

ANALYSIS OF CONSULTATION RESPONSES

Approach to Assessment and Awarding for 2020 to 2021

Consultation on the assessment and awarding of Vocational and Technical and Other General Qualifications in 2020 to 2021

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Introduction

The coronavirus (COVID-19) pandemic has resulted in loss of education and training during this spring and summer. Public health restrictions are likely to be in place during 2020 to 2021, and further disruption may occur on a localised basis, which may affect teaching and learning and the delivery of assessments. The government's expectation is that assessments should take place in the academic year 2020 to 2021 because that is the fairest way of providing results for students.

We have [consulted on our proposed arrangements](#) for the assessment and awarding of vocational, technical and other general qualifications in 2020 to 2021. Our proposed approach would apply to vocational and technical qualifications, including Technical Qualifications within T Levels, and general qualifications other than GCSEs, AS and A levels.

Our consultation ran between 3 August and 14 August 2020 and we received 366 responses, submitted either through an online form or by email. This document provides a summary of the responses we received.

Background

We have been engaging with awarding organisations, centres and other stakeholders to consider what mitigations might be necessary in 2020 to 2021 in relation to the assessment of regulated vocational and technical qualifications and other general qualifications.

We know from our engagement that the impact of the disruption over the spring and summer on teaching, learning and assessment varies between centres, depending on the qualifications that they offer and their approaches to teaching and learning, with some sectors and subjects more affected than others. In line with public health guidance, there may also be a need going forward to adapt assessments in some sectors/subjects to accommodate the impacts of any social distancing requirements or other disruptions to teaching, learning and assessment.

We published [a position paper](#) on 2 July 2020, where we set out the themes we were exploring as we developed our approach and invited feedback and explained then that we would carry out a formal consultation to implement our approach if we needed to make revisions to our regulatory framework.

Subsequently we published a [consultation document](#) on 3 August, setting out our proposed approach. We propose to introduce the following arrangements, for assessments taken and regulated qualifications awarded during 2020/2021:

- i. to enable awarding organisations to mitigate the impact of disruptions to teaching, learning and assessment, and any ongoing restrictions on the delivery of assessments, through the adaptation of assessments and qualifications – and to make no provision for the issue of calculated results which we introduced specifically in relation to the cancellation of assessments in the summer of 2020

- ii. to introduce a second version of the Extraordinary Regulatory Framework (ERF), the Extended ERF, to reflect the approach to mitigation and adaptation we are proposing to take in response to the situation we face in 2020/21
- iii. to issue a set of objectives to guide awarding organisations' decisions about how assessments and qualifications should be adapted. We said that we would consider whether and how to incorporate these objectives within the Extended ERF
- iv. in parallel with the consultation, to work with awarding organisations and sector bodies on the development of guidance on adaptation to support the implementation of our proposed approach and support the development of consistent approaches

We also set out our regulatory and equalities impact assessments for the proposals.

We said that we would consult on the guidance on adaptation and any additions or changes to the Extended ERF that might be necessary in light of feedback from the consultation and the development of the guidance, later in August.

Approach to analysis

The consultation included 16 questions and was published on our website with an online form for responses.

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 truly representative sample of any specific group.

We present here summaries of 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 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. In some instances, respondents answered a question with comments that did not relate to that question. Where this is the case, we have reported those responses against the question to which the response related rather than the question against which it was provided.

Who responded?

We received 366 responses to our consultation. Three hundred and sixty-four respondents completed the survey online – these are recorded in the figures shown against each question. We also received two free text responses; relevant comments from these have been included against the appropriate questions. We list the organisations who responded to the consultation in Annex A.

Table 1: Breakdown of consultation responses

Personal/organisation response	Respondent type	Number
Personal	Teacher	171
Organisation	School or College	42
Personal	SLT	38
Organisation	Awarding Organisation	37
Organisation	Other representative or interest group	16
Other	Other	14
Personal	Exams officer or manager	14
Personal	Parent or Carer	9
Personal	Student	8
Personal	Awarding Organisation employee	7
Organisation	Private training provider	3
Personal	Examiner	2
Organisation	Academy chain	2
Personal	Student, home educated	1
Personal	Governor	1
Personal	Consultant	1

The vast majority of respondents indicated that they were based in either England, Northern Ireland, Wales or the United Kingdom. We received a small number of responses from other EU countries and some from outside of the EU.

Stakeholder engagement

In addition to the formal consultation, we also held engagement events with a wide range of stakeholders including awarding organisations, colleges and different sector and professional bodies during the consultation period. The purpose of these events was to support awarding organisations in developing consistent approaches to adapting assessments in line with the Extended ERF, and to identify and understand

potential issues, and how these might be addressed. These events were attended by representatives from the following sectors:

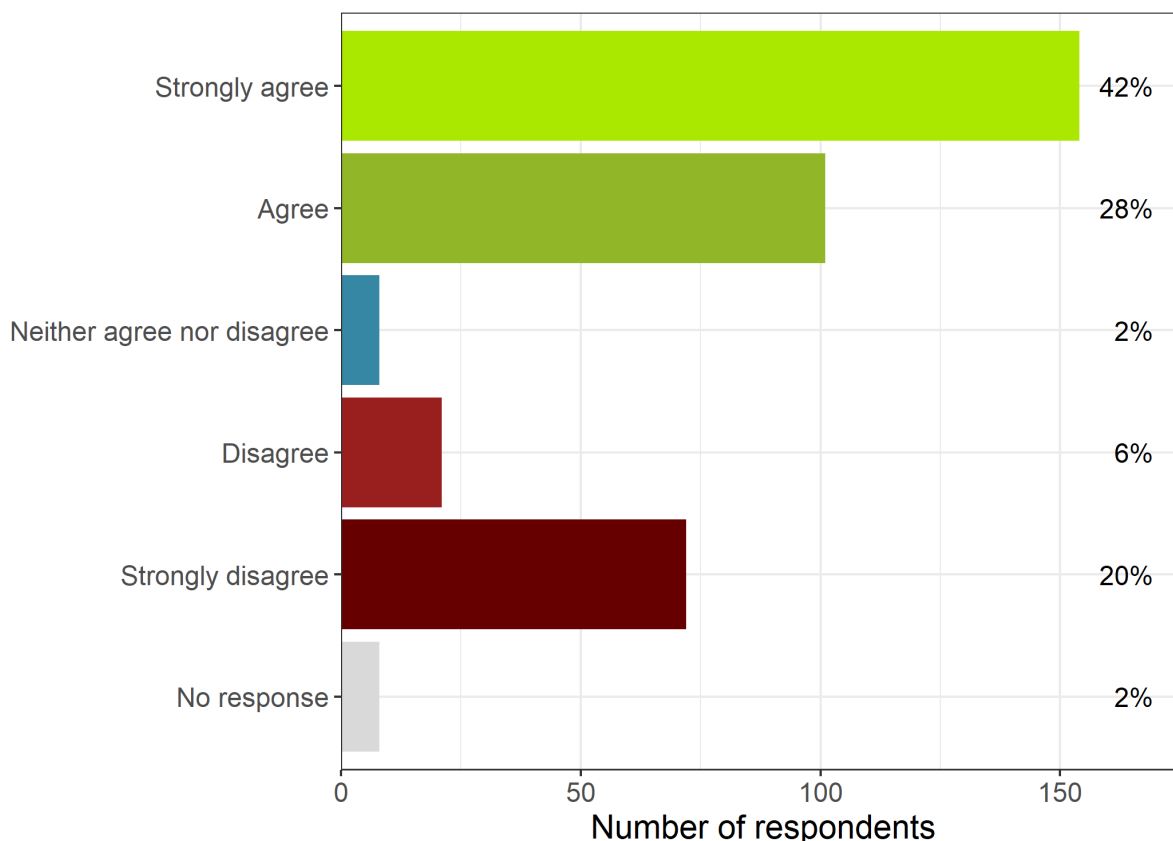
- hair & beauty
- aesthetics
- sports
- health & fitness
- performance and creative arts
- education and training
- skills for life and employability
- construction and the built environment
- land-based occupations
- food safety
- security sector
- healthcare, childcare, dental and pharmacy
- first aid
- awarding organisations offering performance table qualifications, Functional Skills qualifications, and ESOL qualifications

The views expressed at these events were not formal consultation responses (although some of those attending may have separately responded to the consultation) and as such are not reported in this analysis document. The events were intended to focus on points of detail relevant to specific sectors, and have been used to inform the development of the guidance on which we are now consulting.

Question-by-question analysis

Approach to 2020/2021

QUESTION 1: To what extent do you agree or disagree with our proposed approach to mitigating the longer-term impacts of the pandemic in 2020/21 by permitting awarding organisations to adapt assessments and qualifications?



A total of 356 responses were received to this question and 259 respondents provided comments.

Seventy per cent of respondents either agreed or strongly agreed with our proposed approach, compared to 26% who disagreed or strongly disagreed. Two per cent neither agreed nor disagreed.

The majority of respondents that agreed with the proposal said that they felt that this approach offered the flexibility necessary for qualifications and assessments to be adapted in light of the developing situation with coronavirus (COVID-19). One respondent agreed that the wide range of courses and qualifications covered within our proposals would necessitate a flexibility in approach.

Respondents in agreement with this proposal said that the adaption of assessments and qualifications was necessary due to the loss of teaching time that most learners had encountered. They suggested that changes would need to be made to qualifications to compensate for the reduction in learning time and the loss of time necessary for learners to generate work to the usual required standard.

There were many comments from those in agreement with the proposal set out in question one that supported a reduction in the content covered in assessments. They felt that a reduction in the content that would be covered and then assessed would go some way to offset the loss of teaching time that many learners have encountered.

A number of respondents commented on the potential impacts on practical assessment resulting from coronavirus (COVID-19). This group raised concerns that social distancing measures and centre closures mean that some practical assessments are no longer possible to perform as before. They felt that adaptations would be necessary to ensure practical assessment could take place.

Respondents also said that there may be a need for adaptations to some qualifications that contain a work placement or work-based activity element. It was suggested that access to work environments would be restricted and, in some sectors, not be possible at all. An approach that permitted adaptations was supported so that any potential barriers for students to achieve a qualification could be overcome.

Many of the respondents agreed with our aim not to advantage or disadvantage learners compared to their peers taking AS, A levels and GCSEs. Parity in approach between vocational qualifications and GCSEs/AS and A levels was seen as desirable.

