

Ofqual consultation on the assessment and awarding of Vocational, Technical and other General Qualifications in 2020 to 2021

SFCA's summary response on behalf of sixth form colleges
August 2020

1. Sixth form colleges predominantly deliver A levels and Applied General Qualifications (AGQs) such as BTECs. Therefore, this response addresses only the assessment and awarding arrangements for AGQs, rather than the broader and varied field of technical qualifications. Due to the nature of both A levels and AGQs, which are designed to enable progress into further study/higher education, it is absolutely essential for the assessment and awarding arrangements for 2020/21 of AGQs to be in line with the decisions made regarding A level qualifications, which were the subject of a separate consultation held in July. This will help ensure both are comparable, as well as not advantage or disadvantage students based on the type of qualifications they have undertaken, which are often a product of relatively small differences in prior attainment.
2. While there have been serious difficulties in the use of centre accessed grades (CAGs) this year as a result of flawed moderation arrangements, we continue to support the idea of using teacher assessment in situations where holding exams is not possible. Therefore, we believe that it is important for CAGs to remain an option for 2020/2021, and they should be included in Ofqual's EERF. There is still uncertainty around the impact of Covid-19 on the next academic year, with another wave anticipated in the winter - we have already seen the introduction of local lockdowns, which come into force with little notice. It is vital for CAGs to be made available if colleges face further local lockdowns which make teaching all content in time for existing assessments impossible. Without CAGs as an option, Ofqual and awarding organisations risk facing another challenge of devising assessment arrangements in a short space of time. Furthermore, planning for local outbreaks from the outset will help Ofqual, awarding organisations, and colleges to plan, and represent a more measured and sensible approach to assessments.
3. Due to the complex nature and number of AGQs, we understand the reasons for Ofqual not to adopt a single prescribed approach to adapting assessment arrangements and for decisions to be made instead by awarding organisations. Awarding organisations have undertaken a great deal of work in summer 2020, and we hope they will build on this and make sensible tailored decisions on their qualifications. We also hope that awarding organisations continue to put students at the forefront of any decisions made, as well as protecting the creditability and validity of their qualifications.
4. With the exception of the lack of provision for calculated results (CAGs) mentioned above, we support Ofqual's proposals to help mitigate the long term impact of the pandemic, in particular allowing awarding organisations to widen the assessment window. As stated earlier, we may see a rise in local lockdowns. Widening the assessment window will provide greater flexibility and help colleges plan ahead

effectively. However, widening the assessment window may not help all qualifications where assessment arrangements are seasonal, e.g. PE assessments taken in the summer. In this case, alternative arrangements are required, including potentially dropping some practical assessments as Ofqual has already done, for example with fieldwork in geography A level. We also support the proposal that the conditions under which internal assessments are completed can be changed. Based on government guidelines around social distancing, some subject assessments such as drama group work will be difficult to access. Banking of modular assessments throughout the course of study is a useful option for colleges, and will help students feel at ease knowing that they have achieved part of the qualification in the face of another uncertain academic year. Due to the teaching time already lost this year, and the value of face-to-face contact between students and teachers for learning, we support awarding organisations streamlining assessments to help free up teaching and learning time in colleges. Further information will be required in due course on the adaptations awarding organisations are planning to make using the proposed flexibilities for qualifications where calculated results were issued in the summer. We would welcome the opportunity to be consulted on these adaptations to ensure they are appropriate for students and colleges.

5. We support Ofqual's proposed objectives and think they will help protect the validity, reliability and credibility of qualifications. We agree that content should not be removed from qualifications, as this is the decision that has already been taken for A level qualifications; it would be wrong for AGQ students progressing to HE to have less knowledge than their peers with A level qualifications going into the same paths of degree-level study. Increasing the flexibility in when and how assessments are undertaken will greatly help colleges plan ahead and reduce the impact for students if the virus rapidly flares up again.
6. Further information, and a common approach across awarding organisations, is required on how the work placement aspect of some qualifications will be addressed. It is unlikely that all employers will be able to invite students back to the workplace, either for safety or for commercial reasons. Other forms of work experience (e.g. online) will need to be taken into account, with checks to ensure that they are as meaningful and provide as valid and reliable method to assess a student's skills as in-person working. Furthermore, we require further information on qualifications which have a licence to practice element – essential to proceed forward with the qualification. These qualifications have largely been awarded using adapted online assessments or delayed assessments this summer; keeping a consistent approach next year, should in-person assessment not be possible, would be welcome.
7. As mentioned in our response to Ofqual's consultation on changes to the assessment of general qualifications in 2021, the achievement gap will widen in 2020 and 2021 for BAME students and those from working class backgrounds. It is now impossible to avoid this, based on all of the evidence we have on the impact of previous gaps in teaching and the nature of home learning during the lockdown in the UK. Given this, any changes to assessment in 2020/2021 and beyond should be given a full published equalities impact assessment to explore their effects on students from disadvantaged groups. This equalities impact assessment should not just consider the direct role of ethnicity, sex, socioeconomic background, and disability, etc., but also the interrelationship between prior attainment and each of these factors.
8. To ensure potential negative impacts on particular groups of students are mitigated, the approach suggested in Ofqual's consultation on general qualifications could be adopted

- using centre-assessed grades alongside exam assessment. This could be by calculating average grades based on appropriate weighting of a student's CAG and the results of any examinations that can go ahead, or by using the CAG as a 'safety net', where students cannot go more than perhaps a single grade below their CAG. Analysis of 2020 CAGs should allow for a clearer understanding of how optimistic or pessimistic they are relative to usual exam assessment, which should inform this approach.

9. Finally, it is important to highlight how vital continued communication between Ofqual, awarding organisations, representative organisations and colleges is on the assessment arrangements for 2020/2021. Colleges should be consulted and informed of any changes/adaptations to assessment arrangements as soon as possible to plan their programme of assessments effectively whilst also adhering to social distancing guidelines. These requirements may mean that more staff may be required to undertake multiple assessments to accommodate a high number of students if assessments are taking place in college, or that colleges require greater space than is available in college for assessment under normal circumstances. The more time colleges have to make these arrangements, the likelier assessments are to go smoothly and at a minimum of additional cost to colleges and awarding organisations.