ANALYSIS OF CONSULTATION RESPONSES

Analysis - Regulating Essential Digital Skills Qualifications

Consultation on Ofqual's approach to regulating Essential Digital Skills Qualifications

ofqual

Contents

Introduction

Our consultation on regulating Basic Digital Skills Qualifications took place between 5 November 2018 and 13 January 2019. Respondents could complete the questions online or download and submit a response. A copy of the consultation is available at https://www.gov.uk/government/consultations/regulating-basic-digital-skills-qualifications

This consultation was about the policy approach we proposed to take towards the regulation of new digital qualifications, and the Conditions, requirements and Guidance we proposed to put in place. We set out the wording of our proposed conditions in the following areas:

- compliance with the National Standards
- disapplication of certain General Conditions of Recognition
- assessment strategies
- levels and titling
- technical evaluation
- Total Qualification Time (TQT)
- assessment
- standard setting
- qualification structure.

There were 19 responses to the consultation.

In addition, we held 2 consultation events with awarding organisations in Coventry in December. There were 18 attendees across these events. For those unable to attend, we produced a podcast, talking through our proposals.

Background

As part of their plans to improve adult digital skills, the Department for Education (DfE) is proposing to introduce a national entitlement to basic digital skills training from 2020.

In October 2018, DfE consulted on the new national Basic Digital standards to be used by awarding organisations and training providers to inform the development of basic digital skills training and associated qualifications. The standards were developed at two levels, Beginner (Entry level) and Essential (Level 1).

Following their consultation, DfE has changed the title of the national standards. They are now called the National Standards for Essential Digital Skills.

This means that the new digital qualifications, which Ofqual will regulate, will now be called Essential Digital Skills qualifications (EDSQs), not Basic Digital Skills qualifications (BDSQs).

DfE have also removed the descriptors Beginner and Essential from the national standards which will now just be titled Entry level and Level 1.

Who responded?

We received 19 responses to our consultation.

Table 1: Breakdown on consultation responses

Personal or organisation response	Respondent type	Number
Organisation	Awarding Organisation	9
	Local Authority	2
	School or College	2
	Other representative or interest group	5
Personal	Learning Manager, responding in a personal capacity	1

All respondents were based in England. One indicated they were additionally based in the rest of the United Kingdom.

In addition to those that responded to the consultation, there were 18 attendees at our consultation events. The majority of these attendees also responded in writing to the consultation, and as such we have not reported on the consultation events here.

Approach to analysis

The consultation included 39 questions and was published on our website. Respondents could respond using an online form, by email or by posting their responses to us.

This was a consultation on the views of those who wished to participate and, while we tried to ensure that as many respondents as possible had the opportunity to reply, it cannot be considered as representative of any group.

We present the responses to the consultation questions in the order in which they were asked. For each of the questions, we presented our proposals and then asked respondents to indicate agreement and provide comment. Respondents did not have to answer all of the questions.

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 relates, rather than the question against which it was provided.

Analysis – consultation responses

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

Question 1: Do you have any comments on our proposed approach to regulating BDSQs?

Fifteen respondents provided a comment on our proposed approach to regulating BDSQ. The majority of these respondents expressed broad agreement with our proposed approach, noting that regulating against the General Conditions of Recognition as far as possible was a sensible and appropriate approach.

Respondents also noted the balance between flexibility and comparability. Some felt that whilst freedom to develop qualifications was welcome, there was a risk that employers would not have a common understanding of the qualification. Others felt that the proposed conditions would unnecessarily restrict awarding organisations' ability to innovate, and were unduly restrictive given the varied learners likely to take the qualifications.

One awarding organisation requested clarification on how to extend their scope of recognition to include BDSQs, and another suggested the creation of an oversight board (as with Functional Skills qualifications) to support the planning and implementation of BDSQs.

We also received comments regarding the titling of the qualifications and the use of the qualifications as a route to employment, which have been captured under the relevant questions in this document.

Question 2: Do you have any comments on the purpose statement for BDSQs, which we propose to set out in our Qualification Level Conditions?

Eleven respondents provided a comment on our proposed purpose statement for BDSQs. Of these, the majority welcomed a clear purpose, noting that it aids understanding. Respondents also commented on specific parts of the drafting, including:

- there being no mention of 'underpinning knowledge' in the proposed purpose statement
- using plain English, for the benefit of learners
- the purpose overstates the use of these qualifications in employment ('required for […] the significant majority of jobs') as these qualifications are unlikely to be used in this way
- the purpose is too broad and doesn't recognise the differing needs of learners

One awarding organisation requested that a clear definition of the term 'digital' and examples of likely employment routes be included in the purpose.

Question 3: To what extent do you agree or disagree with our approach to securing compliance with the national standards?

Q3. To what extent do you agree or disagree with our approach to securing compliance with the national standards?
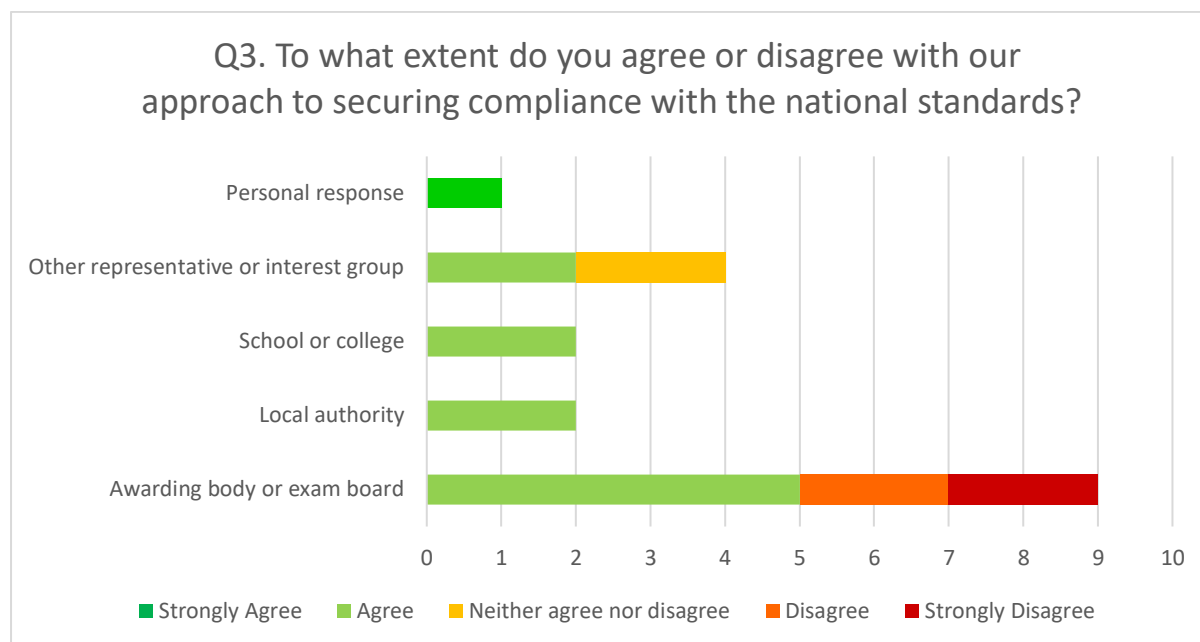
The majority of respondents either agreed or strongly agreed with our approach. Their comments note the importance of qualifications complying with the new national standards. They also note that the standards, and therefore the qualifications, will need to be reviewed and updated regularly, to reflect changes in technology. They also note that consideration needs to be given to the time and budget required to update qualifications – awarding organisations would welcome more guidance regarding procedure and timelines for implementing such changes.