Additional comments from those that agreed with the approach to mitigating the longer-term impacts of the pandemic in 2020 to 2021 included:

- adaptations to assessments should be agreed and communicated to learners and centres as soon as possible, to enable the planning of delivery and assessment to begin in centres
- respondents would welcome additional guidance on when adaptation is not possible
- the potential digital barriers faced by learners and centres need to be considered in any adaptation of assessment
- regulated awarding organisations should liaise with professional and sector bodies, to ensure their needs are met and the assessments remain valid
- one respondent felt that adaptation should be permitted as one solution within a suite of potential interventions, which may include calculated results where there is verifiable evidence and no clear alternative

Just over half of the respondents who disagreed with the proposed approach did so as they felt the guidance was not specific enough. Concerns were raised about the comparability between qualifications where different approaches were taken to assessment. We received comments to say that this approach would create uncertainty for students, and a more specific set of guidance would help alleviate this. Others felt that the qualifications covered by this approach vary in size and involve different assessment and delivery methods. An individual, case-by-case approach to differing qualifications was seen as preferable

Respondents raised their concerns about the potential increase in workload that would result from this approach. There was concern that awarding organisations,

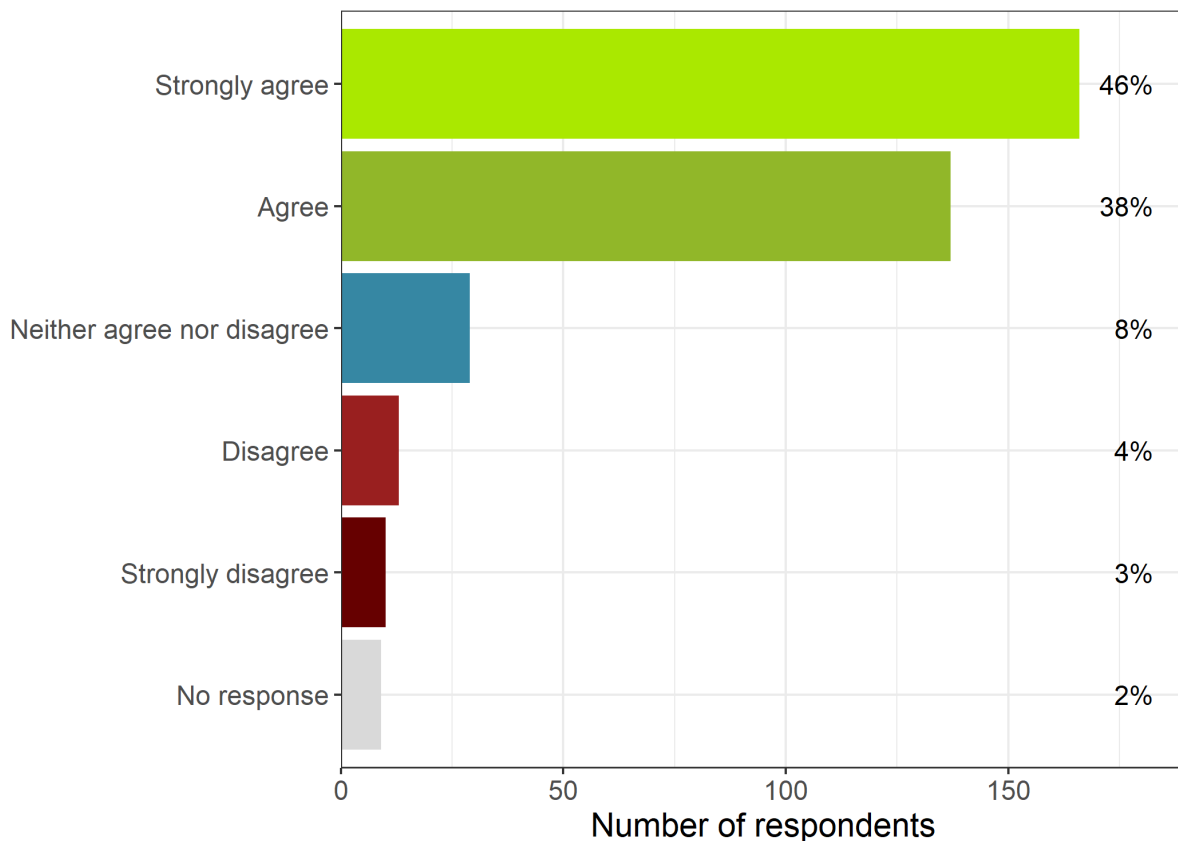
teachers and centre staff would see a significant increase in the work required in implementing the changes to assessments and qualifications.

We received a number of very similar responses relating to a specific qualification (International Baccalaureate (IB)). Comments from teachers and students that deliver and study the IB highlighted the relatively large size of the qualification in comparison to others at the same level. This group felt that a reduction in the content to be assessed is necessary in light of the reduction in teaching time due to coronavirus (COVID-19).

Those respondents that neither agreed nor disagreed largely did so due to the uncertainty that remains due to coronavirus (COVID-19). Respondents commented to say they could not make a judgement when there could be further developments in the situation. One respondent recommended that further work with colleges and schools should take place to assess the viability of the approach.

An objectives-based approach

QUESTION 2: To what extent do you agree or disagree with our proposed approach to take an objectives-based approach, supported by additional guidance to develop consistent approaches, rather than prescribing a single approach to adaptation?



A total of 355 responses were received to this question and 214 respondents provided comments.

Eighty-four per cent of respondents either agreed or strongly agreed with our proposed approaches for question 2, compared to 7% who disagreed or strongly disagreed. Eight per cent neither agreed nor disagreed.

Respondents in support of the proposal made the following comments:

- a single approach would not work with vocational and technical qualifications due to variances between awarding organisations and qualifications – ‘one size does not fit all’ - so the objectives-based approach is a sensible way of managing assessments in 2020 to 2021
- the proposed approach would ensure consistency while allowing for flexibility to meet the needs of specific contexts, such as delivery within prisons. Flexibility will also be needed in order to account for localised lockdowns and/or differing restrictions
- awarding organisations know their qualifications best so are best placed to make decisions about which adaptations are suitable for their qualifications, while meeting the regulator’s expectations
- it is a fair approach which minimises advantage and disadvantage while also retaining validity, reliability and manageability
- an awarding organisation agreed that Ofqual will need to support awarding organisations to work collaboratively, especially in developing methods for tracking inter-organisation divergence across adaptation processes

Several of those who agreed also wanted further clarification about some aspects of the proposal:

- several awarding organisations queried the status of the objectives, and whether these are intended to be guidance or would have parity with Conditions
- an awarding organisation wanted clarification on the significant overlap between these objectives and the principles in the ERF; some awarding organisations wondered whether these objectives should be merged with the ERF principles

A few respondents agreed but had some concerns:

- decisions taken by awarding organisations would need to take into account not only validity and reliability, but also individual commercial needs (including resource limitations and risks to business continuity as well as the impact of implementing the initial ERF)
- a professional body felt there was a risk that awarding organisations might not interpret the objectives and guidance in the same way

- an awarding organisation was unsure if the objective-based approach would be sufficient to maintain a standardised approach across all awarding organisations and centres
- there should be more communication by sector skills councils with awarding organisations to ensure any recommendations reflect their views

Respondents who disagreed with the proposal made the following comments:

- some respondents noted that a permissive approach might lead to confusion and a lack of consistency, and wanted Ofqual to be more prescriptive
- an awarding organisation felt that Ofqual should focus on consistent outcomes rather than consistent approaches in its guidance. They felt that validity should be prioritised over consistency, and approaches should therefore aim to be 'qualification appropriate' rather than 'consistent'
- one awarding organisation felt proposals lacked clarity on where consistent approaches should be applied: across learners progressing along similar progression pathways; according to their use; for those progressing in regulated qualifications only; by qualification type; by sector; by delivery context; by coronavirus (COVID-19) context, or by assessment methodology
- the awarding organisation also wanted clarity as to whether 'consistency' should apply to total qualification time and guided learning hours
- where vocational and technical qualifications are closely aligned with general qualifications, a respondent felt they should all be required to maintain consistent approaches, rather than general qualifications and vocational and technical qualifications following different approaches
- a centre noted that the onus on awarding organisations to collaborate on adaptations might lead to a delay in information reaching centres to allow them sufficient time for planning and preparation time for the year ahead
- one respondent wanted clearer guidance on how lost teaching time would be accounted for or mitigated

Respondents who were neither for nor against the proposal made the following comments:

- they felt it was a non-committal approach and wanted greater clarity
- they felt this approach would work better with some qualifications than others
- they favoured a reduction in content as so much time had been and was likely to be missed, but agreed otherwise

Some were concerned the proposed approach might leave scope for awarding organisations to interpret objectives very differently resulting in some learners being advantaged or disadvantaged compared to those studying similar qualifications with a different awarding organisation.

QUESTION 3: Do you have any comments on the objectives we have proposed to underpin awarding organisations' decisions about the adaptation of assessments and qualifications?

We received 251 responses to this question.

In general, awarding organisations expressed support for the proposed objectives, and the balance struck between consistency and flexibility. Awarding organisations sought clarification as to what extent objectives would be 'enforceable' and should be read as Conditions. Awarding organisations also queried whether the objectives are listed in any hierarchy, i.e. whether one objective is seen as more or less important than another. An awarding organisation noted that it is essential that any objectives are clearly understood across all awarding organisations. They requested that any guidance contain examples upon which awarding organisations can base their adaptation.

Many teachers and centres welcomed the moves to improve consistency, which some felt had been lacking this year, and for the flexibility for awarding organisations to respond to local situations. Some felt that centre-assessed grades should be available for 2020 to 2021, if required.

Many teachers and centres (particularly those delivering IB qualifications, who responded in large numbers) expressed concern around Objective C, around whether it would be possible for their students to achieve qualifications in 2020 to 2021 without a reduction in content. This view was based around the large amount of content that has already been missed and that students might face further disruption to learning over the coming year. Another respondent suggested that a reduction in content overall would be fairer than very local arrangements allowing students to submit different work in different areas.

Teachers also expressed concerns over students' lack of access to required technology, and over the impact of the proposed approaches on increasing teacher workload. Teachers and centres delivering qualifications aimed at progressing to university, such as the IB Diploma, supported the recognition in Objective A of the need to avoid disadvantaging their students compared to general qualification students. Teachers, centres and representative bodies agreed that it was important that they are consulted throughout the process.

A number of respondents commented on specific objectives as follows:

Objective A

- an awarding organisation was concerned about how an objective of parity and fairness between general qualifications and similar vocational and technical

qualifications could be met, and the possibility of vocational and technical qualifications being required to align with general qualifications

- an awarding organisation pointed out that many or most vocational and technical qualification learners take these qualifications alongside general qualifications, and at key stage 4, Department for Education rules heavily incentivise schools to limit any vocational and technical learning to a maximum of 20% of the curriculum. It would be better, therefore, to phrase this objective in a way that doesn't imply that vocational and technical qualification learners are a separate group distinct from general qualification learners

Objective B

- awarding organisations fully supported maintenance of standards
- one awarding organisation queried if there was an implicit hierarchy in the objectives with standards, validity and reliability ranked above common approaches, manageability, flexibility and unit banking
- an awarding organisation noted that in 2020 to 2021, there would be additional challenges and complexities in maintaining standards (compared to summer 2020), due to expected multi-level and uneven pattern of disruption caused by local lockdowns and restrictions and by impacts on staff availability and qualification delivery

Objective C

- several centres, teachers and awarding organisations favoured reducing content to reflect missed teaching time
- a professional body argued against this, saying it would be wrong for vocational and technical qualification students progressing to higher education to have less knowledge than their general qualification peers following the same paths
- awarding organisations wanted clarification on whether content or Guided Learning Hours (GLH) and Total Qualification Time (TQT) can be reduced
- an awarding organisation suggested that it should be made clear in the guidance that it is possible to preserve the taught content while still being able to reduce the amount of content that is assessed, through a process of sampling, or by removing some optional units
- it was suggested that some requirements, e.g. those which involve group work, might need to be adapted so the removal of some taught content would be unavoidable
- an awarding organisation suggested that there was a lack of evidence about the impact on validity of reduced content

Objective D

- some awarding organisations requested clarity on who would be accountable for developing ‘common approaches’; who would own and manage them, and take decisions. They also queried what would happen if one awarding organisation refused to agree an adaptation supported by the other awarding organisations in the sector, and whether Ofqual would arbitrate. They noted that decisions on adaptation would need to consider deliverability and resourcing implications which might affect some awarding organisation more than others
- several awarding organisations wanted clarification on what would constitute a ‘common approach’ and how it should be applied: across awarding organisations offering similar qualifications, or within individual awarding organisations to ensure internal consistency – i.e. all adaptations made by an awarding organisation are consistent with other adaptations made by that same awarding organisation. Also, they queried if this removed the scope for centres to suggest adaptations suitable for their specific circumstances
- several awarding organisations requested the regulator support any inter-awarding organisation collaboration to ensure this takes place as intended, particularly for those sectors currently lacking sector groups and forums, with a mechanism for regular communication over the next 12 months required. Sector groups would need adequate resource to support them
- a few awarding organisations queried how the need to follow “common approaches” is compatible with paragraph 26 – “awarding organisations to make tailored decisions about what to do with each of their qualifications.” They wanted clarity on which approach should take priority
- an awarding organisation suggested this objective be more realistically expressed, by adding ‘as far as possible’, given the lack of time for awarding organisations to agree approaches and prepare for their delivery
- an awarding organisation suggested that ‘similar delivery contexts’ should be added to the list of areas that should be similar for ‘common approaches’ to be successful, as e.g. delivery in a workplace setting requires very different approaches to delivery in a classroom

Objective E

- an awarding organisation agreed with the principle but noted that given the time needed to communicate any changes intended to increase manageability and for teachers to understand and adopt these changes, this might negate the benefit of these changes; in many cases, minimum change would have a more positive impact on manageability

