



# **Analysis of responses to our consultation on Ofqual's approach to regulating Technical Qualifications**



September 2018

Ofqual/18/6422/1

## **Contents**

Contents.....	2
1. Executive summary .....	3
2. Introduction .....	4
3. Who responded? .....	6
4. Approach to analysis .....	7
5. Views expressed – consultation response outcomes .....	8
6. Views expressed – consultation engagement events .....	75
Appendix A: list of organisational consultation respondents .....	80

## **Executive summary**

Our consultation on Ofqual's approach to regulating Technical Qualifications took place between 10 July and 6 August 2018. The consultation questions were available to either complete online or to download. A copy is available at <https://www.gov.uk/government/consultations/ofquals-approach-to-regulating-technical-qualifications>.

There were 53 responses to the consultation. Of these responses, 50 were in a form that matched or broadly followed the layout of the online consultation and 3 responses were written submissions. They were not included in the quantitative data analysis, but were considered within the qualitative sections. Of those responses that gave their respondent type, 6 were from individuals and 46 were from organisations. One respondent did not disclose their identity.

In addition, we held 3 consultation events which were attended by 98 people, including awarding organisations, school and college representatives and other stakeholders, and a webinar which was attended live by 42 people. We summarise the responses provided through these events at the end of this analysis.

## Introduction

As part of its vision to transform the technical education system in England, the government is introducing T Levels, which will be overseen by the Institute for Apprenticeships (the Institute). Each T Level will include a level 3 Technical Qualification, which will be regulated by Ofqual. The government has set out its decisions in relation to the Technical Qualification in a technical annex as part of its published approach<sup>1</sup> for the introduction of T Levels.

This consultation was about our approach to regulating these Technical Qualifications. Our proposed approach was intended to:

- ensure that skills and knowledge are assessed reliably to provide an accurate indication of candidates' abilities
- secure comparability where the same content is assessed in different Technical Qualifications
- secure comparability where it is appropriate to do so between occupational specialisms
- maintain grade standards over time within each Technical Qualification
- ensure a consistent and appropriate level of demand

To do this, we proposed to regulate Technical Qualifications against our General Conditions of Recognition. We identified, however, that in order to meet the objectives set out above, as well as our statutory objectives, in particular in relation to maintain qualification standards and public confidence, the need to put in place additional Technical Qualification-specific Conditions and guidance.

We proposed to put in place Technical Qualification-specific requirements and guidance in the following areas:

- qualification purpose
- assessment structure
- number of assessments
- assessment availability

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<sup>1</sup> [www.gov.uk/government/consultations/implementation-of-t-level-programmes](https://www.gov.uk/government/consultations/implementation-of-t-level-programmes)

- retakes
- prior learning
- grading
- results and certification
- accreditation requirement
- assessment strategies
- outline content
- assessment objectives
- setting and marking assessments
- controls on taking assessments
- reviewing and appealing results
- setting and maintaining grade standards

We also proposed to disapply the following Condition:

- Condition E1 – Qualifications having an objective and support

We proposed to put in place Technical Qualification-specific guidance against the following General Conditions:

- D3 – Reviewing approach
- E7 – Total qualification time

This document sets out respondents' views in response to our proposals.

## Who responded?

We received 53 responses to our consultation. There were 50 responses to the consultation questions and 3 written submissions that did not fit the format of the consultation. We do not include the 3 written submissions in the detailed breakdown of responses in section 4, as those responses did not answer the consultation questions we set out, but all responses were considered as part of our analysis.

Of those responses that gave their respondent type, 6 were from individuals and 46 were from organisations. All the responses were from individuals or organisations based in England or Wales.

**Table 1: Breakdown of consultation responses**

<b>Personal / organisation response</b>	<b>Respondent type</b>	<b>Number</b>
Organisation	College or training provider	14
Organisation	Awarding organisation	11
Organisation	Representative organisation	19
Organisation	Employer	2
Personal	Individual	7

## **Approach to analysis**

The consultation included 52 questions and was published on our website. Respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us.

This was a consultation on the views of those who wished to participate and, while we tried to ensure that as many respondents as possible had the opportunity to reply, it cannot be considered as a representative sample of any specific group.

We present the responses to the consultation questions in the order in which they were asked.

For some of the questions, respondents could indicate the extent to which they agreed with our proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree), as well as providing free-form narrative comments on our proposals. For others, respondents were asked to provide comments on our proposals.

Not all respondents expressed a preference using the 5-point scale, with some only providing a comment. Likewise, not all respondents who expressed a preference on the scale provided a comment and, of those who did, not all comments were relevant to the question.

During the analysis phase, we reviewed every response to each question, and also the two responses that did not follow the format of the consultation (though these responses are not included in the figures which set out the number of responses received to each question).

*When the consultation was published on our website, question 25 (To what extent do you agree or disagree that we should require Technical Qualifications to meet our existing accreditation criterion?) was omitted from the online and downloadable response forms. Respondents that downloaded the form would therefore not have seen this question, although it was in the consultation document itself. We identified and contacted 11 respondents who had submitted responses before this error was identified to give them the opportunity to respond to this question.*

## Views expressed – consultation response outcomes

In this section, we report the views, in broad terms, of respondents to the consultation.

Appendix A lists the organisations who responded to the consultation.

<b>Question 1 – Do you have any comments on the way that the purpose for Technical Qualifications (in paragraph 3.7) which we propose to set out in our Qualification Level Conditions document is described?</b>
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Twenty-nine respondents provided a comment in relation to this question, of which a substantial number (13) noted that a clearly articulated purpose, such as the one proposed, was both helpful and important when designing qualifications.

A few respondents raised a specific issue regarding the drafting in paragraph 3.7, noting that it appears to have diverged from the drafting found in the purpose statement of the Department for Education's Technical Annex. Respondents noted that threshold competence is described in the Technical Annex as signalling that *"a student is well placed to develop full occupational competence, with further support and development, once in work"*, and they suggested that Ofqual's current drafting suggests job readiness, and may lead to confusion or potentially misrepresent the Department for Education's intention. Some respondents expressly noted the potential impact on apprenticeships, if full occupational competence is to be expected as an outcome of Technical Qualifications.

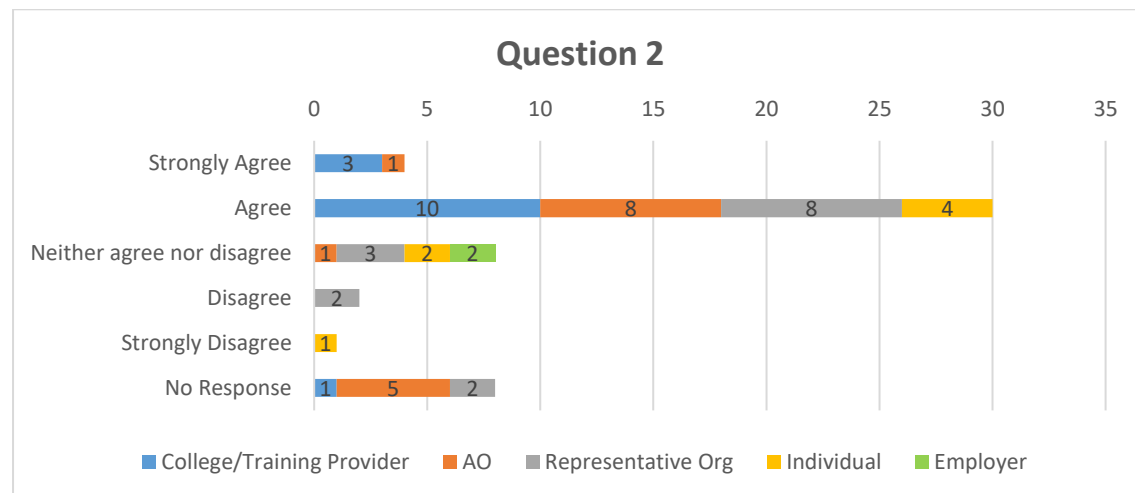
A small number of responses indicated confusion regarding the structure of the T Level and the role of Technical Qualifications within them, with some suggesting Ofqual's purpose statement should reflect the purpose of the T Level as a whole.

Two respondents noted that they felt the language used in the drafting was "quite dense" or difficult to understand.



**Question 2 – To what extent do you agree or disagree with our proposal to set a requirement that Technical Qualifications are assessed through a Core and Occupational Specialism(s)?**

Responses from those who responded to this question were as follows:



There were 45 responses to this question. This included 13 colleges or training providers, 10 awarding organisations, 13 representative organisations, 7 individuals and 2 employers. 8 respondents did not provide a response to this question (1 college or training provider, 5 awarding organisations and 2 representative organisations).

The majority of respondents agreed with our proposal, including 13 colleges or training providers, 9 awarding organisations, 8 representative organisations and 4 individuals. Where comments were provided, they indicated that the proposed approach would better equip students with the knowledge and skills needed, and add credibility to the qualification.

In addition to this, respondents who agreed indicated that there was a need for consistency between Technical Qualifications within a given pathway and across T Levels. One respondent noted that it is important there is no perceived difference between different subjects, to ensure that no one subject is perceived to be an easier route to attainment.

One respondent noted that while consistency was desirable, a degree of flexibility needs to be allowed to address the differences in the type of skills and knowledge being assessed. Another noted that offering a range of relative weightings *"creates the opportunity for a flexible approach that allows the overall qualification to respond*

to the demands of the 11 routes” but further noted that such flexibility may result in varied standards of performance.

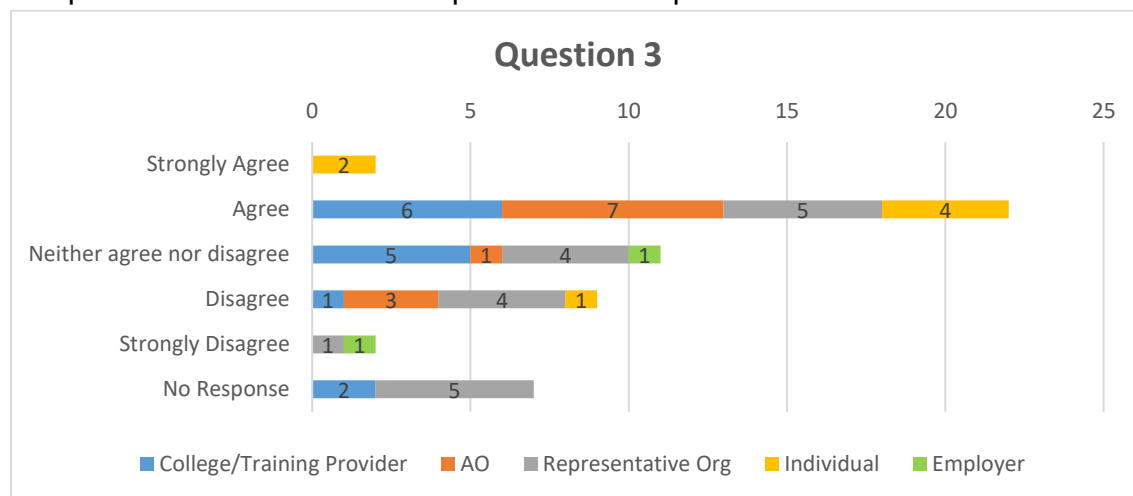
Another respondent who agreed sought assurance that attainment would be ‘on par’ with other qualifications, such as A levels and that greater emphasis should be placed on the Core to allow for more varied and diverse employment or further study.

Of the 3 respondents who disagreed, 2 were representative organisations and 1 was an individual. One respondent again noted the need for flexibility in response to the different demands of the routes, while another noted that a similar approach (ie of a qualification having a Core and Subject Specialisms) has been unsuccessful in the past.

Two respondents (both representative organisations) neither agreed nor disagreed with our proposal.

**Question 3 – To what extent do you agree or disagree with our proposal to set a requirement that core knowledge and understanding and core skills are assessed separately?**

Responses from those who responded to this question were as follows:



There were 46 responses to this question. This included 14 colleges or training providers, 11 awarding organisations, 19 representative organisations, 7 individuals and 2 employers. Five representative groups and 2 colleges or training providers did not respond to this question.

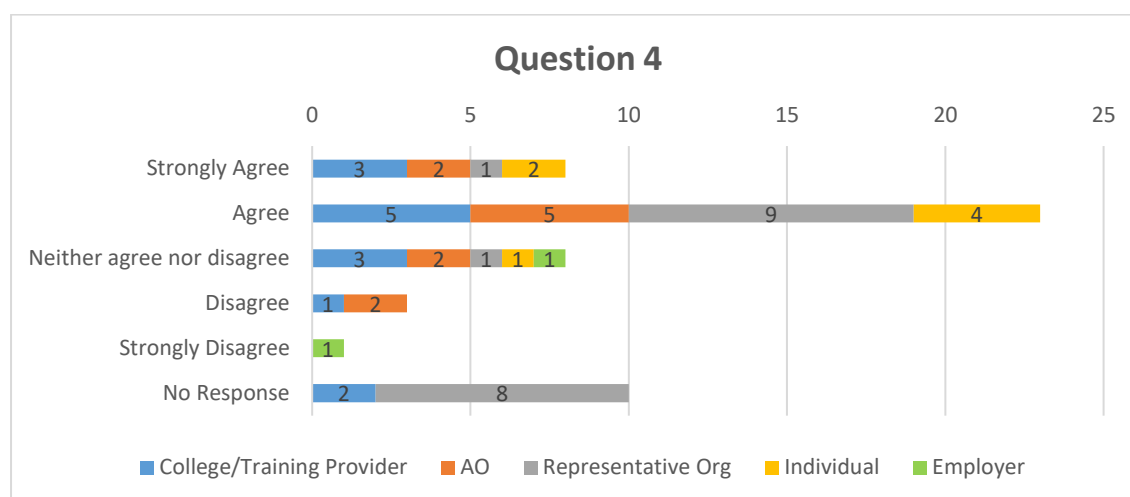
The majority of respondents (24) agreed with our proposal, including 6 colleges or training providers, 7 awarding organisations, 5 representative organisations and 6 individuals. Their comments suggest allowing learners to demonstrate both their knowledge and practical competence separately would be to their benefit, although many respondents noted that the two are closely linked.

Eleven respondents (including 1 college or training provider, 3 awarding organisations, 5 representative organisations, 1 individual and 1 employer) disagreed with the proposal. These respondents suggested that a more holistic approach to assessment would be preferable, as knowledge and understanding and core skills are not separate from one another, and knowledge is often evident when learners perform skills. The respondents noted that any separation of the two would be "artificial" and could result in a lack of cohesion between what a learner can do and what they know and understand.

Of the respondents who neither agreed nor disagreed, 2 were colleges or training providers, and 5 were representative organisations. The respondents who provided a comment noted a concern that separating knowledge and understanding from skills could result in over-assessment or duplication of assessment.

**Question 4 – To what extent do you agree or disagree with our proposal to provide guidance on the relative weightings of core knowledge and understanding and core skills within the Core?**

Responses from those who responded to this question were as follows:



There were 43 responses to this question. This included 12 colleges or training providers, 11 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Ten respondents did not provide a response to this question, including 2 colleges or training providers and 8 representative organisations.

The majority (31) of respondents agreed with our proposal, including 8 colleges or training providers, 7 awarding organisations, 10 representative organisations and 6 individuals. Where comments were provided, they suggested that such guidance was welcome and would ensure a consistent approach, establishing parity across different Technical Qualifications. Respondents further commented that weighting

ranges would provide the flexibility to ensure that the final weightings are appropriate to the specific content of a qualification.

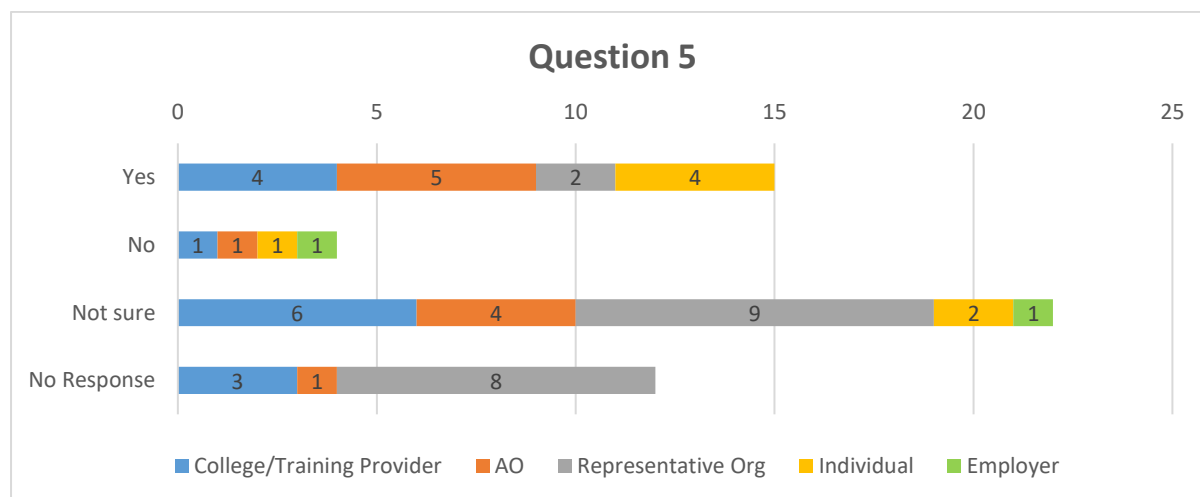
Four respondents (1 college or training provider, 2 awarding organisations and 1 employer) disagreed with our proposal, and of those who provided a comment, comments included:

- as a result of these weightings, independent research and exploration may not be given enough importance
- weightings could over-complicate qualification design
- as specific Technical Qualifications may require different weightings, guidance is unnecessary

Eight respondents neither agreed nor disagreed with our proposal, including 3 colleges or training providers, 2 awarding organisations, 1 representative organisation, 1 individual and 1 employer. Of these, one respondent emphasised the need for flexibility in weighting ranges to meet the needs of each route.

**Question 5 – Do you believe that 25-40% is an appropriate weighting for the assessment of core skills within the Core? If not, what do you believe the range should be and why?**

Responses from those who responded to this question were as follows:



There were 41 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Of those who did not provide a response to this question, 3 were colleges or training providers, 1 was an awarding organisation and 8 were representative organisations.

For this question, respondents could indicate their agreement using 'yes', 'no', or 'not sure', as well as providing free-form narrative comments on our proposal.

Fifteen respondents indicated that they felt our proposal was appropriate, including 4 colleges or training providers, 5 awarding organisations, 2 representative organisations and 4 individuals. Of these, comments included:

- a range, as opposed to a fixed value, allows for the variations in content across different pathways
- the range may be too great to ensure comparability, or may impact equivalence across routes

Four respondents (1 college or training provider, 1 awarding organisation, 1 individual and 1 employer) did not feel the proposal was appropriate, but did not propose alternatives. One respondent commented that weightings should be decided at sector level.

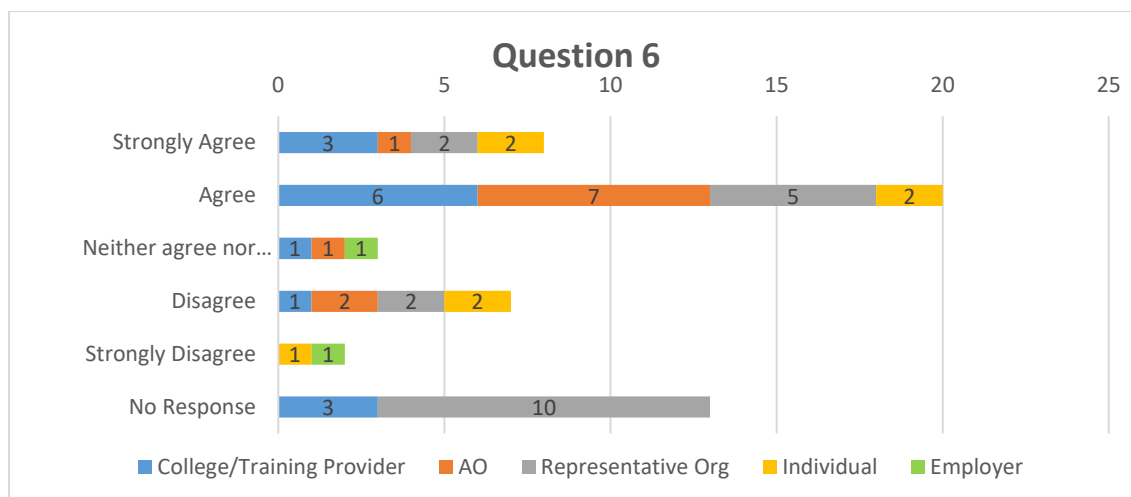
Twenty-two respondents were unsure whether our proposed weighting was appropriate, including 6 colleges or training providers, 4 awarding organisations, 9 representative organisations, 2 individuals and 1 employer. Their comments, where provided, included:

- it is challenging to identify a specific weighting range without having the full and final content for the qualification
- the weighting should be fixed and not a range, in order to secure a higher degree of standardisation and comparability
- it is important to ensure no route is perceived as easier than another
- 25-40% is too low
- the range should be 20-25%
- the range should be higher, for example 30-50%

One respondent who provided a comment, but did not indicate their agreement, noted that at the lower end this weighting may under represent the skill aspect of the qualification, while at the higher end it may over represent it.

