

Analysis of responses to our consultation on updating our rules and guidance for Project qualifications



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Executive summary

We consulted on revised rules and guidance for Project qualifications (designed to replace existing regulations) from 21 March 2017 to 18 April 2017. A copy of the consultation is available on our website.¹

There were 4 responses to the consultation, all from organisations.

In the main, respondents supported removing the Code of Practice and aligning our rules for Project qualifications with the rest of our regulatory framework. Views were more mixed on the best timing for implementation, and one respondent questioned whether it was really necessary to introduce such detailed rules for reviews and appeals, and whether rules for Project qualifications needed to replicate the rules for GCSEs, AS and A levels.

Respondents also raised some concerns about the detail of our proposals, including:

- the removal of grade descriptors;
- allowing students to request a review of centre-marked assessments; and
- changes to the description of how students choose a project at level 1 and 2.

¹ www.gov.uk/government/consultations/updating-our-rules-and-guidance-for-project-qualifications

About our consultation

Our consultation took place from 21 March 2017 to 18 April 2017 And it set out our proposal to replace existing regulations for project qualifications, with revised rules and guidance.

Who responded?

We received 4 responses to our consultation, all from organisations based in England or Wales.

Table 1: Breakdown of consultation responses

Personal / organisation response	Respondent type	Number
Organisation	Awarding organisation	4

Approach to analysis

We published the consultation on our website and respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us.

This was a consultation on the views of those who wished to participate and it cannot be considered as a representative sample of the general public or of any specific group.

Data presentation

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

One respondent chose not to answer the questions directly, but instead provided a general comment that they were content with the proposals.

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

During the analysis phase we reviewed every response to each question.

Consultation response outcomes

In this section, we report the respondent's views. We have structured this around the questions covered in the consultation and provide analysis of the data broken down by stakeholder.

A consultation is not the same as a survey and the responses only reflect the views of those who chose to respond. Typically these will be those with strong views and/or particular experience or interest in a topic. What follows is a fair reflection of the views expressed by respondents to the consultation.

Withdrawing the Code of Practice for Project

Question 1: To what extent do you agree or disagree that we should replace the Code for Project qualifications with new rules that cover only reviews, appeals, awarding and grading?

All 4 respondents either agreed or strongly agreed with this proposal, noting that it was a "sensible and long overdue piece of housekeeping", and would remove unnecessary complexity and duplication from our regulatory framework.

Respondents also commented that the current arrangements risk inhibiting innovation or operational best practice.

One respondent expressed concerns about the number and complexity of the new rules we were proposing to introduce

New rules for reviews and appeals

Question 2: To what extent do you agree or disagree that the requirements for reviews of marking, moderation and appeals in Project qualifications should reflect those for GCSEs, AS and A levels?

Responses to this question were mixed, with 2 respondents who agreed with our proposal, one who strongly disagreed, and one who neither agreed nor disagreed.

The two respondents who agreed both commented that it was sensible for requirements to be the same across Project, GCSEs, AS and A levels, as this would be clearer for both awarding bodies and schools/colleges.

The respondent who neither agreed nor disagreed commented that Project qualifications currently use an assessment model that is very different from GCSEs, AS and A levels.

The respondent who strongly disagreed with our proposals commented that it was unclear whether any review of marking for centre-marked assessments should take

place before or after moderation, and whether it should be arranged and conducted within schools/colleges. They also queried whether our definition of a 'Moderation Error' would impact on current moderation procedures.

Question 3: To what extent do you agree or disagree that the requirements for reviews of marking, moderation and appeals in the Project should be introduced for the summer 2017 exam series?

Responses to this question were mixed, with 2 respondents agreeing with our proposal, and 2 strongly disagreeing.

The 2 respondents who agreed both commented that it was sensible to harmonise the arrangements for Project qualifications with those for GCSEs, AS and A levels, and that changes should be implemented to the same timescales across all these qualifications to avoid confusion for students and schools/colleges.

The 2 respondents who strongly disagreed both commented that it would be unreasonable to implement changes for the 2017 exam series, as this would not allow sufficient time for them to implement the required changes. They also commented that making such a late change could create confusion for students and schools/colleges.

Question 4: To what extent do you agree or disagree that the transitional changes to reviews of marking, moderation and appeals should be introduced for Project according to the same timescales as for GCSEs, AS and A levels?

Three respondents agreed with this proposal. All 3 commented that this would be the most straightforward approach, and the least likely to lead to confusion for students, schools and colleges.

One respondent disagreed with this proposal, noting that it would be more difficult for them to implement these changes because they did not offer GCSEs, AS and A levels, and had not been involved in the process of developing the transitional arrangements.

New rules for awarding and grading

Question 5: To what extent do you agree or disagree with our proposed approach to awarding and grading in Project qualifications?

Three respondents either agreed or strongly agreed with our proposals, noting that it made sense to harmonise arrangements for awarding and grading in Project qualifications with those for GCSEs, AS and A levels.