- an awarding organisation noted that reducing the burden of assessment to improve manageability of assessments in the interests of centres should not take priority over maintenance of standards
- an awarding organisation suggested the term 'streamlining' should be clarified, to identify if it refers to removing requirements to undertake repeat assessments that cover the same or overlapping content

Objective F

- several respondents agreed that increasing the flexibility in when and how assessments are undertaken will help colleges plan ahead and reduce the impact for students if coronavirus (COVID-19) rapidly flares up again
- some teachers noted that adaptations that required access to technology (such as sitting an onscreen test remotely) might increase access to assessments for some learners but risked disadvantaging learners with no access to the required computer hardware and software or the internet such as those suffering from socio-economic deprivation
- an awarding organisation noted that this could prove costly and burdensome for awarding organisations delivering certain types of assessment and would have limits, e.g. awarding organisations could only produce a finite number of contingency exam papers and new ones could not be produced at short notice
- a respondent suggested this objective should explicitly state it refers to the provision for localised adaptation due to local restrictions
- another said that there are specific, significant difficulties faced in offender learning and that learners in prisons will probably be unable to access most forms of adapted assessment

Objective G

- an awarding organisation noted that this objective should be balanced against the additional bureaucracy, moderation activity and cost which could arise from submitting assessments for each learner as soon as they are ready, as well as the risks to reliability of assessment if very low volumes of work are spread over many submissions. The awarding organisation suggested replacing 'as soon as they are ready' with 'regularly'
- some respondents noted that if learners take assessments earlier than usual, this might raise the risk of a greater proportion of unsuccessful outcomes relative to previous years' cohorts, as learners might be encouraged to take assessments before they were fully ready

Objective H

- teachers/centres welcomed the proposed streamlining of communications with schools particularly in the current climate where schools are responding to many additional and extraordinary demands on a daily basis
- some awarding organisations requested further clarity as to how the co-ordination and streamlining of communications would work and how and by whom it would be facilitated
- several awarding organisations suggested it would be beneficial for Ofqual to provide support mechanisms such as shared messaging hubs
- some awarding organisations noted that centralising communications was not suitable in all cases, as it risked slowing them down, and would not be suitable where centres required clarity over specific points relating to specific awarding organisations and qualifications

Objective I

- an awarding organisation supported this objective as they have vocational and technical qualification learners in England, Wales and Northern Ireland and would not want any learner to be disadvantaged based on the country in which they are studying
- a few awarding organisations requested further clarity as to how this objective could be implemented and who would be involved; also, in relation to the intent to develop a shared risk matrix and mitigation approach, examples of the types of risk this is intended to cover
- some respondents queried what was intended by this objective, and how qualifications outside of the scope of Ofqual regulation could be covered by this consultation. They also queried how this objective could form part of any regulatory or statutory expectations; an awarding organisation was unclear which organisations would or could be held to account for a failure to meet this, and suggested it might sit better within Ofqual's own annual plan

Some respondents stated they would like to see additional objectives addressing the following areas:

- information on how the compulsory work placement aspect of some qualifications should be addressed, as safety and commercial reasons are likely to impact employers' ability to offer work placements
- Ofqual should retain the option to use centre-assessed grades in case of further coronavirus (COVID-19) disruptions
- how to manage coursework, practical assessments or written examinations
- group assessments and audiences for assessments
- the role of the 'expert witness'

QUESTION 4: Do you have any comments on our plans to develop and consult on additional statutory guidance and on any changes to the Extended ERF later in August, to support the interpretation and implementation of these objectives?

A total of 225 responses were received to this question.

Many awarding organisations commented on the consultation period:

- most noted that the suggested consultation period was very short and during a very busy period for awarding organisations. Some expressed concern that this might prevent the breadth of responses needed
- awarding organisations generally agreed that it was essential that they have guidance ready to implement as early as possible in the academic year (by early September) to allow them to plan and deploy resources, and to support centres in implementing any adaptations to assessment strategies. They noted that some awarding organisations have a January 2021 assessment series

Some awarding organisations commented on how the consultation should be carried out:

- one awarding organisation requested that the consultation be sent via invites to the awarding organisations rather than placed on the Ofqual website without further communication
- one awarding organisation requested the involvement of all awarding organisations in the consultation process, including the smaller awarding organisations, who risk being excluded by high fees charged by some sector membership organisations

Awarding organisations also commented on the pros and cons of producing new guidance now:

- a number of awarding organisations stated that they would find the guidance useful, as long as it allows for flexibility and is not too prescriptive. They said that it would not be appropriate to unduly burden awarding organisations with unnecessary regulatory requirements and bureaucracy, while the sector was under considerable strain due to coronavirus (COVID-19) restrictions
- an awarding organisation noted that while statutory guidance can be helpful, it can be resource intensive to implement, with every new issue adding more pressure and cost to staff and organisations, and would place a particular burden on small awarding organisations, which do not have large compliance teams to assist with interpretation and implementation
- another awarding organisation warned that additional changes so soon run the risk of causing confusion across the sector – to staff delivering

programmes, students and their parents, so messaging and guidance needs to be clear

Some awarding organisations commented on what the guidance should contain:

- some suggested that guidance should include overarching principles and hard lines e.g. do's / don'ts rather than focusing on the detail of how adaptations can be implemented
- one noted that additional guidance similar to the positive and negative indicators included within the statutory guidance to the General Conditions of Recognition would be useful
- one requested that guidance includes detail around supporting access for students who do not have access to digital technology or have additional learning needs and those with protected characteristics, as well as parameters for use of remote invigilation

Most teachers, centres and professional bodies who responded commented on the proposed timing of the consultation:

- nearly all agreed that it was essential for teachers to have adjusted plans in place as soon as possible and preferably by the start of September to ensure planning for the curriculum can take place for the new term
- a few respondents suggested that the consultation period should be longer, to allow sufficient engagement and a high quality of response
- a few respondents expressed the view that it would be unrealistic for teachers to deal with the introduction of the Extended ERF and the additional statutory guidance on top of the additional stresses and strains of new restrictions in schools which are being imposed in response to the pandemic
- likewise, 1 respondent was concerned that students and their parents would be confused if changes were made too often and without clear instructions and explanation

Some teachers, centres and professional bodies commented on the importance of consulting with teachers and centres directly:

- respondents stated that teachers and centres should be consulted. They noted that awarding organisations will understand their assessment processes but are not delivering qualifications on the ground and therefore do not understand the limitations of any changes or adaptations

Some teachers, centres and professional bodies commented on the content of what they would prefer to see:

- some respondents suggested any guidance should be subject/qualification specific, as with GCSE

- one respondent noted that differences between the Extended ERF and the General Conditions of Recognition need to be clear, particularly where organisations will be running qualifications across both frameworks

Special consideration

QUESTION 5: Do you have any comments on the issues we should consider in any guidance we develop around Special Consideration?

We received 251 responses to this question.

Awarding organisations had different views on how prescriptive the guidance should be:

- one awarding organisation noted they did not support the prescription of what Special Consideration should, or should not, be applied to, but felt it should be left to awarding organisations to determine so they can adapt to changing circumstances
- some other awarding organisations, by contrast, stated that they would prefer to see some central guidance about what types of request would fall into each category (i.e. the level of Special Consideration that is applied) to ensure that all are applying the rules consistently. One awarding organisation suggested that it would be helpful for Ofqual's guidance to consider scenarios that might arise over the next 12 months and the appropriate Special Consideration that could be applied in each circumstance
- one awarding organisation queried if Special Consideration should be applied in a standardised way within sectors or similar qualification types

Awarding organisations asked for clarification on what kind of situation should merit Special Consideration, how it could be applied and who to. It was clear that in a number of responses, the notion of Special Consideration was not well understood:

- clarification was wanted on the circumstances and types of assessment where Special Consideration is a suitable and appropriate mitigation and those where it may not be. One respondent queried whether issues such as IT system crashes would merit Special Consideration, as, with the greater use of online assessment and remote invigilation, it seems an increasingly likely scenario
- one respondent said that Special Consideration would not usually be given for teaching difficulties which might include not being able to access facilities, and queried whether this might be a situation that would now potentially be included

- an awarding organisation wanted clarification on whether local and national lockdowns should be treated differently through Special Consideration
- an awarding organisation suggested the use of a 'no detriment' policy as used in universities to allow awarding organisations to apply uplifts based on previous cohort data and centre performance data if results prove weaker than previous sittings. This was because they said that any adaptation of assessment at short notice, with no real opportunity for a practice exam, could disadvantage learners
- an awarding organisation queried how Special Consideration will be added in situations where adjustments are made
- a respondent noted that work-based learning qualifications have the sole emphasis of confirming competence so it would be a concern to industry if decisions were made in setting 'minimum' amounts of assessment evidence
- one view provided noted that given everyone is living through difficult and unprecedented times, there would need to be clear guides as to where the boundary might lie in order to count as a 'special circumstance', and also between different types of Special Consideration
- respondents indicated a number of situations where they thought guidance on Special Consideration might be required:
 - for students disadvantaged by lack of access to online lessons during lockdown due to lack of hardware or software needed and/or of internet access for economic reasons
 - for students missing study through illness, affecting them personally or in the family with long term consequences, or through centre closure
 - where experiences necessary for optimal completion cannot be gained due to organisations being closed, restricted or not allowing non-employees in
 - where exams or assessments are missed or impacted by following government guidelines on coronavirus (COVID-19) self-isolation, social distancing and use of PPE
 - for rehearsal and performance for performing arts qualifications, as if students are ill or self-isolating this could have a huge impact on others who perform with them
 - where schools might not have the resources for students to socially distance, e.g. in IT rooms – suggesting that an extension to deadlines for coursework would be needed
- another awarding organisation noted that learners' mental health will have suffered during this time and that this should be taken into account

Awarding organisations queried who should receive Special Consideration:

- one awarding organisation stated it should not apply to whole cohorts but only individuals, whereas other awarding organisations thought it should apply to both
- a teacher noted that guidance should consider offender learning: adapted assessments could be considered but will be restricted by local security considerations, shared cells and access to resources/equipment
- several teachers noted that this whole cohort deserved Special Consideration, given the amount of learning time they had missed
- another respondent noted that learners with special educational needs might be further disadvantaged by adaptations
- it was also suggested that Special Consideration should be given to learners who have lost learning time where their teachers have been off work for a lengthy spell with coronavirus (COVID-19) or where family members have been ill

Awarding organisations commented on the evidence needed to receive Special Consideration:

- additional guidance would be useful on how to deal with situations where there is little or no evidence, such as medical certificates, available to support a claim for Special Consideration, as local lockdowns or quarantine make it harder to obtain these, or where schools are closed so students cannot study as expected due to the lockdown
- evidence should include internal assessment documentary evidence to support teacher assessments
- it was also asked whether there should be a set minimum amount of assessment that must have been completed before an aegrotat can be used to allow completion or whether specific guidance could be given as to how to apply this across vocational and technical qualifications as it is established and consistent for GCSEs and A levels
- one awarding organisation queried whether Special Consideration could be used to alter grades for students who got higher grades in their second year compared to grades based on centre-assessed grades in their first year, as the year 2 result might be a better indicator of the student's grade.