**Question 6 – To what extent do you agree or disagree with our proposal to set a requirement for awarding organisations to specify combinations of Occupational Specialisms that may, or may not, be taken in combination?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 11 colleges or training providers, 11 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Three colleges or training providers and 10 representative organisations did not provide a response to this question.

Of those who did respond, the majority (28) agreed with our proposal. This included 9 colleges or training providers, 8 awarding organisations, 7 representative organisations and 4 individuals. Of those respondents who agreed with the proposal, many suggested it was a sensible approach that will provide clarity for all parties.

Other comments from those who agreed included:

- that it is important that any combinations set by awarding organisations are developed in conjunction with employers, colleges and training providers
- that consideration should be given to the feasibility of centres delivering multiple options
- that awarding organisations are best placed to specify combinations
- that support must be given to learners in making appropriate choices that maximise the opportunities available to them, post-T Level

One respondent who agreed noted difficulties could arise where more able students are restricted by the combinations available to them.

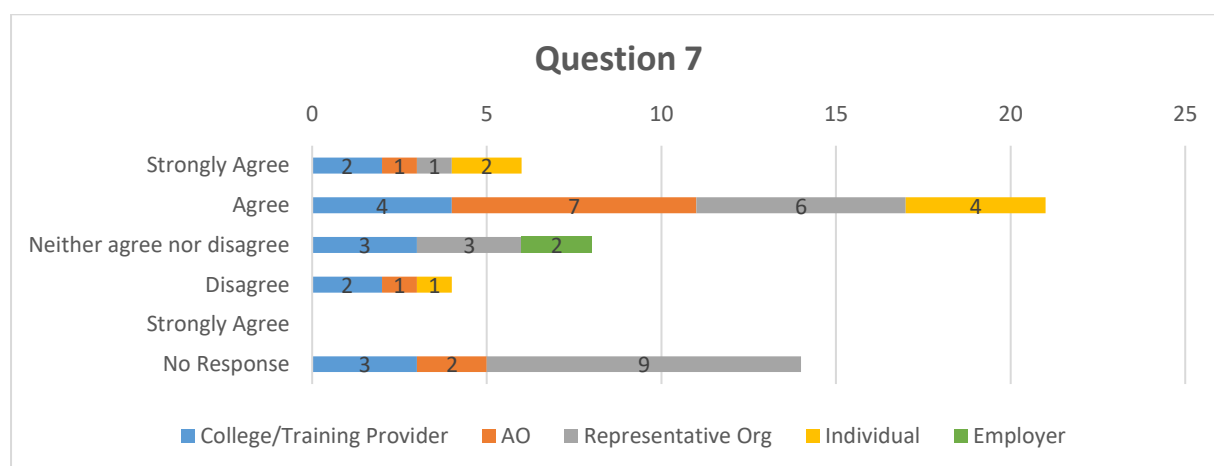
Of the 9 respondents who did not agree with the proposal (1 college or training provider, 2 awarding organisations, 2 representative organisations, 3 individuals and 1 employer), comments included:

- combinations should be indicative, 'not absolute must-do'

- only one specialism should be taken; specialisms should be distinct enough for this to occur
- studying multiple specialisms could reduce the level of attainment for individual specialisms
- combinations should have been established earlier in T Level development, and should not be determined by awarding organisations

**Question 7 – To what extent do you agree or disagree with our proposal to set a requirement for Occupational Specialisms to be assessed separately to one another?**

Responses from those who responded to this question were as follows:



There were 39 responses to this question. This included 11 colleges or training providers, 9 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Three colleges or training providers, 2 awarding organisations and 9 representative organisations did not provide a response to this question.

Of those who did respond, the majority (27) agreed with our proposal, including 6 colleges or training providers, 8 awarding organisations, 7 representative organisations and 6 individuals. Their comments, where provided, suggest that Occupational Specialisms are likely to be sufficiently different to require separate assessment. Additionally, the approach will allow learners to demonstrate, and have recognised, abilities in specific areas.

Other comments from those who agreed included:

- approaches should be developed in conjunction with employers and educational providers
- students should be able to obtain a qualification when studying a single Occupational Specialism

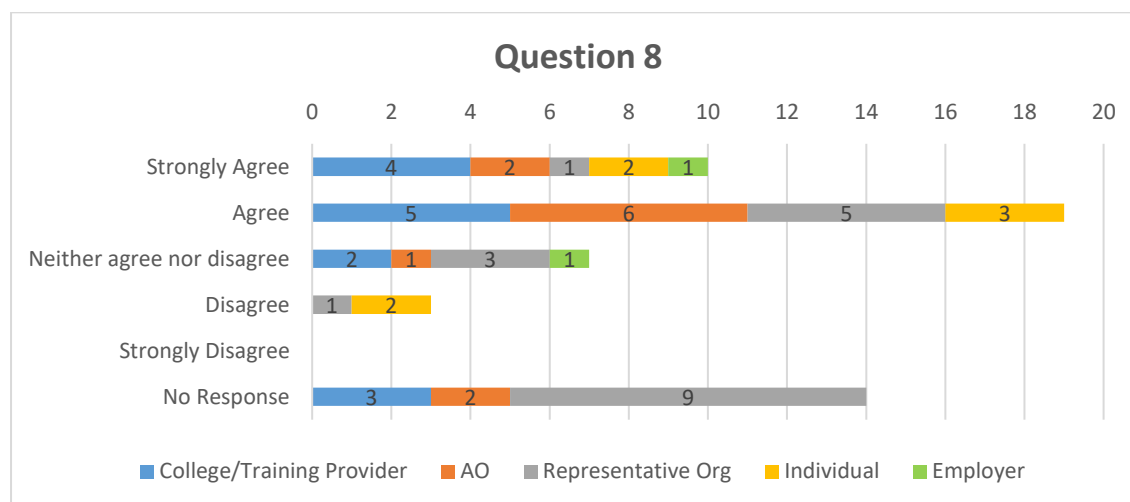
- each Occupational Specialism would need to be sufficiently distinct in order to prevent significant overlap of content and potential over assessment

Four respondents disagreed with the proposal, including 2 colleges or training providers, 1 awarding organisation and 1 individual. Of those which provided a comment, respondents noted the cost implications of developing separate assessments and the risk of over-assessment or overlap of content.

Eight respondents neither agreed nor disagreed with our proposal, including 3 colleges or training providers, 3 representative organisations and 2 employers.

**Question 8 – To what extent do you agree or disagree with our proposal to put in place guidance that where possible, performance outcomes within a particular Occupational Specialism should be assessed together?**

Responses from those who responded to this question were as follows:



There were 39 responses to this question. This included 11 colleges or training providers, 9 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Fourteen respondents did not respond to this question, including 3 colleges or training providers, 2 awarding organisations and 9 representative groups.

The majority of respondents (29) agreed with our proposal, including 9 colleges or training providers, 8 awarding organisations, 6 representative organisations, 5 individuals and 1 employer. Of the respondents who agreed with the proposal and provided a comment, responses suggest this approach will allow for a holistic, synoptic approach to assessment, and could ensure more valid assessment.

Other comments from those who agreed included:

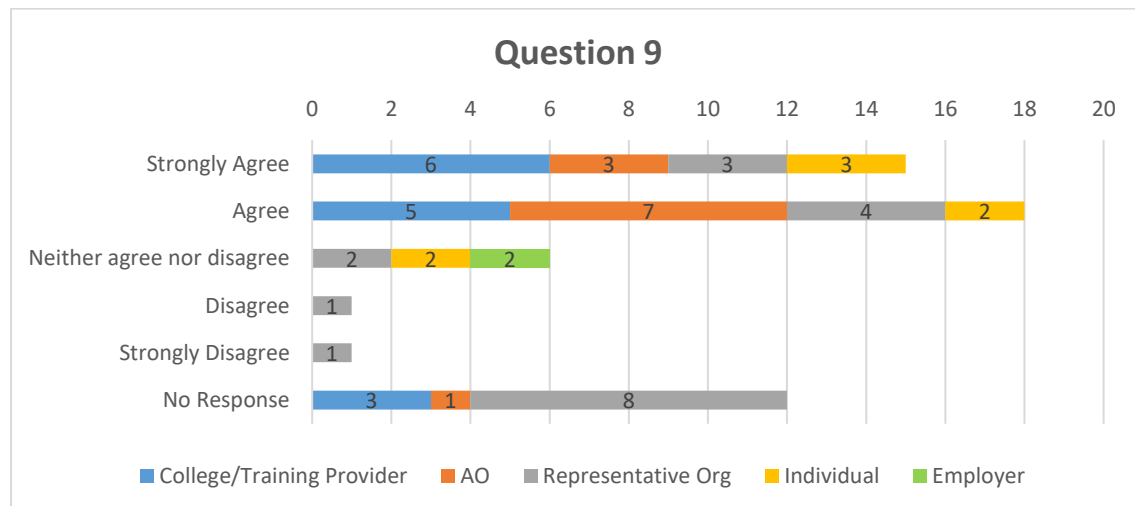


- further guidance is needed to clarify what is meant by 'assessed together'
- the approach reflects work requirements where a variety of skills would be used in a single task
- the approach reduced burden on learners to complete multiple assessments and would be clearer for other users of the qualifications, such as employers

Three respondents (1 representative organisation and 2 individuals) did not agree with our proposal. One comment suggested the approach may lead to confusion for end users where differences across routes have developed.

**Question 9 – To what extent do you agree or disagree with our proposal to set requirements and guidance on the titling of Technical Qualifications and Occupational Specialisms?**

Responses from those who responded to this question were as follows:



There were 41 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Three colleges or training providers, 1 awarding organisation and 8 representative organisations did not provide a response to this question.

Respondents across the 5-point scale noted the potential of confusion between 'Technical Qualification' and pre-existing qualifications with similar titles; they note consideration should be given on how to make Technical Qualifications distinct.

The majority of respondents (33) agreed with our proposal, including 11 colleges or training providers, 11 awarding organisations, 7 representative organisations and 5 individuals. Of the respondents who agreed with the proposal, many noted that the approach would ensure consistency and provide clarity for users of the qualifications.

Other respondents who agreed commented that:

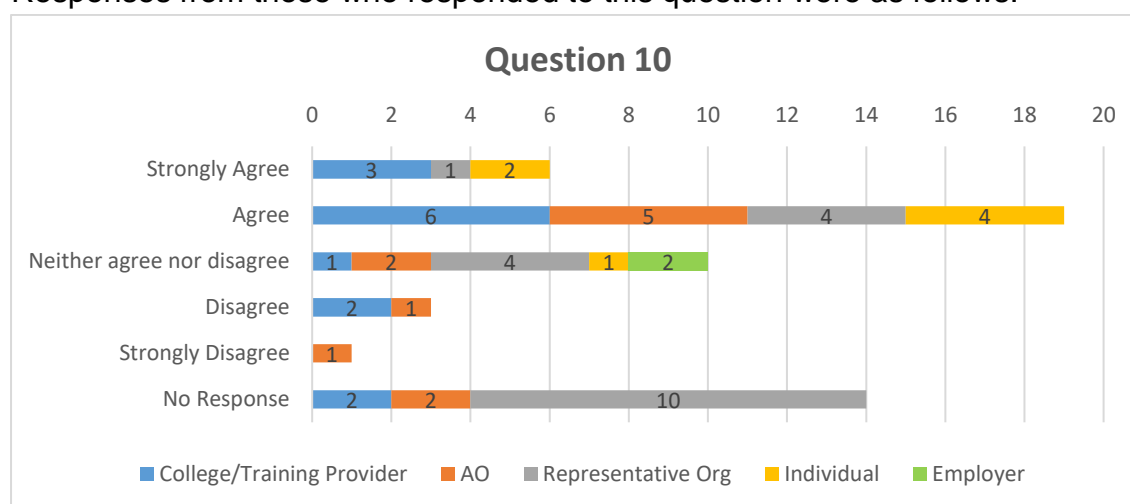
- consideration would need to be given to qualification titles where students undertake multiple Occupational Specialisms
- where a route corresponds to an existing apprenticeship standard, similar titling should be adopted

Of the 2 respondents who did not agree with the proposal (both representative organisations), one noted that clear and consistent titling was sensible; their disagreement lay with the certification of Technical Qualifications, and their comment has been considered under later questions in the consultation. The other respondent again agreed with a consistent approach to titling, but felt that regulation under Condition E2 of the General Conditions of Recognition would ensure this.

Six respondents neither agreed nor disagreed with our proposal, including 2 representative groups, 2 individuals and 2 employers. Of these, one comment suggested that titling should be sufficiently different between apprenticeships and T Levels.

**Question 10 – To what extent do you agree or disagree with our proposal to set requirements or guidance on the number of assessments for Technical Qualifications?**

Responses from those who responded to this question were as follows:



There were 39 responses to this question. This included 12 colleges or training providers, 9 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 2 awarding organisations and 10 representative organisations did not provide a response to this question.

The majority of respondents (25) agreed with our proposal, including 9 colleges or training providers, 5 awarding organisations, 5 representative organisations and 6 individuals. Of the respondents who agreed with the proposal, the comments included:

- specifying a set number of assessments would be inappropriate, and the proposal to require the smallest number of assessments possible is "the best way forward"
- the assessment demand on students studying a Technical Qualification should not exceed the requirements of a 3 A level course (a comment echoed by a respondent who neither agreed nor disagreed)
- there should be comparability between Technical Qualifications, with regard to the number of assessments

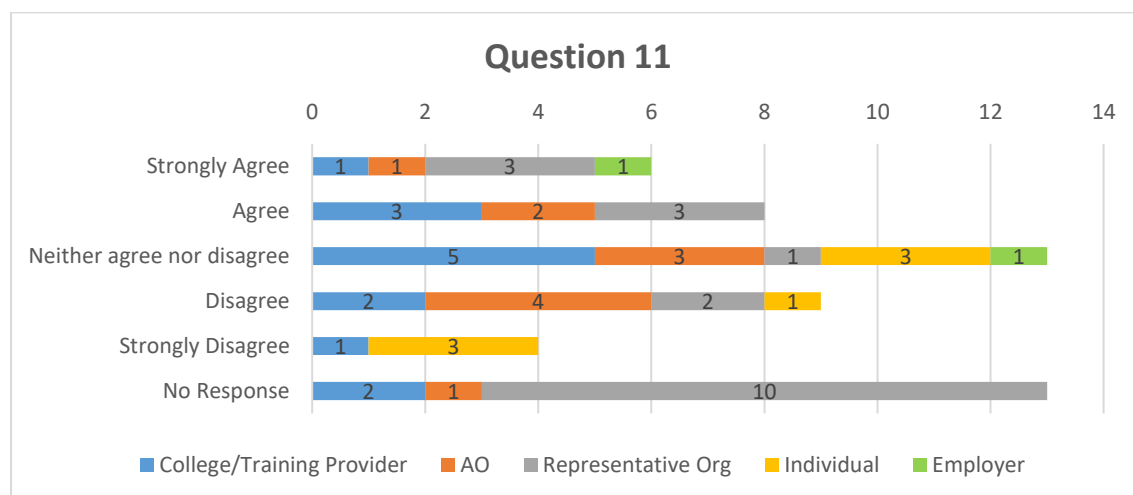
Of the 4 respondents who disagreed with the proposal (2 colleges or training providers and 2 awarding organisations), the comments included:

- a suggestion that this should be framed as guidance rather than a requirement
- a concern that too many assessments could negatively impact on the uptake of T Levels

Ten respondents neither agreed nor disagreed with our proposal, including 1 college or training provider, 2 awarding organisations, 4 representative organisations, 1 individual and 2 employers.

**Question 11 – To what extent do you agree or disagree with our proposal to set a requirement that the whole of the Core should be assessed together and the whole of each Occupational Specialism should be assessed together?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 12 colleges or training providers, 10 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 1 awarding organisation and 10 representative organisations did not provide a response to this question.

Fourteen respondents agreed with our proposal, including 4 colleges or training providers, 3 awarding organisations, 6 representative organisations and 1 employer. Those respondents who agreed or strongly agreed, and commented, noted that this approach “*will make it easier to ensure the required standards are achieved and the requirements of the technical qualifications will be clearer to the end user*”.

Other comments from those who agreed with this proposal included:

- this approach may place pressure on learners
- that where formal exams are to be the preferred method of assessment the timing must be appropriate to the learners
- formal exams should be scheduled to allow in year retakes where necessary as a learner may otherwise be unable to take up a work placement opportunity
- the proposal will meet employers’ expectations of process and delivery

One respondent who agreed with our proposal noted that they disagreed with the suggestion that awarding organisations are unable to secure consistent year-on-year standards when assessments are taken at different points during a course of study.

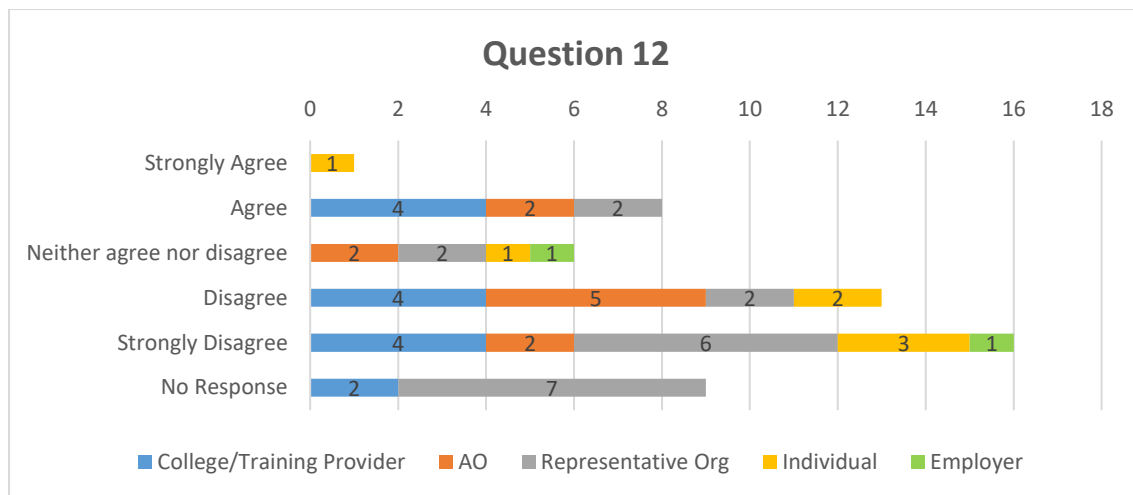
Thirteen respondents disagreed with our proposal, including 3 colleges or training providers, 4 awarding organisations, 2 representative organisations and 4 individuals. Of these respondents, comments included:

- this proposal could place pressure on organisations to resource assessments at the same time
- learners should be assessed when they are deemed to be ready and competent
- the methodology for monitoring comparability of standards over time should not dictate the assessment opportunities made available for these qualifications; this risks undermining their intended purpose
- learners benefit from feeling a sense of achievement at each stage of their journey and also have the opportunity to improve grades as they move along – suggesting support for a more modular approach
- the proposal bears similarities to the approaches adopted in general qualifications; an opportunity should be taken to incorporate new models of thinking and delivery

Thirteen respondents neither agreed nor disagreed with our proposal, including 5 colleges or training providers, 3 awarding organisations, 1 representative organisation, 3 individuals and 1 employer. Of these, the approach was considered to allow for learners to build up the knowledge and understanding over a period of time, and that assessing components alongside each other would be more straightforward for teaching and delivery. However, respondents also noted that this approach would add to the pressure learners would be subject to around assessments and that it increased the risk of the qualification becoming two 1-year courses.

**Question 12 – To what extent do you agree or disagree with our proposal to set a requirement that that all assessments for Technical Qualifications should take place in May/June?**

Responses from those who responded to this question were as follows:



There were 44 responses to this question. This included 12 colleges or training providers, 11 awarding organisations, 12 representative organisations, 7 individuals and 2 employers. Two colleges or training providers and 7 representative organisations did not submit a response to this question.

Nine respondents agreed with our proposal, including 4 colleges or training providers, 2 awarding organisations, 2 representative organisations and 1 individual. Respondents who agreed commented that the suggested approach would be consistent with A levels and other level 3 qualifications, would align with the teaching timetable and teaching workloads, and would give sufficient teaching time to cover the qualification content.

