impacts and we suggest that a full Equality Impact Assessment of this year's awarding system be published at the same time as the results, including socio-economic status, provider type and provider size as well as the protected characteristics.

Regulatory impact assessment

Question 9. Do you consider there are any regulatory impacts arising from our technical proposals which we have not previously identified?

No