



ASSOCIATION  
OF COLLEGES

# VTQ Assessment 2021 TECHNICAL consultation

**AoC final response**

11 March 2021

The Association of Colleges (AoC) represents nearly 93% of the 238 colleges in England incorporated under the Further and Higher Education Act 1992.

## **VTQ Assessment 2021**

### **Question 1: Do you have any comments on our proposed overall approach to the determination of results in the VCRF?**

It is sensible to be considering impact on the 2021/22 cohort too. Some students are on two year programmes or will be progressing from one level to another – all, including new students from September 2021, will have had a disrupted learning experience.

Key for colleges is consistency of approach and processes between awarding organisations and clear guidance about what to do, how and when to do it.

### **Question 2: To what extent do you agree or disagree with our proposal that we should bring the ERF and Extended ERF to a close?**

Agree. It seems sensible to bring adaptations and changes into one place.

### **Question 3: Do you have any comments on the two proposed categories of qualifications within the VCRF?**

The two categories of qualification seem sensible. Going forward it would be helpful to have agreed titles for these categories of qualification to aid understanding by key stakeholders such as parents/carers and employers.

Colleges are particularly concerned about FSQ assessment in 2021. There are three different types of student taking FS in colleges: 16 to 18 students on academic year study programmes; adults on academic year programmes and short courses; apprentices. Students on academic year programmes make up the bulk of enrolments. Flexibility to meet the needs of these student groups is welcomed, but the lack of clarity regarding the threshold at which the college/AO can consider teacher assessed grades is confusing. As it stands there is lack of parity of experience for 16 to 18-year-olds undertaking FSQs as part of their study programme and their peers who are sitting Functional Skills. Some students may be taking a GCSE in English and an FSQ in maths. This is very confusing for students, the end users of these qualifications and for parents/carers. It is vital that all AOs have the same arrangements in place to ensure parity.

Colleges have voiced the following concerns:

- Challenges of running assessments, especially at scale and for multiple papers when colleges are working under social distancing.

- Remote assessment/ invigilation is not possible at scale – digital poverty, unreliable wi-fi, and insufficiently supporting students with learning difficulties all compound this.
- FS assessment will be based on the whole syllabus, which is not equitable with GCSE
- There will not be sufficient time for students to take the multiple assessment opportunities they often need to pass which will impact progression.

Where colleges feel it is appropriate for students to receive a TAG there should be a simple and transparent process to achieve this agreed by all awarding organisations. It is vital that all AOs have the same arrangements in place.

We are pleased to see that the specific challenge for early years qualifications for example has been identified. We would like to see clear guidance for colleges to enable them to support students to progress to higher education or Level 3 as required.

**Question 4: To what extent do you agree or disagree with our proposal to have separate principles for qualifications in Category A and Category B?**

Agree. The most important thing for colleges is clear, consistent and timely guidance and points of contact in awarding organisations.

**Question 5: To what extent do you agree or disagree with the proposed principles for qualifications in Category A set out above and in the VCRF?**

Agree. Wider consideration needs to be given regarding how best to support students to achieve their qualifications after 18 months of disrupted learning. We are raising this with DfE.

**Question 6: To what extent do you agree or disagree with the proposed principles for qualifications in Category B set out above and in the VCRF?**

Agree. It is crucial that approaches and processes put in place by awarding organisations are as consistent as possible including types of evidence, sampling, submission and return of results to colleges. In 2021 many colleges had to manually submit grades.

**Question 7: Do you have any comments on our expectation that the approach to awarding for qualifications in Category B aligns with the approach to awarding for GCSEs, AS and A levels, where possible and appropriate?**

Agree. The burden on staff and impact on students in this very challenging year must be a key priority.

**Question 8: To what extent do you agree or disagree with our proposed approach to the determination of results and the role of the minimum evidential threshold?**

This is crucial. We question why for qualifications in category B this cannot be prescribed by Ofqual. For general qualifications the approach taken by all awarding organisations is the same. Consistency of approach for similar qualifications is essential.

It would be helpful to clarification of the proposal in paragraph 50.

**Question 9: To what extent do you agree or disagree on our proposed approach to internal assessment?**

Agree. We welcome the approach that where possible internal assessment should go ahead. This is motivating for students. We also welcome the understanding that in some cases, for individual students and groups, this may not be possible and we welcome the opportunity for other evidence to be submitted.

**Question 10: To what extent do you agree or disagree with our proposed approach to issuing results to January learners?**

Agree. This is a fair approach both for all students, those who did or did not take January exams as expected.

**Question 11: To what extent do you agree or disagree with our proposal to permit but not require awarding organisations to issue alternative results for banked assessments based on a Teacher Assessed Grade?**

Neither agree or disagree. What is the reasoning behind permitting but not requiring? The same approach should be taken by all awarding organisations.

**Question 12: To what extent do you agree or disagree with our proposal not to require awarding organisations to issue a result for each unit and to instead only issue qualification level results?**

Disagree. College feedback indicates that unit level results are important to students and sometimes required by HE providers.

**Question 13: To what extent do you agree or disagree with our proposed approach the issue of results for non-certificating learners?**

Agree. There must be early discussions about the approaches to be taken to awarding in 2022 as students on the first year of a two-year programme completing next summer will have encountered a great deal of disruption.

