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Dear Responsible Officer

Centre Controls and Moderation of VTQ

Many awarding organisations delegate some parts of the development, delivery and award of their qualifications to centres. The arrangements awarding organisations must have with their centres are set out in our Conditions (C1 and C2 in particular). We have reviewed aspects of these arrangements across the regulated vocational and technical qualifications (VTQ) market over the past year (including through a FAB-facilitated workshop), and we have considered in particular some of the circumstances in which awarding organisations delegate the setting and marking of assessments to centres.

We are writing to you to summarise what we have learned to date, and the actions we will be taking over the next 12 months. You should be aware that:

- **Centre Controls.** We will shortly begin auditing awarding organisations' practice on centre controls; and
- **Moderation of VTQs.** We are aware that there are specific issues around moderation of VTQs that are marked by centres. We are keen to receive awarding organisations' input to address these issues at our conference on 27 February and afterwards through a formal Call for Evidence.

Centre Controls

We have evidence that although the arrangements that many awarding organisations have with their centres are robust, this is not universally the case, and there is intelligence to indicate that the level of control exercised by awarding organisations has reduced in recent years. Lack of sufficiently robust centre controls plays a role in a number of cases of non-compliance we and other regulators are currently handling. A failure to comply with the Conditions can call into question the integrity of assessments, undermine the maintenance of standards and damage public confidence in the qualifications Ofqual regulates.

As you know, irrespective of the responsibilities delegated to centres, you retain accountability for your qualifications. You need to ensure that your centre controls are robust and effective, otherwise you are at risk of non-compliance. It is your responsibility to put in place the right controls, and to appropriately manage any risks, to ensure you are awarding valid, reliable qualifications. We are asking all awarding organisations to review their arrangements with centres to ensure

compliance with our rules as a matter of priority. We will be undertaking a series of audits over the coming year, that will focus on a range of centre controls. We will begin in February, by looking at centre approvals, before looking more widely at other aspects. If you are selected for audit, we will write to you separately nearer the time that audit is scheduled.

Moderation

We have also given specific, additional thought to the moderation of VTQ assessments which are marked on behalf of the awarding organisation by centres (covered by Condition H2). This includes continuous assessment, practical assessment and the development of a portfolio of evidence under the supervision of the centre.

Awarding organisations and centres have told us that in some circumstances moderation of these centre-marked assessments takes place only after the awarding organisation has issued results and certificates to learners. As an extreme example, we understand that some awarding organisations might issue results and certificates on the basis of a statement from an approved centre that a cohort of learners has completed assessments to the required standard, without first conducting any moderation of the centre's marking of those assessments. In effect, once the awarding organisation has approved the centre, it relies entirely on the centre's judgments as to the learners' level of attainment. This is an example of what is sometimes referred to as 'direct claims status'.

We recognise that such an approach has immediate benefits for centres and learners, because it is efficient and allows results and certificates to be issued quickly. However, it clearly carries a risk that results and certificates for the same qualification, issued to learners assessed at different centres, will not indicate a consistent level of attainment. It is for this reason we set Conditions to ensure that before issuing results which rely on evidence assessed by centres, an awarding organisation must undertake effective moderation to make sure the assessment is fit for purpose and the assessment criteria are being applied reliably and consistently whenever and wherever the assessment is taken.

An awarding organisation which only ever reviews a centre's assessment judgments after issuing results and certificates – irrespective of the strength of their centre approvals and other risk-based controls – will not comply with the Conditions because it is not possible in those circumstances to change the centre's marking or confirm that performance and assessment criteria are being appropriately and consistently applied before issuing the results or certificates.

We think these Conditions are necessary because to secure standards we need to make sure awarding organisations take responsibility for the assessment judgments which lead to the issue of results and certificates. We recognise the importance of assessment by centres, particularly for VTQs and sought to achieve this balance in

the Conditions by requiring effective moderation of the centre's assessment decisions, rather than requiring the awarding organisation to take all of those decisions itself. The awarding organisation needs to do enough moderation to assure itself, at the point of issue, that the results and certificates it awards for a qualification mean the same thing across all of its centres.

However, we understand that there is some anxiety in the sector both about whether current common practice complies with our rules but also about whether we might have set the bar appropriately. We want to address both of these possibilities. If we have created unnecessary rules then we will need to change them (and we want input from awarding organisations and the wider sector to ensure the requirements are appropriate and achievable). But if the rules are appropriate, we want to make sure awarding organisations are complying.

We would therefore like you to tell us if there are specific challenges with achieving compliance with our rules – particularly undertaking moderation before issuing results and certificates. We also want to know if there are alternative ways of securing that before you issue results and certificates you have confidence that the same qualification awarded in different centres means the same thing. We will be running two workshops on centre controls and moderation at our awarding organisation conference on 27 February, and it would be helpful if you could reflect on these questions and come prepared to share your reflections with us then. If you have not already registered to attend and wish to come along, please register at <https://www.eventbrite.co.uk/e/ofqual-conference-2018-tickets-37529143679>. You are also welcome to submit your views through Contact Ofqual, ideally by the end of February.

We plan to use feedback from the workshops – as well as any relevant evidence gathered through the audits mentioned above – to shape a formal Call for Evidence from awarding organisations and the sector more widely later in the spring.

If we decide as a result of this work to change the regulatory framework on moderation, then we will of course consult on those proposals, and we will be clear about what elements of the Conditions are subject to change. We will provide a period of time for awarding organisations to achieve compliance before moving into any enforcement action.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Beach'.

Phil Beach

Executive Director for Vocational and Technical Qualifications