

ANALYSIS OF CONSULTATION RESPONSES

Awarding organisation controls for centre assessments - regulations

Consultation on Conditions, requirements and
guidance

ofqual

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Introduction

Our consultation on awarding organisation controls for Centre¹ assessments took place between 19 September and 14 November 2019. Respondents could complete the questions online or download and submit a response. A copy of the consultation is available at <https://www.gov.uk/government/consultations/awarding-organisation-controls-for-centre-assessments-regulations>

There were 29 responses to the consultation. In addition, we held a consultation event in London and published a podcast. There were 51 attendees at the event.

Background

As part of our work to strengthen vocational and technical qualifications, we announced, following our initial policy consultation between February 2019 and May 2019, how we would regulate awarding organisations' controls where centres make assessment judgements on their behalf. The approach we announced was designed to ensure that awarding organisations retain sufficient control over the standards of their qualifications, where centres make assessment judgements on their behalf. At the same time, we sought to reflect the range of different qualifications and assessments that exist, by allowing greater flexibility in our framework, in particular for assessments where it is not practical for awarding organisations to sample check results for every cohort before they are issued.

We subsequently consulted on the specific wording of the Conditions, requirements and guidance needed to implement this approach. We proposed to:

- require awarding organisations to put in place a process to scrutinise the standards of centre assessment decisions, known as a Centre Assessment Standards Scrutiny and for all centre assessments to be subject to a form of such scrutiny
- amend the definition of Moderation to remove reference to verification, and to make Moderation a distinct form of Centre Assessment Standards Scrutiny
- specify that all centre assessment in certain qualifications must always be subject to Moderation
- set minimum requirements for the controls awarding organisations must have in place as part of their Centre Assessment Standards Scrutiny and provide guidance on when and how an awarding organisation might go beyond these minimum requirements
- require an awarding organisation to set out its approach to Centre Assessment Standards Scrutiny (including Moderation) in a Centre Assessment Standards Scrutiny strategy
- put in place guidance about what an awarding organisation should do when, through Centre Assessment Standards Scrutiny, it discovers a centre has issued incorrect results, and to allow for awarding organisations to revoke certificates in such circumstances

¹ In our General Conditions, we define a Centre as: An organisation undertaking the delivery of an assessment (and potentially other activities) to Learners on behalf of an awarding organisation. Centres are typically educational institutions, training providers, or employers.

- allow awarding organisations to phase implementation of our requirements, anticipating that awarding organisations will want to be compliant as soon as possible, with all awarding organisations demonstrating full compliance no later than September 2021

Who responded?

We received 29 responses to our consultation.

Table 1: Breakdown of consultation responses

Personal/organisational response	Respondent type	Number
Organisational response	Awarding Organisation	28
Organisational response	Representative Body	1

Seventeen respondents stated that they were based in England, one indicated they were based in Wales, and one was based in Scotland. Ten did not state where they were based.

In addition to those that responded to the consultation, there were 51 attendees at our consultation event.

Approach to analysis

The consultation included 15 questions and was published on our website. Respondents could respond using an online form, by email or by posting their responses 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 each of the questions, we presented our proposals and then asked respondents whether they had any comments on what we had proposed. Respondents did not have to answer all of the questions. Some respondents chose to provide general comments instead of responding to the specific proposals. During the analysis, we reviewed every response to each question.

Analysis – consultation responses

In this section, we report the views, in broad terms, of respondents to the consultation. We list the organisations who responded to the consultation in appendix A.

Question 1. Do you have any comments on our proposed definition for Centre Assessment Standards Scrutiny?

Twenty-four respondents provided a response to this question. There was broad support for the definition with 11 respondents commenting that it was helpful and clear.

A number of respondents raised issues with some of the terminology used. Twelve respondents noted the use of the terms *'marks'* and *'marking'* and queried how this would apply to vocational qualifications that do not use numerical marks in assessments. Three awarding organisations and the representative body added that this should be reworded to be more inclusive of grade-based or pass/fail awards, such as including *"a footnote to confirm that reference to 'mark or marks' is used as a form of shorthand for the recording of learner achievement"* or *"assessment outcomes"* as one awarding organisation suggested. In addition, 4 respondents noted that this confusion is exacerbated by the references to *'correcting'* of marks, noting that this could be interpreted to mean that all assessments must be mark-based, rather than graded or pass/fail.