Awarding organisations expressed concern about the potential impact on their resources:

- an awarding organisation noted that if Special Consideration was expected to be used widely – e.g. any time a learner (or cohort of learners) was not able to complete an assessment due to coronavirus (COVID-19); or if it was required to be considered on a case-by-case basis – the impact on awarding

organisation workload could be huge and unmanageable. Awarding organisations would need extra support

Some respondents queried the timescales involved:

- an awarding organisation queried whether there should be a deadline for applying for an extension using coronavirus (COVID-19) as a reason, for example asking for an extension in 2022 for a 6-month loss of study in 2020
- a teacher queried if there could be a 'fast-tracking' process to allow centres to respond quickly in the case of, for example, a local lockdown

A large group of IB teachers and centres suggested that the General Condition of Recognition G7 (Arrangements for Special Consideration) should continue to apply and should be part of the IB's assessment procedures

Respondents suggested the following support could be helpful:

- further guidance – a workshop or a clear guide – to show awarding organisations how to use Special Consideration to support a learner
- clarity for centres and awarding organisations about how to manage requests
- for Ofqual to work with AELP and AoC to explore different perceptions on Special Consideration and for Ofqual to produce guidance for centres they understand how it can be used

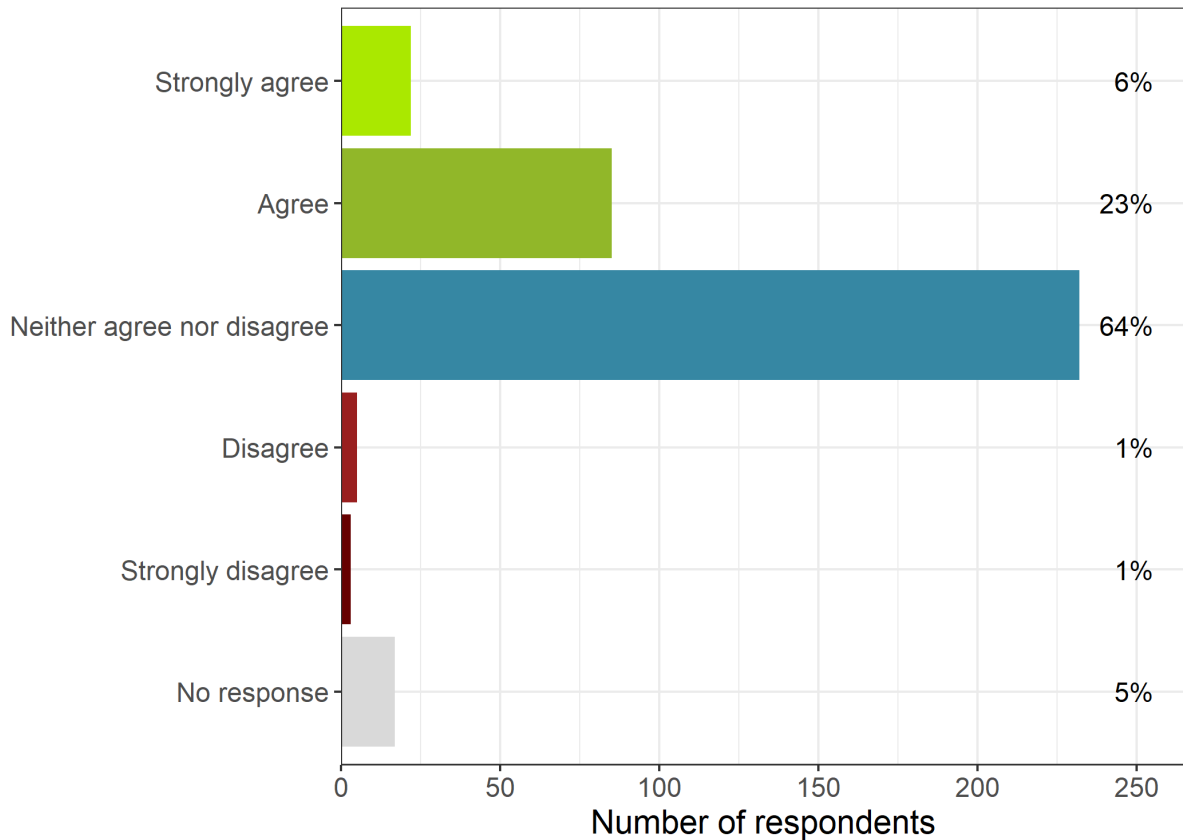
One awarding organisation suggested the process should lead to a review of policies on Special Consideration following the launch of the Extended ERF, with guidance required to support this and ensure a standardised approach.

Another awarding organisation wanted clarification on using Special Consideration concerning the use of dictionaries in Functional Skills English reading exams:

- currently once a learner has used a dictionary in their assessment, that then cannot be used again for a period of time (adhering to the current guidance), but if this element is not included in the assessment, then the assessment is non-compliant to the DfE stipulation of 100% coverage

Qualifications taken internationally

QUESTION 6: To what extent do you agree or disagree with our proposed approach to qualifications taken internationally?



A total of 347 responses were received to this question and 142 respondents provided comments.

Twenty-nine per cent of respondents either agreed or strongly agreed with our proposed approaches for question 6, compared to 2% who disagreed or strongly disagreed. Sixty-seven per cent neither agreed nor disagreed.

All awarding organisations who responded, whether they agreed or strongly agreed or neither agreed nor disagreed with our proposed approach, made similar points:

- as the current extraordinary circumstances apply internationally as well as in the UK, the approaches to mitigation should be the same
- adaptation works well in international markets and that calculated grades were not suitable due to increased risk of malpractice
- our proposed approach would reduce the potential to advantage/disadvantage cohorts taking the same qualification in the international or domestic market

Other respondents in agreement with the proposals stated that:

- they felt it made sense for the approach for international markets to align with the domestic market
- they would appreciate Ofqual guidance on putting in place a contingency plan for learners, assessors and internal quality assurers as different countries may face various lockdowns and travel restrictions

- qualifications need parity but an understanding of local situations
- while the proposal is pragmatic, in some international markets, delivery for 2020-21 has already commenced and therefore the scope to adapt qualifications and assessments will be more limited than in England
- consideration should also be given to the respective governmental restrictions which apply in any given country when making decisions on whether or not qualification/assessment adaptations are appropriate in that context
- the focus should be on pupils sitting the qualifications in the UK

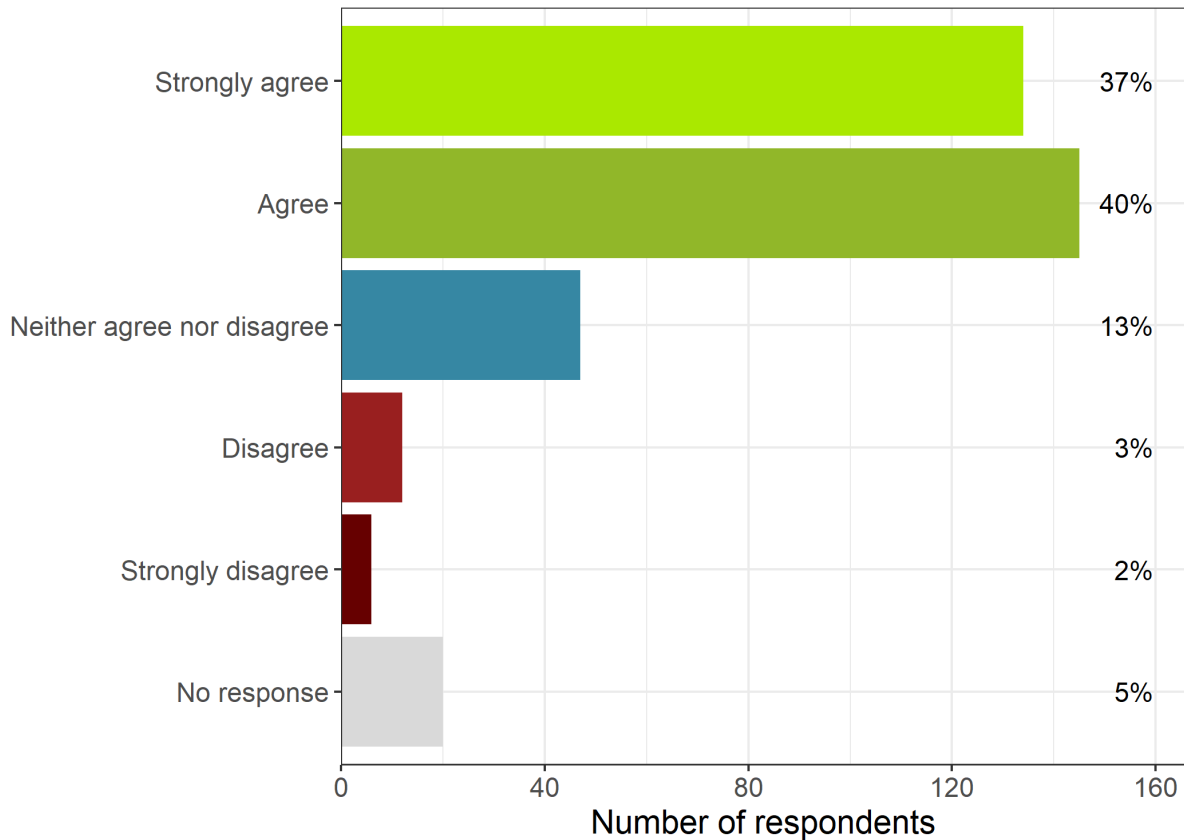
Some respondents agreed that additional considerations with regard to risk and malpractice will need to be addressed for qualifications made available internationally.

One centre that disagreed noted that in a global education market, regional variations within the same qualification would reduce comparability.

We received a number of very similar responses relating to a specific qualification (IB), which neither agreed nor disagreed, and noted that while they could see potential advantages to an awarding organisation, setting different assessments for international markets risked undermining the global nature of that qualification and the ability of its students to transfer to higher education overseas, or for overseas students to transition to UK universities.

Certification

QUESTION 7: To what extent do you agree or disagree with our proposed approach to certification?



Three hundred and forty-four responses were received to this question and of these, 134 respondents provided comments.

Seventy-seven per cent of respondents either agreed or strongly agreed with our proposed approach to certification, compared to 5% who disagreed or strongly disagreed. Thirteen per cent neither agreed nor disagreed.

The vast majority of the comments from those in agreement supported our proposal that certificates should be issued as normal and should not refer to a result having been determined under the arrangements in the Extended ERF. Respondents felt that certificates achieved in 2020 to 2021 should have no material difference to those achieved in other years, as they would be held in the same regard. Many respondents felt that any references to the Extended ERF on certificates could erode confidence in the results and disadvantage students.

A large number of respondents commented to support the use of e-certificates. It was felt that e-certificates would increase student access to them, at a time when many centres would be closed. Many of this group suggested that the use of e-certificates would result in a reduction in the costs and workload associated with issuing paper certificates.

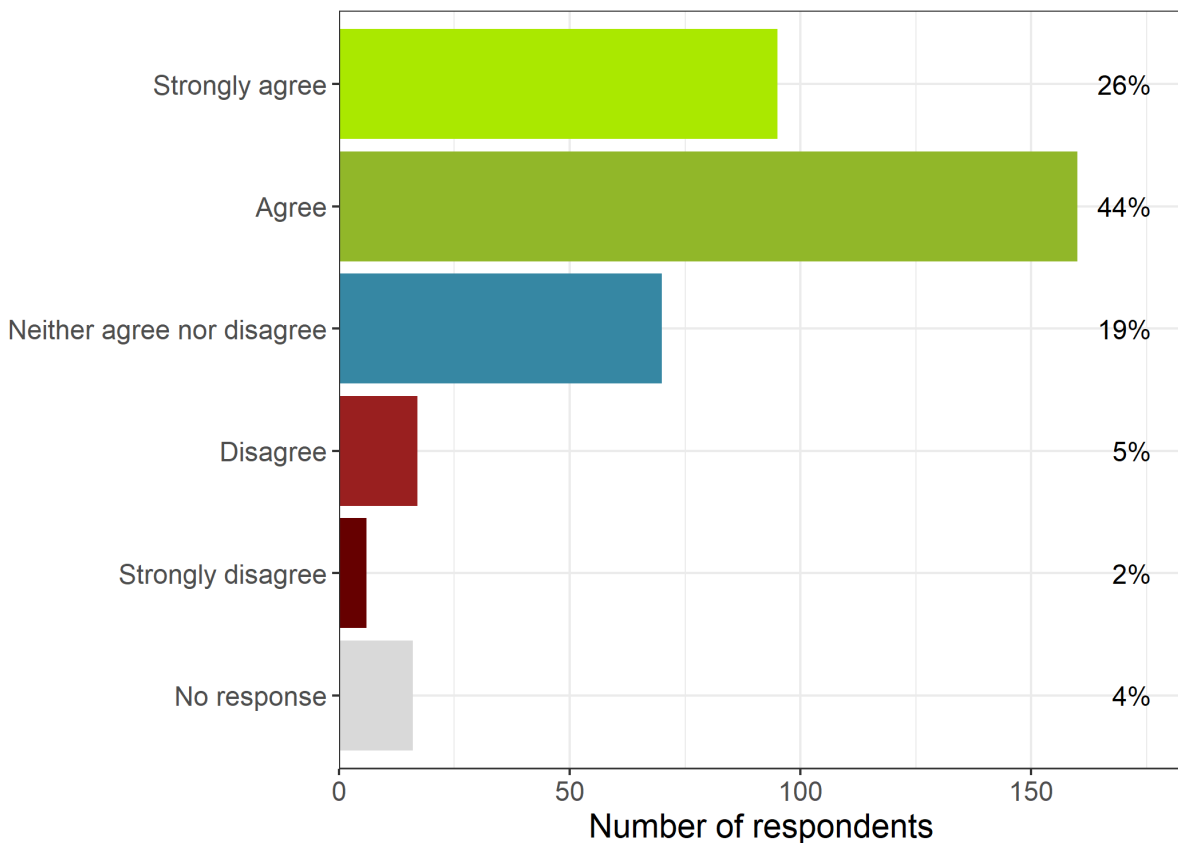
Just over half of those that disagreed with the proposed approach to certification did so as they felt that there should be a reference to the circumstances in which the certificate was achieved. This group felt that it would be important for employers to see what elements had been assessed and what competencies a student had.