One of the respondents who agreed said that the introduction of any additional assessment sessions would have implications for manageability, cost and assessment validity because of the need to change assessments to avoid predictability. Another said that although they agreed with the proposal, there was a need to be mindful of administrative and examination timetabling burden on centres.

The majority of respondents (29) disagreed with our proposal. This included 8 colleges or training providers, 7 awarding organisations, 8 representative organisations, 5 individuals and 1 employer.

Many of the respondents who disagreed commented on the challenges centres would face in resourcing Technical Qualification assessments at the same time as A levels, GCSEs and other qualifications. Comments included:

- many of the c.300,000 learners currently taking technical and vocational qualification might in the future take T Level qualifications; centres were already struggling to accommodate linear A levels and reformed Applied

Generals and technical qualifications, with some colleges already having to close teaching centres in May/June, to run examinations

- the extra examination burden could impact on teaching and learning
- centres would not have sufficient space or invigilators, and examination staff would be under increased pressure

Some respondents also commented that it would place additional pressures on awarding organisations, the pool of available markers, Ofqual, and assessment organisations at an already very busy time. It could risk overloading the delivery infrastructure because of the large number of examinations happening at the same time and pose a significant capacity risk for the whole examination system. Some respondents therefore suggested that the delivery approach should be modelled to provide assurance that the both examination system overall and centres could cope, with one suggestion that it could be piloted before a final decision was made.

A number of respondents also said that a May/June window could have implications for the industry placement. Comments included:

- it would mean that placements could not take place in the summer, which may be problematic in some occupational sectors where placements traditionally take place in the summer, eg land-based.
- it does not align with the steer from the Department for Education that industry placements should be locally arranged and does not take account of employer capacity

Other comments regarding the May/June timing included:

- the timing of the assessments should take account of the amount of content to be taught; for example, it may be possible to assess the Core earlier, or the large volume of content proposed may require a later assessment opportunity
- the timing does not accommodate resit opportunities to allow learners to progress or enter the job market
- it does not enable learners to join the programme part way through, either after a change of course or having left an apprenticeship
- it would put pressure on students who were taking other examinations at the same time, eg GCSE resits or Functional Skills

Many respondents commented that a single assessment point in each year was inappropriate for a technical or vocational qualification. Comments included:

- vocational qualifications have a tradition of assessing learners when they are ready to be assessed; more frequent opportunities should therefore be made available to better reflect practice in the workplace
- learners might only have one opportunity to sit the Occupational Specialism assessments, making them a very high stakes assessment
- one assessment opportunity might encourage centres to try to enter learners for all assessments just to enable a resit opportunity the following year
- a single assessment opportunity in each year might affect the validity of the design of the assessments, for example it would limit the ability to assess competence over time
- there should be the opportunity to choose the most appropriate assessment model as part of the qualification development process
- mirroring the approach used for General Qualifications does not reflect current practice in other stakes vocational and professional examinations which make use of developments in e-assessment to provide flexible and on-demand assessment, reinforcing the existing system will restrict innovation in delivery

Some respondents also commented that this approach was not learner centred, would not be attractive to learners, and that it would place pressure on young people at a time of increasing concerns about mental health.

Some of those who disagreed could also see some advantages in a single May/June assessment window, including:

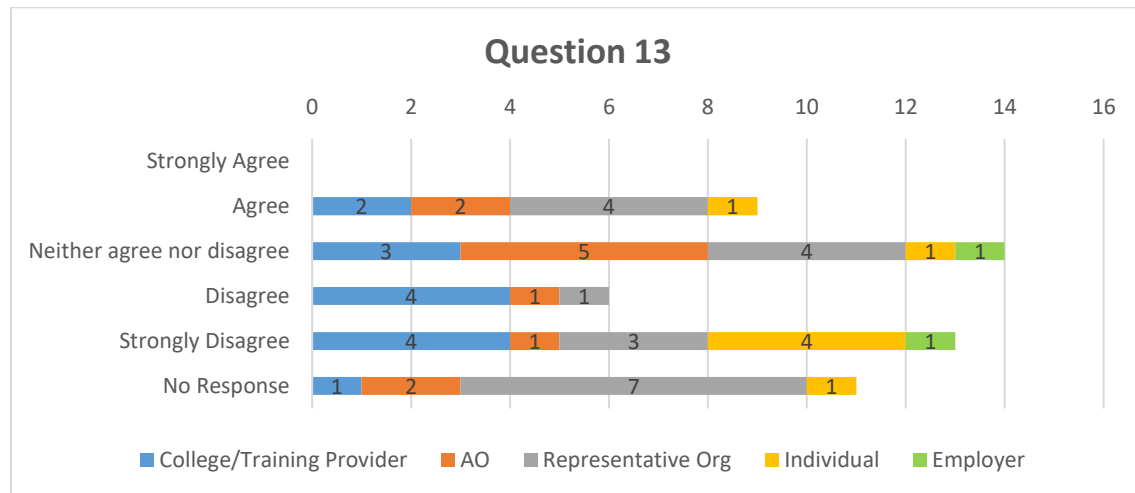
- it would enable learners to receive their results at the same time as A level students and put T Levels on a par with A levels
- it would allow a consistent approach to monitoring assessments

Six respondents neither agreed nor disagreed with our proposal, including 2 awarding organisations, 2 representative organisations, 1 individual and 1 employer. Of the comments received, one respondent agreed with the logic behind the proposal to align with A levels and GCSEs but was also concerned about the manageability of the approach, and felt that it should be modelled. Another felt that the assessment approach should be informed by the content of the occupational pathway and that awarding organisations should be able to use their expertise to determine the most appropriate methodology, documenting it in their assessment strategy.



**Question 13 – To what extent do you agree or disagree with our proposal to set a requirement that where a student is proposing to retake, they must retake the whole of core knowledge and understanding, and/or the whole of core skills, and/or the whole of an Occupational Specialism within the Technical Qualification?**

Responses from those who responded to this question were as follows:



There were 42 responses to this question. This included 13 colleges or training providers, 9 awarding organisations, 12 representative organisations, 6 individuals and 2 employers.

Nine respondents agreed with our proposal, including 2 colleges or training providers, 2 awarding organisations, 4 representative organisations and 1 individual.

Of the respondents who agreed with the proposal and commented, two (1 representative organisation and 1 individual) stated that this approach was important to the maintenance of standards. Several others, who neither agreed nor disagreed, stated that they sympathised with the underlying intention, and that retaking the whole of a section rather than individual assessments would make maintaining standards over time easier.

While often agreeing in principle, other respondents raised concerns about the structure of the proposal, particularly the requirement to retake the whole section, rather than the ability to retake individual assessments.

Nineteen respondents disagreed with our proposal, including 8 colleges or training providers, 2 awarding organisations, 4 representative organisations, 4 individuals

and 1 employer. Of those respondents who disagreed or strongly disagreed comments included:

- that this might lead to the creation of a cascade of failure, whereby a learner might fail one small aspect and be required to retake the whole section and then fail a different aspect and be required to retake the whole section again; the risk of this would be exacerbated by the size of these sections
- that awarding organisations would need to provide detailed information on any learner who failed, detailing where they failed in order to allow colleges and training providers to support learners effectively for retakes
- it is unreasonable to expect learners to effectively retake 3 A levels if they fail any aspect of 1 A level
- that, assuming the other proposal to only have one retake opportunity per year is accepted, learners could be faced with the complete assessment for two years in one sitting, which would place a considerable burden on a learner.
- concern regarding the burden that this will place on colleges

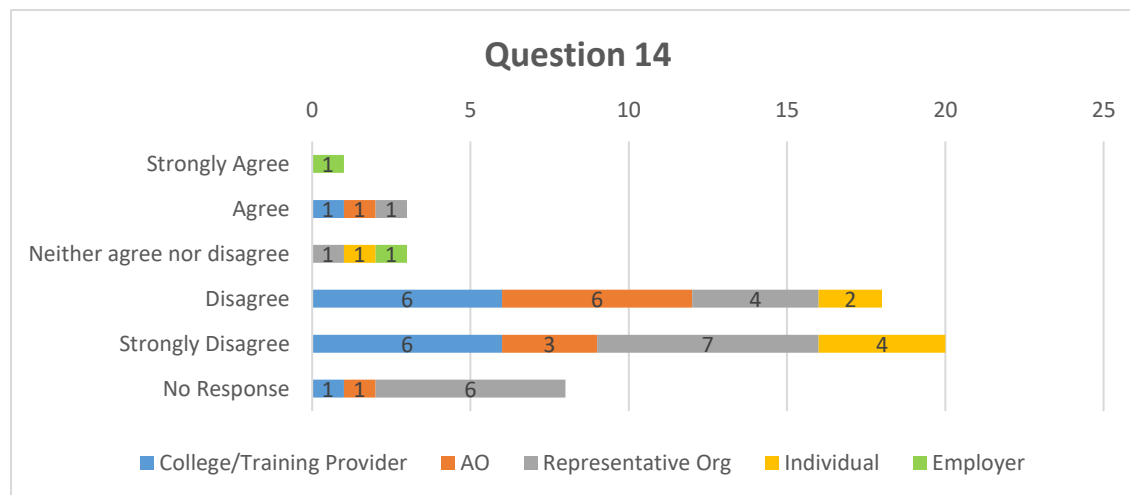
There was significant support to allow learners the opportunity to retake discrete elements of the assessments rather than having to sit the whole section (6 representative organisations, 3 awarding organisations and 3 colleges).

Fourteen respondents neither agreed nor disagreed with our proposal, including 3 colleges or training providers, 5 awarding organisations, 4 representative organisations, 1 individual and 1 employer. Of these, several respondents (4 representative organisations, 1 college and 2 awarding organisations) raised concerns about our proposal to require learners to retake the whole section (eg knowledge and understanding, Core Skills or Occupational Specialism):

- difficulties could arise for assessments which were not exam based; for example they have undertaken an employer-set project over a period of time, or compiled a substantial portfolio of work, it is unclear what benefit would accrue for forcing the student to re-do the whole project, or to undertake a whole new one
- the size of some Occupational Specialisms could make resitting the whole of it problematic in terms of capacity and expense for the awarding organisation and college/training provider

**Question 14 – To what extent do you agree or disagree with our proposal not to allow an additional assessment series for retakes?**

Responses from those who responded to this question were as follows:



There were 45 responses to this question. This included 13 colleges or training providers, 10 awarding organisations, 13 representative organisations, 7 individuals and 2 employers. One college or training provider, 1 awarding organisation and 6 representative organisations did not respond to this question.

Of the 4 respondents who agreed with the proposal (1 college or training provider, 1 awarding organisation, 1 representative organisation and 1 employer) comments included:

- given potential candidate numbers will be low, it will be difficult to set grade boundaries for additional resit opportunities with any conviction.
- this will ensure consistency across providers

Thirty-eight respondents disagreed with our proposal, including 12 colleges or training providers, 9 awarding organisations, 11 representative organisations and 6 individuals. These respondents raised a number of concerns, including:

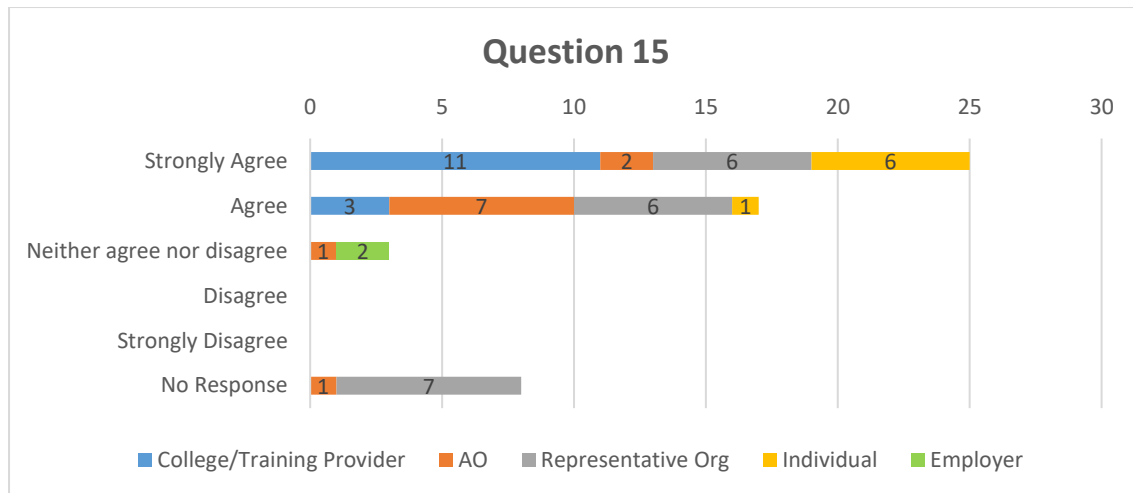
- the size and learning time required to prepare for a retake, in addition to the second year's work
- whether learners will be able to access funding for year 3 retakes as well as the learning to support this
- learners who fail at the end of the first year and have to sit essentially the whole qualification in a single series at the end of year 2 may be inclined to drop the qualification

- the impact on learners with protected characteristics
- if a learner fails the second year assessments, they may be unable to access employment opportunities
- the proposed assessment arrangements are contrary to existing further education practice
- approach potentially incentivises centres to force learners through in year 1 even if they are not ready, in order to be able to access the retake window in year 2
- the proposed approach restricts the use of innovative delivery models
- the proposed approach is more restrictive than in A levels
- the proposed approach does not align with the needs of the vocational sector
- this increases the risk of necessitating further regulatory intervention, such as the Applied General 'safety net'
- learners and providers need flexibility in assessment

Of the respondents who neither agreed nor disagreed with our proposal (1 representative organisation, 1 individual and 1 employer), one commented that it welcomed Ofqual's commitment to balancing the entitlement of students to access retake opportunities with the administrative and financial burden on schools of organising and timetabling additional assessment opportunities outside of the summer examination series.

**Question 15 – To what extent do you agree or disagree with our proposal to set a requirement that awarding organisations should provide schools, colleges and students with sufficiently detailed information about student performance on which to base a decision about whether to retake a part of the Technical Qualification?**

Responses from those who responded to this question were as follows:



There were 45 responses to this question. This included 14 colleges or training providers, 10 awarding organisations, 12 representative organisations, 7 individuals and 2 employers. One awarding organisation and 7 representative organisations did not provide a response to this question.

The vast majority of respondents (42) agreed with our proposal, including 14 colleges or training providers, 9 awarding organisations, 12 representative organisations and 7 individuals. Of those respondents who agreed or strongly agreed, comments included that the proposed approach would help to ensure parity with A levels, and that it would help learners understand if it is sensible to retake.

Several issues were, however, highlighted by respondents who agreed:

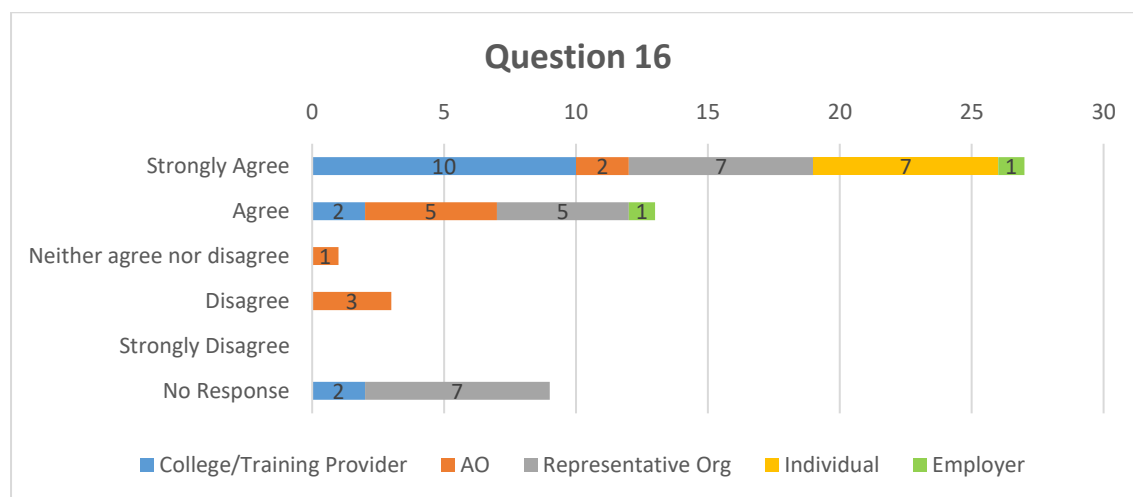
- whether there was a need for this to be enshrined in regulation, stating that this represented “double regulation”
- it would be difficult to see how granular awarding organisations could be in response to Occupational Specialism assessments
- awarding organisations would need clear guidance on what this feedback should be composed of and what it should look like
- that it was important to have clear timeframes agreed
- that this approach would seem to contradict the earlier proposal to restrict retake opportunities to a single opportunity a year and would be more suited to component level retakes which occurred frequently throughout the year

Respondents also raised questions in relation to capacity at the centres in terms of teaching time, assessment feasibility and funding for those learners resitting, especially those learners who fail in their year two assessments.

Three respondents (1 awarding organisation and 2 employers) neither agreed nor disagreed with our proposal, and no respondents disagreed with our proposal.

**Question 16 – To what extent do you agree or disagree with our proposal to put in place a requirement that where an awarding organisation ceases to make a Technical Qualification available, it must ensure that arrangements are in place to allow students to retake their assessments?**

Responses from those who responded to this question were as follows:



There were 44 responses to this question. This included 12 colleges or training providers, 11 awarding organisations, 12 representative organisations, 7 individuals and 2 employers. Two colleges or training providers and 7 representative organisations did not provide a response to this question.

The majority of respondents (40) strongly agreed or agreed with this proposal, including 12 colleges or training providers, 7 awarding organisations, 12 representative organisations, 7 individuals and 2 employers. Of these respondents, comments indicate agreement that students should not be disadvantaged by a change in provider and that the proposal would act to protect students' interests.

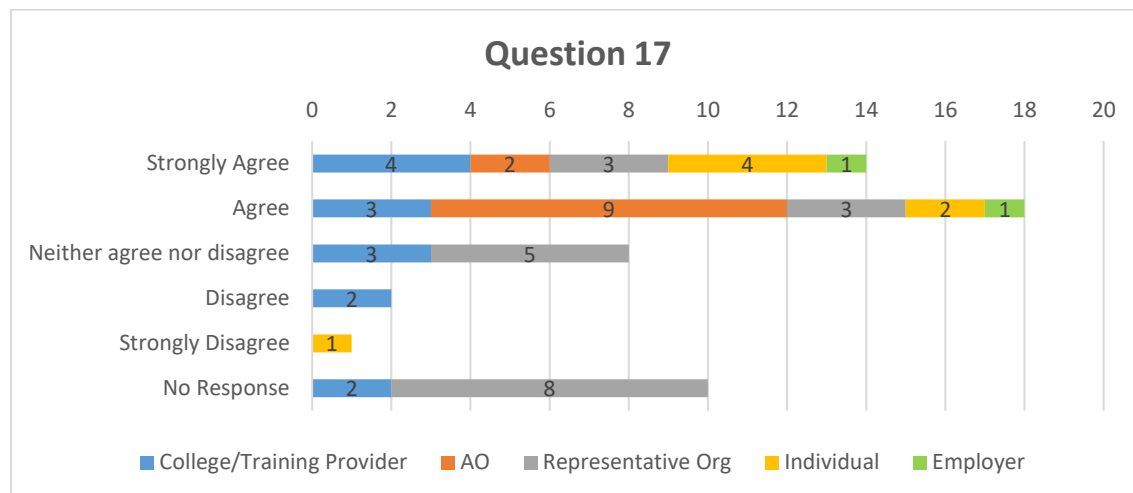
Additional comments included:

- to support smooth transition from one awarding organisation to another, the requirements regarding handover and resits should be written into contracts
- there is additional administrative burden and risk associated with the above
- resits must be undertaken within a reasonable timeframe
- this requirement is already covered by the General Conditions of Recognition, and additional regulation is unnecessary

These comments were echoed by the 3 awarding organisation respondents who did not agree with the proposal and by those who neither agreed nor disagreed.

**Question 17 – To what extent do you agree or disagree with our proposal to put in place a requirement for an awarding organisation to recognise prior learning in Technical Qualifications, where this is possible?**

Responses from those who responded to this question were as follows:



There were 43 responses to this question. This included 12 colleges or training providers, 11 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Two colleges or training providers and 8 representative organisations did not provide a response to this question.

The majority of respondents (32) agreed with our proposal, including 7 colleges or training providers, 11 awarding organisations, 6 representative organisations, 6 individuals and 2 employers. Of the respondents who agreed, the comments noted that, in addition to students transferring between Technical Qualifications, this proposal would support those moving between centres and those returning to education.