**Question 14: To what extent do you agree or disagree with our proposed approach to the eligibility window for learners to receive results for qualifications in Category B?**

Agree. This appears fair.

**Question 15: Do you have any comments on the statutory guidance on appeals in the draft VCRF?**

If during an appeal an incorrect grade has been issued why would it not be appropriate to issue the correct grade?

Would other grades in the same cohort also be checked?

**Question 16: To what extent do you agree or disagree with our proposed approach to correcting incorrect results following an appeal?**

It needs to be clear as to why an incorrect grade would not be corrected and reissued.

**Question 17: Do you have any comments on the arrangements we should put in place for the provision of assessment opportunities in autumn 2021?**

It will be important to have opportunities for students to take Functional Skills assessments to enable them to complete apprenticeship standards that might have been delayed.

Of greater concern to colleges is the overall impact of delayed assessment for qualifications in category A.

**Question 18: To what extent do you agree or disagree with the proposed changes made to the requirements and proposed statutory guidance on adaptation?**

It is important that where students are required to demonstrate competency that sufficient assessment should take place. Students should not be required to complete multiple assessment to demonstrate competency unless necessary. If assessment does need to be delayed there needs to be consideration as to how colleges manage delayed assessment and preparation for assessment. This has resource implications. For qualifications in category B that are both competency based and provide progression to higher education there needs to be clear guidance for college staff, students and parents/carers of the approaches to be taken.

**Question 19: Do you have any comments on the proposed provisions in the VCRF related to these decisions?**

It is vital that the burden on teaching staff, exam officers and managers is kept to a minimum. Clarity of approach will help this. Colleges need to have enough time to upload results before results days for example.

## Functional Skills

Colleges are particularly concerned about FSQ assessment in 2021. There are three different types of student taking FS in colleges: 16 to 18 students on academic year study programmes; adults on academic year programmes and short courses; apprentices. Students on academic year programmes make up the bulk of enrolments. Flexibility to meet the needs of these student groups is welcomed, but the lack of clarity regarding the threshold at which the college/AO can consider teacher assessed grades is confusing. As it stands there is lack of parity of experience for 16 to 18-year-olds undertaking FSQs as part of their study programme and their peers who are sitting Functional Skills. Some students may be taking a GCSE in English and an FSQ in maths. This is very confusing for students, the end users of these qualifications and for parents/carers. It is vital that all AOs have the same arrangements in place to ensure parity.

Colleges have voiced the following concerns:

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Where colleges feel it is appropriate for students to receive a TAG there should be a simple and transparent process to achieve this agreed by all awarding organisations. It is vital that all AOs have the same arrangements in place.

### **Question 20: Do you have any other comments on any other proposed provisions in the VCRF?**

- Colleges require clear, consistent and transparent approaches and processes with due regard to the limiting the burden on both staff and students.
- Communication with colleges should be timely and responsive.
- Awarding organisations should have identified points of contact or email addresses that will ensure a prompt response to queries.

### **Question 21: To what extent do you agree or disagree that it would be helpful to provide VTQ centres with information about making objective judgements?**

Agree. Lack of clarity leads to anxiety for both staff and students. A swift decision on approaches to functional skills for example would help prevent this.

**Question 22: Do you have any comments on the information that should be included in the proposed information for centres about making objective judgements to meet the needs of VTQ centres and learners?**

It would be helpful to provide centres with prompts of things to remember when making objective judgements. This could be a checklist. It might be helpful to run webinars to enable centres to share good practice and ensure consistency of approach. Lengthy documents should be avoided. Assessment cannot be seen in isolation from all the other tasks required of staff in the coming months eg covid testing, supporting students, interviewing, teaching. Therefore guidance should be easily accessible.

**Question 23: Are there any potential positive or negative equality impacts arising from the proposed provisions in the VCRF, apart from those we have explored? If yes, what are they and how might they be mitigated?**

The different approaches to FSQs and GCSEs for students on study programmes should be addressed by enabling students to receive TAGs for FSQs in the same way that they are being awarded for GCSEs.

There are many other 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.

**Question 24: What new activities do you expect to carry out as a result of these proposals and what additional costs will you incur across the range of qualifications you offer? Please give monetised values for these additional costs where possible, covering, for example, direct delivery; people and staff; equipment and administration.**

- Staff training and internal moderation
- Dealing with queries
- Uploading materials – evidence required should be kept to a minimum.

**Question 25: What savings do you expect to make as a result of your proposed approach? Please give monetised values where possible for any savings you may realise, compared with a normal qualification year and also compared with qualification delivery in 2020.**

We can see no opportunities for savings for colleges.

**Question 26: Are there any other regulatory impacts, costs or benefits associated with the implementation of our proposals that have not already been identified? If yes, what are they?**

The resources required to support students to prepare for and achieve qualifications in category A when they have missed over half a term of practical assessment in spring 2021 and in many cases experienced disrupted learning in autumn 2020.

**Question 27: Do you anticipate any overall impact on qualification fees as a result of these proposals? If so, what do you expect these might be?**

Any savings on exam costs should be passed back to colleges and other centres. The additional costs of the current academic year cannot be underestimated.

**Question 28: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?**

- Ensure consistent approaches and timely communication from awarding organisations.
- Ensure sampling processes are manageable
- Enable FSQ students to receive a TAG where identified that this is the most appropriate route by a college.