The remaining group of respondents that disagreed raised concerns about the differences in course delivery and approaches across awarding organisations. This group felt that different students might be at different stages of a course, but they would still receive the same certificate. This group raised concerns about the comparability of learners' certificates across awarding organisations and centres where there were differences in approaches to adaptation.

Those that commented to say they neither agreed nor disagreed with the proposed approach to certification felt it was difficult to comment prior to awarding; they wanted to see the process in practice before deciding.

Appeals

QUESTION 8: To what extent do you agree or disagree with our proposed approach to appeals in 2020/21?



Three hundred and forty-eight responses were received to this question and of these, 82 respondents provided comments.

Seventy per cent of respondents either agreed or strongly agreed with our proposed approach to appeals, compared to 7% who disagreed or strongly disagreed. Nineteen per cent neither agreed nor disagreed.

The comments we received suggested that many respondents were not clear about our proposal.

The majority of the respondents that supported our approach to appeals did so as they felt that appeals should be available to students and that the proposal was fair.

Over half of those that agreed with the proposed approach also requested further clarification on key points. It was felt by this group that clear communications on the approach that was to be taken would be helpful so that students, awarding organisations and teachers were clear on what the process entails. They wanted additional guidance to ensure consistency across awarding organisations and a fair process for learners in differing scenarios.

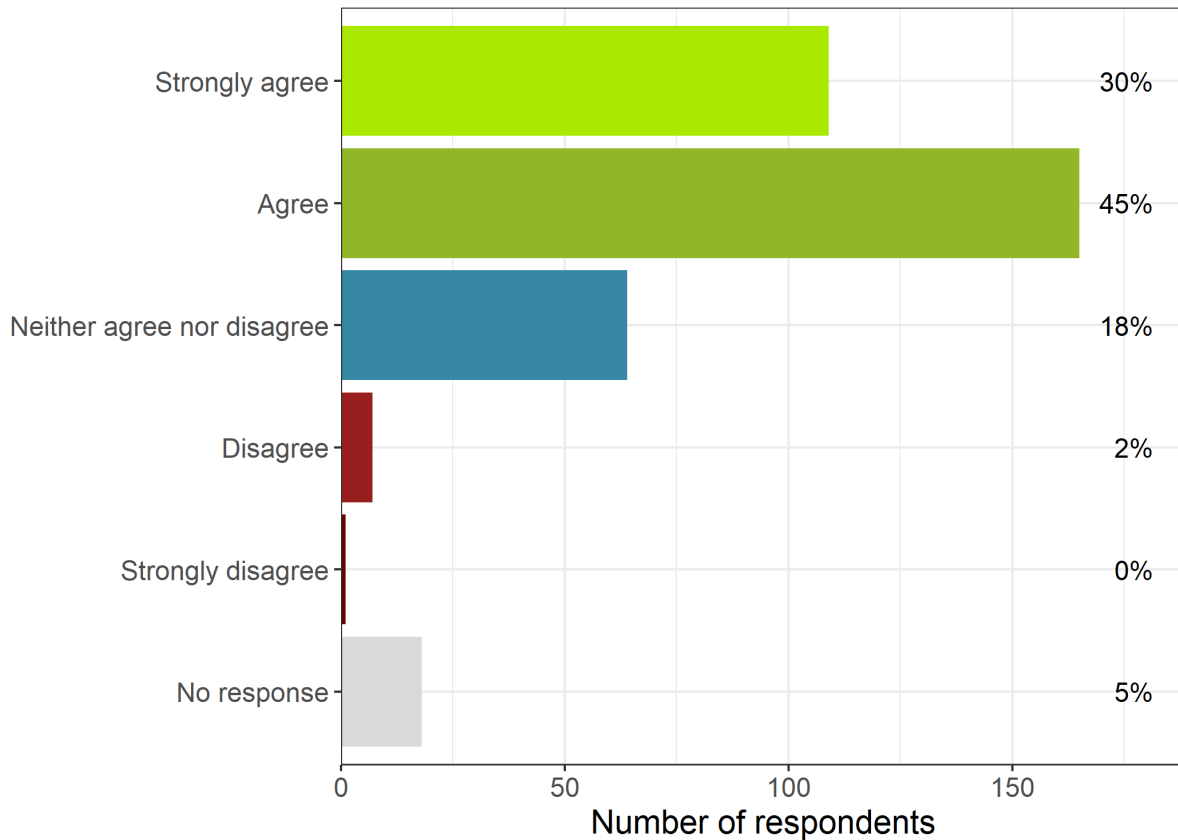
Many respondents said that a similar approach to appeals should be taken in 2020 to 2021 as was implemented for 2019 to 2020 to ensure consistency. Some suggested however that it would be helpful to review the appeals process once the 2019 to 2020 process concludes to see whether any changes or additional guidance is required.

Respondents that disagreed with the proposed approach to appeals largely raised questions about the transparency of the process and requested more detailed information. One respondent asked about the timelines involved and requested that appeals be completed by a set date as to have as little impact on the following year's study as possible. One respondent commented to say that there should be a case by case review of the grounds to appeal, so each case is taken in isolation.

Respondents who neither agreed nor disagreed with this proposal mainly did so as they felt that they would need to see the outcome of the process in 2019 to 2020, or requested more details to inform their decision.

Record keeping and regulatory oversight

QUESTION 9: To what extent do you agree or disagree with our proposed approach to record keeping and regulatory oversight?



Three hundred and forty-six responses were received to this question and of these, 79 respondents provided comments.

Seventy-five per cent of respondents either agreed or strongly agreed with our proposed approach to record keeping and regulatory oversight, compared to 2% who disagreed or strongly disagreed. A further 18% neither agreed nor disagreed.

The majority of respondents supported this proposed approach and those that left comments said they did so due to the increased assurance this approach gave. Some respondents however misunderstood our proposal and thought that it was requiring centres to keep records whereas the proposal only related to record keeping by awarding organisations. Respondents in this group felt that the record keeping of centres and awarding organisations would be a key part of the evidence that would be needed to ensure students achieve the correct grades.

Others that supported the proposals provided further comments, including:

- the approach will be used for the 2019 to 2020 academic year and a consistency of approach between years was seen as positive
- the process should be kept under review and any lessons learnt from 2019 to 2020 should be considered for 2020 to 2021
- requesting the key dates and timelines for the process

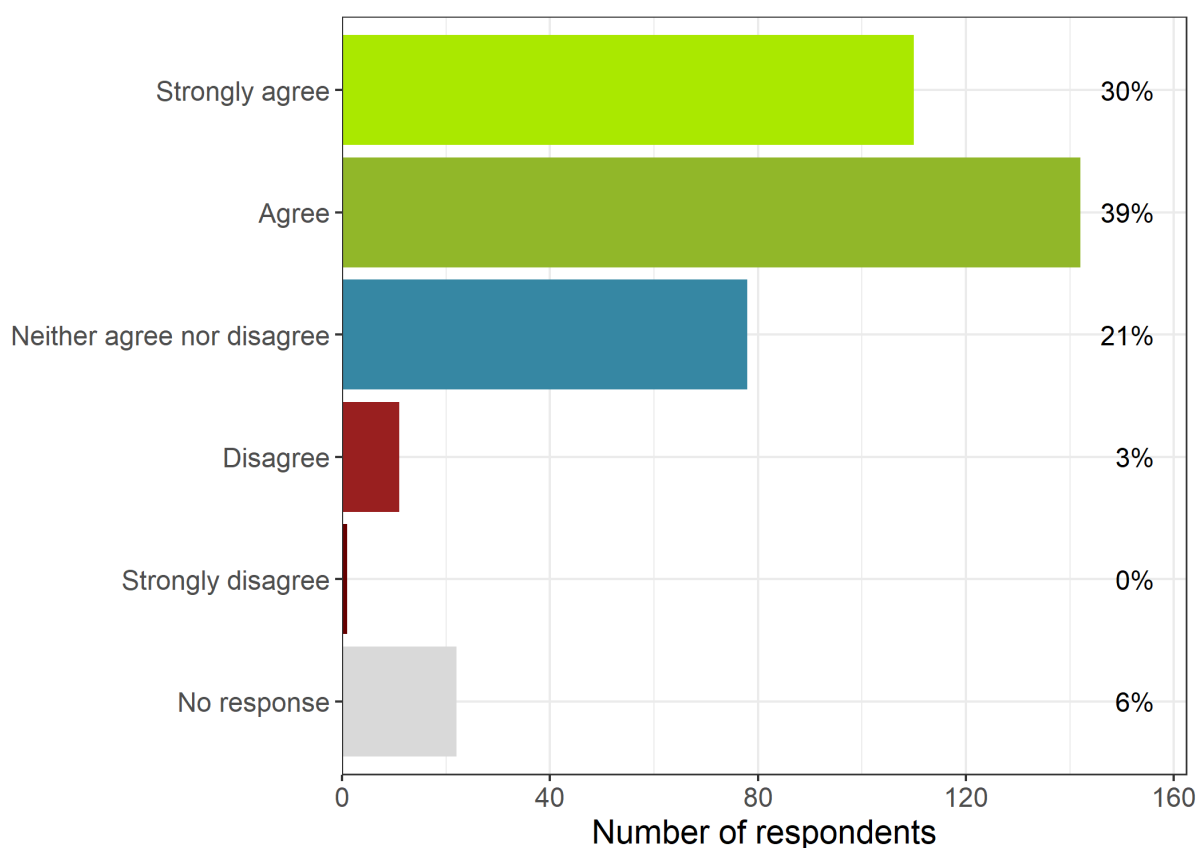
One respondent who disagreed expressed concerns that this approach did not allow for an individualised approach for each qualification and student.

Those respondents that neither agreed nor disagreed with the proposed approach and provided comments asked for more detail on specific aspects. The most commonly requested clarification was around the amount of record keeping and the level of detail that would need to be recorded. Some comments referred to the need to set out the requirements for record keeping so that all parties have sufficient information to support later audit activities and comparability exercises.

A number of awarding organisations raised concerns here about the regulatory burden of the proposal. They asked that Ofqual's approach to regulatory oversight be proportionate.

Extending the Extraordinary Regulatory Framework

QUESTION 10: To what extent do you agree or disagree with our proposal to develop the Extended ERF to take account of our proposed approach for 2020/21?



Three hundred and forty-two responses were received to this question and of these, 79 respondents provided comments.

Sixty-nine per cent of respondents either agreed or strongly agreed with our proposal, compared to 3% who disagreed or strongly disagreed. Twenty-one per cent neither agreed nor disagreed.

