



All Responsible Officers

17 May 2019

Information on Annual
Statement to Ofqual 2019

Our ref: RO66/2019 Statement
of Compliance 2019

Annual Statement to Ofqual – 2019

Dear Responsible Officer,

Condition B2 of the General Conditions of Recognition requires you, and the Chair of your Governing Body, to jointly submit an [annual statement](#) specifying whether or not your organisation is fully compliant with your Conditions of Recognition.

The annual statement must be submitted between Monday 3 June and Monday 30 September 2019. Our window for submitting the Statement of Compliance (SoC) is the same as that of Qualifications Wales and CCEA Regulation.

The form to complete your Statement of Compliance will be available as an item in your Portal Inbox on Monday 3 June.

Your statement to us

In your statement, we ask you to:

- confirm whether or not you are fully compliant with your Conditions of Recognition, and if you are not compliant, to describe each instance of non-compliance against the relevant Conditions and set out when you expect to rectify this;
- confirm whether or not you have cause to believe that you are likely to fail to comply with any of your Conditions of Recognition within the next 12 months; and if you have cause to believe you are likely to fail to comply, to describe each instance of potential non-compliance against the relevant Conditions, the grounds on which you believe you are likely to be non-compliant, and the steps being taken to address this non-compliance.

This year we have enhanced the SoC to make it easier for you to:

- report current and future compliance with the qualification level conditions and subject level conditions where they apply to you;
- provide more information about the steps you are taking to remedy current non-compliance in an optional field (in previous years, we have contacted you after the submission of the SoC to gather more information, so in providing it to us as part of the SoC we should reduce burden in the long term).

We also plan to introduce some improvements to the follow up work that we undertake after we have received your submission. This will include sampling your sign-off arrangements to find out more about how you prepare and agree the contents of your declaration and how you ensure that it is accurate and submitted on time. If you are selected to be part of this sample, you will be notified after the SoC window has closed and you will be given ample time to prepare.

General Condition H2 – Moderation where an assessment is marked by a Centre

We published our consultation: [‘Moderation and verification of centre assessment judgements’](#) in February, and held associated consultation workshops in April and May. The purpose of this work is to consider changes to the way our regulations ensure that awarding organisations retain accountability for the award of qualifications when relying on assessment judgements made by centres.

In particular, we are proposing changing Condition H2, which requires you to conduct moderation of centre assessment judgements before issuing results. Our consultation sets out how we might allow other approaches for quality assurance of a centre’s assessment judgements, which place greater reliance on up front checks on a centre’s ability to make reliable assessment decisions together with verification after results have been issued.

Our proposals reflect the variety of evidence we considered which illustrated that moderation may not always be the most effective way to secure standards and that, in some instances, moderation would undermine effective delivery in line with the needs of learners and employers.

The evidence we obtained in the lead up to our consultation suggested that a number of awarding organisations were not consistently conducting moderation, but instead were relying on other methods of quality assurance for the centre judgements they relied on. In the consultation, and again at the consultation events, we explained that, however rigorous these other approaches to quality assurance may be, any awarding organisation which routinely issues results on the basis of assessment decisions made by centres without first checking the accuracy of a sample of those results will breach Condition H2, and may breach a number of other conditions.

We recognise that some awarding organisations may not have considered, before we published our consultation, that their approaches to quality assurance of centre assessment decisions were not compliant with Condition H2. We know there is some consequent confusion as to how you should report your state of compliance in respect of Condition H2.

For your SoC this year, we will consider it sufficient for an awarding organisation which has in place a quality assurance process for centre assessment decisions **in which it has confidence**, but which does not include the essential elements of moderation, to indicate non-compliance with Condition H2, and add as explanation the word 'verification'. It is not necessary to set out how, or by when, you expect to secure compliance.

Conversely, an awarding organisation which is not confident that it has effective quality assurance measures in place for assessment decisions that are made by centres, should declare non-compliance with Condition H2 and explain the weakness it has identified in its approach, and the steps it is taking to secure compliance, in the usual way.

This will allow us to differentiate within what we anticipate will be an increased level of non-compliance declarations in respect of Condition H2.

Completing your SoC declaration

Annex A below provides details of the specific questions you will be asked. You may find this document useful for collating the required information before submitting your statement via the Portal.

Before submitting your statement, you must declare that your statement is accurate and has been approved by you, as Responsible Officer, and the Chair of your Governing Body. It will not be possible to print the statement, so you and the Chair will both need to log into the Portal to approve the statement before it is submitted. We will not be able to accept your SoC without your, and your Chair of Governing Body's, sign off.

If you have any questions about the process, please do contact us via the Contact the Regulator function of the Portal.

Yours sincerely,



Yun Ding

Associate Director, Standards for Delivery and Performance of VTQs

Annex A: Statement of Compliance 2019 questions

Current compliance declaration

You will need to select one of the following options:

- We are fully compliant with all of our Conditions of Recognition
- We are not fully compliant with all of our Conditions of Recognition and have indicated such non-compliance below.

Should you declare that you are not fully compliant you will be required to provide us with the following information:

- Describe the instance of non-compliance
- General conditions (if applicable)
- Qualification-level conditions (if applicable)
- Subject-level conditions (if applicable)
- Special conditions (if applicable)
- The date by which you expect to be compliant
- How will you address this non-compliance (optional field)

Future compliance declaration

You will need to select one of the following options:

- We have no cause to believe that we are likely to fail to comply with our Conditions of Recognition within the next twelve months
- We are likely to be non-compliant with some or all of our Conditions of Recognition within the next twelve months and have indicated likely compliance below

Should you declare that you are likely to be non-compliant you will be required to provide us with the following information:

- Describe the instance of potential non-compliance
- General conditions (if applicable)
- Qualification-level conditions (if applicable)
- Subject-level conditions (if applicable)
- Special conditions (if applicable)
- Explain how you will know you are likely to fail to comply
- Describe the steps you are taking or plan to take to address this non-compliance

Please note that each instance of current and future non-compliance needs to be entered separately against the corresponding condition(s). These will appear as individual instances within the Statement of Compliance.