Other comments included:

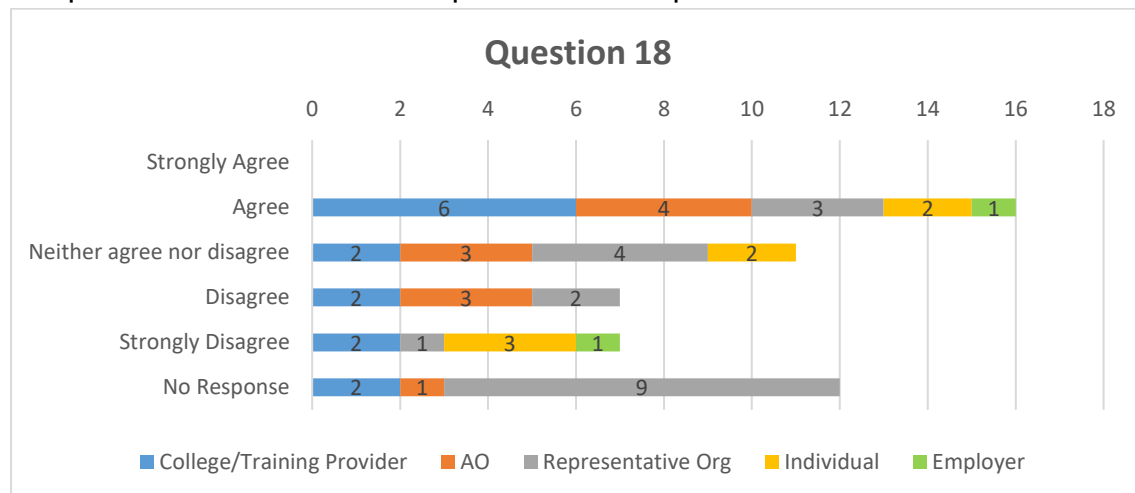
- a concern about the relevance of prior learning, given the learners who would be taking Technical Qualifications
- that there is work to be done to establish what is to be accepted as prior learning to ensure a "universal standard of content and expected performance"

Of the 3 respondents who did not agree with the proposal (2 colleges or training providers and 1 individual), one noted that only formally accredited prior learning should be accepted.

Of the 8 respondents who neither agreed nor disagreed with the proposal (3 colleges or training providers and 5 representative organisations), some comments suggested that recognising prior learning can be challenging for centres.

**Question 18 – To what extent do you agree or disagree with our proposal to set a requirement for the Core (core knowledge and understanding and core skills) to be reported as a single grade on a scale of A\*-E?**

Responses from those who responded to this question were as follows:



There were 41 responses to this question. This included 12 colleges or training providers, 10 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 1 awarding organisation and 9 representative organisations did not provide a response to this question.

Sixteen respondents agreed with our proposal, including 6 colleges or training providers, 4 awarding organisations, 3 representative organisations, 2 individuals and 1 employer. Of these, respondents commented that they supported the approach as it would encourage comparability with A levels by using the same scale. Other comments suggested the scale was well understood by both employers and higher education providers.

Fourteen respondents did not agree with our proposal, including 4 colleges or training providers, 3 awarding organisations, 3 representative organisations, 3 individuals and 1 employer. Of these respondents, comments included:

- having different grading systems for the Core and Occupational Specialisms could cause confusion for users of the qualifications



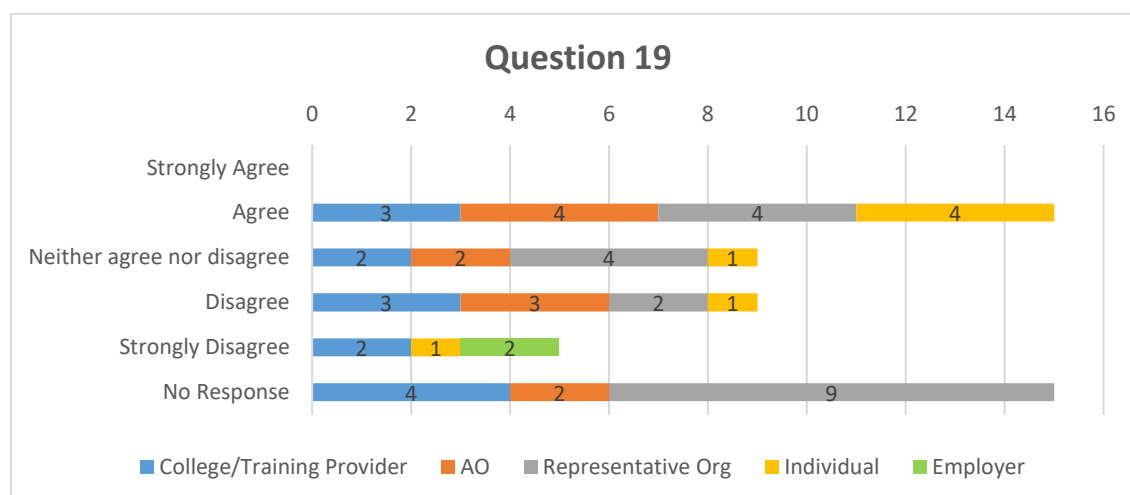
- the Core should also be graded on a Pass, Merit, Distinction scale
- the qualifications should not be intended to have parity with A levels, therefore adopting the same grading system is inappropriate
- there may not be sufficient differentiation between learners' achievement, therefore the boundaries between grades could be too narrow and undermine reliability

Eleven respondents neither agreed nor disagreed with our proposal, including 2 colleges or training providers, 3 awarding organisations, 4 representative organisations and 2 individuals. Where comments were provided, they suggested:

- this is a grading scheme understood by the public, however skills are usually Pass/Fail
- confusion as to why there are different grading schemes for the Core and Occupational Systems; one respondent argued both elements should either use Pass, Merit, Distinction, or adopt the 9 to 1 GCSE grading

**Question 19 – To what extent do you agree or disagree with our proposal to set a requirement for Occupational Specialisms to be reported against a grading scale of Pass, Merit and Distinction?**

Responses from those who responded to this question were as follows:



There were 38 responses to this question. This included 10 colleges or training providers, 9 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Four colleges or training providers, 2 awarding organisations and 9 representative organisations did not provide a response to this question.

Fifteen respondents agreed with our proposal, including 3 colleges or training providers, 4 awarding organisations, 4 representative organisations and 4 individuals. Respondents commented that the grading system of Pass, Merit and Distinction was familiar to employers and the public because it is already used in other vocational and technical qualifications.

Fourteen respondents disagreed with our proposal, including 5 colleges or training providers, 3 awarding organisations, 2 representative organisations, 2 individuals and 2 employers.

Some respondents disagreed because they wanted a common grading system across both the core and occupational specialism components of the qualification.

Comments provided by those who disagreed with the proposal included:

- using two different grading systems (A\* to E and P/M/D) will be confusing to parents, learners, employers (in particular small employers) who may not understand the relationship between differently graded components and what it says about the overall ability of the learner; this will not help the new qualifications to establish parity with A levels
- there is a risk that a D grade for the core could be confused with a Distinction, (often abbreviated to D), for the occupational specialism
- a common grading system would support the development of an overall aggregate grade for the qualification

One respondent commented that the grading mechanism should be tested with stakeholders, including employers, to ensure that it was as transparent as possible. Another respondent said that the grading system should be developed as part of overall qualification development, not in advance.

Among those respondents who wanted a common grading scale, there were differing views on whether the scale should be A\* to E or P/M/D.

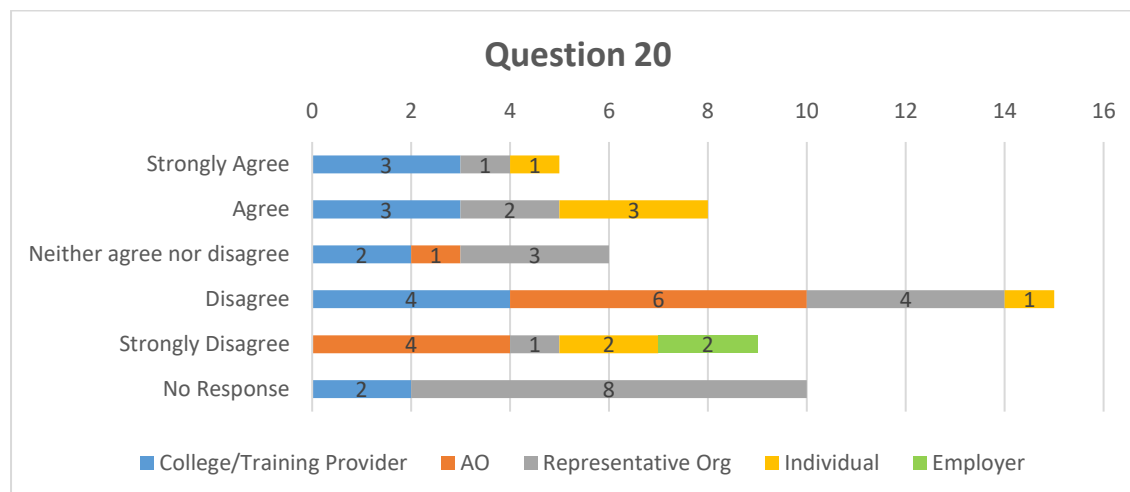
Some respondents disagreed with the concept of using grades beyond Pass/Fail in an assessment measuring threshold competence. They questioned what Merit and Distinction meant if Pass signalled threshold competence.

Some respondents disagreed with the mechanism proposed to determine Pass/Merit/Distinction. They did not agree that a mark-based approach was a valid way to determine threshold competence.

Nine respondents neither agreed nor disagreed with our proposal, including 2 colleges or training providers, 2 awarding organisations, 4 representative organisations and 1 individual.

**Question 20 – To what extent do you agree or disagree with our proposal that we should set a requirement for Occupational Specialisms to have a ‘Working Towards’ grade below Pass?**

Responses from those who responded to this question were as follows:



There were 43 responses to this question. This included 12 colleges or training providers, 11 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Two colleges or training providers and 8 representative organisations did not respond to this question.

Thirteen respondents agreed with our proposal, including 6 colleges and training providers, 3 representative organisations and 4 individuals. Where comments were provided, respondents saw benefit in having a grade which recognised partial achievement of the qualification, which would be motivating to students who have not yet met the required standard, in particular learners with disabilities, and which could indicate that a learner should resit the qualification. One respondent also suggested that a ‘working towards’ grade might enhance the value and standing of a pass grade.

Twenty-four respondents disagreed with our proposal, including 4 colleges and training providers, 10 awarding organisations, 5 representative organisations, 3 individuals and 2 employers. Almost all of these respondents provided an explanatory comment.

Some respondents made the point that ‘working towards’ was not an accurate description of the learner’s situation and did not clearly describe a level of attainment. The wording suggested that the learner was still studying on the programme, whereas it was more likely that the candidate had completed the course, having not met the required threshold competence standard. It also could suggest that the learner might ultimately be successful in passing the assessment, which may not be the case.

One comment suggested that the title 'working towards' could be seen as patronising to learners with disabilities who may not be able to achieve threshold competence. One respondent questioned what impact this grade would have on learners who were graded below 'working towards'.

Others commented that if the intention was to signal that learners had only just missed achieving threshold competence and should consider resitting the assessment, this would be better achieved by providing details of scores and grade boundaries. One respondent did however suggest using a different title such as, 'near pass', to signal this.

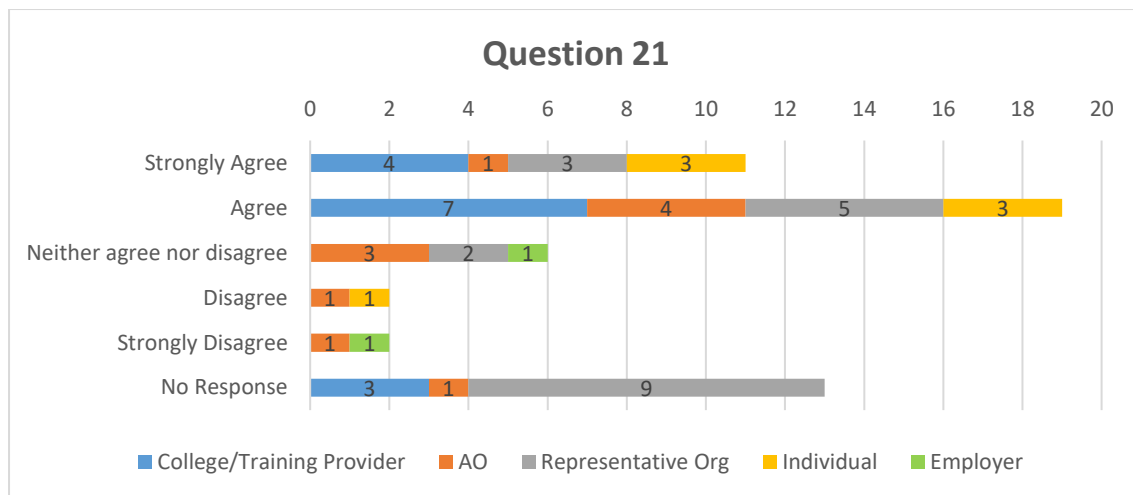
Many of the comments focussed on how this additional grade might be perceived by parents, employers and students, and the risk that it would add confusion to what was already perceived to be a complicated grading system for the qualification, including:

- there is no equivalent grade in A levels and it would not help to establish the credibility of Technical Qualifications by suggesting that there was need to have this additional grade
- the grade would have no currency with employers, universities and other end-users who may not understand whether the learner had achieved the assessment or not
- there would need to be clarity about how the grade was defined and calculated to avoid confusion with the pass grade, which it might devalue

Nine respondents neither agreed nor disagreed with our proposal, including 2 colleges or training providers, 2 awarding organisations, 4 representative organisations and 1 individual.

**Question 21 – To what extent do you agree or disagree that we should put in place guidance for Occupational Specialisms regarding how assessment design must take into account this grading model?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Three colleges or training providers, 1 awarding organisation and 9 representative organisations did not respond to this question.

The majority of respondents (30) agreed with our proposal. This included 11 colleges or training providers, 5 awarding organisations, 8 representative organisations and 6 individuals, some of whom did not agree the proposed grading system.

Respondents commented that guidance was required, whatever grading system was used, to ensure consistency across awarding organisations and training providers and to uphold the integrity of the new qualifications. It was also felt important for learners, parents and end-users.

Some respondents said that it would be essential because of the perceived complexity of the proposed grading system with differing grading scales within Technical Qualifications.

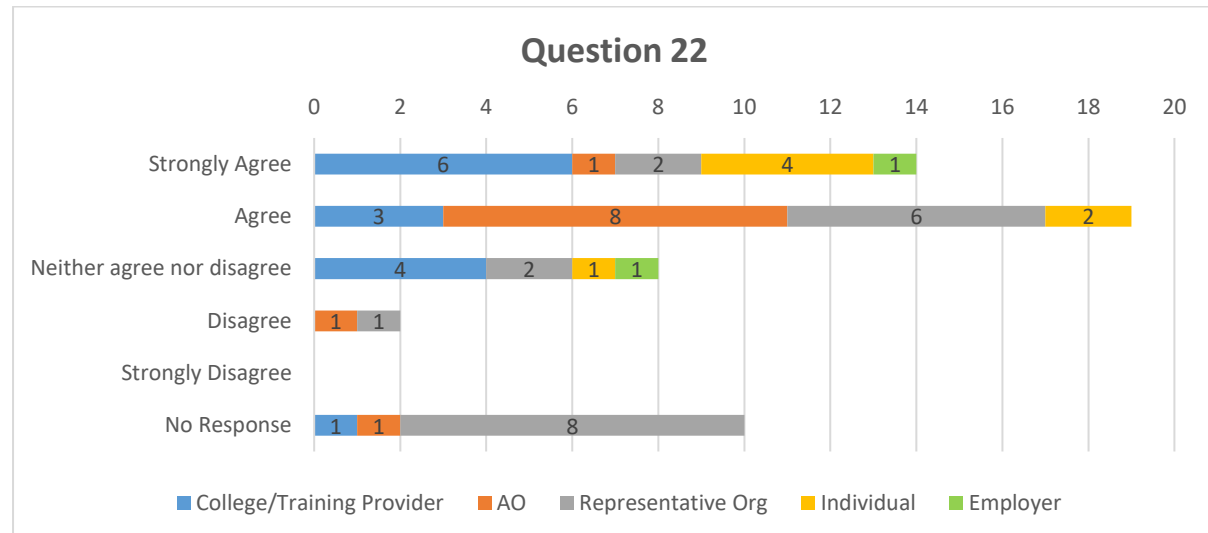
One respondent was not clear what was being proposed – guidance, which might be welcome, or requirements mandating a particular approach, which would not.

Of the 4 respondents who did not agree with the proposal (2 awarding organisations, 1 individual and 1 employer), some disagreed because they did not agree with the proposed grading system. Others were not clear what additional guidance was necessary, as awarding organisations already know how to develop valid approaches. It was suggested that Ofqual should work with assessment experts in awarding organisations via the Federation of Awarding Bodies/the Joint Council for Qualifications to develop any additional guidance.

Six respondents neither agreed nor disagreed with our proposal, including 3 awarding organisations, 2 representative organisations and 1 employer.

**Question 22 – To what extent do you agree or disagree with our proposal to provide guidance on Condition H6 (Issuing results) in respect of Technical Qualifications?**

Responses from those who responded to this question were as follows:



There were 43 responses to this question. This included 12 colleges or training providers, 10 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. One college or training provider, 1 awarding organisation and 8 representative organisations did not respond to this question.

The majority of respondents (33) agreed with our proposal, including 9 colleges or training providers, 9 awarding organisations, 8 representative organisations, 6 individuals and 1 employer. Of the respondents who agreed or strongly agreed, the comments included:

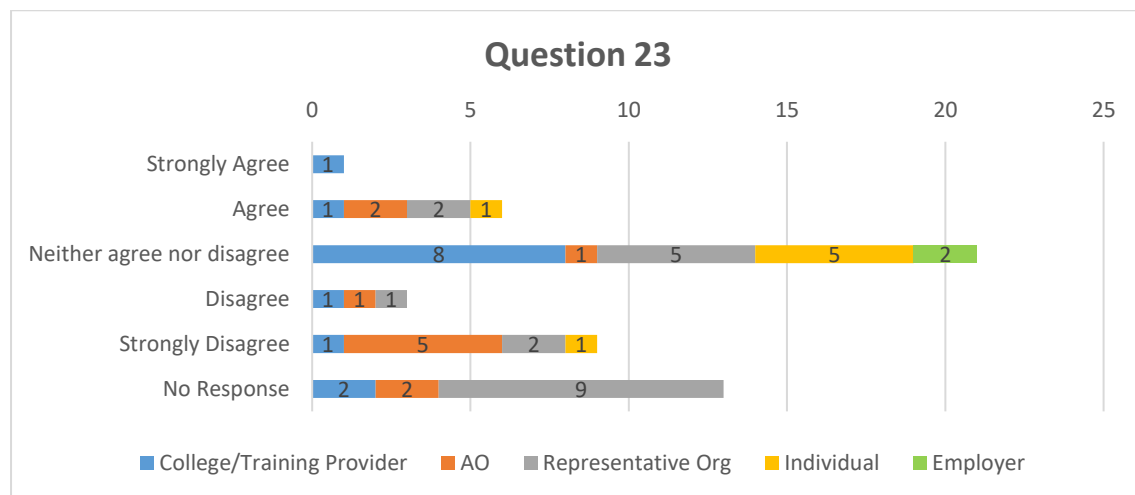
- guidance would avoid confusion
- this would be well received and benefit all providers
- it was important that results are issued in a similar timeframe to GCSEs and A levels
- timely issue of results was important to allow for resit opportunities
- results should be turned around quickly; ideally within 1 month of the assessment taking place

Two respondents (1 awarding organisation and 1 representative organisation) did not agree with our proposal, commenting that Condition H6 already adequately covers all the necessary requirements, so there is no need for additional guidance.

Eight respondents neither agreed nor disagreed with our proposal, including 4 colleges or training providers, 2 representative organisations, 1 individual and 1 employer.

**Question 23 - To what extent do you agree or disagree with our proposal to disapply Conditions I3 (The design and content of certificates) and I4 (Issuing certificates and replacement certificates) in respect of Technical Qualifications taken as part of a T Level?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 12 colleges or training providers, 9 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 2 awarding organisations and 9 representative organisations did not provide a response to this question.

Seven respondents agreed with our proposal, including 2 colleges or training providers, 2 awarding organisations, 2 representative organisations and 1 individual. Of these, several noted that they disagreed with the restrictions on certification, explaining that they thought it would be helpful to certificate each component separately, and that lack of certification could cause confusion for learners and employers.