Two respondents noted that not all skills statements would be relevant for all learners, for example those wishing to gain digital skills for life and not necessarily for employment. One respondent thought Ofqual should not require coverage of all the skills statements but should allow awarding organisations to specify which skills should be covered.

Four respondents either disagreed or strongly disagreed with our approach. Two of these respondents noted the same issues by respondents who agreed, which we have recorded above. One also noted that by not specifying weightings for the coverage of skills, there may be variations in the level of difficulty across different organisations' assessments.

Two respondents objected to the use of 'beginner' and 'essential' in the standards, and are therefore beyond the scope of this consultation. Other comments included:

- approach to compliance is not sufficiently flexible
- given the specific nature of the amplification accompanying the standards, assessment will necessarily have to address the amplification anyway

One of the two respondents who neither agreed nor disagreed provided a comment, suggesting that if Ofqual is to allow awarding organisations to justify their approach to the national standards, an audit function would be necessary to ensure they are doing as intended.

Question 4: Do you think we should permit or prohibit unitisation? Please give your views on the benefits and disadvantages of unitisation.

In response to this question, not all respondents clearly indicated whether we should permit or prohibit unitisation. However, taking comments into account, 13 respondents were either in favour of unitisation, or felt that we should not explicitly prescribe a particular approach to assessment. Comments include:

- unitisation works in other adult provision
- unitisation supports learners to progress to full qualifications
- unitisation offers flexibility to meet the needs of varied learners and employers
- awarding organisations should be allowed to choose the most suitable structure for their qualifications
- a lack of unitisation might be a barrier to learners, including those with protected characteristics and offender learners
- the new national standards lend themselves to an unitised structure
- the letter from the Minister for Apprenticeships and Skills expressed a preference for unitisation

Two respondents thought we should prohibit unitisation. Their comments included:

- as the content is highly interrelated, identifying individual units is difficult
- a holistic approach is more appropriate, given the interrelated skills areas
- unitisation may require multiple, small assessments, which could be disadvantageous and a barrier for learners
- multiple assessments might lead to the over-assessment of some skills
- as DfE has proposed a minimum of 45 GLH, units may be extremely small
- unitisation will create administrative and assessment burden for centres, and costs for awarding organisations
- unitisation could be confusing for users of the qualification, as it may be unclear what the value of a single unit is, versus a full qualification

Two respondents provided ambiguous responses - both noted that they believe unitisation to be disadvantageous. One expressed concern about prohibiting unitisation at this stage, noting the potential benefits for learners with protected characteristics. The other respondent felt that the subject content lends itself to a unitised structure.

Several respondents questioned the funding arrangements for these qualifications, and whether funding would be available at unit level. Funding is the concern of the ESFA, and beyond the scope of this consultation.

Two organisations did not respond to this question.

Question 5: What are the likely impacts (positive and negative) of us permitting or prohibiting unitisation on learners who share a particular protected characteristic?

Seventeen respondents provided a comment for this question. They list the following impacts of unitisation on learners sharing a protected characteristic:

- it would widen participation generally
- it would provide flexibility to learners who cannot undertake all the learning at one time (perhaps due to medical issues)
- it would make resits less burdensome
- it would allow those learners who may find a whole qualification overwhelming to focus on one unit at a time
- adult learners may have not engaged with learning for a number of years, and would benefit from achievement in 'small steps'
- it would allow more time for the absorption and application of knowledge and skills.
- offerings to learners could be tailored, allowing them to develop only the skills/knowledge necessary
- the funding arrangements for adult learning may not support the development of a unitised curriculum

One respondent noted that unitisation could allow awarding organisations to develop 'specific self-learning modules' to support learners with protected characteristics.

One organisation noted several accessibility issues with the standards themselves, which is beyond the scope of this consultation. They do, however, suggest that Ofqual should:

- allow learners with disabilities to learn and be assessed in their usual way of working (including using specialist software and human assistants)
- consider how exemptions could be granted to make the qualification more accessible

One organisation noted that the negative impacts of a unitised approach have been sufficiently laid out in the consultation document. Two respondents noted that unitisation could break apart the assessment of related skills, or increase the number of assessments, both of which are detrimental to the learner. One organisation felt that any negative impacts could be overcome through careful and considered qualification design.

Several organisations noted the financial benefits of unitisation however, as this was not linked to provision for learners with protected characteristics, it was considered beyond the scope of the question and has been recorded elsewhere in this consultation.

Question 6: To what extent do you agree or disagree that we should <u>not</u> introduce requirements regarding assessment times for BDSQs?

Q6. To what extent do you agree or disagree that we should not introduce requirements regarding assessment times for BDSQs?
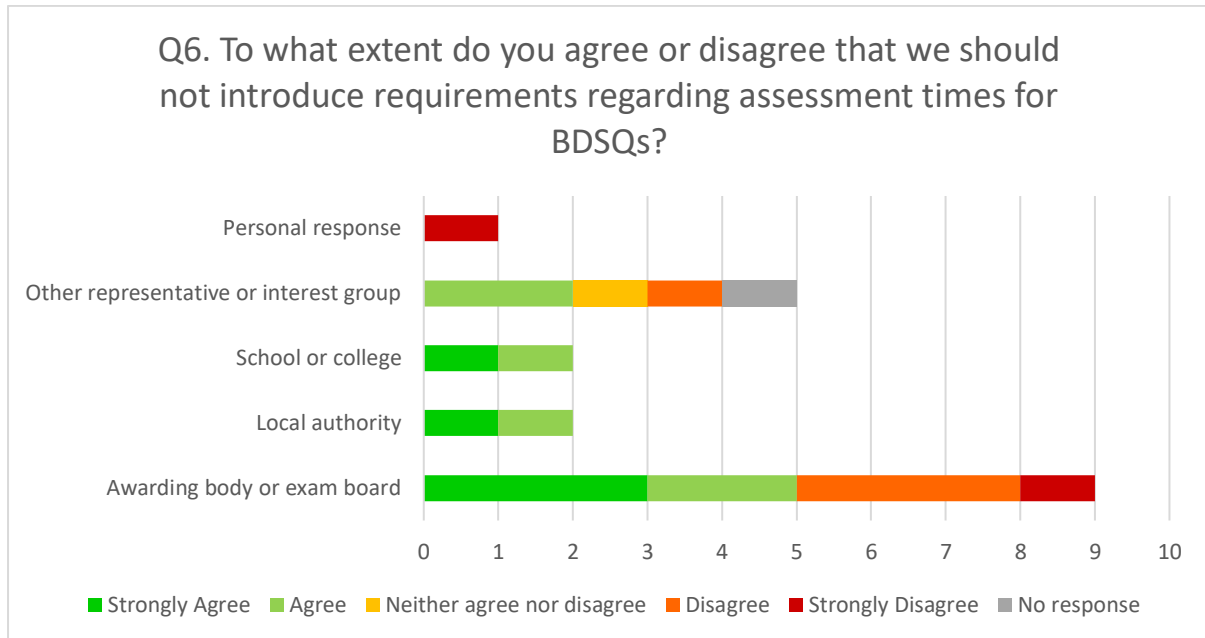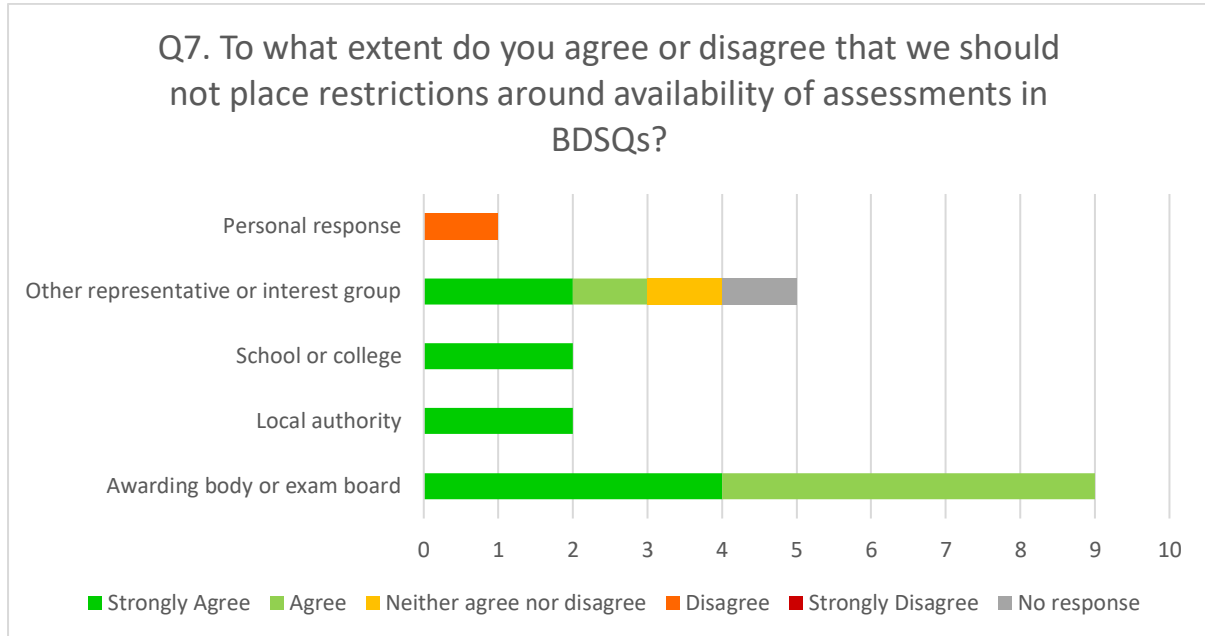