Four respondents expressed concern about the use of the term *'periodically'* within the Conditions. They stated that, without a fuller explanation of how Ofqual interpreted this term, this may be confusing, particularly where different awarding organisations adopt different Centre Assurance Standards Scrutiny (CASS) approaches. Some respondents submitted suggestions as to how *'periodically'* could be better defined or reworded. For example, using *'at least annually'* instead or making it similarly time-bound.

One awarding organisation stated that they would prefer *'Scrutiny'* to be replaced by *'Inspection'* or *'Review'* as they felt that *'Scrutiny'* was a term more commonly applied to examinations. Another awarding organisation noted that the definition should require action to be taken in the instance of any deviation from standards, rather than in just those circumstances explicitly included in the definition.

Several respondents felt that the definition could be clearer in certain aspects. These included:

- making explicit that the scrutiny could take place before or after results had been issued
- making clear what activities were required under a Moderation approach
- clarifying that Moderation is an approach under CASS, rather than separate to it

Additionally, one awarding organisation noted that they saw the definition as combining two separate processes: quality assurance and the processing and issuing of results. They expressed a concern that these were not necessarily complementary and that trying to include them both in one strategy could create a confusing document.

Question 2. Do you have any comments on our proposed definition for Moderation?

Twenty-one respondents provided a response to this question. Fifteen respondents stated that the definition was clear and appropriate.

Some respondents suggested clarifications:

- one respondent stated that the definition should include a reference to ‘cohorts’ of learners. Another said that the definition should explicitly say that Moderation should take place for every cohort of learners
- another respondent stated that the definition should indicate the frequency and scope of Moderation and that it should be clear that every centre must be moderated
- another respondent believed that the definition should read as (*addition in bold*): “A particular form of Centre Assessment Standards Scrutiny through which the marking of assessments by Centres is monitored **externally by the awarding organisation** [emphasis added] to make sure it meets required standards ...”.

In addition, one respondent questioned whether it would better to demonstrate that Moderation was part of the CASS by reordering the proposed Conditions and requirements. Another respondent stated that Ofqual should specifically refer to Direct Claims Status (DCS) in the Conditions and explain how this term interacts with the definition of CASS.

Two respondents also noted their reservations about the use of the terms ‘marks’ and ‘marking’ in response to this question, stating that Ofqual should make it clear if the intended implication is that all moderated qualifications should be mark-based.

Question 3. Do you have any comments on the qualifications we propose to specify where centre assessments must always be subject to Moderation?

Sixteen respondents provided a response to this question. Thirteen respondents stated that the proposed list of qualifications was acceptable and clearly understood.

One respondent was concerned about consistency in terminology, stating that the proposed wording under our proposed Condition H2.3, could confuse the list of qualifications where centre assessment must always be subject to Moderation, with Ofqual’s Register of Regulated Qualifications.

Two respondents requested more clarity on what constitutes ‘project qualifications’, while one stated that requiring Moderation for project qualifications could limit innovation and pose challenges with approaches to setting and maintaining standards in these qualifications.

One respondent requested that we clarify the mechanism for adding new qualifications to the list of qualifications that are always subject to Moderation. Another respondent stated that “it would be reassuring to know that there could be scope for negotiation or appeal if required”. One respondent noted that, given that an exception has already been made for A level science practicals, we should make it clear that there is some flexibility built into the proposal.

Question 4. Are there any other qualifications which we should also specify?

Fifteen respondents provided a response to this question. Five respondents stated that they did not think any further qualifications needed to be specified.

Eleven respondents suggested additions, including:

- qualifications equivalent to GCSEs and A levels, particularly those eligible for UCAS points or which are used for university entry, for example, Applied Science or Access to HE qualifications
- Licence to Practice qualifications
- Applied Generals
- Health and Safety qualifications
- awarding organisation set assessment with a written exam or multiple-choice questions

Three respondents requested clarity on whether we would consult on adding new qualifications to the list.

Question 5. Do you have any comments on the factors we have set out that an awarding organisation might consider when determining the most effective Centre Assessment Standards Scrutiny approach?

