



ASSOCIATION
OF COLLEGES

Ofqual consultation on rules for Department for Education performance table qualifications

Association of Colleges response:
December 2019



Association of Colleges

QUESTION 1: Do you have any comments on our proposed approach to regulating Technical Awards?

It is essential for college 14 to 16 delivery of technical awards that any updates to qualifications are made within a realistic timespan to allow staff to prepare for teaching in September 2021.

QUESTION 2: Do you have any comments on the general purpose statements for Technical Awards, and the guidance supporting those statements, that we propose to include in our rules?

No, these are clear.

QUESTION 3: To what extent do you agree or disagree with our requirement that awarding organisations should define specific qualification purposes in the context of the general purposes and explain how their qualification will fulfil the purposes they set out?

Agree.

QUESTION 4: To what extent do you agree or disagree with our proposal to disapply General Conditions E1.1 and E 1.2?

Agree.

QUESTION 5: Do you have any comments on our proposal to introduce a bespoke Condition for guided learning and TQT that requires Technical Awarded guided learning to be at least 120 hours?

No.

QUESTION 6: Do you have any comments on our proposal to require an awarding organisation to ensure the appropriateness of its Technical Award qualification content in relation to purpose, level, size and assessment methods?

No.

QUESTION 7: To what extent do you agree or disagree with our proposals that Technical Awards should be assigned either level 1 or 2 or both?

It would be helpful to providers if young people had the opportunity to achieve at Level 1 or 2 in all Technical Awards to ensure the offer is inclusive.

QUESTION 8: To what extent do you agree or disagree with our proposal relating to synopticity that awarding organisations should design their assessments to demonstrate how their qualifications promote a holistic understanding of the content

and provide opportunities for students to demonstrate a broad understanding across the qualification content?

It is important that Technical Awards are inclusive. End point, synoptic assessment should not be overly burdensome and act as a barrier to engagement for students who struggle with assessment.

QUESTION 9: To what extent do you agree or disagree with our proposals to disapply (a) General Condition E7 and (b) General Condition E9?

Agree.

QUESTION 10: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Disagree. Changes to assessment methodology may impact on students' ability to succeed in the qualification.

QUESTION 11: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings

An impact assessment should consider impact on students as well as any additional cost to providers of a move to end point synoptic assessment including indirect costs such as additional invigilation requirements and exam access requirements.

QUESTION 12: To what extent do you agree or disagree with our proposal to require that Technical Award assessment by examination is in the form of a written test or tests?

Disagree. Students who opt to take technical awards often do so because they benefit from a more applied style of learning and struggle with written assessment under high control conditions. Written assessment should include the opportunity to complete a portfolio of work either in hard copy or online depending on a student's needs. It is important that a comprehensive impact assessment is carried out. These are technical awards and assessment should reflect the reality of the sector to which they introduce students.

QUESTION 13: Do you have any comments on our proposal that of the total marks available for a Technical Award, an awarding organisation must ensure that at least 40% of those marks are made available through an assessment by examination that is normally in the form of a written test (or tests) set by the awarding organisation.

40% seems disproportionate for technical awards which by definition are, and should be, distinct from general qualifications at this level. Technical awards should provide the opportunity for students to experience a technical route and what it entails. This is generally not reflected through written tests.

QUESTION 14: Do you have any comments on our proposals that awarding organisations should set and mark their assessments for examination and specify conditions for sitting the assessments by examination?

Awarding organisations should set assessment to guarantee consistency. Assessments should be suited to the route/sector and not necessarily multiple choice or short answer. If awarding organisations mark assessments it should not come at any greater cost to providers. Consideration must be given to students with special education needs when conditions are set.

QUESTION 15: To what extent do you agree or disagree that there should be two set dates in each academic year to take the assessment by examination? Please include in your comments your thoughts on whether or not it would be appropriate for us to set the windows for those set dates, and whether January and May/June would be suitable.

May and June are becoming very congested with exams. For colleges with large cohorts and no large spaces in which to accommodate the ever-increasing requirement for written examinations this is already problematic. Many colleges have to close for 5 days in the May/June period to accommodate GCSEs in English and maths. While on their own assessments for technical awards will not have this impact, they will add to the amount of assessment in this period. It is a cumulative effect. It is vital that assessment dates for all qualifications, general and technical at KS4 and post-16 are cross checked to avoid clashes and excessive stress on exam teams.