Sixty-four respondents who supported our proposal provided additional comments. Comments from this group covered a wide range of reasons for agreement and included:

- this approach would provide clarity to all involved
- that calculated results should not form the main focus of the work in 2020 to 2021, there should be other methods used before the calculation of results is considered

A number of comments were received relating to timelines and duration, including that:

- there needs to be a clear timeline for how awarding organisations will transition from one framework to the other and that consideration should be given to how awarding organisations would work under the other frameworks alongside the Extended ERF
- the extension to the ERF should be regularly reviewed and updated in line with the changing situation and government guidelines for coronavirus (COVID-19)
- the process for how and when to remove the ERF and Extended ERF should be drawn up

Other respondents in agreement said that further clarity and guidance was needed about the expected process where adaptation is not a viable option and that the role of professional bodies should be reevaluated and should sit lower in the order of priorities that is listed in the proposals.

Respondents who disagreed with our proposed approach to introduce the Extended ERF commented to say they felt there was a lack of clarity with the proposal. Many of this group commented to say that the proposal was not as clear and directive as the one used for GCSEs and A levels.

One respondent raised their concerns that the change and reissuing of regulatory arrangements would cause confusion. They supported the adoption of a single temporary framework that had in-built flexibility to adapt throughout the duration of the impacts of coronavirus (COVID-19).

Most of the respondents that neither agreed nor disagreed with the proposal did so because they required more information before deciding.

Awarding organisations who neither agreed nor disagreed raised concerns that some adaptations may lead to non-compliance with the Extended ERF. They asked that there was guidance from Ofqual to inform their decision-making and clear requirements set out for the documentation and evidence Ofqual would require to

support the choice of adaptation. They also requested more information on the timelines for this approach and the expectations for awarding organisations going forward, especially where stakeholder engagement would form part of the process of developing adaptation approaches.

QUESTION 11: Do you have any comments on the new conditions, requirements and guidance for 2020/21 set out in the Extended ERF?

One hundred and seventy-nine responses were received to this question.

A large number of comments received to this question mentioned the need for planning to respond to the changing national situation in light of coronavirus (COVID-19). Respondents asked for scenario planning and for there to be adequate flexibility in the guidance to allow stakeholders to react to changing situations at pace.

A large number of comments submitted to this question compared the guidance proposed for vocational and technical qualifications and other general qualifications to the guidance already released for general qualifications. Specific points included that:

- the guidance for GCSE and A levels is given on a subject by subject basis, and a similar approach here would be useful
- the Extended ERF needs to offer similar flexibility to general qualifications in terms of content

A number of responses stated that assessments must align with public health advice, especially where it involves group activity and practical work. It was suggested that there should be a link to government guidance on social distancing and other coronavirus (COVID-19) related rules so that the framework remains current.

A number of respondents raised concerns that local lockdowns may necessitate the reintroduction of delay mitigations for assessments.

One respondent requested that the definition of guided learning hours be reviewed in light of coronavirus (COVID-19). They felt that the wording was focused on face-to-face learning, which may be difficult with social distancing rules in place.

One response from an awarding organisation requested clarification on the status of the Technical Advice Notice. They felt this lacked clarity and were unsure of the awarding organisations' duties in regard to this.

Respondents from centres and awarding organisations raised concerns that the storage of student information may raise concerns around GDPR and data handling. They requested that any legal matters associated with this approach are considered by Ofqual.

A number of colleges and schools commented to ask that a common format is used for any data exchange activity. Different approaches used over the last period have resulted in confusion and an increased workload as different data transfer procedures were used for different qualifications.

One comment related to the qualification explainer tool that Ofqual had set up to provide students with the details of assessments and the mitigations that were in place. The respondent stated that this was a helpful tool and they would support its continuation as an additional source of information for students.

Equalities Impact Assessment

QUESTION 12: Are there other potential positive or negative equality impacts that we have not explored? If yes, what are they?

One hundred and seventy-five respondents provided comments in response to this question.

A number of respondents made comments relating to the potential disadvantage faced by students who were not able to access remote learning or assessments. Comments received included:

- at least 10 respondents including centres, teachers and representative bodies noted challenges around accessing technology to work and complete assessment at home. One respondent noted that not everyone will have equal access to digital equipment to enable them to study at home, and that not all centres would have enough equipment for entire cohorts to sit online assessments simultaneously if required. Another said that the quality of remote learning would have varied significantly while centres have been closed, with those that had a poor experience likely to be disadvantaged.
- several stated that learners without access, for example, to software or specialist hardware, could be disadvantaged. Comments received included that things like software licences required to complete some courses can be expensive, and that schools may be unable to afford to provide additional licences for learners at home
- it was also noted that learners with no internet access, or limited means to access remote learning may be disadvantaged. Several respondents commented that this could occur for a number of reasons, including learners who did not have internet access at home, learners who had access but were unable to use it, and learners in rural areas where internet access was unavailable or unreliable. Respondents said that learners affected in this way should be provided with additional support to allow them to catch up on work they had missed

- a number of respondents provided identical or very similar responses, which referred to the impact of the 'digital divide'. These respondents commented that learners in disadvantaged households could be negatively impacted where they have not had adequate access to online resources, so will have made little progress while centres have been closed. Some of these respondents commented that they believed this was a particular issue for learners taking IB diploma programmes. A representative group similarly noted that learners from lower socio-economic backgrounds may be less likely to be able to access remote assessments
- one respondent noted that access to equipment could be an issue within schools, and that some schools and colleges may be better set up to accommodate learners within social distancing guidelines than others. Another teacher made similar comments relating to additional resources needed to complete assessments, for example catering facilities and ingredients for those taking assessments in this area
- several respondents commented that learners with special educational needs could also be affected in the event of further lockdowns, as they may not have access at home to the support they would normally receive from their centre. An awarding organisation commented that learners taking entry level qualifications with special educational needs or disabilities often require reasonable adjustments which can be difficult to support when working remotely. They said that it may be necessary to spend teaching time familiarising learners with accessing the technology, rather than actual teaching

A number of respondents made comments relating to the students who typically take vocational qualifications, noting that these students may be from more disadvantaged groups than those taking general qualifications.

- an awarding organisation commented that learners with certain protected characteristics are more likely to take certain types of qualifications. They are also more likely to have other responsibilities, for example caring responsibilities. They thought that for adult learners, women would be more likely to have childcare responsibilities, and in the event of further lockdowns, could be affected to a greater extent and find it more difficult to access teaching and assessments remotely. A representative group made similar comments
- a representative group commented that some groups of learners, such as those taking qualifications in prison settings, could be disadvantaged. They said that these settings are likely to have higher number of learners with special educational needs, who may have limited access to technology, and who could also be more likely to be subject to local lockdowns in future

- a teacher, an awarding organisation and a representative group stated that learners who are shielding could be disadvantaged. A representative group suggested that learners with underlying health conditions might be less able to complete assessments in the event of further disruption

A number of respondents, including those from centres, parents and awarding organisations, made comments relating to challenges presented by the structure and delivery of many vocational qualifications, and the centres that deliver them. These comments noted that:

- the size of the centre could impact on its ability to deliver assessments; and that often smaller centres seem more able to adapt to social distancing than large centres. Respondents said that large centres are more likely to have to put in place arrangements such as staggering attendance, and continuing to offer remote learning, to accommodate large numbers of learners within social distancing requirements
- the structure of qualifications and the order in which assessments are taken could disadvantage learners. It was suggested that any constraints on how qualifications can be delivered need to be made clear in the specification, so that centres can consider these when planning their delivery
- the amount of time spent with each learner each week would be limited due to restrictions, which could negatively affect learners, and that learners may be unable to complete the units required within the time available
- the number of units required to be completed for coursework should be reduced, to take account of the amount of learning that will have been missed by learners
- there would need to be fewer restrictions, for example on the set up of practical equipment for things like online testing to allow centres to set up equipment in ways that maintain social distancing or around the use of live audiences in some types of practical assessments involving performances. It was also noted that there is a need for teachers to be able to safely demonstrate aspects of assessment
- the arrangements would need to take account of learners that were subject to local lockdowns and therefore unable to complete assessment tasks under teacher supervision. It was suggested that where work was completed during lockdown, it was possible that this would not be at the same level as that which may have been completed in a classroom
- there are large differences between schools, with learners at some state schools receiving very little face-to-face contact, while learners at some private schools have received teaching to a full online timetable. There was concern that learners taking the same assessments, but who have received very different teaching experiences, could be disadvantaged

- centres would need guidance on how to manage the increased number of assessments that will need to be held in the next academic year, as a result of delays to summer 2020 assessments
- there is the potential for learners who received calculated results for units in summer 2020 to be in different positions depending on which units had been taken in which order. Learners taking the same qualification due to complete in 2021 could have different combinations of calculated results and results from assessments either taken normally or in adapted form

A number of respondents made comments relating to the need to ensure consistency between awarding organisations, and between different qualifications. Several respondents said that it would be important that any approach is applied consistently by awarding organisations and a representative group said that the approach should maintain parity with general qualifications. A centre senior leader said it would be helpful to ensure there were no discrepancies in assessment loads between qualifications, while a teacher suggested that more detailed guidance would be needed on a case by case basis for specific subject types, in a similar way to that being provided in some general qualifications. A representative group commented that the key principle for all qualifications should be that learners are able to complete their assessments on a timely basis.

Some respondents made comments relating to specific groups of students with special educational needs or disabilities.

- an awarding organisation commented that learners with special educational needs would be less likely to achieve successful outcomes with adapted assessments, particularly if they are unable to access their centre to receive the support they need. Another respondent made similar comments, noting that learners taking assessments remotely may not be able to access the support they need to assist with any reasonable adjustments, or difficulties faced during an assessment
- an awarding organisation commented that learners with hearing impairments could be affected to a greater extent if remote assessments were conducted remotely by video. They also commented on difficulties that could be faced by some learners accessing online or remote assessments, and that some centres may not be set up to support remote invigilation of learners taking assessments
- a teacher commented that learners with special educational needs could be disadvantaged if they did not have access to teaching assistants. They commented that actions, such as staggered start and finish times to support social distancing, could make it difficult for learners who require additional time to be provided with this. Another teacher commented that where learners were allowed additional time as a reasonable adjustment, in assessments which require contact, such as beauty assessments, the additional time could

lead to them exceeding the permitted contact time under social distancing requirements

A number of respondents made more general comments on the challenges and, in some cases, benefits, that adaptations to assessments could provide.

- an awarding organisation said that the use of technology and remote assessments could support access for some learners, but would disadvantage others who could not access the assessments. They commented that it would be important for awarding organisations to monitor the impact of the adaptations they make and said that the principle in the current framework that prioritises issuing results to as many learners as possible should be retained as it could still be relevant in the event of further disruption
- another awarding organisation commented that as all qualifications are now in scope for adaptations, there should be no reason for any learners to be disadvantaged
- one awarding organisation commented on the proposal that in making adaptations, they need to consider whether any learners could be disadvantaged if they were unable to access the adapted assessment. They commented that if they were unable to offer a particular adaptation on the basis that some learners could not access it, this could make adaptation unworkable. They said that greater clarity of this requirement would be helpful. The awarding organisation also stated that learners working at lower levels, for example entry level, are less likely to be able to access remote or adapted assessments. They thought that different types of adaptation may be required for these learners and that mixed approaches could be needed within qualifications for different groups of learners
- another awarding organisation was concerned that learners may be disadvantaged, as although certificates would not indicate whether a student took an adapted assessment, employers would be able to tell from the date of the certificate that this was the case

QUESTION 13: Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

Two hundred and twenty-three respondents provided comments to this question.

A number of respondents commented on the need to make use of teachers' judgements as part of assessment decisions. Comments included that:

- teachers' decision making should be trusted and that trends over time should be used and adjustments made where necessary, to ensure that learners with special educational needs are not disadvantaged
- centres should be able to provide estimates for coursework components that were not able to be completed between March and September 2020, and that all learners should be required to sit external assessments at a later date, rather than allowing calculated grades
- teacher assessments should be considered alongside pupils' work as some learners could be more affected than others due to personal circumstances, and that learners should not be penalised as a result of their individual circumstances; also, teachers' judgements on the intention to complete work and effort of learners should be considered
- it would be important to speak to heads of departments to help mitigate potential negative impacts on particular groups of learners

A large number of respondents made comments relating to the potential for removing or reducing the amount of content to be covered, or the number of components to be taken. Respondents, including teachers and senior leaders, said that:

- it would be helpful to work with awarding organisations to look at their qualifications and amend or remove criteria that could unfairly disadvantage learners from more disadvantaged backgrounds
- the percentage of content covered in examinations could be reduced and/or practical assessments could be removed and marking criteria adjusted accordingly, to provide time for learners to catch up
- theory and practical content to be covered could be reduced in line with the amount of time available to complete the qualification
- the number of units taken by learners should be reduced to help manage the potential impact on learners
- a number of respondents, who submitted identical or very similar responses suggested adjustments to content and assessment processes to support learners in centres

In contrast, 1 teacher said that it would be important that sections of content are not missed out, as this could disadvantage learners who choose to continue their studies in the specific area covered by that content.