Eleven respondents either agreed or strongly agreed with our proposal to not introduce assessment time requirements for BDSQs. Comments suggested that while there are benefits to comparability, common assessment times are not required to achieve sufficiently comparable qualifications. The flexibility of our proposal will allow awarding organisations to innovate and respond effectively to the diverse needs of this varied group of learners.

Six respondents either disagreed or strongly disagreed with our proposal. These respondents indicated that set assessment times were necessary to ensure the qualifications were sufficiently comparable across awarding organisations. One respondent noted that some parameters would be helpful, as there 'may be a perceived market pressure to allow "extra time"'. Another respondent felt a lack of required assessment times might lead to awarding organisations competing on the basis of who had the shortest assessment – this respondent also felt that there were no disadvantages to introducing requirements for assessment times.

One organisation who disagreed with our proposal provided a comment which appeared to support our proposal.

The respondent who neither agreed not disagreed reflected upon the need to ensure that awarding organisations adhere to the approach set out in their assessment strategies.

Question 7: To what extent do you agree or disagree that we should <u>not</u> place restrictions around availability of assessments in BDSQs?

Q7. To what extent do you agree or disagree that we should not place restrictions around availability of assessments in BDSQs?


The overwhelming majority of respondents either agreed or strongly agreed with our proposal to not restrict assessment availability in BDSQs. Comments indicate that this flexibility was welcomed by respondents, in order to meet the needs of users of these qualifications. Other comments included:

- requests for more guidance around learners taking assessments multiple times
- concerns that the proposals suggest an examination approach to assessment, rather than the observation of skills being demonstrated in context

The comment of the respondent who disagreed with our proposal suggests that they agree with our proposal.

The respondent that neither agreed nor disagreed did not provide a comment.

Question 8: To what extent do you agree or disagree that we should <u>not</u> set requirements around the number of assessments within individual BDSQs?

Q8. To what extent do you agree or disagree that we should not set requirements around the number of assessments within individual BDSQs?
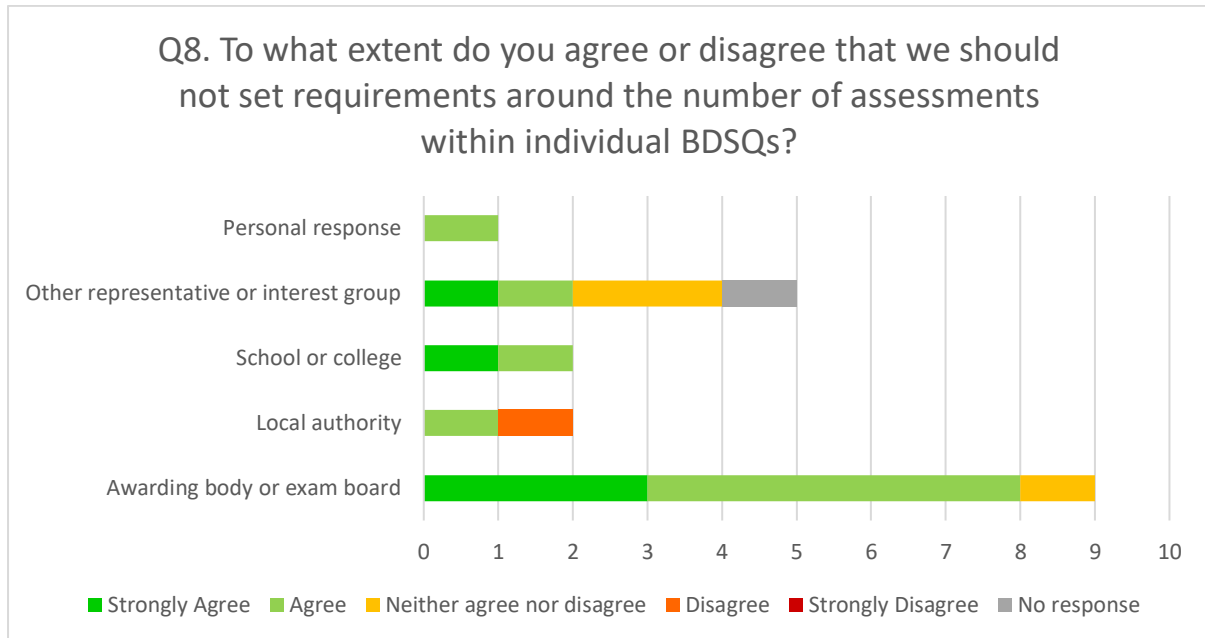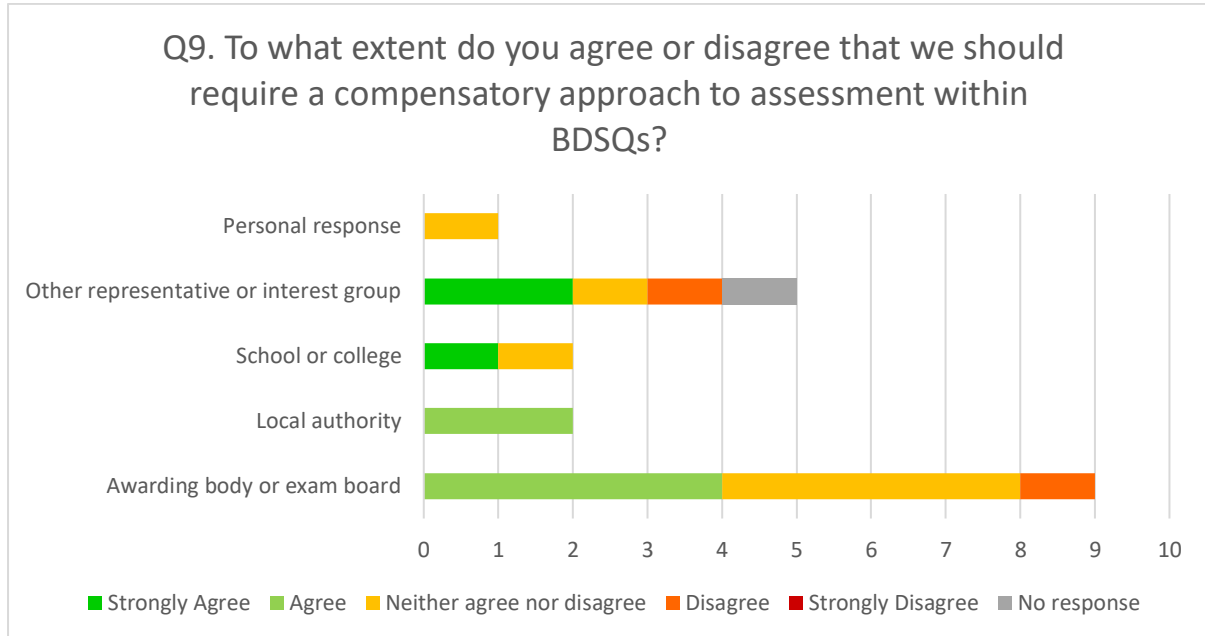
The majority of respondents either agreed or strongly agreed with our proposal to not specify the number of assessments in BDSQs. Again, it was felt that this flexibility would best meet the needs of users of these qualifications. Several respondents noted the need for awarding organisations to explain their approach in an assessment strategy.