Twenty-eight respondents provided a response to this question. Ten respondents stated that they were pleased that Ofqual had adapted the proposals to support awarding organisations in adopting risk-based approaches. Three of these respondents commented further that they do not envisage the need to make many changes from their current approaches to comply with these proposals. Three other respondents welcomed changes, such as the move to annual activities (as opposed to specifying face-to-face visits), noting that this acknowledges the variety of methods awarding organisations use. Two other respondents commented that they welcome the flexibility and potential for innovation allowed for within the proposals, and specifically welcomed the change from 'unannounced visits' to 'short notice activities', although they would prefer to have some further guidance on how to manage those centres where this type of activity is impractical or not allowed or viable.

Five other respondents noted that the proposed approach was helpful, appropriate and welcomed.

Six respondents expressed concerns about the data they felt they would need to gather in order to be able to implement a Centre Assessment Standards Scrutiny approach. Notably, they referred to the data pertaining to typical learner, typical course of study, typical duration of study and number and profile of learners. They expressed concern that the gathering of this type of data would be challenging and disproportionately burdensome on both awarding organisations and centres, particularly where the delivery of a course of study at a centre is flexible.

In addition, two respondents expressed concern about the level of data and burden they would face in trying to gather the information to devise sampling regimes to ensure consistency between assessors in a centre. They stated that this would require significant IT systems changes and had the potential to create unbalanced samples. One awarding organisation suggested that an alternative way of managing this was for Ofqual to require

awarding organisations to ensure that centres standardised marking by assessors and that any breach of this be treated as maladministration or even malpractice, rather than expecting a CASS approach to deal with it.

Three respondents stated that they found the difference between Moderation and other CASS approaches difficult to understand, especially determining which requirements related to Moderation approaches and which did not. Similarly, they were unclear what requirements applied to non-Moderation approaches, for example, what level of annual activities, including short notice activities, applied. They suggested that Ofqual provides more clarity as to which requirements apply to Moderation approaches and which do not.

One respondent was concerned that Moderation was still seen as the default approach and that awarding organisations would be expected to justify not choosing it as the final approach, even on qualifications where it is obviously inappropriate. Another respondent suggested that we require all results which are issued without the cohorts being moderated before release to be issued as provisional.

Three respondents noted that they had concerns around the appropriateness and utility of the suggested observation of assessments and observation of marking. They stated that the usefulness of assessment observation is highly situational and should not be a blanket requirement. Likewise the observation of marking separately from an assessment situation would be unproductive.

Finally several respondents had a number of general comments including:

- the use of 'units' as a term
 - one respondent noted that this is more related to the old QCF framework and that some qualifications do not have units, while three others suggested the use of 'components' or 'assessment components' instead
- the need to ensure that guidance was not overly prescriptive
- a lack of clarity around the requirements in instances when 'where appropriate' is used, such as in the Annual Activities section of the Centre Assessment Standards Scrutiny requirements
- whether the value of a qualification, and the use which may be made of it, was a significant factor in deciding an approach
- clarification on Ofqual's position on an awarding organisation adopting an approach which allows different modes of delivery for the same qualification, including roll-on/roll-off
 - *"To avoid complication and adopting different strategies for the same qualification, we may propose verification for all qualifications where roll-on, roll-off is an included mode of delivery as long as it gives us the required assurance and includes different levels of control dependent on risk."*

Question 6. Do you have any comments on the controls an awarding organisation might put in place based on the factors set out above?

Twenty-four respondents commented on this question. Eleven respondents found the proposed approach helpful and appropriate, with one commenting that the information served as a good starting point for them and another that it gives awarding organisations the freedom to determine the most appropriate approach to suit the circumstances. Two

respondents commented that they welcomed the change from 'unannounced' to 'short notice' activities.

One respondent sought clarification as to whether the controls listed were suggested considerations or requirements. Another noted that not all of the controls listed are relevant to a Moderation approach.

One respondent noted that they do not regard the controls listed in this section as controls, but different levels of activities or considerations. Another noted that they would hope that guidance would explain:

- how an awarding organisation identifies and resolves issues in centre assessment marking
- the actions awarding organisations would be expected to take, specifically where it identifies issues with centre assessment marking
- guidance on making mark adjustments
- considerations of when or if feedback should be given to centres

One awarding organisation noted that *"The [awarding organisation's] control rests with it if and when it issues results. An AO should not issue results unless it has scrutinised the centre's assessments in advance (i.e. through Moderation) or has satisfied itself that a centre has sufficient measures in place so that there is minimal risk of that centre claiming incorrect results. Non-moderated models of centre assessment relinquish considerable control to the centre and are therefore much higher risk."*

Several respondents commented on sampling:

- three noted that they agree that sampling is a reasonable approach, adding that a bigger sample is not always better, especially if the sample is not representative
- one respondent stated that samples should cover learners who have already received their results in order that awarding organisations are aware of any issues
- another noted that the number of units sampled and whether a unit is sampled each year should be dependent on centre risk rather than qualification risk or structure
- another respondent added that retrospective sampling of work should be subject to a defined timescale and a clear rationale, they added that they would appreciate clarity on Ofqual's expectations of appeal processes following revocation

Four respondents stated that they would add determining the maximum length between scrutiny activities as an additional factor, although they do not feel that Ofqual should necessarily specify this. One noted that this would be a better control than 'typical frequency' and would be better stated as 'time between'. Two other respondents suggested adding sampling assessors as an additional control.

Two respondents commented that they were concerned that controls and guidance should not be overly prescriptive, or that the CASS strategy will require too much detail and thus restrict flexibility. Another noted that they felt that the controls could lead two awarding organisations to adopt very different approaches to very similar qualifications in the same centre.

Two respondents repeated the suggestion that 'unit' should be replaced by 'component'.

Question 7. Do you have any examples of controls you may put in place for particular types of assessment?

Twenty-one respondents commented on this question. Six respondents noted that in addition to a variety of activities, their Sanctions Policy is the primary control they use.

Other examples respondents gave included:

- apply Moderation to all qualifications
- observing assessments, including the use of technology and interviews with Assessors
- sampling, especially for shorter and one-day practical courses
- remote scrutiny activities
- annual verification visits
- external Quality Assurers observe speaking and listening assessments
- require centres to annually declare compliance with awarding organisation requirements, including updates on changes of staff
- reviewing centre-developed assessment materials

Three respondents noted that they would be reviewing and developing their controls in line with the new requirements. One respondent noted that there were none beyond those Ofqual has set out. Another respondent stated that they would be keen to work with Ofqual in developing further guidance on assessment controls.

Question 8. Do you have any comments on our proposed Conditions?

Twenty-six respondents commented on this question. Nine respondents stated that the Conditions proposed are clear and sensible. The points made in response to this question tended to be points of detail about the drafting, and as such, we do not repeat all of those here, but have provided a summary below.

Eight respondents expressed concern about the use of the term '*personal interest*'. Most requested clarification and guidance in respect of how Ofqual views this and how they should apply it to their staff and centre staff in particular. Two respondents suggested replacing this term with '*personal gain*'. Other terms which respondents requested clarity on were:

- '*rules*'
- '*where appropriate*'
- '*promptly*'
- '*marks*'
- whether '*assessment*' in Condition A4 refers to '*assessment decision*'

Respondents had a number of comments referring to specific Conditions which have been set out below.

Condition A4: Conflicts of interest

- Replacing '*Moderation*' with '*Centre Assessment Standards Scrutiny*' is a minor and sensible change.

- “The statement ‘any part of the assessment’ in the wording of this condition” could cause misunderstanding by awarding organisations.

Condition C2: Arrangements with Centres

C2.3

- Respondents noted that they will need to update Centre agreements. Some requested further clarity on the level of detail Ofqual would require awarding organisations to include in their Centre agreements.

Condition H2: Centre Assessment Standards Scrutiny where an assessment is marked by a Centre

- It would be useful to have more clarity as to whether minimum requirements apply to Moderation approaches.
- Suggestion that paragraphs 2.3 – 2.5 (which address Moderation) should be moved to after the paragraphs (2.6 – 2.10) referring to CASS.
- It is unclear where and how the list of qualifications that must include a Moderation approach would be published.

Condition H6: Issuing results

- Further guidance was requested relating to what constitutes an ‘incorrect result’ and whether this, or the remedies to this, vary according to the qualification type. For example, are GCSEs treated differently to vocational qualifications?

Condition I4: Issuing certificates and replacement certificates

- Will Ofqual require awarding organisations to revoke certificates in all instances of incorrect results?

Other general comments included:

- lack of clarity amongst some respondents as to whether the CASS strategy framework is a template that must be followed or just an example and that the sub-headings in the framework were confusing. One respondent stated that the structure of CASS strategy guidance was helpful
- do the minimum requirements apply to moderated and non-moderated approaches and equally do the ‘going beyond’ sections only apply where a non-Moderation approach is adopted?
- it would be useful not to have to sample all centres and assessors every year, but instead to be able to infer assurance from similar samples of other assessors or units
- Ofqual should define DCS to aid a better understanding of what is permissible under CASS approaches

Question 9. Do you have any comments on our proposed guidance?