Respondents commented on other approaches that could be taken in relation to the structure or delivery of qualifications.

- an awarding organisation commented that centres may choose to register learners on smaller qualifications, at the same level, than those they had originally intended to take, in order to take account of the reduction in

teaching time. They noted that this could lead to a reduction in the breadth of knowledge and skills that learners gain in the academic year

- an exams officer noted that coursework should be released earlier so learners and centres have as much time as possible to complete it in the event of any further disruption. A teacher suggested that there should be greater flexibility and variety in terms of how learners are able to submit work for assessment
- a teacher suggested that, for some performing arts qualifications, changes could be made to group performance requirements to allow them to be completed solo or in pairs, instead of groups. Another teacher made similar comments that learner numbers for practical assessments could be limited to allow for current safety measures. Another teacher commented that things like the durations of performances and requirements relating to live audiences could be removed
- one teacher commented that in some practical assessments (for example dance assessments) learners have not been able to practice at home to the same extent they would have done had they been in a centre and that this will impact on the development of their skills and may impact their performance in an assessment
- another teacher said that centres could be required to get learners to take mock exams, so that there was data available on learners in case they are unable to sit exams

A number of respondents made comments relating to the use of technology and other resources to mitigate potential negative impacts on particular groups of students:

- two representative groups along with a teacher commented that some disadvantaged learners would need to be provided with devices to access remote or adapted assessments. They said it would be important for suitable equipment and resources to be available for these learners to access assessments, and for these to be made available in good time. A teacher also commented that practical support might need to be made available for learners accessing remote assessments. Another teacher said that learners from disadvantaged backgrounds were less likely to be able to access technology both for use in learning and assessments
- one teacher suggested that learners should be able to use their own devices to support access to remote learning and assessment
- a member of a senior leadership team commented that it would be important to make the most of potential IT opportunities for the presentation of learner work
- two individuals commented that the use of remote invigilation could help ensure learners are not disadvantaged. One commented that in care settings,

remote observations could help protect vulnerable people. An awarding organisation employee made similar comments. An awarding organisation employee commented that some learners could be disadvantaged if direct observations of assessments were not able to be adapted to be carried out remotely

Some respondents made comments that related to the possible impact of further disruption, or specific restrictions that are, or could be, put in place.

- a teacher, responding in a personal capacity, commented that some assessments would not be possible if it was necessary for centres to close again. Two teachers commented that it may still be necessary to issue calculated grades to some learners in 2021 if this were to happen
- an awarding organisation commented that localised lockdowns could lead to some learners being disadvantaged, particularly if more deprived areas were more likely, due to wider socio-economic factors, to be placed under lockdowns
- a centre commented that some assessments may not be possible due to sports still being prohibited, and that where this was the case, adaptations would need to be made to allow for this

A number of respondents commented on the need to mitigate negative impacts on students in particular groups, or with special educational needs or disabilities.

Comments received included that:

- it would be important to focus on those learners who cannot access learning in the normal way, for example because they are vulnerable for health reasons
- learners who are allowed extra time due to disability or special educational needs must have their needs considered
- it would be important to consider the impact of any adaptations on learners from disadvantaged groups and that an equalities impact assessment should be undertaken which should not just consider the direct role of ethnicity, sex, socioeconomic background, disability and other characteristics, but also the interrelationship between prior attainment and each of these factors

Respondents commented on the need to provide support for centres delivering qualifications, and the need, where possible, for consistent approaches to be taken.

Comments received said that:

- it would be important that adaptations are made consistently, and that current guidelines appear open to interpretation
- there should be an emphasis on supporting centres with holistic assessment and professional discussions being encouraged

- guidance should be provided for those unable to access assessments and that resources should be made available for disadvantaged learners to access assessments
- it would be important to provide clarity about assessment structuring, timings and mark weightings as early as possible. It was suggested that any approach would require close consultation with centres to ensure it is feasible to deliver

A representative group and a teacher commented that centres would need to be given sufficient notice of any adaptations to assessments and qualifications so that they can prepare students effectively and provide appropriate support to familiarise them with any adapted methods. They also noted that for online assessments, centres would need flexibility on the timing of assessments to manage resources.

Some respondents commented on external factors which could impact students' ability to access adapted assessments. These included that:

- consideration needs to be given to learners who rely on public transport to get to centres, as services may be reduced. They also commented that learners with underlying health conditions could be more disadvantaged than others
- potential negative impacts could be mitigated by paying for tuition for learners who have been disadvantaged
- many colleges deliver qualifications working with private training providers and that there is concern that such providers could be subject to financial difficulties, presenting a risk of failure in delivery at the assessment stage if these providers went out of business
- it would be important to consider the mental health implications on all learners, not just those from disadvantaged backgrounds or with protected characteristics; that learners from any background can be affected and may become disengaged, yet may not be eligible for additional support as they are not directly affected on equalities grounds

Three teachers commented that there should be special consideration, and that forms used to request it should be easy to complete, and that decisions should be based on individual circumstances. An exams officer and an awarding organisation commented that the application of special consideration should be extended to cover students with special educational needs.

One teacher said that it is important that results are monitored to ensure that they reflect normal results, to prevent students from being unfairly disadvantaged.

An awarding organisation commented that it did not think anything should be done at system level, and that awarding organisations needed flexibility to consider how to adapt assessments to minimise disadvantage. They commented that the regulatory framework would need to allow for this. Another awarding organisation commented

however that it would be helpful for Ofqual to provide guidance on adaptations to help ensure a consistent approach across awarding organisations.

Regulatory Impact Assessment

QUESTION 14: Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are not identified in this consultation? If yes, what are they?

Ninety comments were received in response to this question. The majority acknowledged that the impacts, costs and benefits that were identified in the consultation were relevant and stated that they could not identify anything additional.

Many referenced and/or reinforced the detail we had already included in the consultation when providing their response. The key themes highlighted in responses that were already covered by the consultation included the costs of:

- development and implementation of adapted assessments, including designing them, testing them, delivering them securely (in particular managing and mitigating risks around malpractice) and undertaking suitable quality assurance activities
- development and implementation of new guidance and processes, delivery of additional training (to awarding organisation staff and centre staff and students) and provision of additional support to centres; all in relation to introducing new adaptations
- enhancing technology – including investing in new platforms for managing online delivery, equipment for staff and centres, purchase of software and licences
- administrative burden – engagement with the regulator on a number of regulatory frameworks, increased engagement with centres, additional requirements from the regulator, such as data requests
- reviewing qualifications to determine suitable approaches, including those amended under the ERF; especially relevant to those who were using centre-assessed grades and who will need to develop new mitigations
- developing similar approaches to adaptation where the same assessment methods are used

Several respondents noted, as set out in the consultation, the benefit that might be brought through having potentially increased accessibility of assessments, although a small number noted that this may still require investment in technology. Another benefit noted was that the investment in innovation by awarding organisations could

help with continued development of their qualifications with further returns in the future.

A range of additional impacts, costs or benefits were also identified by respondents.

Impacts:

- a small number of awarding organisations noted that promoting engagement through sector or professional bodies risks excluding those awarding organisations who are not members because the joining costs are prohibitive
- more than 5 awarding organisations and a representative body noted the risk that decisions are taken by Ofqual that do not sufficiently take into account the individual circumstances of awarding organisations. Several noted that this was particularly relevant if decisions are to be taken around expecting similar approaches for similar qualifications
- several awarding organisations said that implementing adaptations was adding cost without providing additional revenue, the potential outcome being that capacity to undertake other work or business development would be hampered
- a number of awarding organisations suggested that if there are any delays to decisions, or any further changes to the regulatory framework that this will have a prolonged impact on what they can deliver, when and how. Several also noted the challenges of operating for any length of time under multiple frameworks. One centre raised the concern that if appeals are delayed or take a longer period of time, that this will impact more on student progression opportunities
- more than 5 respondents, mostly from schools but also students, indicated the impact on mental health of dealing with continued changes to learning environments, course content and assessment methods. Several noted that trying to catch up on lost time puts pressure on teachers and students and that there are expectations to be able to be ready for assessment that add additional burden. One respondent noted that due to restrictions, morale and motivation is being impacted where assessments still cannot be completed. Others highlighted the lack of time, and that there are expectations to adjust timetables in order to increase teaching time and also fit in additional assessments
- several centres said that they will be unable to draw down as much funding if completions fall, and that this will be impacted if assessments cannot be completed to schedule
- one centre indicated the impact on assessment activity of losing specialist staff due to cuts or other issues relating to coronavirus (COVID-19). They were concerned about conducting assessments for students already on course as well as being able to offer qualifications in specialist areas in future.

Another centre noted the impact of not being able to offer access for students to real time work experience, and how this might affect their preparation to progress post-qualification

Costs:

- one awarding organisation raised the risk of centres carrying out adaptations without prior agreement with their awarding organisation, or misinterpreting guidance and requirements around adaptations, which would lead to awarding organisations incurring additional costs in order to put right any issues or to remedy breaches
- another said that with implementing new approaches to assessment, they expected to have to undertake additional quality assurance activities in order to assure themselves that changes were being delivered in centres as intended, as well as ensuring standards are maintained. They also noted that there is likely to be increased costs around standardisation of assessors, as they adapt to new approaches as well
- several awarding organisations suggested that they are expecting to have to deal with an increased number of enquiries and appeals, which would require additional resource. Other additional costs raised by awarding organisations included continuing to pay for registrations or licensing to use software such as remote invigilation – highlighting that these are not one-off costs
- one centre noted that additional cleaning requirements would impact on cost but also time available for teaching and assessing. The need to purchase additional PPE was also raised by several centres as extra costs; other extra costs identified were around modification of spaces used for teaching or assessment, and additional staff time where additional teaching is required or assessment takes longer to deliver either because of the assessment design itself or because of needing to meet requirements, for example, around social distancing and classroom bubbles

Benefits:

- one awarding organisation suggested that they may benefit from moving assessment online as it would enable more efficient submission and processing of learner achievements and certifications
- another awarding organisation noted the potential to save on travel costs if visits to centres are not required, while 1 other suggested that adapted assessment provides a more fluid approach to assessment design and is leading to improvements in quality assurance

A number of respondents suggested that additional funding should be made available to centres and to awarding organisations to help deal with the additional impacts and costs. It was also suggested that there might be greater flexibility

around ESFA funding/claim requirements. One school suggested that the costs of any retakes should be covered, so that all schools can access retake opportunities.

Several other suggestions were made, or queries raised, around managing some impacts and costs. These were:

- whether potential burden around special consideration could be eased by allowing special consideration to be given at a class or centre level, rather than only at candidate level. This proposal, which was raised by a number of awarding organisations, a representative body and a centre, noted that a local lockdown could mean that all students in a centre would require special consideration
- that Ofqual should provide more guidance to awarding organisations on managing impact of decisions on centres
- whether a qualification be offered with different assessment approaches for different groups of students (for example, to deal with a local lockdown), and if so, whether the qualification would be treated as being the same qualification
- that Ofqual should ensure, when planning other non coronavirus (COVID-19) related work, that it takes account of the disruption and impact being felt by awarding organisations of operating under an additional framework
- that, while the regulatory framework is temporary, Ofqual should not see investments and amendments made now as temporary fixes, but a step towards changed ways of working in the future

It was also said that little consideration had been given in the regulatory impact assessment as to the impact on learners with SEND and those who are disadvantaged.

