



ASSOCIATION  
OF COLLEGES

**Arrangements for the assessment and awarding of  
Vocational and Technical and Other General  
Qualifications in 2020/2021 Consultation – Part 2  
The Extended Extraordinary Regulatory Framework  
Ofqual consultation – AoC draft response**

9 September 2020

The Association of Colleges (AoC) represents most of the 240 colleges in England incorporated under the Further and Higher Education Act 1992.

**Question 1: Do you have any comments on the proposed principles set out above and in the second draft version of the Extended ERF requirements?**

**Proposed principles**

**Principle 1 – As far as possible and without prejudice to the other principles, an awarding organisation must seek to ensure that the adaptations, which it makes to a qualification, assist with mitigating the impact on teaching, learning or assessments caused by the coronavirus (COVID-19) pandemic on learners taking that qualification. Agree**

**Principle 2 – An awarding organisation must seek to ensure, as far as possible, that the adaptations which it makes to a qualification do not serve to advantage or disadvantage learners taking that qualification against their peers taking general qualifications not covered by the Extended ERF. Agree**

**Principle 3 – An awarding organisation must seek to ensure that, where it makes any adaptations to its qualifications in accordance with the Extended ERF, the validity and reliability of those qualifications is maintained. Agree. It needs to be clear in which qualifications adaptations are not required and why.**

**Principle 4 – An awarding organisation must seek to maintain standards, as far as possible, within the same qualification in line with previous years, and across similar qualifications made available by the awarding organisation and by other awarding organisations. Agree. It is important in terms of standards that awarding organisations work together to ensure consistency across similar qualifications.**

**Question 2: Do you have any comments on the proposed guidance on adaptation set out in the second draft version of the Extended ERF?**

In the Extended ERF key questions are:

- 1) Remote assessment and online invigilation – This will require training of both staff and students. If, due to local lockdowns or cases of the virus on a college site, assessments need to take place remotely it cannot be assumed that all students will have appropriate environments, wifi access and equipment to undertake assessments. It needs to be clear how SEND needs will be met.
- 2) Consistent approaches by awarding organisations offering similar qualifications – There needs to be clarity on how this will be assured. In summer 2020 this was not always the case causing unnecessary confusion for college staff and thus students.

- 3) Professional qualifications and licence to practise – It is important to maintain standards and reliability and for professional/sector bodies to be consulted. However, adaptations have to be manageable for college staff and students and in line with Government public health advice.
- 4) Short vs long courses – Page 9 of the consultation document notes that ‘awarding organisations will be able to make many qualifications, in particular short qualifications which are available on demand, available as normal or with minimal changes in 2020 to 2021’. There needs to be clarity of approaches that will be taken to functional skills which can both be short and on demand for adults and or apprentices, but also delivered as part of an academic year study programme.

The following seem sensible for AGQ type assessments:

- **reducing the amount of content being assessed, whilst still validly and reliably measuring the knowledge, understanding and skills, or practical competence, signalled in the qualification**
- **reducing or combining assessments, whilst assessing the same or similar content**
- **making assessments available to centres earlier or more flexibly**

However, **reviewing the conditions under which some assessments are taken** needs further explanation. If as per point 1 above this means online and or remote assessment centres and students will need to be properly prepared. It also needs to be made clear whether there are any cost implications for centres. Exam and assessment fees constitute a significant part of a college budget and will have been planned for in advance. We would expect that that there will be no additional costs.

**Question 3: Do you have any comments on the proposed guidance on Special Consideration set out in the second draft version of the Extended ERF?**

Adaptation as the first mitigation appears sensible. However, it is difficult to predict the impact of local lockdowns or isolated outbreaks in centres on teaching, learning and assessment. This will need to be monitored throughout the year ahead.

**Question 4: Do you have any comments on the proposed regulatory arrangements for autumn assessment opportunities?**

It needs to be clear to centres when the original extraordinary regulatory framework finishes and the extended extraordinary regulatory framework starts and any impact on students.

**Question 5: Are there any potential positive or negative equality impacts arising from the proposed principles, the proposed guidance on adaptation and Special Consideration, and the proposed regulatory arrangements for autumn assessment opportunities, apart from those we have explored? If yes, what are they and how might they be mitigated?**

The consultation document quite rightly refers to the diverse range and thus circumstances of students who take technical and vocational qualifications. This analysis must be considered before any adaptations are put in place such as online assessment or remote invigilation.

**Question 6: Are there any potential regulatory impacts arising from the proposed principles, the proposed guidance on adaptation and Special Consideration, and the proposed regulatory arrangements for autumn assessment opportunities that we have not explored? If yes, what are they and how might they be mitigated?**

For centres the key concerns will be manageability and costs. We assume there will be no additional costs to centres for assessments, but as the consultation document points out any adaptive proposal which requires new hardware, software and training for staff and students will have cost implications which will not have been budgeted by colleges. It is crucial that if there are to be any requirements to purchase new systems that all AOs agree to use the same system.