The respondent that disagreed thought that we should specify a maximum of 3 assessments, as they were concerned that too many assessments would restrict teaching and learning time and could demotivate learners.

Three respondents neither agreed nor disagreed. Of the 2 that provided a comment, one noted the need to confirm that the approach outlined in an assessment strategy was being adhered to. The other respondent welcomed the flexibility of our proposal but felt that providing a range for the number of assessments would support comparability between awarding organisations.

Question 9: To what extent do you agree or disagree that we should require a compensatory approach to assessment within BDSQs?

Q9. To what extent do you agree or disagree that we should require a compensatory approach to assessment within BDSQs?
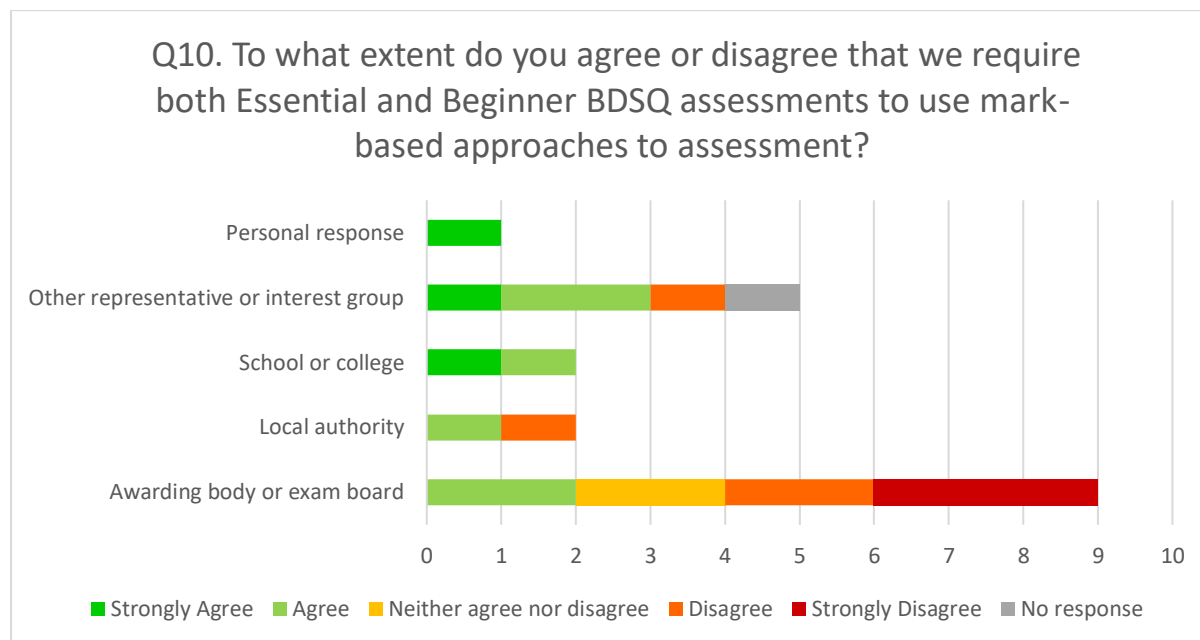
Nine respondents either agreed or strongly agreed with our proposal to require compensation in BDSQ assessments, as this would balance learners' performance across the skills areas. One awarding organisation noted that a compensatory approach does not necessitate an exam.

Two respondents disagreed with our proposals. One argued that if the qualification's grading is pass/fail, then it cannot be compensatory. The other respondent offered comments in support of a criteria approach to assessment.

Seven respondents neither agreed nor disagreed, 3 of which (all awarding organisations) provided comment, including:

- compensation would be appropriate within, but not across assessments
- there is limited scope for compensation – they would not wish to award a pass to someone who has excelled in four skills, but shown no awareness in one (for example, being safe online)
- the parameters of compensation should be clearly set and regulated, and further clarification should be provided

Question 10: To what extent do you agree or disagree that we require both Essential and Beginner BDSQ assessments to use mark-based approached to assessment?

Q10. To what extent do you agree or disagree that we require both Essential and Beginner BDSQ assessments to use mark-based approaches to assessment?

