



ASSOCIATION
OF COLLEGES

Vocational and technical qualification assessment 2020 2021

Ofqual consultation – AoC final response

August 2020

The Association of Colleges (AoC) represents nearly 93% of the 244 colleges in England incorporated under the Further and Higher Education Act 1992.

The Ofqual consultation on vocational and technical qualification assessment 2020/2021 is based on the premise that there will be no calculated grades or delayed assessment.

Question 1: To what extent do you agree or disagree with our proposed approach to mitigating the longer-term impacts of the pandemic in 2020/21 by permitting awarding organisations to adapt assessments and qualifications?

We agree with the overall approach of ensuring flexibility, reliability and credibility of qualifications for students. However, there are a number of clarifications required to ensure that any system for 2020/21 assessment is realistic and manageable for students, staff and colleges.

If mitigations from summer 2020 are to be continued the following points in paragraph 12 need clarification:

- **change the the way in which assessments are delivered, for example by using an online rather than paper-based test, or carrying out an assessment remotely rather than face-to-face** Consideration needs to be given to ensuring all students, staff and colleges are prepared for these changes and have the necessary and reliable resources. This will need investment in training and equipment. Colleges would also like to see greater use of technology to film assessment for example and submit evidence by digital means not in hard copy as required by some awarding organisations.
- **adapt assessment methods, for example by using a practical simulation in place of an observation, or professional discussion in place of a practical demonstration** – seems sensible, but needs to be confirmed as soon as possible.
- **change invigilation requirements, for example by allowing the use of online invigilation so that assessments can take place in a wider range of settings** – as above, this will require training and resource. It cannot be assumed that all students have suitable facilities at home or that colleges have staff trained in online invigilation.
- **waive or adjust work experience or placement requirements, for example allowing learners to undertake a shorter period of work experience.** – seems sensible where needed. However, any changes to work placement requirements should be consistent across awarding organisations. In the first instance consideration needs to focus on learners completing their studies i.e. 2nd year Level 3s so those entering the work place soonest will have had opportunity to undertake a placement. Consideration also needs to be given to qualifications with large amounts of work experience or placement where students will certify in summer 2022 such as Early Years and the first three T Levels being introduced this year in Education/Childcare, Digital and Design, Survey and Planning. There also

needs to be consideration of additional challenge in rural areas where most businesses are small/micro, less sophisticated transport systems potentially meaning too much reliance on public transport which doesn't align with DfE guidance.

- **change the way in which a qualification is quality assured, for example by allowing for standardisation or Centre Assessment Standards Scrutiny to take place remotely or on-line.** seems sensible, but as above training needs to be taken into consideration and clear guidance must be given to EQA staff by the awarding organisations to ensure that the quality assurance process is fair for students studying the same or similar qualifications with different AOs.

Some of these mitigations should also be considered as long term aims such as online QA. Investment now will pay dividends in the future.

For the most part calculated grades were the least challenging aspect of the VTQ assessment process in summer 2020 although they placed additional pressure on colleges and staff with tight turn arounds and challenging data collection formats. Vocational and technical teachers are highly experienced professionals with experience of assessing their students and we would ask whether the decision not to use calculated grades could be reviewed.

If calculated grades are not to be used in 2020/21 the following points in paragraph 20 need clarification:

- **widen assessment windows to provide greater flexibility (the period of time during which an assessment is conducted)** – colleges will need details of these windows as soon as possible; for colleges which offer general and vocational qualifications consideration needs to be given to avoiding clashes.
- **encourage the banking of modular assessments throughout the course of study to mitigate the risk of future disruption** – seems sensible
- **change the conditions under which internal assessments may be completed** – this needs clarification.
- **look to change some assessment requirements where this is the only way to deal with the impact of any ongoing social distancing measures, for example in sport or performing arts qualifications where learners are currently assessed working in a group** –subject experts in colleges should be consulted on the details of any adaptation prior to changes being made to ensure they are manageable. Any changes should be consistent across all awarding organisations.

We recommend taking early soundings from colleges and other providers before final decisions are made about any mitigations. We welcome the intention to work with partners, stakeholders, other regulators and with government to deliver a

coordinated system-wide approach where the risks impacting on qualifications and assessments are outside the scope of Ofqual regulation.

Question 2: To what extent do you agree or disagree with our proposed approach to take an objectives-based approach, supported by additional guidance to develop consistent approaches, rather than prescribing a single approach to adaptation?

The technical and vocational qualification landscape is complex; qualifications vary in type and purpose. The summer 2020 permissive approach to AO assessment methods, though well-intentioned, led to confusion as similar qualifications had different mitigations and in many cases adaptation meant delay in reality. We would need to be convinced that awarding organisation interpretation of the objectives wouldn't lead to a similar situation in summer 2021. Another challenge was the lack of alignment between public health/Government guidance such as adult attendance on site and the requirement for adapted assessments to be taken on site or in assessments which include others e.g. sport, performing arts, hair and beauty.

Question 3: Do you have any comments on the objectives we have proposed to underpin awarding organisations' decisions about the adaptation of assessments and qualifications?