Twelve respondents disagreed with our proposal, including 2 colleges or training providers, 6 awarding organisations, 3 representative organisations and 1 individual. Of these respondents, comments included:

- concerns that this would impact on learners with protected characteristics
- utility of certification for Recognition of Prior Learning (RPL) purposes

- disadvantage to learners in England against learners in other jurisdictions who would benefit from receiving certificates
- that learners would have nothing if they passed this aspect of the T Level, but were not able to complete the whole T Level programme, for example, the industry placement
- certification is required to establish value and validity of the T Level for learners and employers
- certificates should be issued for every level and programme of study completed by a student
- importance of certification in establishing parity between A levels and T Levels, as A level learners can fail 1 qualification and still achieve 2 certificates in a similarly weighted study programme
- the Conditions are in place to protect learners and dis-applying them exposes learners to risk
- preventing an awarding organisation from issuing a certificate disadvantages both the learner/employer and the awarding organisation for different reasons. The value to the learner of a certificate is that it is recognised by an employer and provides them with 'currency' in the market place that can be transferred from job to job. A certificate from the Education and Skills Funding Agency has no meaningful currency in most marketplaces or with employers. The key is to provide a learner with an instantly recognisable certificate in the market place, which in many industries means identification of the specific awarding organisation

One awarding organisation and one representative organisation noted that lack of certification for the Technical Qualification would prevent learners from transferring from T Levels to other programmes of study such as an apprenticeship or academic study.

One representative organisation noted that they believe Ofqual would not be fulfilling its regulatory obligations by allowing this approach. In addition, they noted that the policy intention to allow for certification outside of England was designed in the interests of awarding organisations' earnings rather than protecting learners.

On the subject of allowing certification outside of England, one awarding organisation and 2 representative organisations felt that this would not only disadvantage learners in England, but that this approach was *"illogical and unfair"*. Respondents noted that given that the qualification is equivalent to 3 A-levels, not certifying the Technical Qualification reduces the perceived value of the overall programme of study.



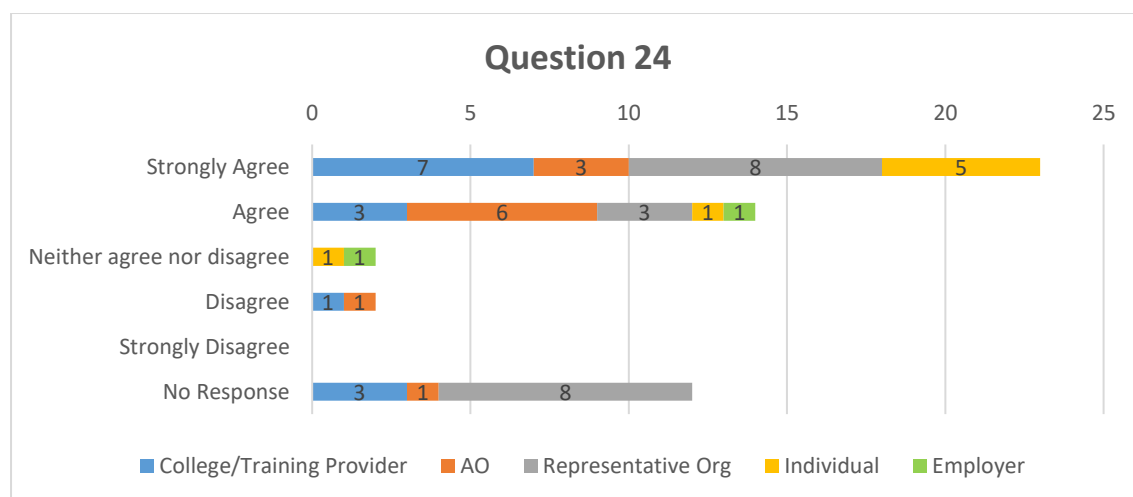
One representative organisation also expressed concern about how lack of certification in England would interact with the devolved education systems in the rest of the UK.

The majority of respondents (21) neither agreed nor disagreed with our proposal, including 8 colleges or training providers, 1 awarding organisation, 5 representative organisations, 5 individuals and 2 employers. Those respondents who neither agreed nor disagreed, and commented, noted concerns that the lack of certification for the Technical Qualification raises the potential that a learner who does not complete all elements of the T Level (particularly in relation to work placement due to geography or lack of opportunity) will be perceived to have failed and wasted 2 years of education.

Two other respondents noted that they understood that this situation was a DfE policy decision, but that the approach demonstrated the over-complications inherent in overall T Level design. They also raised the issues around awards being made outside of England and how this would affect accountability for various elements. One respondent noted that they did not sufficiently understand the potential impact.

**Question 24 – To what extent do you agree or disagree that we should require Technical Qualifications to be accredited?**

Responses from those who responded to this question were as follows:



There were 41 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Three colleges or training providers, 1 awarding organisation and 8 representative organisations did not respond to this question.

The majority of respondents (37) agreed with our proposal, including 10 colleges or training providers, 9 awarding organisations, 11 representative organisations, 6 individuals and 1 employer. Of those that provided a comment, many indicated that accreditation would uphold the integrity and secure the quality of the qualification. This in turn would inspire public confidence in the qualifications.

Other comments included:

- accreditation would ensure maintenance of standards over time within a single provider model, especially where a new provider replaces an old one
- accreditation should be as 'light-touch' as possible, given many awarding organisations already operate effectively without an accreditation requirement; this approach would reduce regulatory burden upon the organisations
- resubmissions should be assessed and reviewed by the same expert(s) judging the original submission
- close collaboration between all parties, including Ofqual and the Institute, is essential for a successful accreditation system
- concerns regarding the timelines for the programme, including the time taken for development, accreditation and approval of Technical Qualifications

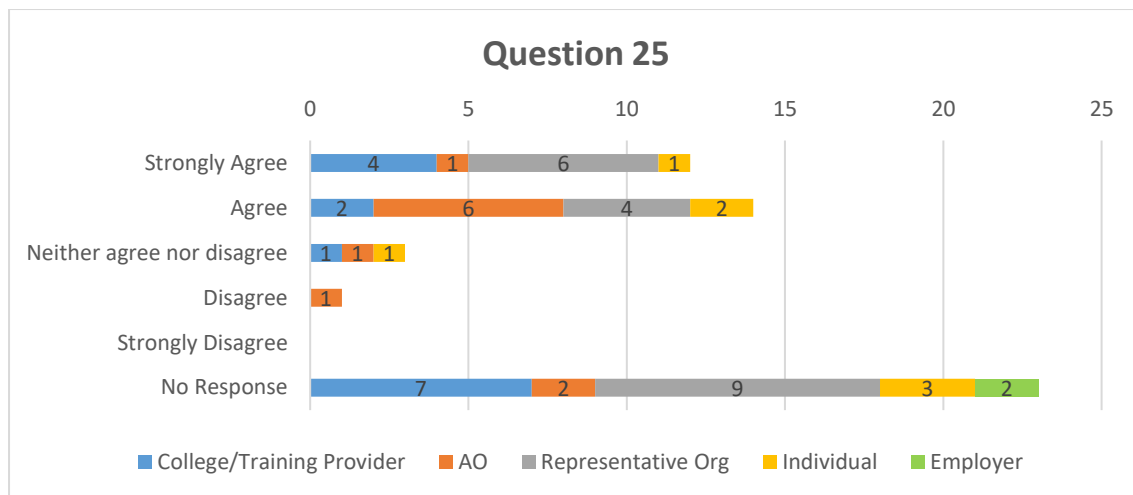
Two respondents (1 college or training provider and 1 awarding organisation) disagreed with our proposal; one provided a comment which indicated that as awarding organisations already operate in this space, accreditation is unnecessary.

Two respondents (1 individual and 1 employer) neither agreed nor disagreed.

<b>Question 25 – To what extent do you agree or disagree that we should require Technical Qualifications to meet our existing accreditation criterion?</b>
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*As described in the 'Approach to analysis section' this question was omitted from the online and downloadable response forms when the consultation was published, although it was in the consultation document itself. We contacted the 11 respondents that had submitted responses prior to this error being identified to give them opportunity to respond to this question. Our analysis includes all responses received.*

Responses from those who responded to this question were as follows:



There were 30 responses to this question. This included 7 colleges or training providers, 9 awarding organisations, 10 representative organisations and 4 individuals. Seven colleges or training providers, 2 awarding organisations, 9 representative organisations, 3 individuals and 2 employers did not respond to this question.

Of those that did respond, the majority (26) agreed with our proposal, including 6 colleges or training providers, 7 awarding organisations, 10 representative organisations and 3 individuals.

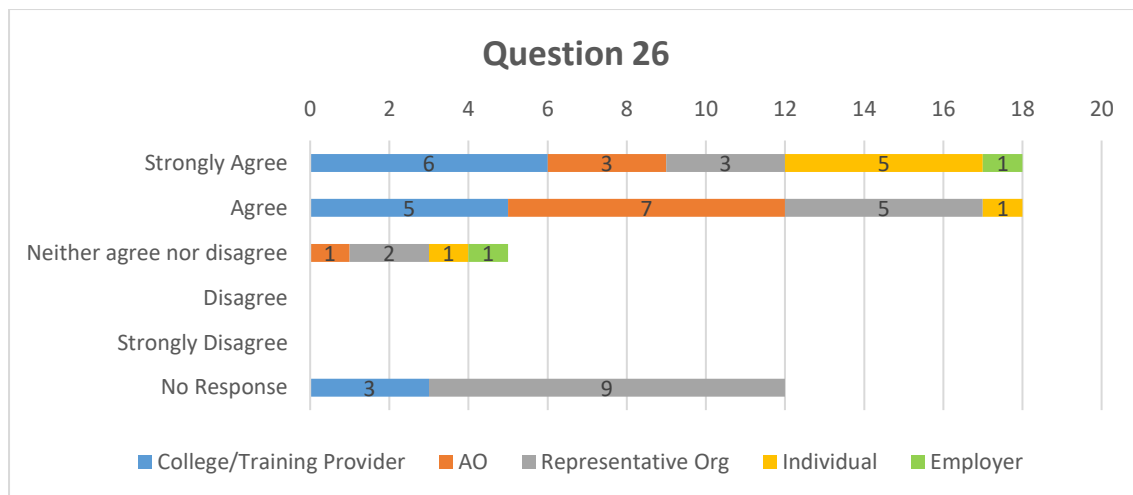
One awarding organisation respondent disagreed with our proposal, while 3 respondents (1 college or training provider, 1 awarding organisation and 1 individual) neither agreed nor disagreed.

Very few comments were submitted for this question and many have already been captured in the analysis for question 24. Additional comments include:

- existing regulatory criteria should be applied, as awarding organisations are already familiar with this process
- consideration should be given where there is overlap with the Institute in order to avoid repeating requirements and reduce burden

**Question 26 – To what extent do you agree or disagree with our proposal to require awarding organisations to put in place and comply with an assessment strategy covering the areas described?**

Responses from those who responded to this question were as follows:



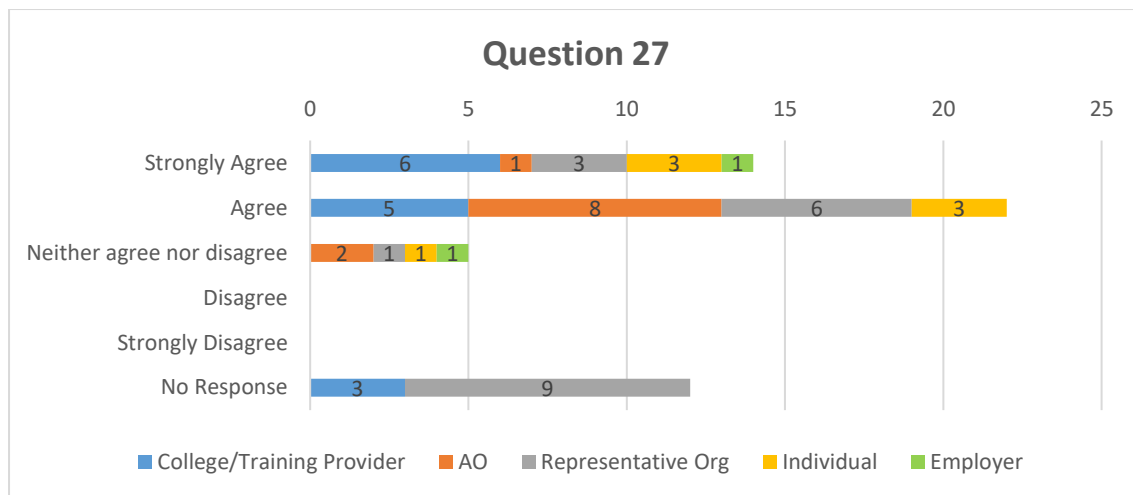
There were 41 responses to this question. This included 11 colleges or training providers, 11 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Three colleges or training providers and 9 representative organisations did not provide a response to this question.

The vast majority of respondents (36) agreed with our proposal and no respondents disagreed. The 5 respondents that neither agreed nor disagreed with our proposal included 1 awarding organisation, 2 representative organisations, 1 individual and 1 employer.

A small number of respondents provided comments on this question, which suggested that the approach would uphold the integrity of the qualification and ensure Technical Qualifications meet the same standard as other qualifications that undergo upfront evaluation by Ofqual.

**Question 27 – To what extent do you agree or disagree that we should require awarding organisations to explain through their assessment strategy, their approach to covering the outline content?**

Responses from those who responded to this question were as follows:



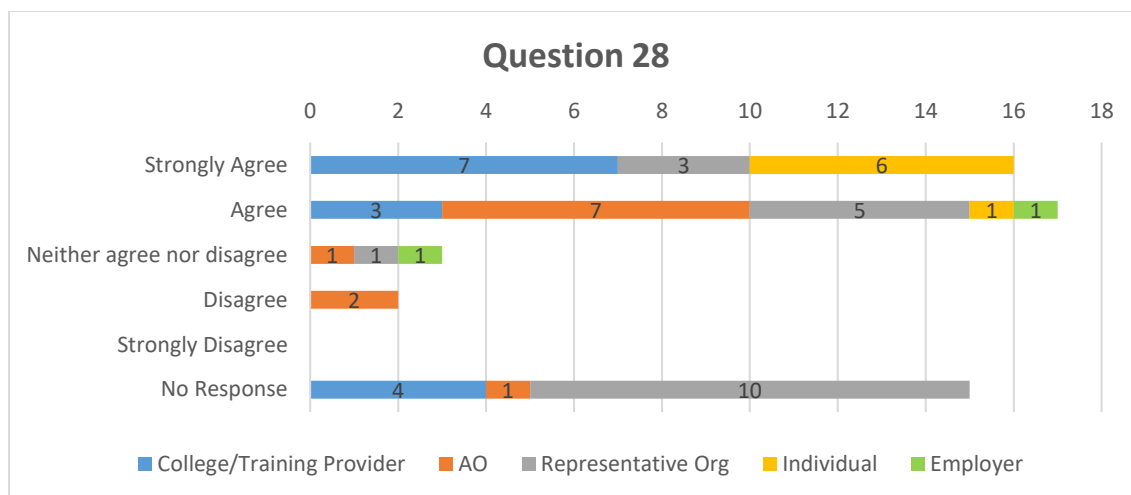
There were 41 responses to this question. This included 11 colleges or training providers, 11 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Three colleges or training providers and 9 representative organisations did not respond to this question.

The majority of respondents agreed with our proposal, including 11 colleges or training providers, 9 awarding organisations, 9 representative organisations, 6 individuals and 1 employer. Of these, comments suggested the proposal reflects the need to respond to changes within industry. Other comments noted the importance of considering the impact of updated content on centres and learners.

No respondents disagreed with our proposal, and 5 (2 awarding organisations, 1 representative organisation, 1 individual and 1 employer) neither agreed nor disagreed.

**Question 28 – To what extent do you agree or disagree with our proposed approach to put in place guidance on the development of assessment objectives for core skills?**

Responses from those who responded to this question were as follows:



There were 38 responses to this question. This included 10 colleges or training providers, 10 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Four colleges or training providers, 1 awarding organisation and 10 representative organisations did not provide a response to this question.

The majority of respondents (33) agreed with our proposal, including 10 colleges or training providers, 7 awarding organisations, 8 representative organisations, 7 individuals and 1 employer. Of these, comments suggested the approach would secure consistency between Technical Qualifications.

Other comments included:

- further guidance regarding mathematics, English and digital skills should be provided
- the completion of the brief should reflect a real working environment (time allowed, referring to peers and line managers, etc)

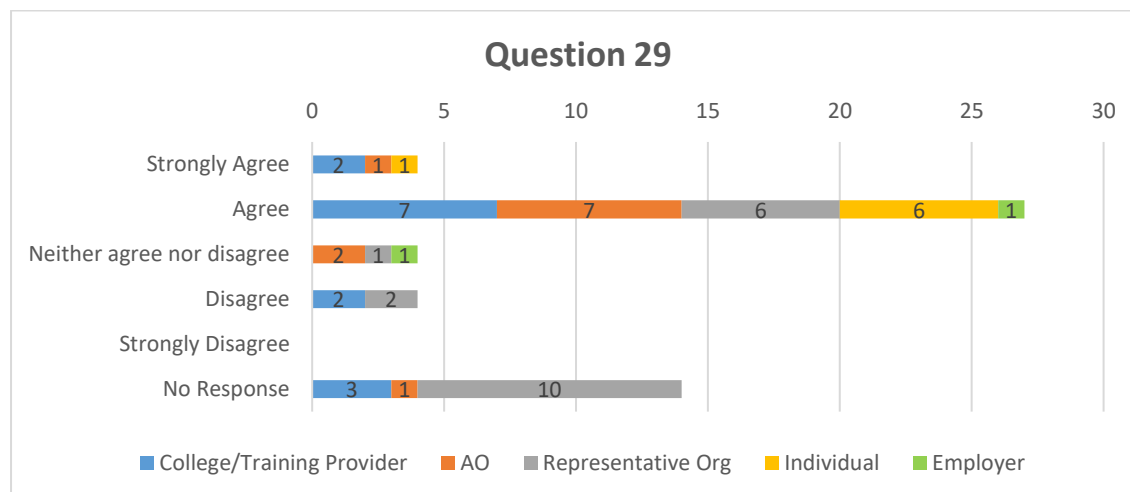
Of the 2 awarding organisation respondents who disagreed with this proposal, comments included:

- assessment objectives should be specified by Ofqual
- any guidance regarding the weighting of application and analysis/evaluation should not be too prescriptive, but rather require awarding organisations to justify approach in their assessment strategy
- it is too early to specify weightings for the application of core knowledge and skills; to do so risks inappropriate task design
- fewer, more holistic assessment objectives "may prove more suitable"

Three respondents neither agreed nor disagreed with our proposal, including 1 awarding organisation, 1 representative organisation and 1 employer.

**Question 29 - To what extent do you agree or disagree with our proposed approach to setting assessment objective requirements for core knowledge and understanding?**

Responses from those who responded to this question were as follows:



There were 39 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Three colleges or training providers, 1 awarding organisation and 10 representative organisations did not provide a response to this question.

The majority of respondents (31) agreed with our proposal, including 9 colleges or training providers, 8 awarding organisations, 6 representative organisations, 7 individuals and 1 employer. Of the respondents who did agree, the comments suggested the proposal would secure consistency and allow a degree of flexibility.

Other comments included:

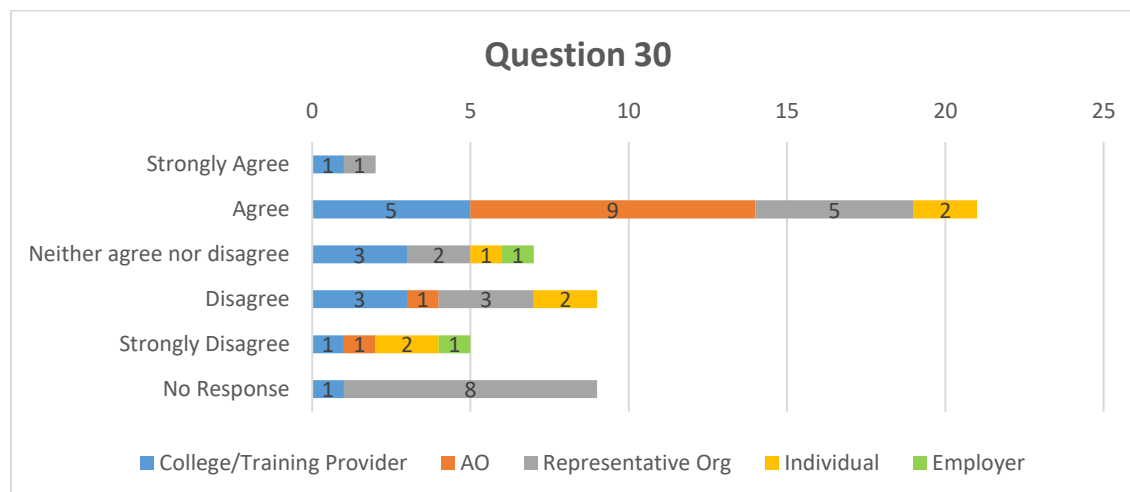
- account needs to be taken of the outline content documents
- the proposed percentages do not appear comparable to other Level 3 provision
- learners should not be disadvantaged by the 'relatively academic approach' proposed for Core assessment

Four respondents disagreed with our approach, including 2 colleges or training providers and 2 representative organisations.