Nine respondents either agreed or strongly agreed with our proposal to require mark-based approaches to assessment. One awarding organisation commented that this will more readily support a compensatory assessment model. One representative/interest group noted that mark-based performance should be mixed with appropriate descriptors (e.g. Likert scales) which should then inform the moderation of marking.
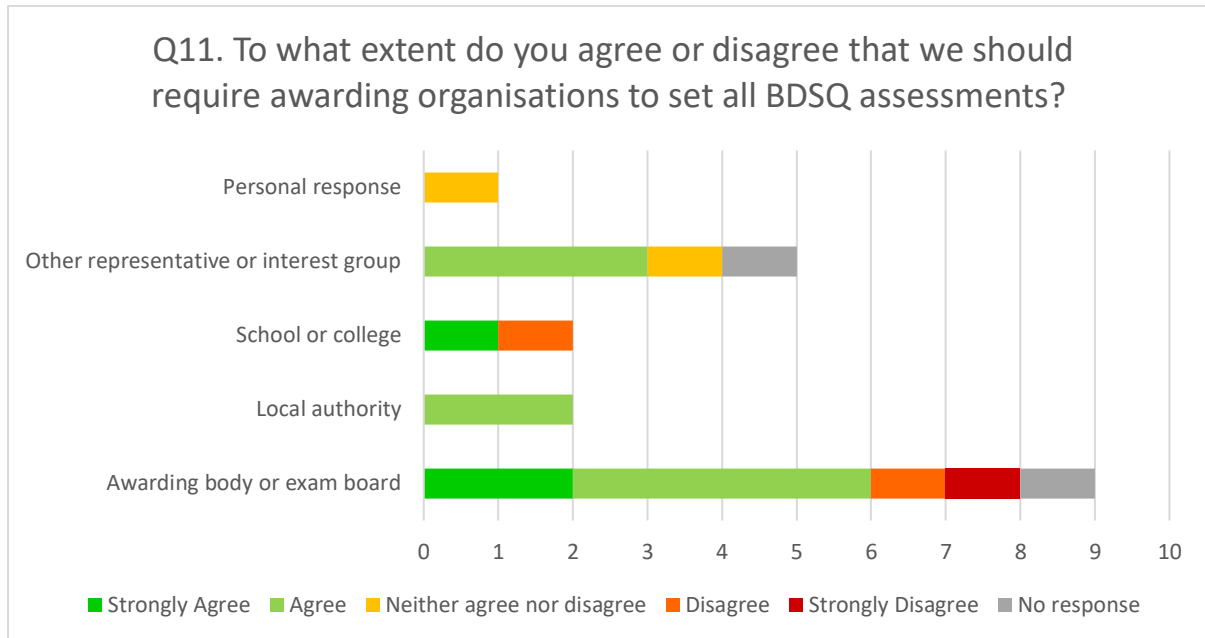
Seven respondents either disagreed or strongly disagreed with our proposal. Their comments include:

- marking can make standardisation more difficult
- marking may not be appropriate for practical assessments
- the main reason to have a mark-based approach is to differentiate performance, and so is not appropriate for a pass/fail qualification
- the qualifications don't warrant the need for a complex marking approach
- awarding organisations should have the flexibility to combine mark-based approaches and judgements against criteria, as appropriate to the task/assessment

One respondent who disagreed, agreed that if compensation is required, a mark-based approach would be appropriate. However, the respondent advocated the use of practical assessment, and so argued that they would not use a mark scheme for specific answers, but rather ensure skills statements are met through a portfolio of evidence.

Two respondents neither agreed nor disagreed, with one providing a comment which noted advantages for a number of assessment approaches, but concluded that there should be a single approach adopted across all awarding organisations. They also note that they would be 'content' to adopt a mark-based approach.

Question 11: To what extent do you agree or disagree that we should require awarding organisations to set all BDSQ assessments?

Q11. To what extent do you agree or disagree that we should require awarding organisations to set all BDSQ assessments?
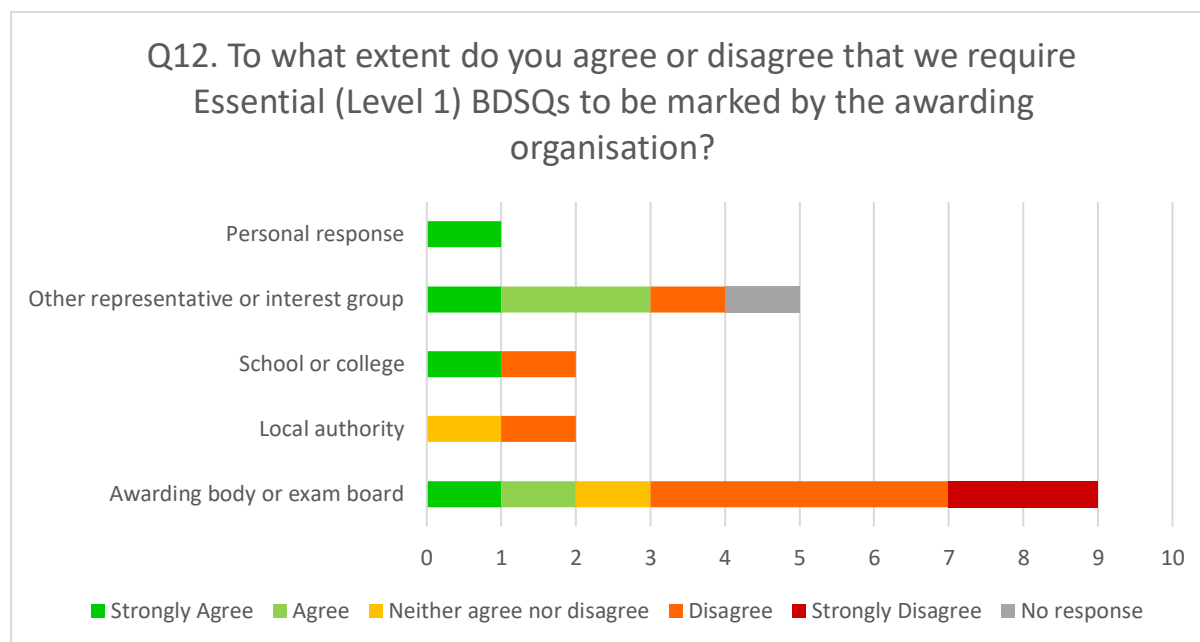
The majority of respondents either agreed or strongly agreed with our proposal to require awarding organisations to set all BDSQ assessments. Their comments suggest that this approach will ensure the assessments are of an appropriate standard, meet the requirements, and the standard is maintained across centres and over time.

Three respondents either disagreed or strongly disagreed. Their comments included:

- the provider should design and set the assessments where appropriate
- awarding organisation set assessments should not be the only means of assessment (this response suggests that the substantive part of the assessment should be against performance criteria, rather than an AO set test)

The respondents who neither agreed nor disagreed did not provide a comment.

Question 12: To what extent do you agree or disagree that we require Essential (Level 1) BDSQs to be marked by the awarding organisation?

Seven respondents either agreed or strongly agreed with our proposal to require awarding organisations to mark Essential (Level 1) BDSQs. Their comments suggest this would increase validity and confidence in the qualifications. Two respondents noted that the approach is appropriate given their use and the risk associated with that, for example they may be used as entry to employment.

Nine respondents disagreed or strongly disagreed with our proposal. Their comments highlighted the burden this might create for awarding organisations, in terms of both cost and resource, with some respondents suggesting a moderation model might be more appropriate.

The other substantive point raised was that centre-based, practical assessment (with appropriate oversight) would be the most appropriate way to assess these skills. Some respondents noted that the skills themselves could only be 'meaningfully' assessed in a real-time activity, which is observed and marked in the learning environment.

One awarding organisation noted that the assessments need not necessarily be a set exam, but rather an external examiner could be sent to a centre to conduct the assessments. They then note that this would not be manageable on scale, due to the resource burden and associated costs.

One respondent noted a potential negative impact on learners – the target audience for these qualifications may be lacking confidence or have learning styles that do not lend themselves to exam-based approaches.

Two respondents neither agreed nor disagreed with our proposal. One respondent suggests 'qualified assessors' should conduct the marking, which is then verified externally by the awarding organisation. The other notes that they would not wish to discount internal assessment at this stage, providing appropriate awarding organisational controls are in place. Their response highlights the diverse range of skills within the standards, noting that a range of assessment approaches may be appropriate.