All 29 respondents commented on this question. Thirteen expressed support for the guidance, describing it as clear, comprehensive, helpful and not overly prescriptive. Of these, three stated that they were glad that Ofqual had shifted its approach from prescriptive Conditions to guidance.

Further feedback from respondents is gathered into several sections for clarity below.

Minimum CASS requirements

Respondents expressed some concern about the application of the minimum requirements, particularly in relation to Moderation approaches. Several respondents commented that it is unclear from the guidance which requirements apply to Moderation approaches and which do not.

Two respondents commented that the controls listed in the guidance are considerations and not controls and that it would be difficult to apply all of them to all qualifications. Three respondents noted that observation of assessment and marking may be problematic, especially if it were supposed to be carried out separately. They requested further clarity on the practicality and utility of these requirements. Another respondent expressed concern about how qualifications would be affected following changes to a professional standard. They stated that this would effectively require a new qualification to be produced with the ensuing requirements attached.

One respondent asked if '*video observation*' would be acceptable.

CASS strategy

One respondent stated that they were pleased that awarding organisations were not required to publish their CASS strategies. Another respondent expressed concern about the potential for inconsistency for centres if some awarding organisations published some or all of their CASS strategies and other awarding organisations did not. One respondent was concerned about the comparability of CASS strategies.

One respondent was concerned about the extent and limitations of the CASS strategy. This included:

- exactly what needs to be included in the strategy
- which policies would need to be included
- the purpose of the document – is it solely a regulatory document which was created to fulfil Ofqual's requirements and will only be called upon during Ofqual visits, or is it intended to be useful day to day for the awarding organisation's staff?

One respondent stated that 'centre stability' should be added as a risk factor. Another suggested that the wording of the risk factor "awarding organisation offering qualifications in a new sector" should include "and market" to reflect the internationalisation of regulated qualifications.

Going beyond the minimum CASS requirements

Two respondents noted that they liked the structure of the 'going beyond' guidance; one stated that it was "*logical and creates a clear structure*". Other respondents were unsure how the 'going beyond' guidance applies to Moderation approaches.

Incorrect results

A number of respondents commented on this aspect of our guidance. One requested more clarity about what the phrase "*Accurately and completely reflect the marking of assessment*" entails. Others requested further guidance pertaining to observation of marking in particular. Two respondents stated that the approach required by "*opportunities to retake the assessments*" needed further clarity, particularly in relation to qualifications where this approach is not practical, such as those assessed by continual assessment or portfolios.

One respondent noted that there is some duplication included in the guidance relating to factors to consider on incorrect result revocation decisions and that this could be made less complicated and clearer.

Other Comments

One respondent expressed concern about awarding organisations collecting data on centres, stating that it would be problematic for them to track staffing changes within centres to inform their centre profiles, for example. They stated that this would be disproportionately burdensome and impractical. Additionally, it is unlikely to be possible in a timely manner to be able to adapt to the changes. They also requested further guidance on how they should track the profile of entries, and what they should draw from it.

Six respondents raised concern about notifying other awarding organisations about concerns that they may have regarding issues in centres, including the practicalities of it, Ofqual's expectations, and potential issues of defamation. Two respondents requested further clarity concerning 'short notice' activities, one stating that 'short notice' activities may still be problematic in some circumstances, or at some centres.

<p>Question 10. What cost would you anticipate the development of a Centre Assessment Standards Scrutiny strategy for the relevant qualifications offered by your awarding organisation would be?</p>
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Twenty-eight respondents commented on this question.