Four respondents neither agreed nor disagreed, (2 awarding organisations, 1 representative organisation and 1 employer) one of which commented that assessment objectives should be specified by Ofqual.

**Question 30 - To what extent do you agree or disagree that we should set a requirement for core knowledge and understanding to be assessed through Assessment by Examination?**

Responses from those who responded to this question were as follows:



There were 44 responses to this question. This included 13 colleges or training providers, 11 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. One college or training provider and 8 representative organisations did not provide a response to this question.

The majority (23) agreed with our proposal, including 6 colleges or training providers, 9 awarding organisations, 6 representative organisations and 2 individuals. Those that agreed or strongly agreed commented that:

- an exam is an appropriate way to assess core knowledge and understanding (2 respondents)
- this approach will help maintain standards in the Technical Qualification and is important for the credibility of the qualification
- the approach appears to be appropriate given the overall qualification design (2 respondents)

Some respondents who agreed also provided further comments about things that would need to be considered if this approach was implemented. These included that:

- it is important that the form of the assessment reflects the needs of learners
- it would be important to ensure that assessment does not result in the qualification replicating the approach used in A levels, and that it instead allows Technical Qualifications to provide an alternative to A levels



Some respondents that agreed also commented on the availability of assessments, stating that while they agreed with the approach, they felt that assessments should be made available more frequently.

Fourteen respondents disagreed with our proposal, including 4 colleges or training providers, 2 awarding organisations, 3 representative organisations, 4 individuals and 1 employer. Respondents that disagreed or strongly disagreed with our proposals made the following comments:

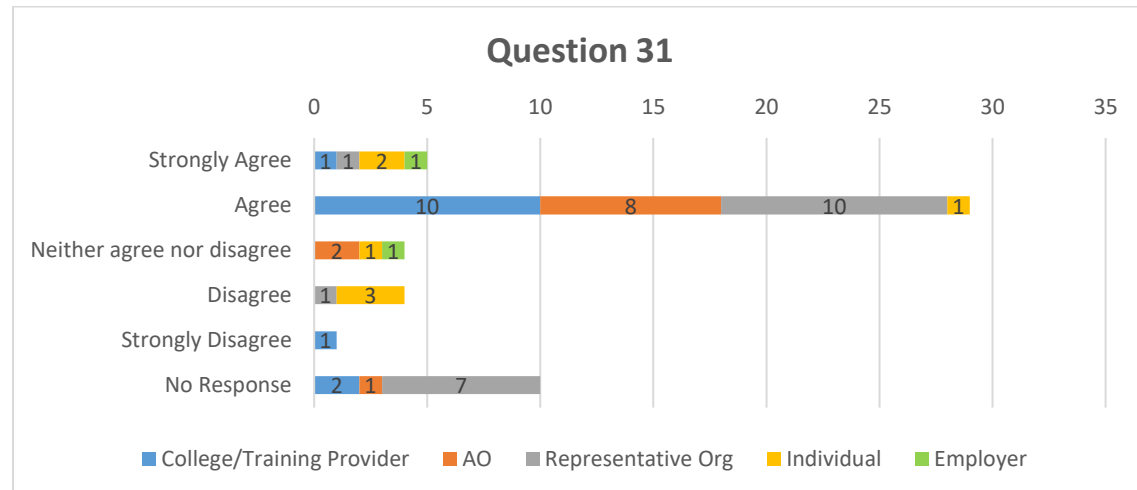
- one respondent commented that the students who take T Levels, and therefore the Technical Qualifications, may not perform well in written exams; this respondent further commented that Technical Qualifications should allow for creativity and application as this is what students will be required to show in the work place
- one respondent commented that they felt exams were out of context with the project part of the final assessment
- one respondent commented that the assessment should reflect the individual Technical Qualification and that in some cases, the amount of core knowledge and understanding content may not be sufficient for there to be an exam

Seven respondents neither agreed nor disagreed with our proposal, including 3 colleges or training providers, 2 representative organisations, 1 individual and 1 employer. Respondents commented that:

- one respondent was unsure how students taking Technical Qualifications would manage these assessments and whether this could affect the overall pass rate for the T Level
- it would be important that the assessment method met the needs of individual
- one respondent noted it would be important to make sure that the assessment remains fit for purpose, whatever assessment method is used
- one respondent noted that it is important that the approach does not restrict innovation by awarding organisations

**Question 31 - To what extent do you agree or disagree that we should require awarding organisations to set assessments for core skills?**

Responses from those who responded to this question were as follows:



There were 43 responses to this question. This included 12 colleges or training providers, 10 awarding organisations, 12 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 1 awarding organisation and 7 representative organisations did not provide a response to this question.

The majority of respondents (34) agreed with our proposal, including 11 colleges or training providers, 8 awarding organisations, 11 representative organisations, 3 individuals and 1 employers. Those that agreed or strongly agreed made the following comments:

- seven respondents commented that awarding organisation-set tasks would help to ensure consistency and ensure that tasks are valid and reliable
- three respondents commented that they felt awarding organisations would be best placed to have the specialist knowledge, skills and resources to set robust assessments that meet the requirements of the sector
- one respondent commented that it would be important to make sure that the timing of the tasks set by awarding organisation does not place additional pressure on students
- one respondent commented that while they agreed, it would be important that awarding organisations provide a range of project briefs for providers to choose from
- one respondent said it would be important that tasks could be contextualised as necessary

- one respondent commented that awarding organisation-set tasks would help to reduce the workload for teachers

Five respondents disagreed with our proposal, including 1 college or training provider, 1 representative organisation and 3 individuals. Of the respondents who did not agree with the proposal, the comments included:

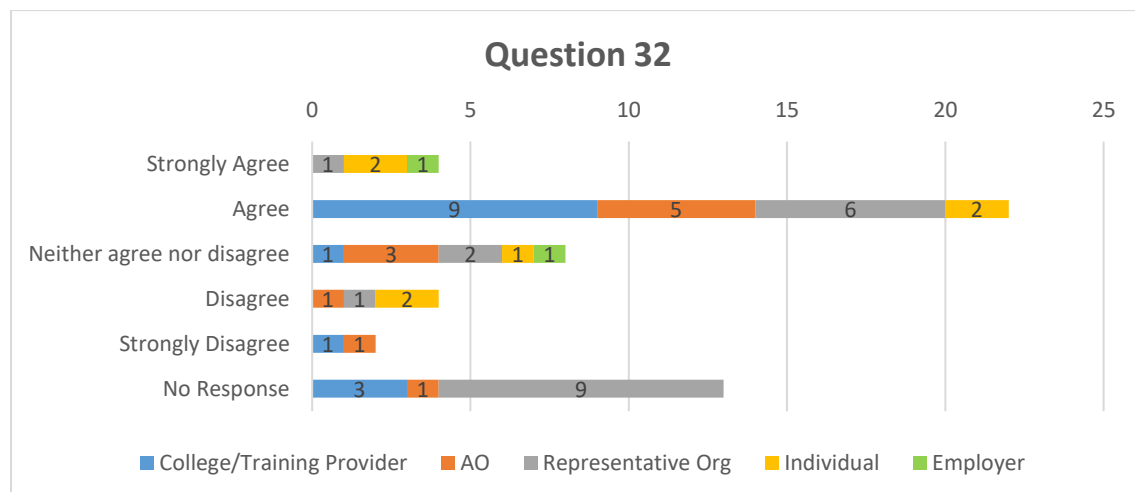
- that the range of Technical Qualifications available was too wide for a single approach to be applied
- two respondents commented that assessments could be made more relevant to students and employers if briefs could be designed locally and approved by awarding organisations

4 respondents neither agreed nor disagreed with our proposal, including 2 awarding organisations, 1 individual and 1 employer. Of these:

- one respondent commented on the manageability and cost of this proposal, depending on the number of tasks that an awarding organisation made available and the frequency at which these were changed
- one respondent commented that they would prefer a mixed approach to assessment to allow students to best showcase their strengths

**Question 32 - To what extent do you agree or disagree that we should require awarding organisations to set assessments for Occupational Specialisms?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 11 colleges or training providers, 10 awarding organisations, 10 representative organisations, 7 individuals

and 2 employers. Three colleges or training providers, 1 awarding organisation and 9 representative organisations did not provide a response to this question.

The majority of respondents (26) agreed with our proposal, including 9 college or training providers, 5 awarding organisations, 7 representative organisations, 4 individuals and 1 employer. The main reason given was that this would ensure the consistency, comparability, reliability and integrity of the assessments, drawing on the expertise of the awarding organisation.

Some of those who agreed also commented on the need to ensure that a range of employers and professional bodies had input into the design of the assessments to ensure that they were accessible to all learners and reflected the breadth of the occupational sector.

Some of those who agreed also wanted flexibility for provider staff to tailor the assessments to reflect their learners' placements, including using locally designed assessments briefs approved by the awarding organisation.

One also commented on the need to look at the assessment demands on the learners as a whole and the timing of the assessments to avoid pressure on learners and providers at key points in the year.

Six respondents disagreed with our proposal, including 1 college or training provider, 2 awarding organisations, 1 representative organisation and 2 individuals. Of the respondents who did not agree with the proposal, most thought that the awarding organisation should have oversight to assure standards but also thought that locally designed assessment briefs, approved by the awarding organisation, would be more relevant to learners and employers and allow greater flexibility to meet their needs and circumstances.

One respondent also commented this approach would de-skill tutors and assessors.

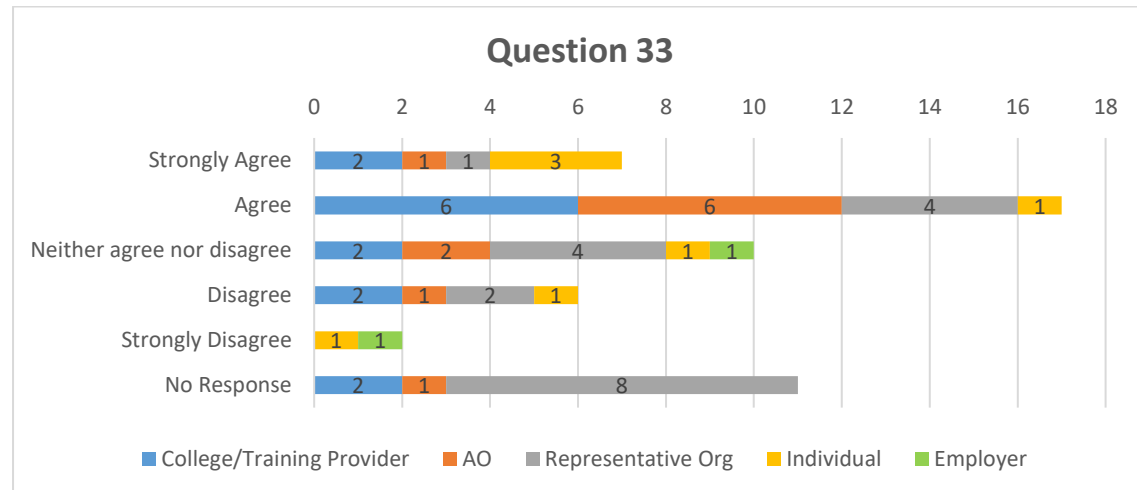
Eight respondents neither agreed nor disagreed with our proposal, including 1 college or training provider, 3 awarding organisations, 2 representative organisations, 1 individual and 1 employer.

One of the respondents who neither agreed nor disagreed expressed concerns about the manageability, cost and validity of assessments set by an awarding organisation and commented that Ofqual should not set any detailed requirements about the assessments, eg number of tasks, frequency with which the assessments must be changed.

Another commented that the decision about who should set the assessments was dependent on the occupational sector and therefore may vary.

**Question 33 - To what extent do you agree or disagree with our proposal to set a requirement for core knowledge and understanding to be marked by the awarding organisation?**

Responses from those who responded to this question were as follows:



There were 42 responses to this question. This included 12 colleges or training providers, 10 awarding organisations, 11 representative organisations, 7 individuals and 2 employers. Two colleges or training providers, 1 awarding organisation and 8 representative organisations did not provide a response to this question.

The majority of respondents (24) agreed with our proposal, including 8 colleges or training providers, 7 awarding organisations, 5 representative organisations and 4 individuals.

Respondents said that if the assessment was to be a written examination as proposed, then marking by the awarding organisation was the appropriate approach, and would support consistency across centres and enhance the reliability and credibility of the assessment.

One respondent commented that it would reduce teacher workloads.

Some of those who agreed also questioned the manageability of the approach, and commented on the need for the marks to be released in a timely fashion to allow for resits and to not delay confirmation of results.

Some respondents who agreed also commented on the proposed assessment approach for core knowledge and skills, either saying that the examination should not be traditional written exam but should take the form of a project, or suggesting that it could take the form of an externally set assessment which was internally marked and moderated.

Eight respondents did not agree with our proposal, including 2 colleges or training providers, 1 awarding organisation, 2 representative organisations, 2 individuals and 1 employer.

Most of the respondents who did not agree with the proposal said that the assessments should be centre marked and externally moderated, as an alternative to centralised marking. This would build on existing systems which already assured the reliability and validity of assessments and which used the same staff who would be acting as markers for the awarding organisation. One respondent commented that existing systems could be improved with greater scrutiny by the awarding organisations; others proposed greater use of technology and the use of Chartered Educational Assessors.

One respondent commented that it would take a time to establish the new marking process and that it would be better to use staff in centres to give them ownership of the new assessment and to give more opportunities to involve employers.

Some respondents questioned the feasibility of the approach and whether the awarding organisation would be able to resource sufficient markers for all centres.

One respondent suggested that Ofqual should set out their preferred approach (marked by the awarding organisation) but should allow variation if an alternative approach can be developed by the awarding organisation and sector employers.

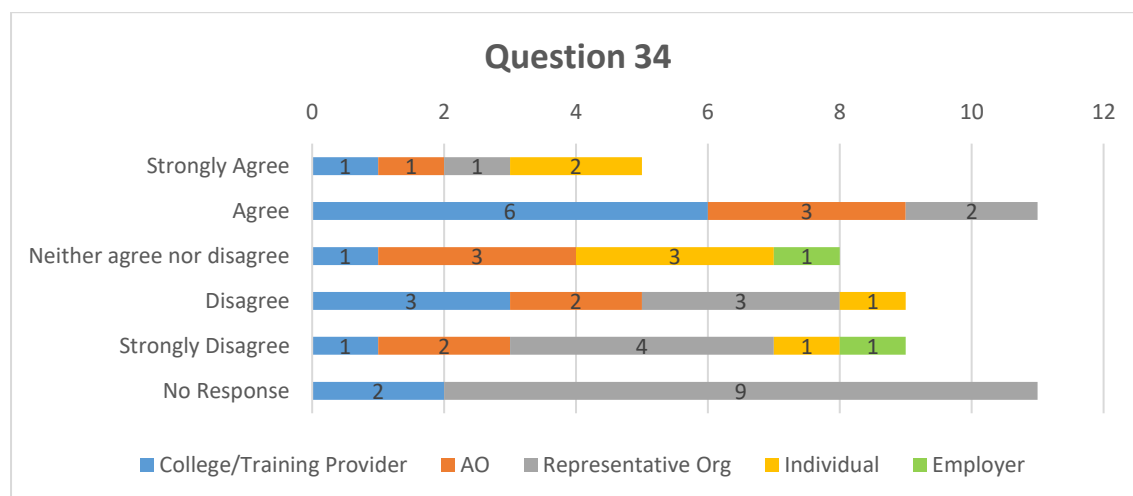
One respondent who disagreed with the proposed assessment approach stated that if examinations were used instead of centre devised assessments, then they should be marked by the awarding organisation.

Ten respondents neither agreed nor disagreed, including 2 colleges or training providers, 2 awarding organisations, 4 representative organisations, 1 individual and 1 employer.

One respondent who neither agreed nor disagreed commented that the approach will vary by occupational area and that there was insufficient information to form a view at this time.

**Question 34 - To what extent do you agree that we should require core skills assessments to be marked by the awarding organisation?**

Responses from those who responded to this question were as follows:



There were 42 responses to this question. This included 12 college or training providers, 11 awarding organisations, 10 representative organisations, 7 individuals and 2 employers. Two colleges or training providers and 9 representative organisations did not offer a response to this question.

Sixteen respondents agreed with our proposal, including 7 colleges or training providers, 4 awarding organisations, 3 representative organisations and 2 individuals. Of these:

- one awarding organisation commented that whilst it agreed, it would be important to consider the additional burden that could be caused by all assessments having to take place at the same time
- one college responded that although they agreed, they did not agree that doing so would lift the pressures placed on centres of having to mark their own students, as they felt that if done correctly, centre marking could be fairer than external marking

Eighteen respondents disagreed with our proposal, including 4 colleges or training providers, 4 awarding organisations, 7 representative organisations, 2 individuals and 1 employer. Of these:

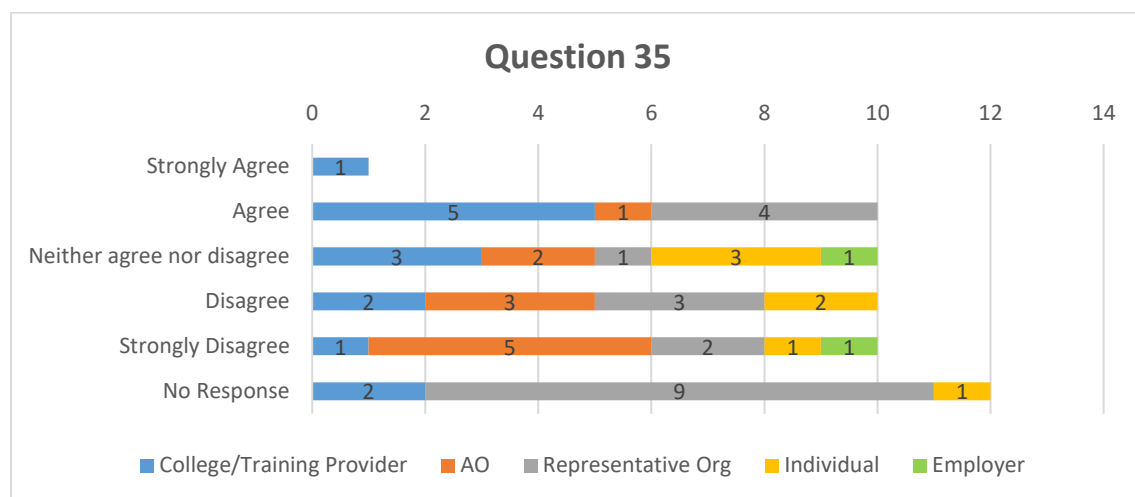
- three respondents commented that the group of markers needs to have enough knowledge to provide a fair marking process, and that they were not sure why marking by the school or college is not a better option
- one college commented that it would depend on how the exams are organised

- one awarding organisation commented that it is only possible to answer the question in full if the assessment model is known
- one organisation commented that it would be difficult for an awarding organisation to mark assessments if all assessments had to be taken on the same day
- one organisation commented that a marks-based externally set project could be designed, but that it is too early to say whether this would be the most appropriate model

Eight respondents neither agreed nor disagreed, including 1 college or training provider, 3 awarding organisations, 3 individuals and 1 employer.

**Question 35 - To what extent do you agree that we should require Occupational Specialism assessments to be marked by the awarding organisation?**

Responses from those who responded to this question were as follows:



There were 41 responses to this question. This included 12 college or training providers, 11 awarding organisations, 10 representative organisations, 6 individuals and 2 employers. Two colleges or training providers, 9 representative organisations and 1 individual did not provide a response to this question.

Eleven respondents agreed with our proposal, including 6 colleges or training providers, 1 awarding organisation and 4 representative organisations. Respondents commented that this would support consistency of assessment across centres and learners, would mirror the approach used with apprenticeship standards, and would be less burdensome for providers. A small number of those who agreed also suggested that moderation could be used as an alternative to central marking by using technology and Chartered Educational Assessors.