QUESTION 16: To what extent do you agree or disagree with our proposal that the assessment by examination should be taken in the assessment series immediately prior to a student's certification?

Taking assessment by examination immediately prior to a student's certification would mean it would be taken in the summer window in year 11 in line with GCSEs, however it would mean that any resit could mean asking a young person to return to a centre where they are no longer a student, which may be problematic.

QUESTION 17: Do you have any comments on our intention not to put in place any specific limitation on resitting assessments by examination?

If students sit their assessments by examination immediately prior to certification it is likely that resitting for this age group will be difficult. It is not guaranteed that students will be at the same provider.

QUESTION 18: Do you have any comments on our intention that an awarding organisation should be able to apply for exemptions from some of the requirements? Please provide any views as to when an awarding organisation might think it appropriate to apply for exemption.

If a technical award is very practical then an exemption is entirely appropriate, but there has to be consistency.

QUESTION 19: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

We agree that some students, eg those with SEND and exam anxiety will be disadvantaged. It needs to be born in mind that these qualifications are supposed to be an alternative to GCSEs. Increasingly they are becoming just like GCSEs which may be off putting for centres and students. Controlled assessments are more appropriate for this type of qualification and reflect industry requirements.

Any increase in costs to centres will also be off-putting at a time when finances are tight.

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There may be additional costs incurred for exam access arrangements and invigilation.

QUESTION 20: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 21: Do you have any comments on our proposal that awarding organisations must explain and justify in their assessment strategy their approach to non-exam assessment including methodology, availability, marking, delivery requirements and controls?

This is a sensible proposal as it supports transparency.

QUESTION 22: To what extent do you agree or disagree with the limits we propose to include on adaptations allowed to be made to awarding organisation-set non-exam assessments by centres? Please include in your comments your thoughts on whether guidance on adaptation would be useful for us to provide.

Guidance will help transparency. Enabling contextualisation will help students.

QUESTION 23: To what extent do you agree or disagree with (a) our proposal that non-exam assessments should be mark-based and (b) that awarding organisations should be allowed to apply for exemption from this requirement?

Mark based supports objectivity. For the sake of consistency all awarding organisations should operate under the same requirements.

QUESTION 24: Do you have any comments on our intention to place performance table qualifications on the list of those qualifications that should always be subject to moderation (subject to the closure of that consultation)?

Agree.

QUESTION 25: To what extent do you agree or disagree with our proposal that awarding organisations should put in place two windows each academic year for the submission of outcomes from non-exam assessments? Please include in your comments your thoughts on whether or not it would be appropriate for us to set the windows.

Centres should be able to use discretion about when it is best to undertake non-exam assessment to meet the needs of their own students and the bigger assessment picture. May and June are congested with exams and put pressure on students all at one time.

QUESTION 26: Do you have any comments on our proposal not to set requirements around resubmitting or retaking non-exam assessments, but to require awarding organisations to explain the controls they have in place to manage their chosen approach in their assessment strategies?

A sensible, transparent approach.

QUESTION 27: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

The impact proposals note the possible burden on awarding organisations, but not potential implications for centres. It is crucial that there are no additional burdens on exam teams, teaching staff or additional costs to college centres.

QUESTION 28: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 29: To what extent do you agree or disagree with our proposal that Technical Awards: all have a minimum of three grades; for level 1 or 2 a maximum of four grades and for a Technical Award across level 1 and 2 a maximum of seven grades; and an unclassified or ungraded outcome?

This is a sensible approach. Awards across Level 1 and 2 in particular are valuable for cohorts where students may struggle to achieve at Level 2 but are rewarded with achievement at Level 1.

QUESTION 30: Do you have any comments on the potential for us to require a common grading scale for Technical Awards in the future, including any benefits or risks you think such an approach might bring?

This would be helpful and more transparent for key stakeholders such as students, parents/cares and employers. Other qualifications such as GCSEs all follow the same grading model.

QUESTION 31: To what extent do you agree or disagree with our proposal (a) to require a compensatory approach to generating individual assessment scores for individual assessments and (b) to allow applications for exemption from this proposal?

A compensatory approach seems sensible. It would be helpful to have examples of when an exemption might be required.

QUESTION 32: To what extent do you agree or disagree with our intention not to require a specific approach to aggregation of outcomes across assessment opportunities to calculate the final grade?