Question 13: To what extent do you agree or disagree that we allow Beginner (Entry level) skill level assessments to be centre marked?
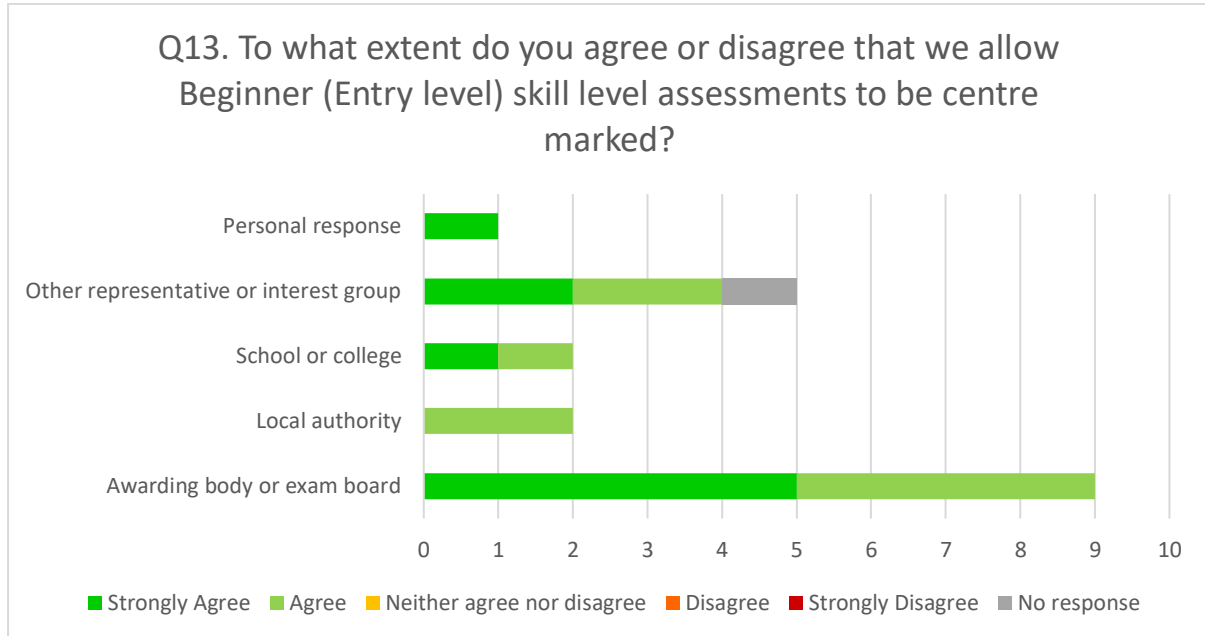
All respondents either agreed or strongly agreed with our proposal to allow centre marking for Beginner (Entry level) BDSQs. Comments suggested the approach is appropriate, considering the low risk associated with the Beginner qualification and the burden on awarding organisations. Some respondents noted that an awarding organisation's assessment strategy should explain how the quality of centre marking should be maintained. One respondent explained that this proposal would allow greater flexibility, and therefore better meet the needs of the qualification's users.

Question 14: To what extent do you agree or disagree that we should allow, but not require, assessments for Beginners BDSQs to be contextualised by centres?
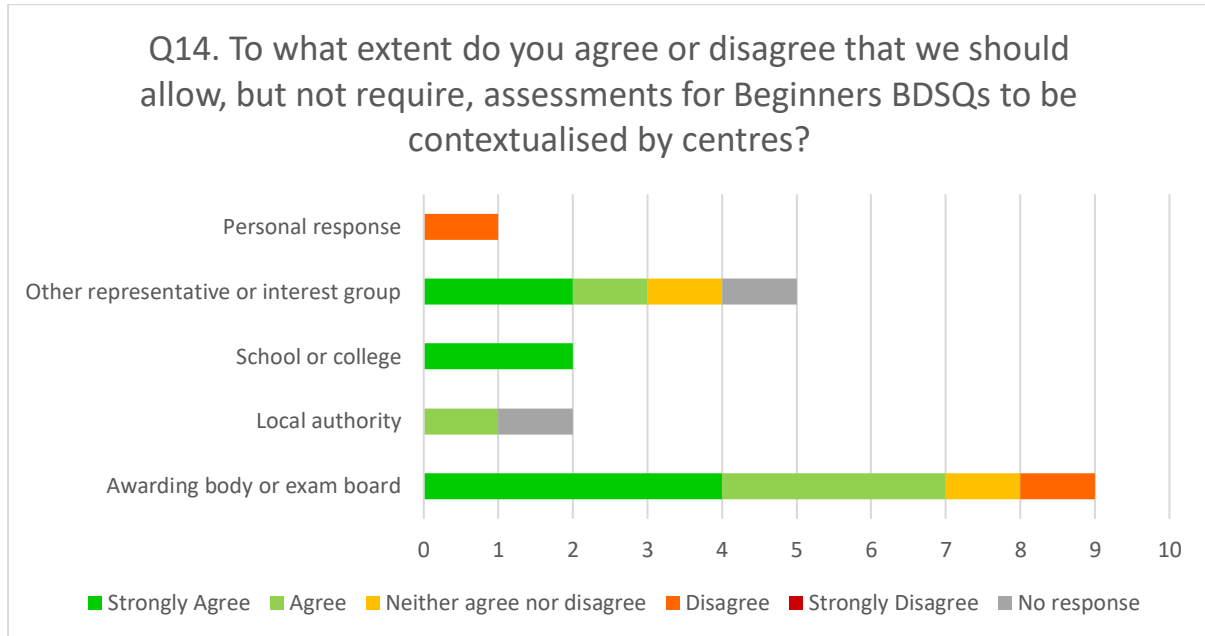
The majority of respondents either agreed or strongly agreed with our proposal to allow centres to contextualise Beginner BDSQs. Comments indicate this will make the learning relevant to users of the qualifications, including offender learners and where centres work with employers to up-skill staff. Respondents also note that contextualisation will only be permitted within the guidelines issued by the awarding organisation.

Two respondents disagreed, one of which provided a comment suggesting that because the skills in the standards are generic, there was no need to contextualise them for learners. Doing so may introduce the risk of inconsistency across assessments, and 'teach[ing] to the test'.

Two respondents neither agreed nor disagreed with our proposal, both of whom noted the need for additional guidance to centres extent of and ways in which assessments could be contextualised.

Question 15: What are the costs, saving or other benefits associated with our proposals? Please provide estimated figures where possible.

At this point in the consultation, we asked for views about the costs, savings and impacts of our proposals. We have recorded the responses to this question separately in the summary at the end of this document.

Question 16: Is there any additional information we should consider when evaluating the impact of our proposals?

At this point in the consultation, we asked for views about the costs, savings and impacts of our proposals. We have recorded the responses to this question separately in the summary at the end of this document.

Question 17: To what extent do you agree or disagree that we should require a single grading approach across BDSQs?