Twenty respondents disagreed with our proposal, including 3 colleges or training providers, 8 awarding organisations, 5 representative organisations, 3 individuals and 1 employer. Many of these respondents repeated comments made in response to other questions about the marking of assessments.

Several respondents commented that the decision to require marking by the awarding organisation could constrain the ability of the awarding organisation to design valid assessments in some occupational areas.

Some commented that it was not good assessment practice to decide assessment and marking approaches before the content of the qualification has been determined and that the awarding organisation should have the flexibility to decide the appropriate approaches to achieve validity, reliability and manageability.

One respondent commented that this approach might lead to the use of written assignments which could only ever sample from the content, and which may not align with the concept of threshold competence.

In many occupational areas, for example in the creative industries or laboratory technicians, respondents commented that the only valid form of assessment should include direct observation of student performance and practical ability. If these assessments were to be marked by the awarding body, this would require the recruitment, training and quality assurance of a large team of external assessors to visit centres to assess learners. Many respondents questioned the feasibility of this approach; comments included:

- there were already difficulties recruiting sufficient external assessors for some apprenticeships, and failure to recruit sufficient staff to carry out this role would risk system failure, particularly once the qualifications were fully implemented
- it might be difficult to get staff released from their own colleges to carry out the role of external assessor when they would be needed to support their own learners
- there is a risk that less well-qualified assessors would be recruited to ensure that there was a sufficient supply, with negative consequences for the quality and reliability of assessment decisions
- deploying a large team of external assessors would increase the awarding organisation's costs significantly and increase examination cost for centres; some respondents asked if a cost analysis had been carried out
- it would take time to establish the new marking process
- it would be a time-consuming activity as there is a limit to the number of learners a visiting external assessor could observe in one day

- it would be difficult for centres to store all the products/artefacts generated through the assessments until the external assessor(s) could visit
- it could limit the flexibility of assessment and so discourage learners, affecting completion rates

Many respondents commented that the long-standing internal marking and external moderation approaches used with existing vocational and professional qualifications should be used instead, as they had been shown to be reliable, valid, cost effective and manageable. Some respondents commented that this approach could also facilitate employer involvement.

A small number of respondents also commented that the use of external assessors suggested a lack of confidence in teaching staff and was not making best use of specialist teaching staff.

One respondent said that occupational specialism assessments should not be assessed by the awarding organisation unless that awarding organisation was also a professional body.

One respondent commented that the use of e-assessment and e-portfolio based assessments would allow more timely, agile and scale-able assessments. The respondent also commented that the appointment of a single awarding organisation with complex regulatory arrangements could limit innovation and use of e-assessment based approaches.

A small number of respondents commented that internal marking and external moderation should not be ruled out at this stage and that the awarding organisation and employers should be able to make the case for this being a valid approach.

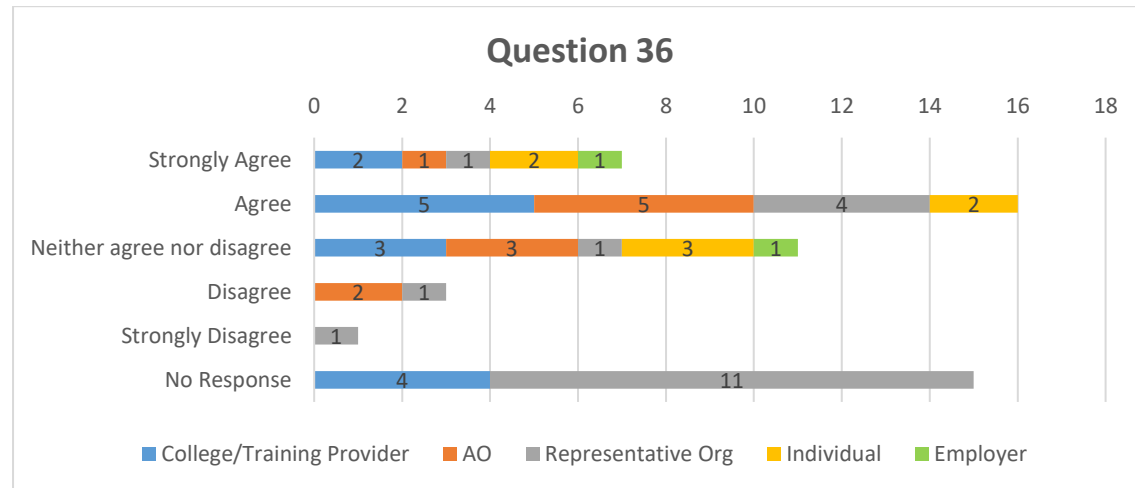
A small number of respondents also commented on the design of the assessment for the occupational assessment, saying that it should be locally devised or that it should be assessed against performance descriptors instead of using a mark-based approach.

Ten respondents neither agreed nor disagreed with our proposal, including 3 colleges or training providers, 2 awarding organisations, 1 representative organisation, 3 individuals and 1 employer.

One of the respondents who neither agreed nor disagreed commented that process should support students to learn and make progress.

**Question 36 - To what extent to you agree or disagree with our proposal to put in place assessment controls for core skills and Occupational Specialisms?**

Responses from those who responded to this question were as follows:



There were 38 responses to this question. This included 9 colleges or training providers, 12 awarding organisations, 8 representative organisations, 7 individuals and 2 employers. Four colleges or training providers and 11 representative organisations did not provide a response to this question.

The majority of respondents (23) agreed with our proposal, including 6 colleges or training providers, 7 awarding organisations, 5 representative organisations, 4 individuals and 1 employer. Of the respondents who agreed, the comments suggested the proposal would uphold the integrity of, and inspire public confidence in, the Technical Qualification. Other comments included:

- the approach would guard against instances of misadministration and malpractice
- consideration should be given to whether the proposal will result in additional cost or manageability implications for both awarding organisations and centres
- the proposal suggests a level of internal assessment not consistent with the mark-based, awarding organisation-assessed model presented elsewhere

Four respondents disagreed with our proposal, including 2 awarding organisations and 2 representative organisations. Their comments suggest that current regulation is sufficient. Other comments include:

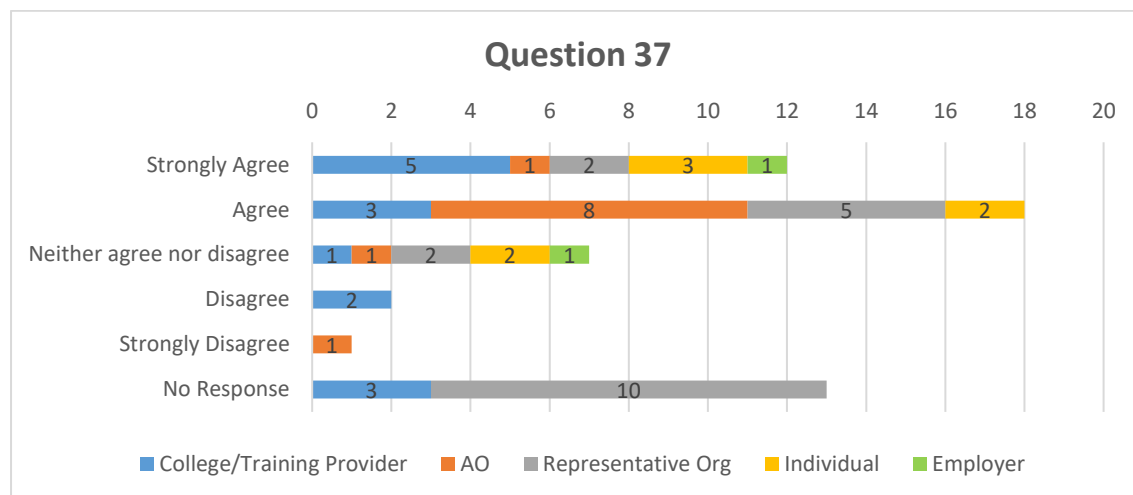
- taking decisions before the assessment model is selected could constrain the development of appropriate and valid assessments for Occupational Specialisms

- while there should be controls, the respondent disagrees with “the context in which this proposal is being made”, suggesting a missed opportunity “to enable centres to contextualise the assessment”

Eleven respondents neither agreed nor disagreed with our proposals, including 3 colleges or training providers, 3 awarding organisations, 1 representative organisation, 3 individuals and 1 employer.

**Question 37 - To what extent do you agree or disagree with our proposal to put in place requirements for awarding organisations in relation to reviews of marking and appeals?**

Responses from those who responded to this question were as follows:



There were 40 responses to this question. This included 11 colleges or training providers, 11 awarding organisations, 9 representative organisations, 7 individuals and 2 employers. Three colleges or training providers and 10 representative organisations did not provide a response to this question.

The majority of respondents (30) agreed with our proposal, including 8 colleges or training providers, 9 awarding organisations, 7 representative organisations, 5 individuals and 1 employer. Of the respondents who agreed, the following comments were made:

- one awarding organisation commented that if assessments are marked by awarding organisations then it would be appropriate to have such arrangements in place
- one organisation commented that the approach is well tested and provides high-level protection for schools, colleges and students

- two organisations commented that reviews of moderation should also be permitted if assessments were permitted to be marked by centres
- one organisation commented that it agreed awarding organisations follow these policies and procedures, but that it would increase costs for awarding organisations

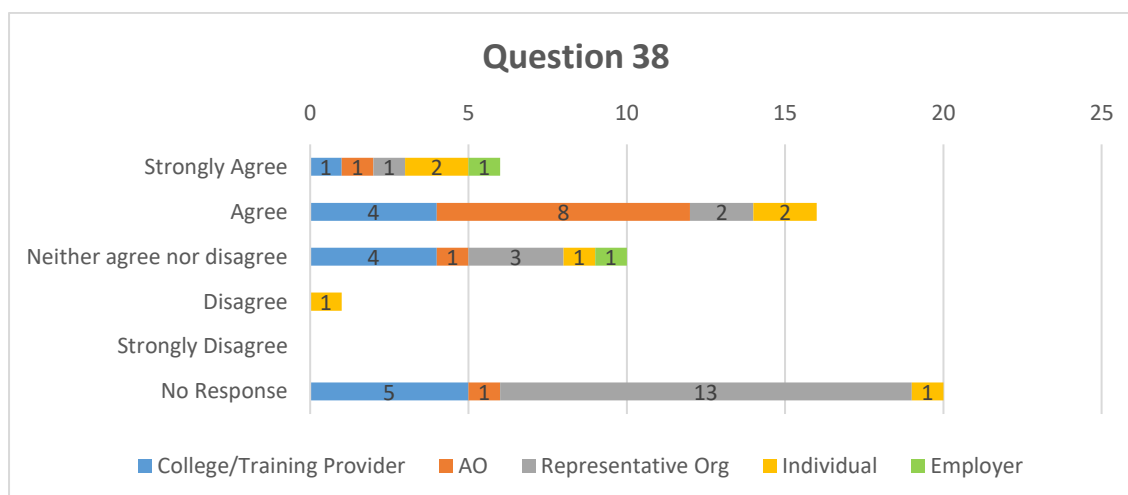
Three respondents (2 colleges and 1 awarding organisation) disagreed with our proposal. One organisation that strongly disagreed commented that it did not believe it necessary to disapply General Condition I1 which relates to the appeals process, but that the proposed requirements should apply in addition to this. One other college commented that it did not feel the current process [which these proposals are based on] was fit for purpose.

Seven respondents neither agreed nor disagreed with our proposal, including 1 college or training provider, 1 awarding organisation, 2 representative organisations, 2 individuals and 1 employer. Respondents that neither agreed nor disagreed made the following comments:

- one organisation commented that consideration would need to be given to how centre marks should be reviewed, if they were to be marked by teaching staff
- one organisation commented that as the proposals would not prohibit an awarding organisation from charging for reviews, this could disadvantage some centres and students, if they were not able to afford to request a review of marking

**Question 38 - To what extent do you agree or disagree with our proposal to disapply Condition E1 (Qualifications having an objective and support) in respect of Technical Qualifications?**

Responses from those who responded to this question were as follows:



There were 33 responses to this question. This included 9 colleges or training providers, 10 awarding organisations, 6 individuals, 5 representative organisations and 2 employers.

Of those who responded, 22 (5 colleges or training providers, 9 awarding organisations, 3 representative organisations, 4 individuals and 1 employer) agreed or strongly agreed with our proposals. There was 1 respondent (an individual) who disagreed. The remainder neither agreed nor disagreed.

Respondents who agreed or strongly agreed generally did not comment. The only comments were to emphasise that as the objective and support will be agreed by the Institute, this Condition was not necessary.

Respondents that neither agreed nor disagreed made the following comments:

- two respondents commented that the need to disapply the Condition reflected the complicated nature of T Levels
- one organisation commented that if the awarding organisation was not responsible for this, it would be important to ensure that the objective that was set was appropriate and that there was oversight of this

The respondent who disagreed did not comment further.

**Question 39 - Are there any other General Conditions that we should disapply in respect of Technical Qualifications?**

Seven respondents provided comments in response to this question.

Three respondents commented that it was not possible to comment on this until further information about the contractual arrangements between the Institute and the awarding organisation offering Technical Qualification were known.

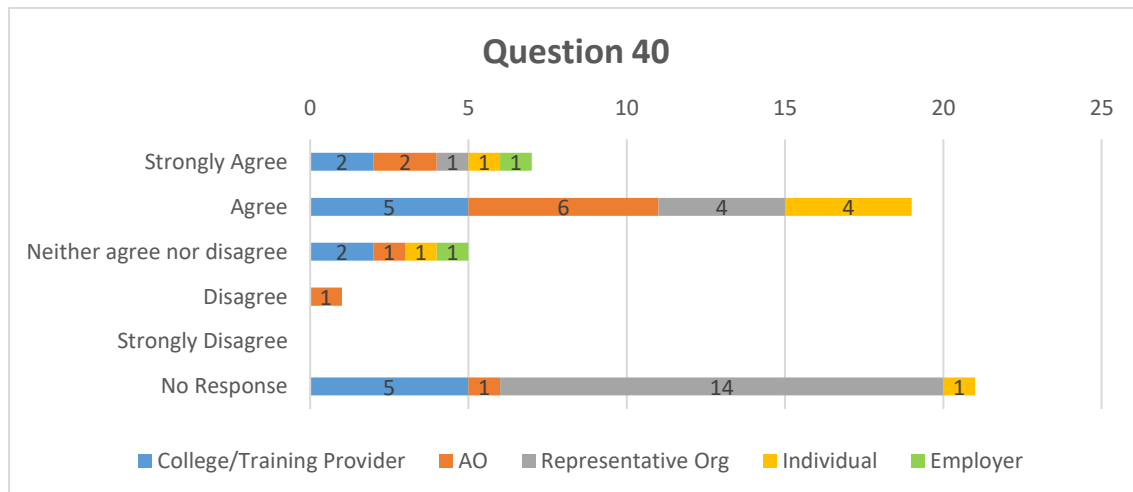
Two respondents commented to confirm they were not aware of any other Conditions that should be disappplied and felt the majority of Conditions were appropriate.

Two organisations commented that while mindful of the fact that T Level development was still taking place, the following Conditions may need to be considered for disapplication:

- C2 (Arrangements with centres) as it is not clear how much control an awarding organisation will have over the providers selected to offer the first Technical Qualifications
- D1 (fitness for purpose of qualifications) as an awarding organisation may not have full control over all aspects of the qualification
- E7 (total qualification time) as it was felt this should be set consistently, not by the awarding organisations
- B3.2 (f) (notification to Ofqual of certain events) and B5.3 (use of Ofqual's logo) to reflect the requirement that awarding organisations will not be producing certificates as part of the Technical Qualifications
- E2 Requirement on qualification titling as requirements and guidance are proposed in relation to titling to align with the Institute's requirements

**Question 40 - To what extent do you agree or disagree that we should provide Technical Qualification-specific guidance for Conditions D3 (Reviewing approach) and E7 (Total Qualification Time)?**

Responses from those who responded to this question were as follows:



There were 32 responses to this question. This included 9 colleges or training providers, 10 awarding organisations, 6 individuals, 5 representative organisations and 2 employers.

Of those who responded, 26 (7 colleges or training providers, 8 awarding organisations, 5 representative organisations, 5 individuals and 1 employer) agreed or strongly agreed with our proposals. There was 1 respondent (an awarding organisation) that disagreed. The remainder neither agreed nor disagreed.

Respondents who agreed or strongly agreed commented that the approach seemed sensible. Two respondents commented that, whilst agreeing, they felt the accountability model for T Levels was complex, so it was not possible to comment definitively.

One respondent who neither agreed nor disagreed commented that it would be important for the timescales for any reviews covered by Condition D3 to be pragmatic and reasonable.

The organisation who disagreed commented that qualification-specific guidance will need to be agreed through the contract between the Institute and the awarding organisations offering Technical Qualifications.



**Question 41 - Are there any other General Conditions against which we should provide Technical Qualification-specific guidance?**

Seven respondents provide comments on this question.

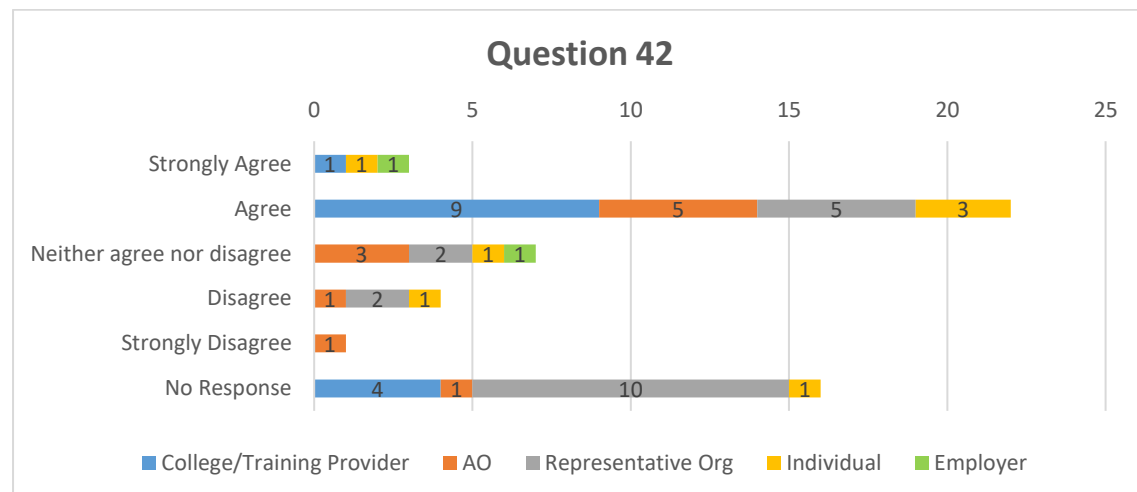
Two respondents provided comments supporting our proposed approach.

Respondents also commented that:

- Condition F (providing qualifications to purchasers) would need guidance, although they did not state why
- if the Conditions proposed for disapplication were not disapplied, then guidance against those Conditions would be needed
- it would be helpful to have guidance on the recognition of prior learning to ensure this is applied consistently across Technical Qualifications
- that they could not comment further until more was known about the development of Technical Qualifications and T Levels

**Question 42 - To what extent do you agree or disagree with our proposed approach to setting and maintaining grade standards in the Core?**

Responses from those who responded to this question were as follows:



There were 37 responses to this question. This included 10 colleges or training providers, 10 awarding organisations, 9 representative organisations, 6 individuals and 2 employers.

Of those that responded, 25 (10 colleges/training providers, 5 awarding organisations, 5 representative organisations, 4 individuals and 1 employer) agreed or strongly agreed with our proposals. There were 5 respondents (2 awarding

organisations, 2 representative organisations and 1 individual) that disagreed or strongly disagreed. The remainder neither agreed nor disagreed.

Respondents who agreed or strongly agreed with our proposals made the following comments:

- one organisation commented that awarding organisations would need to rely heavily on qualitative evidence in the first year as they would need to test and adjust to ensure the required standards
- one respondent made a related comment that they did not believe there was sufficient technical evidence to generate statistical predictions for this approach currently. They commented that as each Technical Qualification will only be offered by one awarding organisation, they did not feel that inter-board comparability would be necessary. They also commented on the difficulty of this approach given the nature of the cohorts likely to study Technical Qualifications and that these would be likely to be self-selecting
- some respondents commented that while they agreed with the approach, they did not agree with the grading scale of A\* to E. This was outside of the scope of this consultation

Respondents who neither agreed nor disagreed with our proposals made the following comments:

- three organisations made similar comments that it would be important to make sure that the views of all employers were considered, not just those on special interest groups. They felt that in some cases, the views of professional institutions, as well as schools and colleges, should also be taken into account
- one awarding organisation commented that the proposed approach will work well for core knowledge and understanding, but that it would be helpful to have an agreed approach to the aggregation of core knowledge and understanding with core skills
- some respondents made more general comments on the assessment approach for Technical Qualifications or T Levels overall, which did not relate specifically to this question.