QUESTION 15: What additional costs do you expect you will incur through implementing our proposals? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

One hundred and ninety comments were received in response to this question, including nearly 40 from awarding organisations and 130 from staff working in schools, training providers and other centres. More than 30 of the responses said that either they could not state any costs or savings or did not know/could not predict them at this point, and another 20 stated simply there would be no savings and/or no additional costs. As well as this, we received 48 near identical responses – the themes of that response are included in the summary below.

Of those who provided detailed comments, more than 10 noted that their costs, or any savings, would depend on changes that were made subsequent to decisions around the Extended ERF. A small number of respondents noted that investments

had already been made for some adaptations and that if these could be carried on, then there may not be substantial, or indeed any, additional costs, but others noted that they would be making adaptations for the first time once the Extended ERF came into force.

It was noted by a number of respondents that the timeframe of the consultation did not allow for any detailed cost-saving analysis to take place and few respondents felt able to provide estimated figures. It was suggested by a representative body that a further survey of awarding organisations should take place to explore their costs in more detail, particularly once more of the detail of the Extended ERF framework has been clarified.

With regards the details provided in response to the questions, respondents highlighted a range of additional costs:

- the need for awarding organisations and centres to invest in technology; including software and registrations/licences, hard drives, laptops, video cameras, USB sticks and other equipment to support continued remote delivery and new or adapted approaches to assessment
- training required for awarding organisation and centre staff and students to accustom them to new technologies, ways of working and ways of being assessed
- development of new materials, or updates to existing materials, and the associated costs of distributing them including photocopying, printing and postage
- development of new assessment methods or processes
- review of existing assessment papers and tasks, and any associated costs of making changes, including repeating quality assurance work and re-printing or re-uploading assessments
- additional text and revision books
- individual PPE for students as it cannot be shared between them as previously might have been done
- increased amounts of cleaning of facilities
- increased home insurance costs for staff who continue to work at home
- anticipated increase in the number of retakes (costs of registering to take them and the costs of administering and marking them)
- costs of administering additional assessments, and of supporting staff to deliver assessments in alternative ways
- provision of access to equipment and/or resources (such as food or textiles) for assessment which would normally be done using equipment and materials at school but which can now be completed outside of direct supervision

- the need to find additional space for teaching and assessment in order to meet social distancing requirements, and also additional staff to cover where classes are split
- additional communications and support between awarding organisations, centres and students
- implementation of changes to standardisation and external verification or moderation procedures
- potential increase in fees, as remote invigilation essentially moves the onus on organising and paying for invigilation from centre to awarding organisation, and awarding organisation may increase fees to deal with this
- and also, a potential increase in fees if centres opt to enter students for an earlier assessment opportunity in order to ensure an in-year resit opportunity

Around a quarter of respondents who provided detailed comments highlighted that a significant cost related to time. Responses noted that additional time would be needed for: planning and administration; creation of new supporting materials and guidance; development of adaptations and their implementation and delivery; teaching time to deal with changes in content and assessment as well as to catch up on lost time; and supporting students' individual needs as they return from a long break from school to an adapted approach to learning and assessment. One teacher estimated an increase in costs to their centre of around £200 per 50 students. Several awarding organisations noted that they required time to maintain an understanding of the regulatory requirements on them, and to ensure colleagues and their centres also understood.

Two estimates of costs were provided by awarding organisations. One stated that to run proctoring software for 2020 to 2021 – post an initial investment this year – would cost around £32,000, and that there would be ongoing staff costs on top of that to ensure they could provide adequate support to centres. Another estimated the cost provided related to the proposed requirement to record the adaptation decision for each qualification, estimating that it was likely to cost them in the region of £2,000-£4,000 in staff time. A small number of awarding organisations noted the increase in burden that this activity would impose.

At least 5 respondents indicated that there would be continuing costs to mental wellbeing, with increasing concerns on the mental health of both staff and students in centres, and several awarding organisations also noted the pressures that their staff were under to develop and implement changes in a short space of time. It was noted by 1 respondent that awarding organisations were having to put other business-critical work on hold to deliver the work around coronavirus (COVID-19), but that without carrying out the other business-critical work or being able to identify opportunities, there was pressure on the future of some organisations. Another respondent noted that many of the costs incurred under this framework would not generate additional revenues for awarding organisations.

A small number of respondents indicated they expected some losses to be incurred, such as a reduction in student numbers, delays in the receipt of funding due to extended completion times and a fall in funding if completion rates drop. One respondent pointed to potential future lost earnings for students who are unable to complete qualifications. Another respondent noted that centres may have already paid for things such as licences related to performances that would not be able to be utilised even under adapted assessment conditions.

Around a quarter of respondents who provided detail indicated that there were some potential savings. Around 10 respondents noted there could be savings on travel expenditure, although many countered this by also expecting additional costs in other areas which would offset any savings made. Other savings were proposed where there might be:

- reduced accommodation costs for staff, assessors and verifiers
- reduced performance costs if public performances are not allowed
- removal of face-to-face standardisation activities, and potential introduction of postal verification
- completion of coursework at home instead of in centre
- a move from exams to coursework, requiring less resource to administer

One centre anticipated that if coursework is used in place of exams that they might save £15,000 as the cost of preparing students for exams.

A small number of respondents did not expect return on investment to be incremental due to the unpredictable context in which they are operating. Several others warned that while it might appear that savings could be made from the move to putting more assessment online, there would need to be the same amount of work undertaken, for example around quality assurance, it would just need to be done differently. More than 20 respondents said that they thought it was unlikely or did not expect that there would be any savings.

QUESTION 16: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

Seventy comments were received in response to this question, including 19 responses from awarding organisations. More than a third of the respondents commented to say they could not think of anything to add.

Key themes in response related to communication and engagement, design of qualification content and assessment, and the need for flexibility but also stability.

A small number of school representatives (teachers and SLT) said that it is important to talk to teachers and curriculum leaders to continue to understand impacts and

potential impacts of adapting assessments and teaching, and to also engage with students who are due to sit assessments.

Five awarding organisations, along with a representative body, all suggested that it would be useful for Ofqual to offer online message boards for engaging with awarding organisations, alongside formal meetings. Several others suggested a need for more working groups, including working with existing sector groups or bringing awarding organisations offering similar qualifications together in order to try to streamline approaches within sectors and to communicate relevant issues specific to certain groups.

There were calls for clarity from a few respondents; to be more specific, to use a single source for requests to awarding organisations and to produce a clear timeline of key dates and requirements. One respondent noted that in Northern Ireland, CCEA appear to be waiting for Ofqual decisions, but that the timelines that Ofqual work to are not in line with Northern Irish term times. With regards timelines, another school respondent stated it is important to establish the position for vocational qualifications quickly so that there isn't too big a gap between A levels/GCSEs and other qualifications in terms of planning for upcoming terms.

Two awarding organisations suggested that to minimise impact we should be clear as to whether the Extended ERF applies where awarding organisations don't need to make any adaptations and can continue to award as usual. One awarding organisation stated that the Extended ERF should only apply to those awarding organisations where the learners were at risk of being disadvantaged. Another said Ofqual should seek to have just a single framework in operation. Several awarding organisations said the contexts of individual awarding organisations were also important to consider in implementing the framework, including their varying infrastructures and limitations on resources and risks to business continuity, as well as actions already undertaken to implement the initial extraordinary framework, which has impacted awarding organisations in many different ways. One awarding organisation suggested Ofqual should make some requirements less prescriptive in order to help awarding organisations meet the intended outcomes.

With regards qualification design, 8 respondents (students, teachers and school representatives) all said that the amount to be studied should be reduced. A similar number suggested there should be fewer assessments – some suggested that students should not be required to undertake both coursework and exams, 1 said that exams could be changed to be modular rather than linear and another said that coursework should be allowed to be completed at home. One suggested that exams could be made easier to reflect limited learning. It was also suggested that teachers should be engaged, as has been done with GCSE, to determine which content should be retained in their subject areas.

A small number of respondents raised concerns around requirements for employer engagement and suggested this should not form a requirement of qualification

design in coming years because of the challenges centres will face in engaging employers and in delivering activities under current restrictions. Also, with regards employer engagement, 1 school respondent noted that capacity and delivery fund requirements should be included in considerations to ensure that any changes to requirements made by awarding organisations can be incorporated and still covered by the funding.

Around a third of the responses discussed adaptations to assessment. Several teachers indicated the importance of ensuring guidance about adaptations is specific and detailed while a small number of awarding organisations said that in order to ease burden it might be possible for rationales and risk assessments relating to adaptations in similar assessments to be shared across awarding organisations. There was support for the use of remote observations (nearly 10 respondents covering awarding organisations, centres and representative bodies) including 2 who said that remote proctoring or invigilation should take precedence over any other adaptations, while others suggested reducing internal verification requirements, extra assessment windows or flexible requirements relating to work-related skills including working with employers to ensure they are able to conduct their own checks. One awarding organisation said that allowing alternative approaches was preferable to a block on specific assessment, but that the costs of introducing alternatives needed to be considered.

Two respondents queried whether making adaptations to assessment would impact on requirements for guided learning– for example if additional safety measures were required or assessment is carried out differently – and how this might be managed within centres.

The comments on adaptations often cited the importance of flexibility, to be able to meet centre needs and be deliverable, while recognising different centre and awarding organisation capabilities. One awarding organisation highlighted that flexibility may also be important in order to account for potential localised lockdowns. Several awarding organisations noted that while qualifications might be similar, flexibility in the framework was important to allow for where there are variations in design and delivery.

However, in contrast, a number of respondents (around 5 covering awarding organisations and schools), said that approaches should be standardised where qualifications and assessments are similar in order to ensure consistency while the system is reacting to different challenges. Several schools called for parity between qualifications. It was suggested by a small number of respondents that Ofqual should allow awarding organisations to make design decisions with some flexibility, but take control in ensuring a level of consistency. One respondent also suggested that centres should be able to make adaptations with awarding organisations offering a checking service to ensure suitable assessments were being offered.

A number of suggestions were made around awarding. These included that:

- students should be awarded some grades now to allow them to focus on study and assessment in key subjects
- centres should be allowed to submit centre assessed grades now for the completion of year 12
- the use of predictions should continue with more weight given to predicted grades
- centres should be allocated grades by an awarding organisation with the centre responsible for allocating the allotted grades to their students

A small number of responses (less than five) commented on the duration of the framework. One school noted that the framework should look further ahead because those students starting two-year courses this September will also be facing a number of challenges and adapted assessments in year one of their course which will impact completion in year two. Two awarding organisations said that the Extended ERF should be retained for a reasonable length of time to ensure stability for awarding organisations, rather than anticipating a further iteration. A representative body said it would be important to be able to continue to mitigate against unknown, future impacts of coronavirus (COVID-19).

A number of other changes to the system were suggested:

- to reduce the cost of resits in recognition of the likely increase in number of people resitting assessments
- to develop a single awarding organisation offering a range of academic and technical qualifications and providing consistent training in assessment to teachers
- for Ofqual to set a target around engagement from the awarding organisations and to monitor against it while the framework is in place
- that awarding organisations should receive additional funding to support implementing the extended framework

Annex A: List of organisational respondents

When completing the consultation 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.

1st4sport	IBO
ABE	IMI
ABRSM	Innovate Awarding
ACCA	Lantra
ActiveIQ	MP Awards
AIM Qualifications and Assessment Group	NALP
AQA	NASUWT
Association of Colleges	NCFE
Association of Employment and Learning Providers	NCTJ Training Ltd
BHS Qualifications	NextGen Skills Academy
Cambridge Assessment International Education	NOCN
Chartered Institute of Legal Executives	Novus (LTE Group)
CIBTAC	OCR
CICM	Open Awards
City & Guilds	Pearson
Controlled Schools' Support Council	QNUK
Council for Dance Drama and Musical Theatre	RICS
CPCAB	RSL Awards
Education and Training Inspectorate	SFJ Awards
English Speaking Board (International) Ltd	Skills and Education Group Awards
Federation of Awarding Bodies	Swimming Teachers Association
HMC Academic Policy Committee	Training Qualifications UK
HOLEX	UKFT
IB Schools and Colleges Association	University and College Union
	VTCT
	WJEC



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