- a. **Learners taking VTQs and other general qualifications should have the opportunity to receive fair results, and, as far as possible, not be disadvantaged by the longer term impact of the current public health crisis. Learners taking qualifications most similar to A and AS levels and GCSEs should not be advantaged or disadvantaged compared to their peers taking those qualifications; this is particularly important where learners are competing for the same progression opportunities.** Agree. Any decisions should be sense checked to ensure this is the case. The adapt mitigations in summer 2020 impacted on students taking highly technical subjects in motor vehicle, construction and hair and beauty. 16 to 18-year-old students taking these qualifications often, though not always, have lower grades on entry. Lessons should be learnt from the feedback on adapt mitigations in summer 2020 to inform 2021.
- b. **As far as possible, standards should be maintained when qualifications are awarded in 2020/21.** Agree
- c. **Adaptations to assessment and qualifications should not undermine the validity and reliability of the qualifications. We therefore do not expect that the content to be taught is reduced. Changes to the content should only be considered in exceptional circumstances where it is the only way of minimising disadvantage to learners as a result of the pandemic. The views of sector and professional bodies and other stakeholders must be also be sought before any changes are made. Any changes to assessment**

requirements or delivery should also be carefully considered so that they do not undermine the validity and reliability of the qualification. Agree; there needs to be clarity on what is understood by 'exceptional circumstances' in the pandemic situation. The views of sector and professional bodies should be sought as soon as possible to prevent delay in decision making. This is particularly important in licence to practise qualifications.

- d. Common approaches to adaptation should be followed where qualifications signal similar knowledge, understanding and skills, or practical competence, and have the same assessment approaches.** Agree
- e. The manageability of assessments should be maximised to allow for an increase in teaching time. Any streamlining of assessments should be carefully balanced with the need to ensure that qualifications remain sufficiently valid and reliable.** Timeframes need to be confirmed quickly to ensure that college staff can plan for changes to the teaching and assessment timetable.
- f. Flexibility in how, and how often, assessments are delivered should be maximised so as to reduce the impact of disruption, illness or quarantine, including at a local level.** Agree; any changes need to be confirmed as swiftly as possible.
- g. The opportunities presented by the inherent flexibility of the modular delivery modes of many vocational and technical qualifications should be maximised so that learners can bank assessments as soon as they are ready, in order to safeguard against future disruption.** Agree
- h. Communications should be streamlined and coordinated to support centres implementing adapted assessments and users of the qualifications.** This is crucial. We welcome the intention to work with centres and centre representative groups such as the AoC and AELP, to develop a coordinated and streamlined communications approach.
- i. A coordinated system-wide approach should be developed to address the risks impacting on learners' results which are outside the scope of Ofqual regulation, working with partners, stakeholders, other regulators and government.** Agree

Question 4: Do you have any comments on our plans to develop and consult on additional statutory guidance and on any changes to the Extended ERF later in August, to support the interpretation and implementation of these objectives?

It is crucial that colleges have clarity regarding assessment for 2020/21 as soon as possible and by no later than October.

Question 5: Do you have any comments on the issues we should consider in any guidance we develop around Special Consideration?

We would welcome clarification on the guidance around special consideration. No one can be certain that assessment will not be disrupted in 2020/21. We recommend that there is a contingency plan in the event of wide-scale disruption to teaching, learning and assessment in the 2020/21 academic year. Calculated grades provided a solution in summer 2020 and should not be discounted for 2021 if there is a another wide-scale lockdown.

Question 6: To what extent do you agree or disagree with our proposed approach to qualifications taken internationally?

Agree

Question 7: To what extent do you agree or disagree with our proposed approach to certification?

Agree though there does need to be consideration of the approach that will be taken if teaching, learning and assessment is badly impacted.

Question 8: To what extent do you agree or disagree with our proposed approach to appeals in 2020/21?

Agree

Question 9: To what extent do you agree or disagree with our proposed approach to record keeping and regulatory oversight?

Agree. Mitigations applied to VTQs which this year has calculated grades should be closely monitored to ensure consistency between awarding organisations.

Question 10: To what extent do you agree or disagree with our proposal to develop the Extended ERF to take account of our proposed approach for 2020/21?

Agree, but question whether there should be a contingency plan in case assessments cannot take place either across the nation or locally.

Question 11: Do you have any comments on the new conditions, requirements and guidance for 2020/21 set out in the Extended ERF?

As all qualifications will be assessed in 2020/21, it would seem to indicate that principle 1 will need to be amended. If the main mitigation to assessment is adaptation then principle 3 will be crucial:

*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.***

This was not always the case in summer 2020. It is important that any assessment aligns with public health advice, especially where it involves others such as sport, performing arts, hair and beauty or work placement which is limited due to Covid-19 related restrictions, e.g. Early years.

We would strongly recommend that awarding organisations use a common format for data exchange with colleges. This year in some instances college staff had to manually transfer information which was time consuming and can lead to errors.

We agree with the guidance around remote invigilation. Feasibility, resource and training are key considerations, especially for students with special educational needs. In the long term this may be a sensible adaptation, but it will take time and funding to implement successfully.

Question 12: Are there other potential positive or negative equality impacts that we have not explored? If yes, what are they?

Unlike A Levels and most GCSEs vocational and technical qualifications are taken by both young people and adults. Particular consideration needs to be given to the additional public health challenges that may be faced by adults in any further local or national lockdown.

Question 13: Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

There needs to be close consultation with centres regarding feasibility.

Question 14: Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are not identified in this consultation? If yes, what are they?

Any adaptation to assessment could have financial implications which need to be taken into account, especially remote invigilation.

Question 15: What additional costs do you expect you will incur through implementing our proposals? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

Remote invigilation could have significant cost implications for colleges in terms of resource and training for staff and students.

Question 16: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

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