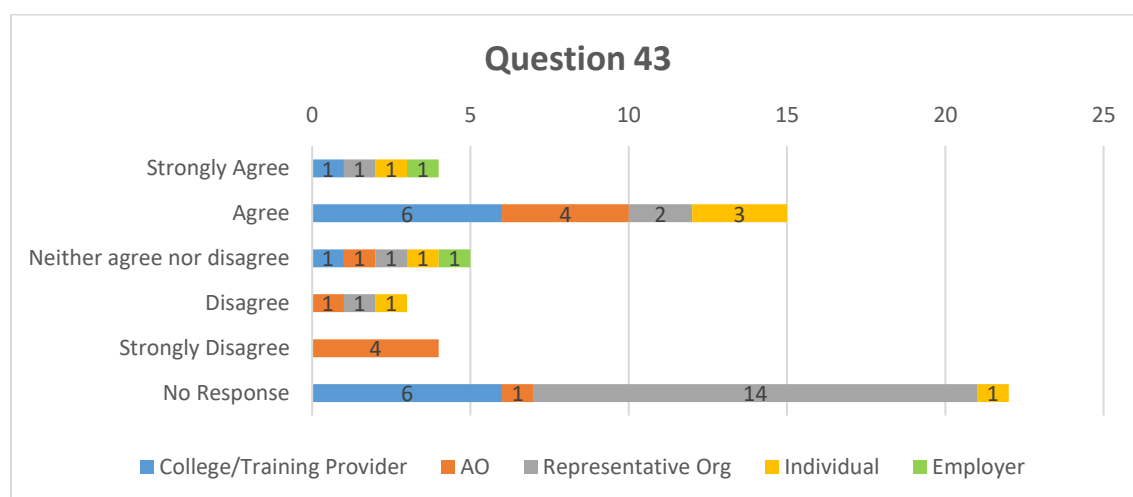
Respondents who disagreed or strongly disagreed with the proposed approach made the following comments:

- two respondents (1 organisation and 1 individual) commented that it was not clear how a competency based assessment model relates to a compensatory model and arithmetic grade boundary calculations

- one awarding organisation commented that there was a lack of clarity about the identify and role of the employers who would be involved in setting standards. They were concerned that an employer could interpret this as meaning that they could tell the awarding organisation what they wanted the pass mark to be, as opposed to articulating what a student who achieves a pass should be able to demonstrate
- one organisation had understood our proposals to mean that grade boundaries each year would be pre-set. This was not what we had proposed.

**Question 43 - To what extent do you agree or disagree with our proposed approach to setting and maintaining grade standards in the Occupational Specialism?**

Responses from those who responded to this question were as follows:



There were 31 responses to this question. This included 8 colleges or training providers, 10 awarding organisations, 5 representative organisations, 6 individuals and 2 employers. Six colleges or training providers, 1 awarding organisation, 14 representative organisations and 1 individual did not provide a response to this question.

The majority of respondents (19) agreed with our proposal, including 3 colleges or training providers, 4 awarding organisations, 3 representative organisations, 4 individuals and 1 employer. Comments from those respondents who agreed with the proposed approach included:

- two organisations commented that it would be important to ensure that grading is consistent between awarding organisations and that it would be important for there to be exemplification materials and for these to be produced early

- one college commented that the approach was required if Technical Qualifications were going to be held with the same regard and esteem as other qualifications
- two respondents commented that there would likely be a tension between a compensatory approach and that of a competency based model
- one respondent commented that the approach would ensure consistency across providers and uphold the integrity of the qualification
- one organisation commented that it would be important to ensure that an appropriate range of employers were involved in determining the standard required for a Pass

Seven respondents disagreed with our proposal, including 5 awarding organisations, 1 representative organisation and 1 individual. Comments from those respondents who disagreed with the proposed approach included:

- one organisation commented that in order to be valid, there is likely to be a substantive element of observation-based assessment necessary to assess some of the Specialisms. This does not lend itself to the use of marks and is most validly assessed qualitatively through the use of descriptors of the required standard of performance. They commented that grade boundaries should not be set arithmetically but should be qualitative and use descriptors
- one organisation commented that the approach seemed to be overly complicated and suggested that it would be difficult to produce exemplification materials up front, although sample materials could be produced
- one organisation commented that a mark-based compensatory model with some arithmetically calculated grades was not the best or most valid way to assess competence. They felt a descriptor based approach would be preferable
- one organisation commented that the approach would mean the grades would be likely to be strongly linked to assessment criteria, allowing compensation, which could weaken the link between assessment evidence and the criteria and raises an element of doubt as to whether the evidence can be said to represent a notion of competence
- some respondents repeated points made in response to the previous question relating to the Core

Five respondents neither agreed nor disagreed with our proposal, including 1 college or training provider, 1 awarding organisation, 1 representative organisation, 1 individual and 1 employer. Respondents who neither agreed nor disagreed made the following comments:

- one organisation commented that the approach to grading was inseparable from the approach to assessment. They commented that the proposed approach implies a mark-based assessment approach, whereas they had envisaged a competency-based model. This respondent commented that to form an assessment perspective, they would support the approach as it avoids introducing hurdles, but would be concerned about whether the approach would impact on the validity of the assessment
- one respondent made a general comment that greater consideration needs to be given to whether the assessment regime for the overall T Level is fit for purpose

**Question 44 - We have set out the ways in which our proposals could impact (positively or negatively) on students who share a protected characteristic. Are there any potential impacts that we have not identified?**

We received comments on this question from 19 respondents. The majority of respondents did not identify any further impacts beyond those set out in the consultation. In some instances, respondents that commented on this question repeated equality impacts already identified, or provided further detail to support impacts identified under previous questions.

Of the comments made, these included:

- concern about the impact of not issuing a Technical Qualification certificate on students who could not, due to a disability, complete other aspects of the overall T Level programme (for example the industrial placement)
- that the working towards grade would not in fact benefit students with protected characteristics, and that reasonable adjustments should have been made during the course of study to eliminate the need for this grade due to disability
- that a single assessment series each year, whilst affecting all students, could particularly affect those with protected characteristics, who may not receive the support they require due to capacity issues
- some respondents comments that, while not a protected characteristic, it would be important to consider the impact on students' mental health. This could be impacted, for example, by having to take assessments in a single exam series

Some respondents comments on equality impacts relating to the completion of the industry placement as part of the overall T Level programme, which was outside of the scope of this consultation.

**Question 45 - Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on students who share a protected characteristic?**

We received comments on this question from 10 respondents. The majority of these responses were suggestions not to implement parts of our proposals as opposed to suggestions about how to mitigate any negative impact.

Of the comments made, these included:

- support for the introduction of an additional retake series in January
- requiring awarding organisations to issue certificates for Technical Qualifications, separate to the overall T Level certificate
- that it would be important to carefully monitor the qualification during its early years to identify any equality impacts

**Question 46 - Do you have any other comments on the impacts of our proposals on students who share a protected characteristic?**

We received comments on this question from 10 respondents. Many of these repeated comments made in response to previous questions. Comments made, included:

- to allow flexibility in the system in relation to when assessments take place, to take account of impacts on students with protected characteristics
- to ensure that alternative qualifications to T Levels continue to be made available for students that cannot complete the T Level programme due to a disability
- to remove exams from Technical Qualifications as students with certain protected characteristics may struggle to complete these
- that awarding organisations should consider aligning the requirements for access arrangements with those that exist in other qualifications
- that Technical Qualifications should be included on the list of relevant qualifications in section 97 of the Equality Act 2010. It may be the case that section 53 of the Equality Act is more relevant to T Levels where the concept of a 'competence standard' in qualifications is introduced, meaning that certain reasonable adjustments may not be appropriate

**Question 47 - What do you anticipate the additional burden and cost to be of permitting an additional retake series and of ensuring this was only used for students retaking assessments?**

Some respondents from colleges or schools did not feel confident in answering this question and would not be able to until the qualification specifications were available.

Other respondents from schools and colleges were able to identify some of the additional costs that may be incurred. These included:

- insufficient resources may be available towards the end of an academic year to spend on the administration of assessments for a potentially large cohort of pupils
- an additional assessment series will significantly increase awarding organisations' costs as new assessments will have to be commissioned, quality assured and marked
- there would be additional cost in terms of deployment of examinations staff, rooming, etc. However, if it is the right thing to do for the students, then it should be allowed (and factored into the funding)
- any retakes will incur additional costs in terms of teaching time, whenever they occur, but the timing of the additional retake series will affect the level of the costs. Waiting for 12 months for a summer series will incur greater costs than if the additional retake series was available in January, as the students would potentially need to be in classes for a longer period
- there will be an additional administrative burden and significant extra cost in permitting an additional retake series. Putting in place checks to ensure the additional retake series was only used by retake students will require extra resource
- centre costs will increase and will rise annually as each of the T Level routes is rolled out and the T Level becomes a technical route of choice for young people. The increase in costs will be associated with administration, accommodation and staff, specifically examination invigilators. In addition, this is a very different method of assessment for many vocational colleges and staff will need support and training in preparing learners for qualifications with end of year exams

A representative organisation noted that any additional costs would be outweighed by the implications of limiting retakes to the summer series, which would limit student progression options.

An interest group was of the view that there would be no additional cost burden, as having an additional retake series was no different to current practice for many qualifications.

Comments from awarding organisations included:

- although an additional retake series would be burdensome and costly, it is necessary for students
- the cost will vary according to the size of the cohort entering for such resits, and the nature of the assessment model

**Question 48 - What do you anticipate the additional burden and cost to be of requiring all assessments to be set and marked by the awarding organisation compared with allowing marking by schools and colleges?**

Only respondents who wanted to provide comments responded to this question. Many respondents identified reasons for increased costs, but did not provide specific details about costs, or felt that it was not possible to do so until there was further clarity about Technical Qualifications.

Awarding organisations who provided comments to this question identified the following:

- there will be an increased time and resource requirement for awarding organisations, which could lead to increased fees for centres to cover these costs
- an increased marking pool will be needed to allow for all assessments to take place within the same window
- that the additional burden would represent a significant increase over other similar qualifications, where marking is often delegated to centres, with awarding organisation moderation
- the cost of any retakes is likely to be high, as this would also need to be marked by an awarding organisation.

Schools and colleges who responded to this question commented provided the following comments:

- requiring awarding organisations to mark all assessments may lead to a significant rise in exam fees to cover these costs and that if funding is not adjusted accordingly, this will be problematic
- there would be a significant burden due to having to organise assessments (for example rooms, invigilation, scheduling, access arrangements)



- the cost of having assessors visit centres, or of centres sending assessments to awarding organisations for marking, is likely to be significant. The respondent did note that some of this would be off-set by the time saved by centre staff not having to mark assessments

One representative organisation commented that:

- it would be important to balance any costs against the validity and reliability of the assessment approach

**Question 49 - We have set out our view of the regulatory impact of our proposals on awarding organisations offering Technical Qualifications. Do you have any comments on this assessment?**

Responses to this question included:

- the assessment model determines the potential impact on awarding organisations. If not more importantly, it also determines the impact on providers. Colleges do not have the funding, nor sufficient exam accommodation or invigilators, to meet this additional demand, arising from the number of external assessments to be taken in a short May/June window at the same time as other external examinations
- the qualifications should be offered by more than one awarding organisation as competition will raise standards

**Question 50 - Are there any additional steps we could take to reduce the regulatory impact of our proposals?**

Only respondents who wanted to provide comments responded to this question. Respondents who provided comments to this question identified the following steps:

- not requiring all assessment to take place in May/June could reduce the overall impact of our proposals
- to reduce any overlap between Ofqual's regulation and the contract for the Technical Qualification between the awarding organisation and the Institute
- for Ofqual and the Institute to continue to liaise to minimise any duplication between the two organisations in the oversight of T Levels
- to ensure that any data reporting requirements in relation to Technical Qualifications do not become resource intensive or require expensive IT systems to meet.

Other comments included a concern that centres would need to invest in equipment to deliver Technical Qualifications and that this could be a burden if courses were cancelled due to low numbers of students taking up T Levels.

Some respondents commented that it would be difficult to comment on this fully until the arrangements for T Levels and Technical Qualifications are finalised.

**Question 51 - Are there any costs or benefits associated with our proposals which we have not identified?**

Respondents identified the following associated costs and/or benefits which had not been identified in the consultation documents:

- employers are clearly important end-users of the vocational education and training system and the opportunity for employers to feed in to assessments, particularly where they relate to activity undertaken on the industry placement, is a benefit and will support confidence in and the credibility of the T level. There may also be a positive impact on the costs of delivery
- colleges would incur additional costs, including the hiring of accommodation, chairs and tables, invigilation staff and access support to accommodate the volume of external assessments

**Question 52 - We have not identified any ways in which our proposals will prevent innovation by awarding organisations offering Technical Qualifications. Do you have any comments on this assessment? Please provide specific examples.**

Respondents were not required to answer this question. Only those that wanted to provide comments responded. Comments made by respondents included:

- that requiring one assessment series to be taken at the same time potentially restricts the use of online assessment as providers may not have access to sufficient computers for all students to take assessments at the same time
- that requiring all assessments to be marked by awarding organisations before all Technical Qualifications have been developed could restrict the choice of assessment methods available to validly and cost effectively assess students
- requiring all assessments to only take place in May/June each year will remove the possibility of Technical Qualifications being offered on-demand
- that setting weighting within the Core could limit the opportunity for innovative approaches to the design of the assessment

## **Views expressed – consultation engagement events**

### **Background**

As part of our consultation we held three consultation engagement events. These were in:

- London on 23 July
- Coventry on 24 July
- Manchester on 21 July

Our consultation engagement events were attended by 98 people in total.

At these events, we presented the proposals set out in our consultation, and provided opportunity for attendees to discuss these, provide feedback, and ask questions.

We also ran a webinar on 2 August. This was attended live by 42 people and made available online afterwards for people to watch. On the webinar, we explained our proposals, and those that attended live were able to ask questions.

### **Views expressed**

Attendees at these events did not provide formal feedback on a question by question basis, so have not been included in the analysis section above (although attendees may also have responded formally to the consultation, in which case their views will have been included as part of the analysis of responses). Attendees were instead asked to consider our proposals by theme.

The majority of views expressed at the events mirror those that we have reported in the formal consultation analysis above. As such, we do not repeat in detail the representations made, but instead provide a brief overview of the issues raised.

### **Setting and marking assessments**

Views on this varied across core knowledge and understanding, core skills, and Occupational Specialisms.

Attendees supported our proposed approach for the core knowledge and understanding to be Assessment by Examination, set and marked by the awarding organisation.

Although attendees recognised why we are proposing that core skills and Occupational Specialisms are set and marked by awarding organisations, attendees commented on:

- comparisons with the approach taken in other vocational and technical, and general qualifications
- the capacity of awarding organisations to recruit sufficient suitable capable assessors
- cost involved for awarding organisations of marking all assessments
- the potential threat to validity of requiring an assessment to be marked by an awarding organisation, when a centre may be better placed to do so. Attendees felt it important that the approach taken is suitable for what is being assessed
- teachers find that marking assessments helps them to understand more about the qualification by applying mark schemes themselves
- that the core skills project could be more readily marked by awarding organisations than Occupational Specialisms assessments
- attendees generally supported the approach for awarding organisations to set assessments for core skills and Occupational Specialisms assessments, subject to employers having input into these and the ability to contextualise locally where necessary

### **Results and certificates**

The majority of respondents attendees were strongly against the proposal not to issue certificates for Technical Qualifications taken in England as part of a T Level programme.

Attendees commented:

- that a certificate is a key feature of a qualification
- allowing certification for Technical Qualifications taken outside of England is unfair on students in England who will not have the same recognition of their achievements
- a large proportion of students may miss out on a T level due to failing other parts of the T Level, despite being able to pass the Technical Qualification. These students would not receive a certificate recognising their achievements

### **Assessment availability and retakes**

Almost all attendees at the events were strongly against our retakes proposals. Comments made by respondents included that:

- it is not clear what a student would do if they wished to retake after the second year, as they would be unlikely to be studying due to the fact that they would no longer be funded

- there should be at least one additional retake opportunity (and possibly two). There was not an outright view as to when this should be, but suggestions included January and/or December, March, or once per term
- a single series could impact on student progression. A student may not be able to enter employment for a further year, despite only having to retake a single assessment out of a qualification that is the size of 3 to 4 A levels

Views on assessment availability were more mixed, although attendees generally preferred for there to be additional assessment opportunities. Comments made included:

- there should be at least 1 additional series, possibly 2, and that these should be able to be used for both students sitting assessments for the first time, and those retaking assessments
- the availability of assessment needs to take account of the potential timing of the industry placement required as part of the overall T Level programme
- flexibility of assessment series will help with capacity issues for awarding organisations, particularly if they are required to mark all assessments (as opposed to allowing centres to mark assessments with moderation arrangements in place)
- the timing of a single summer assessment series may not meet the needs of employers who do not necessarily look to recruit at one point in the year

### **Working Towards grade**

Attendees at the events could see why we had proposed this, and felt that some students would welcome it as some recognition of the achievement. Many queried though what value a Working Towards grade would have and whether an employer would recognise it. Comments made by attendees included that:

- it implies the learner is not going to reach the required standard. A learner who does not pass an Occupational Specialism is likely to retake. A permanent grade of Working Towards is unlikely to be useful
- it would not be clear to employers what parts of the Occupational Specialism a student was working towards
- the name 'Working Towards' is confusing as a student is always working towards something. They would be unlikely to receive this grade until after they had completed their course, and as such would no longer be working towards it

### **Qualification purpose**

Attendees at the events were generally supportive of this proposal. The comments made related more to points of detail than the overall proposal. Comments made included:

- the need to be clear about difference between threshold competence and occupational competence
- referring to part of the purpose being to achieve a T level

### **Accreditation**

Respondents supported this approach. They felt it would bring consistency to Technical Qualifications.

### **Assessment strategies**

Respondents supported our proposals in this area. Comments made included:

- awarding organisations are generally familiar with the idea of assessment strategies and centres supported the idea of Ofqual being able to review these as part of accreditation

### **Outline content**

Respondents supported this proposal. The main comments were about the need for consistency between Ofqual's requirements and what is specified in the content.

### **Weightings for the Core**

Respondents generally supported this proposal.

- they felt that a range was a sensible approach. Some commented that it would be difficult to comment on whether 25-40% was an appropriate range without knowing the content for future Technical Qualifications
- some commented on the size of the range as it could lead to a lot of variation between Technical Qualifications. They recognised though that it would be difficult to be more precise until more was known about the content of future Technical Qualifications

### **Assessment objectives**

Attendees supported this approach. The comments were mainly about the detail of what the guidance would say. They felt they were broadly right and what would be expected for Technical Qualifications at this level.

### **Assessment controls**

Attendees generally supported this approach.

- many felt that requirements similar to those that exist in other qualifications would help ensure consistent standards across Technical Qualifications
- others commented that in comparison to other Vocational and Technical Qualifications, our proposed requirements seemed too detailed
- some commented that if controls were too extensive, then it may limit the ability of awarding organisations to innovate and lead to sterile controlled assessment models, which would not be a good experience for learners
- there was a desire for any controls that are put in place to be coordinated so that centres delivering multiple Technical Qualifications were not having to deal with a number of different systems and processes

### **Setting and maintaining standards**

Respondents were broadly supportive of this approach.

- attendees felt it crucial that employers are involved, and wanted clarity about exactly how this would happen
- there were some comments about the extent to which people would seek to draw comparisons between the Core and A levels, given they use the same A\* to E grading scale and are at the same level

### **Reviews and appeals**

Attendees agreed with these proposals, commenting that it is important that centres can challenge marks that they believe are incorrect.

## **Appendix A: list of organisational consultation respondents**

When completing the questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation.

Below we list those organisations that submitted a non-confidential response to the consultation. We have not included a list of those responding as an individual; however all responses were given equal status in the analysis.

AAT

Altain Education

AQA

Association of Colleges

AELP

ASCL/PPC

BACH

Bishop Burton College

Brian Warrens Associates Ltd

Burton and South Derbyshire College

Cardinal Newman College

CBE EAC

Cirencester College

City & Guilds

City College Norwich

CIEA

CLEAPSS

Council of Deans of Health



EAL

EEF, the manufacturers' organisation

FAB

Institute of Motor Industry

Leicester College

NCFE

NGA

NOCN

OCNWM

OCR

Pearson

Rolls-Royce

Royal Society of Biology

RSC

Scarborough Sixth Form College

South and City College Birmingham

Telford College

The Blackpool Sixth Form College

The College of Richard Collyer

The e-Assessment Association

UCU

UoS

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