

Vocational and Technical Qualifications Consultation Response

Question 1: To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?

We agree with this approach.

Question 2: To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?

We agree with this approach.

Question 3: To what extent do you agree or disagree with the balance we are proposing to strike across the 3 elements of: delegation to awarding organisations; flexibility; and consistency?

We agree that the range of exam boards and qualifications require this flexibility within the framework, however there should be consistency of approach between exam boards offering similar qualifications in order to provide assurance to schools and students that the system is fair and to allow schools to apply processes which are both reliable and manageable.

Question 4: To what extent do you agree or disagree with the key principles we have set out?

We agree with the key principles.

Question 5: To what extent do you agree or disagree with our proposal to allow awarding organisations to deliver their qualifications as normal where they are able to?

Where awarding organisations determine it appropriate to deliver their qualifications as normal, then a centre should have a right to appeal against that decision if the purpose of the qualification is no longer met. For example, if it is not possible to complete a qualification within the academic year because there is a need for a practical assessment and the students need their final grade to support their progression.

Question 6: To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?

We agree with this approach.

Question 7: To what extent do you agree or disagree with the aims of our proposed approach to calculating results?

We agree with the aims of your approach.

Question 8: To what extent do you agree or disagree with our proposal that the minimum evidential threshold is that any approach to providing calculated results needs to be based upon at least one source of trusted evidence along with a sufficiently robust basis for quality assurance?

We agree with the aims of your approach.

Question 9: Do you have any other comments on the approach to providing learners with calculated results?

We have some concerns about the data being used to calculate student grades. They are outlined below:

Using banked grades: We support the use of the historical correlation between those specific banked assessments and final overall grades to inform the statistical standardisation of centre assessed grades. This would be consistent with the approach being used in the assessment of A Levels and GCSEs.

Ranking - Centre assessed grades should be required for each unit of a multi-unit qualification. Ranking should only be asked for the overall grading. Ranking each unit will be a considerable burden on centres and its merits, in terms of increasing the reliability of the grade, are unclear.

For the calculated grades the requirements should be consistent with Alevels/GCSE, for example the use of non-banked evidence in centres should not be required, as suggested by the consultation document. Such non-banked assessments should however be drawn on by teachers in contributing to their holistic assessment of a student's grade. Teachers' professional judgement should be relied upon as they are best positioned to judge the potential achievements of their students by the end of their course.

The historical evidence of centre performance – UTCs are mostly small, young schools that therefore often have little historical data. Only 50% of the 48 UTCs have three years of previous examination data. Five UTCs have no historical data available. Therefore annual achievement patterns in individual UTCs are prone to greater fluctuation than exhibited in larger organisations. During the consultation period for the general qualifications the Ofqual team helpfully confirmed that the final model should incorporate the statistical uncertainty caused by these issues and have provision to deal with it; we would like the same case to be taken with vocational and technical qualifications.

Prior attainment data – Student performance in vocational courses cannot easily be determined by their achievement in academic qualifications and their prior academic studies. Therefore the use of prior attainment to predict achievement data will not be appropriate in many of these courses. Centre assessment grades will be more reliable.

Question 10: To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?

We would be concerned about changing the method of assessment at this stage as the students would require support and preparation for the new form of assessment, that they cannot get at the

moment. In addition, online assessments would be impossible for students with limited or no internet access during this time.

Question 11: To what extent do you agree or disagree that delaying or re scheduling assessments should be the option of last resort?

We agree.

Question 12: To what extent do you agree or disagree with our proposals around decision making and record keeping?

We strongly agree. This is absolutely essential.

Question 13: To what extent do you agree or disagree with our proposed approach to oversight of awarding organisations?

We strongly agree. This is absolutely essential.

Question 14: To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?

We agree with this approach.

Question 15: To what extent do you agree or disagree with our proposed approach to appeals?

The appeals procedure must be consistent with that used in GCSEs and A Levels, so that students and centres can be confident that the system is fair and equitable.

We strongly agree with the Secretary of State in his direction that learners should have access to a right of appeal if the relevant process was not followed correctly by the awarding organisation. Such appeals should be restricted to determining whether the process was followed. Appeals should not challenge the professional grading or ranking judgements applied within the centre.

Question 16: To what extent do you agree or disagree with our proposed position in relation to certificates?

We agree.

Question 17: To what extent do you agree or disagree with our proposed approach in relation to private learners?

We agree with this approach.

Question 18: To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?

We agree with this approach.

Question 19: To what extent do you agree or disagree with our intention to not require any particular approach for adapting assessments and/or issuing results to international learners

We agree with this approach.

Question 20: Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?

We agree with this approach.

Question 21: To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners

We agree with this approach.

Question 22: Do you have any comments on the proposed regulatory framework?

No

Q23: Are there other potential equality impacts that we have not explored? If yes, what are they?

This consultation has not explored the impact of the closure of the schools, colleges and UTCs on Years 10 and 12. In particular those who have been ill; suffered from bereavement; young people who do not have access to their own computer and/or the internet and those living in accommodation that does not support learning e.g. those in multi-occupancy households. These students cannot complete their work as effectively as they would in a normal year.

This is particularly the case for vocational and technical qualifications because, in addition to the internet, they require access to specialised equipment, software and industry-based activities and experiences. Therefore, high quality coursework cannot be completed while the students do not have access to their schools, colleges and UTCs.

The UTCs are working extremely hard to support all their students and are providing an innovative curriculum, online and on paper, adapted to meet the needs of their students. However, they are very concerned that years 10 and 12 will have too much of the curriculum left to learn, too much coursework to complete and too many exams to take in years 11 and 13. As a result the students may feel greater levels of anxiety impacting on their mental health and achievement rates may fall resulting in a reduction in social mobility.

We seek actions from the exam boards to mitigate the risk outlined above.

Q24: Do you have any views on how any potential negative impacts on particular groups of students could be mitigated?

A possible method of achieving this would be a reduction in the size of the curriculum for students expected to complete their qualifications in the summer of 2021.