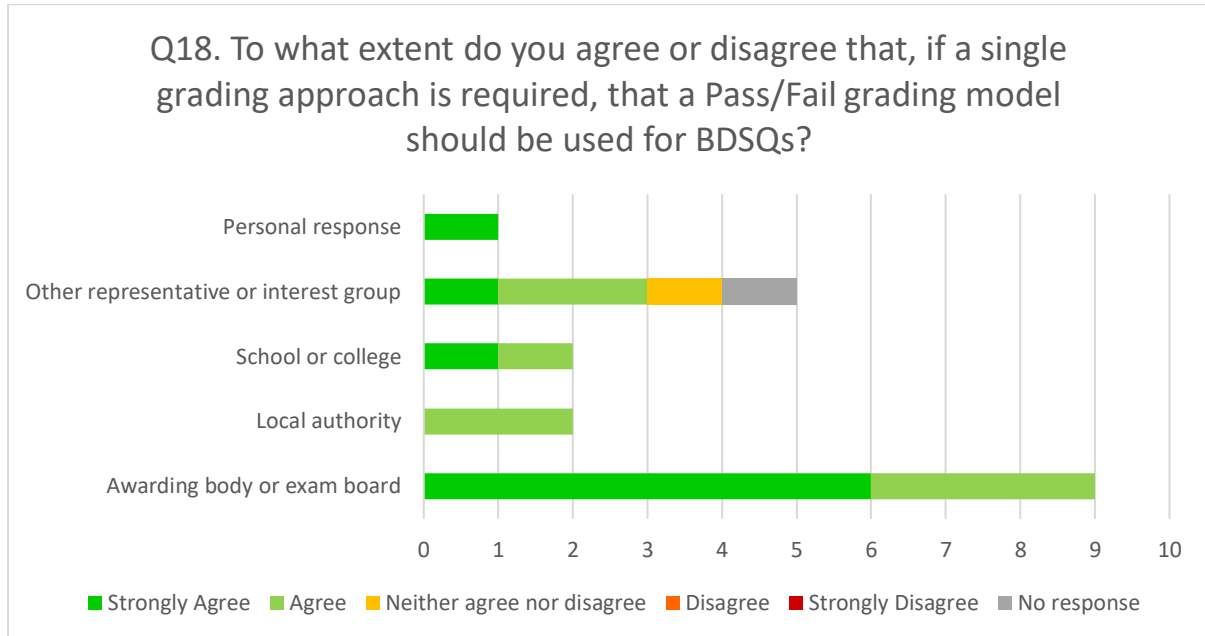Q17. To what extent do you agree or disagree that we should require a single grading approach across BDSQs?
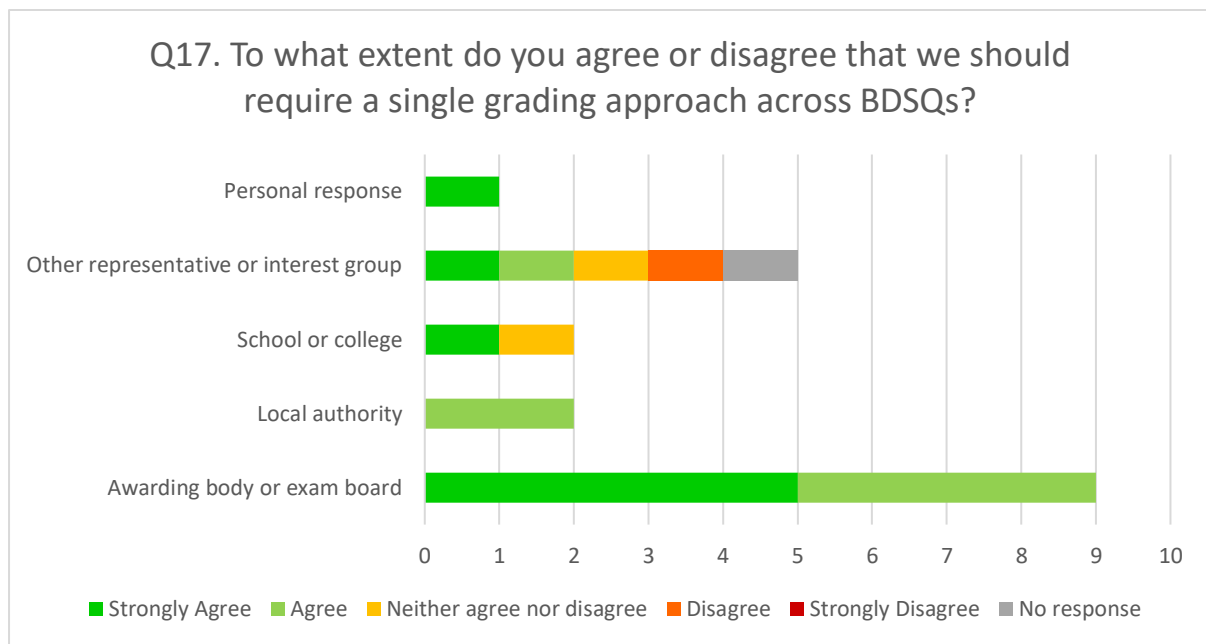
The majority of respondents either agreed or strongly agreed with our proposal to require a single grading approach across BDSQs. Comments suggest this approach will ensure users understand the outcomes, regardless of which awarding organisation awarded the qualification. One organisation also noted that, given the nature of the skills being assessed, developing a grading scale would be technically challenging.

The respondent who disagreed with our proposal suggested that for some learners, this would be their first opportunity to work towards a higher grade, such as a 'merit' or 'distinction'. They noted that by having a scale, differentiation within the classroom might be encouraged, as well as there being differentiation in performance.

Two respondents neither agreed nor disagreed with our proposal, only one of whom provided a comment. This comment was not relevant to the question asked, and so has not been recorded here.

Question 18: To what extent do you agree or disagree that, if a single grading approach is required, that a Pass/Fail grading model should be used for BDSQs?

The majority of respondents agreed or strongly agreed with our proposal. Their comments, where they were provided, echoed those given for Question 17, and so have not been duplicated here.

The respondent who neither agreed nor disagreed with our proposal did not provide a comment.

Question 19: To what extent do you agree or disagree that we should require the Beginner (Entry level) BDSQs to be awarded at Entry level 3?