However, one respondent strongly disagreed with this proposal. They expressed particular concerns about the removal of the current grade descriptors, noting that they were used for standardisation and awarding. They also commented that the grade descriptors provide an objective description of what a project at the key grade boundaries looks like, and ensure that awarders have a consistent reference to award against. They were particularly concerned about making any changes for summer 2017, as the grade descriptors had already been used for standardisation.

Updating our rules for Project qualifications

Question 6: Do you have any comments on the changes we are proposing to our rules for Project qualifications?

In response to this question:

- One respondent reiterated their concerns (set out in response to question 5) about the removal of grade descriptors. They also expressed concerns about aligning the requirements for choosing a topic at levels 1 and 2 with the requirements at level 3, noting that students' freedom to choose their own topic at level 3 was one of the key differences in demand across the different levels.
- One respondent noted that Project qualifications are assessed in a different way (and have a different purpose) from GCSEs, AS and A levels. As a result, they did not think Project qualifications needed to have the same rules as GCSEs, AS and A levels.
- One respondent commented that they agreed with removing rules that are no longer needed, and with aligning the remaining rules with the rest of our regulatory framework.
- One respondent made no comments.

Our proposed Conditions, requirements and guidance

Question 7: Do you have any comments on our proposed Conditions and requirements for Project qualifications?

One respondent commented that some of the language used in the proposed Conditions could be simplified, and the Conditions as a whole made more succinct and clear. This would ensure that the regulatory burden is minimised and Project qualifications are regulated in a proportionate way. They noted in particular that Conditions 4, 5, 6 and 12 all refer to existing General Conditions, and question whether they are really necessary in addition to those requirements.

One respondent commented on the link between our proposed Conditions and the commitment in our Corporate Plan to ‘Review how well standards in Project qualifications are set and take appropriate action if required’.

One respondent agreed with aligning our Conditions for Project with the equivalent rules for GCSE, AS and A level, but noted concerns about the potential impact on centres of allowing students to appeal against the results of centre-marked assessments.

One respondent commented specifically on our proposed content and assessment requirements, noting that:

- students would not normally produce a dissertation, and might produce an event (rather than a performance);
- requirements for students to “where appropriate, develop confidence in applying new technologies” were no longer relevant; and
- it might not always be appropriate for students to apply and develop all 3 of mathematics, English and ICT skills in a particular project.

Question 8: Do you have any comments on our proposed guidance for Project qualifications?

One respondent commented that, because there are significant similarities between the qualification-level conditions for GCSE, GCE and Project qualifications, it would be preferable to merge them into a single document.

Another respondent commented that the guidance was helpful and clearer than the Conditions, and could benefit from being expanded.

The remaining two respondents had no comments beyond those given in their answers to earlier questions.

Equality impact

Question 9: We have not identified any ways in which the proposed changes to rules and guidance for Project qualifications would impact (positively or negatively) on persons who share a protected characteristic. Are there any potential impacts we have not identified?

Question 10: Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a protected characteristic?

Question 11: Do you have any other comments on the impacts of the proposals on persons who share a protected characteristic?

All 4 respondents commented that they had not identified any potential impacts on persons who share a protected characteristic. One further commented that other stakeholders might be best placed to do this.

None of the respondents had any further comments on the impacts of our proposals on persons who share a protected characteristic.

Regulatory impact

Question 12: To what extent do you agree or disagree with our assessment of the regulatory impact of our proposals? Are there any regulatory impacts that we have not identified?

Responses to this question were mixed. Two respondents agreed with our assessment of the regulatory impact, one disagreed, and the fourth neither agreed nor disagreed.

Of the respondents who agreed with our assessment, one noted that the proposed changes would not unduly increase regulatory impact, and the other commented that the consultation acknowledged the potential impact of changes to reviews and appeals, and accepting that these can be argued to be proportionate.

The respondent who neither agreed nor disagreed noted concerns about the possible impact of allowing students to appeal against the results of centre-marked assessments, and the significant number of Ofqual regulatory documents.

The respondent who disagreed expressed concerns about both the number of proposed new Conditions, and the clarity of the language used within them.

Question 13: Are there any additional steps we could take to minimise the regulatory impact of our proposals?

One respondent commented that, given the similarities between a number of the qualification-level Conditions for GCSE, GCE and Project qualifications, it might be simpler to incorporate them all into a single document.

The remaining respondents all answered 'no' to this question.

Question 14: Are there any costs or benefits associated with our proposals which we have not identified?

One respondent commented that:

- the costs of changing documentation and communicating changes to schools and colleges had not been fully acknowledged; and
- the costs to schools and colleges of managing internal appeals is likely to increase.

The remaining respondents all commented that they had not identified any further costs or benefits.

Appendix A: list of organisational consultation respondents

We asked respondents to indicate the capacity in which they were responding as part of their response.

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

- AQA
- City & Guilds
- OCR
- WJEC

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