Eight respondents stated that they would be unable to estimate the costs of developing a CASS strategy until they can consider the final outcome of the consultation. One respondent requested more clarity on what Ofqual would expect of CASS strategies addressing Moderation approaches as opposed to non-Moderation approaches. Other respondents approximated various possible costs:

- the costs would be mainly staff costs
- they may need to employ a full time employee to manage this on an ongoing basis
- 6 staff for 3 months
- 100 staff hours
- 6 respondents estimated between £5,000 and £25,000
- £2,500 and 10 days of staff time per CASS strategy
- £8,000 and £2,000 per year on an ongoing basis
- *“a notional value of £2000 on each CASS [strategy] as an opportunity cost of time not being spent on other projects.”*
- it depends – if only a narrative form is required then £600 - £1,200, which incorporates existing policies and procedures, if everything needs to be rewritten then it would be £3,600

They also added that there would be other implications of the requirement for a CASS strategy. These included the need to invest in new technology and that additional costs would be incurred by other aspects of the proposals, such as publishing some aspects of the strategy in the qualification specification, and if subject specific differences are needed to be

taken into account within the process. This could create a disproportionate burden on awarding organisations and centres. One respondent noted that the costs and burdens imposed by the proposed requirements could raise centre costs. Another respondent added that additional time and cost would be incurred by the need to explain the changes to centres.

Two respondents stated that they estimated the costs of putting a CASS strategy in place would be low, as their current approaches and procedures would fall within the proposed requirements anyway.

The representative body explained that the costs would not be purely monetary and would include other facets, such as staff time within awarding organisations required to:

- review current approaches
- develop new or amended approaches
- develop the materials to support the approaches and fulfil regulatory requirements
- align changes with other stakeholders

As well as this there would be direct costs of training for quality assurance personnel internally and at centres.

Question 11. Are there any regulatory impacts that we have not identified arising from our proposals? Please identify any additional impacts.

Fifteen respondents commented on this question. Of these, six respondents stated that the potential for regulatory divergence for those awarding organisations operating in Wales and Northern Ireland was an additional impact of our proposals. The extent of this impact would vary depending on the level of divergence. Five respondents highlighted the impact of several consultations and regulatory changes happening in parallel, explaining that this exacerbated the impact of the proposals.

Other respondents noted a number of other concerns including the:

- effects of over-prescriptive requirements on innovation
- potential for impacts on public confidence if the CASS approach causes issues, they encouraged Ofqual to build in a method to 'standardise' CASS strategies across awarding organisations
- increased scrutiny activities / visits and the burden on centres, especially if different awarding organisations choose to visit a centre around the same time

Several respondents also expressed concern at the potential for second order consequences, such as the impact of the proposals on conflict of interests and declarations of Adverse Effects and how the awarding organisations would manage their compliance declarations during the implementation period. One respondent stated that it would lessen impacts if Ofqual's stance on DCS was clearer.

Question 12. We have not identified any ways our proposals will prevent innovation by awarding organisations. Do you have any comments on this assessment? Please provide specific examples.

Fourteen respondents commented on this question. Of these, six respondents stated that the proposals would not limit or prevent innovation. Additionally, three respondents stated that they welcomed *“the opportunity provided by the proposals for AOs to innovate when reviewing and refreshing its tools to monitor CASS”*.

Other respondents raised concerns relating to several potential ways that innovation could be limited by the proposals, including:

- Project qualifications needing to be moderated
- *“human and financial resource required”* especially for the development of the CASS approach
- over-prescription
- rigidity imposed by overly specific CASS strategies, especially if a strategy is required for each qualification
- retaining the requirement for visits in person could affect an awarding organisation’s ability to implement an entirely online, remote delivery and assessment model.

Question 13. We have set out our view of the impact of our proposals on people who share a particular protected characteristic. Are there any potential impacts that we have not identified?

Four respondents commented on this question. Three of these respondents stated they could see no further impacts. One respondent was concerned about the impact of the proposals on smaller centres for learners with protected characteristics.

Question 14. Are there any additional steps we could take to mitigate any negative impact you have identified would result from our proposals, on people who share a protected characteristic?

One respondent commented. They were concerned about the effects of the changes on small niche and specialist centres.

Question 15. Do you have any other comments on the impacts of our proposals on people who share a protected characteristic?

No respondents commented on this question.

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.

1st4sport Qualifications
ABRSM
AQA
ATHE Ltd
Chartered Institute for Securities & Investment (CISI)
CILEx
CIPD
City & Guilds
Construction Industry Training Board (ECITG)
CPCAB
Federation of Awarding Bodies
Gateway Qualifications
Innovate Awarding
ITC First Aid Ltd
Kaplan Professional Awards
Lantra
NCFE
NOCN
OCN London
OCR
Open College Network West Midlands
Pearson Education
Royal Society for Public Health
Scottish Qualifications Authority (SQA Awarding Body)
Skillsfirst Awards Ltd

SLQ

University of the Arts London (UAL)

WCSM

WJEC-CBAC



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