Individual awarding organisation approaches to aggregation must be clearly outlined to centres and teaching staff.

QUESTION 33: To what extent do you agree or disagree with our proposal not to prescribe any must-pass requirements?

Agree, this is a sensible approach. Technical awards will not lead directly to employment in a sector and should not be subject to must-pass requirements.

QUESTION 34: To what extent do you agree or disagree with our proposal that awarding organisations should not publish details around setting specified levels of attainment in advance of assessments being marked?

This proposal requires greater discussion. Teachers need to be able to predict grades for post 16 applications. However, as a student will probably only take one technical award it is difficult to see that it would have any overall impact on supporting progression.

QUESTION 35: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree, as long as there are no additional burdens for college centres.

QUESTION 36: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 37: To what extent do you agree or disagree with our proposed approach for setting standards?

Agree. It is crucial that optional strands are not limited. Centres should be able to choose what best meets the needs of their students.

QUESTION 38: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree, unless there is an additional burden on teachers, exam teams or additional costs to centres.

QUESTION 39: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 40: To what extent do you agree or disagree that we propose to put in place Conditions that require awarding organisations to comply with any notice we issue in relation to the provision of data about performance table qualifications?

Agree, but it needs to be clarified whether there are data protection considerations if student data is to be shared.

QUESTION 41: Do you have any comments about our proposal to require awarding organisations to specify clearly within an event notification that the event relates to a Technical Award?

Sensible approach. There needs to be consideration of how and the time frame for this information is relayed to centres so that centres can reassure students as soon as possible.

QUESTION 42: Do you have any comments on our proposed approach to managing the withdrawal of qualifications from the Performance Table Qualification QLCs, requirements and guidance?

This is a key question for technical awards where numbers of entries in some subjects may be low. Any withdrawal of a qualification should ensure sufficient time for centres to identify an alternative or inform students, parents/carers that the qualification is no longer available. As options events occur early in the spring term of year 9, such decisions should be confirmed by the beginning of the academic year.

QUESTION 43: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree, as long as there are no additional burdens on colleges in terms of staff workload or costs.

QUESTION 44: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 45: Do you have any comments on our considerations around introducing requirements in line with those we have in place for the reviews of marking moderation and appeals in GCSEs?

This seems sensible and allows for parity between GCSEs and Technical Awards.

QUESTION 46: Do you have any comments on our considerations on introducing requirements around the marketing or branding of Technical Awards?

Helpful for key stakeholders such as students, parents/carers and employers.

QUESTION 47: To what extent do you agree or disagree with our proposal to require awarding organisations to develop an assessment strategy for each qualification they submit to be considered for inclusion as Technical Awards in performance tables?

Agree; this is a sensible approach.

QUESTION 48: Do you have any comments on the areas of detail we propose should be included in each assessment strategy?

Agree with areas of detail.

QUESTION 49: To what extent do you agree or disagree with our assessment of the potential impact of our proposals?

Agree. It would be helpful to know if any administrative costs incurred by awarding organisations will be passed onto centres.

QUESTION 50: Is there any additional information you think we should consider when evaluating the impact of our proposals? Please provide estimated figures if related to costs or savings.

As above.

QUESTION 51: Do you have any comments on our proposed Performance Table Qualification QLCs requirements and guidance for Technical Awards?

They are in line with the consultation proposals.

QUESTION 52: Are there any regulatory impacts that we have not identified arising from our proposals? If yes what are they and are there any additional steps we could take to minimise the regulatory impact of our proposals?

None identified.

QUESTION 53: Is there any additional information associated with our proposals which we have not identified? Please provide estimated figures if related to costs or savings.

No.

QUESTION 54: Do you have any comments on the impact of our proposals on innovation by awarding organisations?

None.

QUESTION 55: Are there any potential impacts (positive or negative) on students who share protected characteristics that we have not identified?

We agree that some students, eg those with SEND and exam anxiety will be disadvantaged. It needs to be born in mind that these qualifications are supposed to be an alternative to GCSEs. Increasingly they are becoming just like GCSEs which may be off putting for centres and students. Controlled assessments are more appropriate for this type of qualification and reflect industry requirements.

QUESTION 56: Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on students who share a protected characteristic?

Reconsider whether assessment by examination is desired or appropriate for Technical Awards or indeed any technical qualification.

QUESTION 57: Do you have any other comments on the impacts of our proposals on students who share a protected characteristic?

As above.

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