Q19. To what extent do you agree or disagree that we should require the Beginner (Entry level) BDSQs to be awarded at Entry level 3?
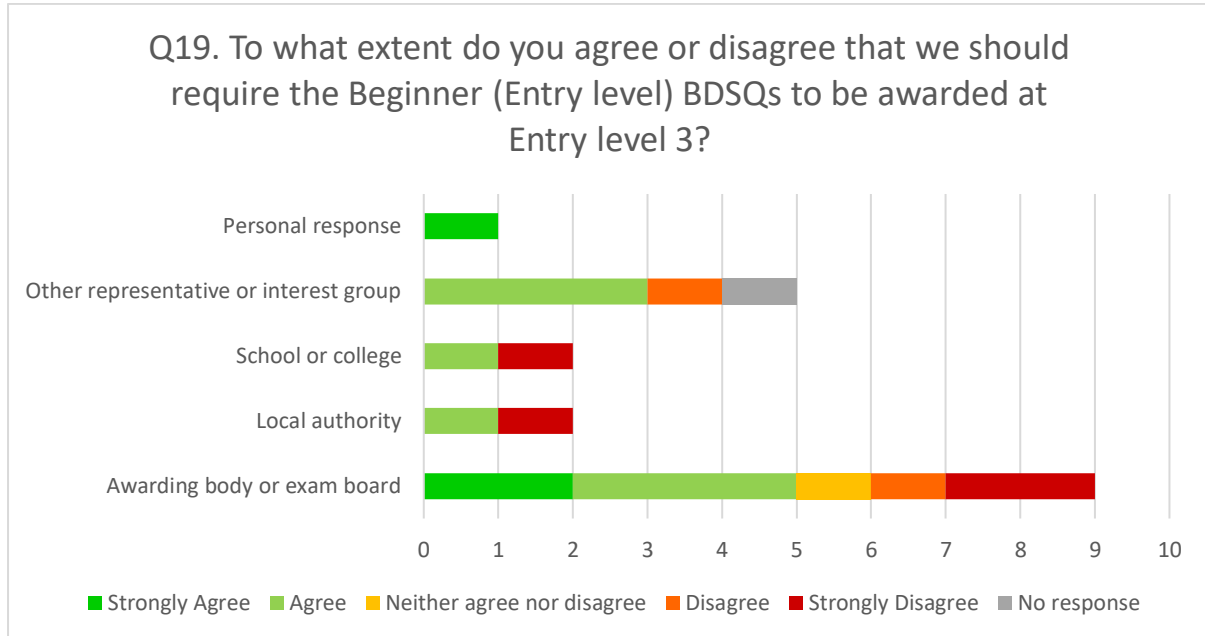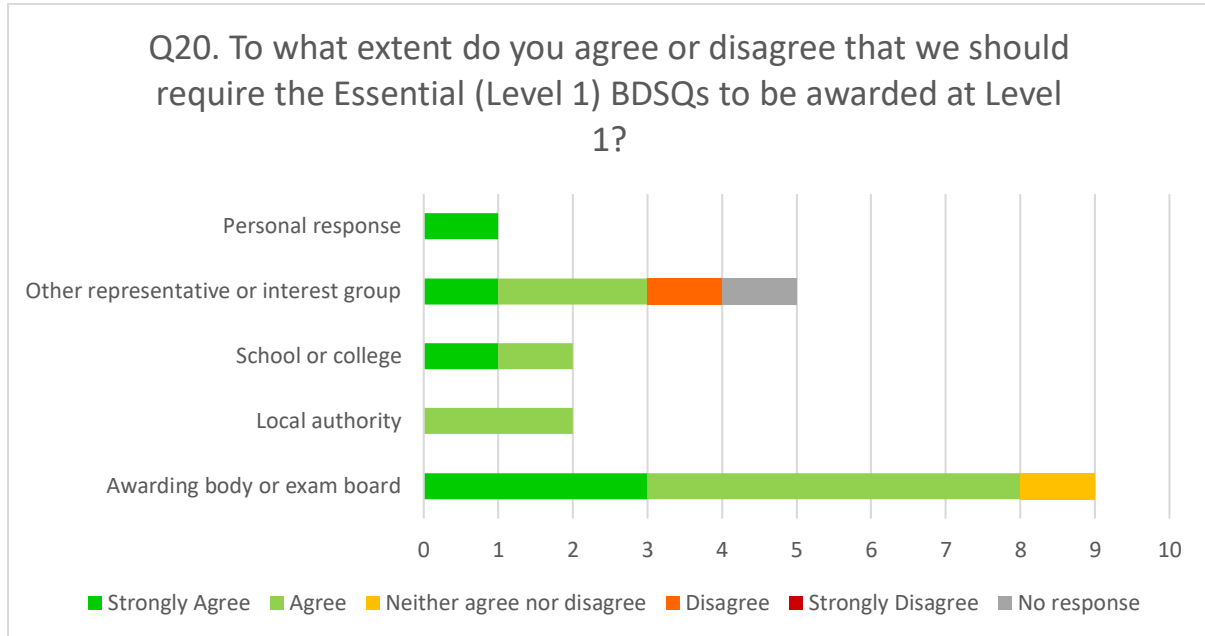

Eleven respondents either agreed or strongly agreed with our proposal to award the Beginner level BDSQ at Entry level 3. The comments indicate that while there was agreement, respondents noted that learners with little to no basic digital skills would have a 'longer distance to travel in the learning required to achieve Entry level 3.' Several respondents noted that to award separately at each of Entry level 1, 2 and 3 does not align with the standards. One organisation noted that the teaching and learning of Beginner skills is likely to take place holistically. The other substantive point made by respondents was in relation to titling conventions and has been recorded elsewhere in this analysis.

Six respondents either disagreed or strongly disagreed with our proposal. As above, they noted that some learners may disengage if the qualification is not awarded at lower levels (i.e. Entry level 1 and Entry level 2). One respondent made note of the literacy levels required for an Entry level 3 qualification, and suggested that someone undertaking a BDSQ may not be sufficiently literate. Some comments were specifically about how the subject content has been devised, and so have not been recorded here.

The respondent who neither agreed nor disagreed did not provide a comment.

Question 20: To what extent do you agree or disagree that we should require the Essential (Level 1) BDSQ to be awarded at Level 1?

Q20. To what extent do you agree or disagree that we should require the Essential (Level 1) BDSQs to be awarded at Level 1?
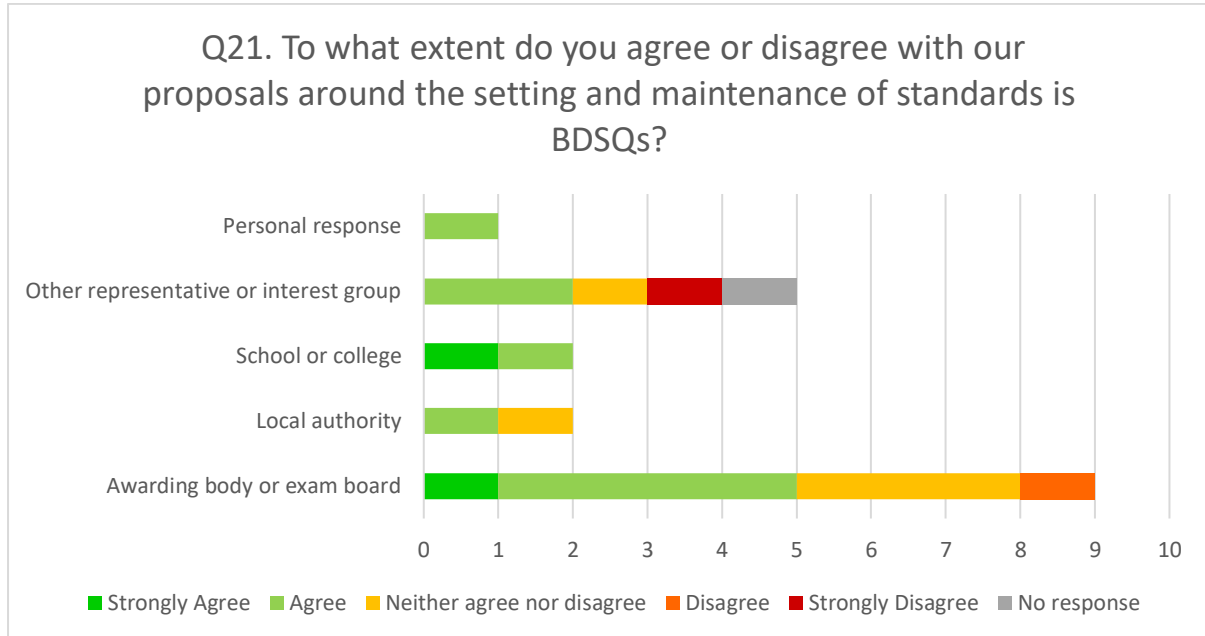

Sixteen respondents either agreed or strongly agreed with our proposal. Where comments were provided, they related to the titling convention for the qualifications and have been captured elsewhere in this analysis.

The respondent who disagreed did so on the grounds of the terms 'Beginner' and 'Essential' being used. Again, this has been captured elsewhere in the analysis.

The respondent who neither agreed nor disagreed did not provide a comment.

Question 21: To what extent do you agree or disagree with our proposals around the setting and maintenance of standards in BDSQs?

Q21. To what extent do you agree or disagree with our proposals around the setting and maintenance of standards is BDSQs?
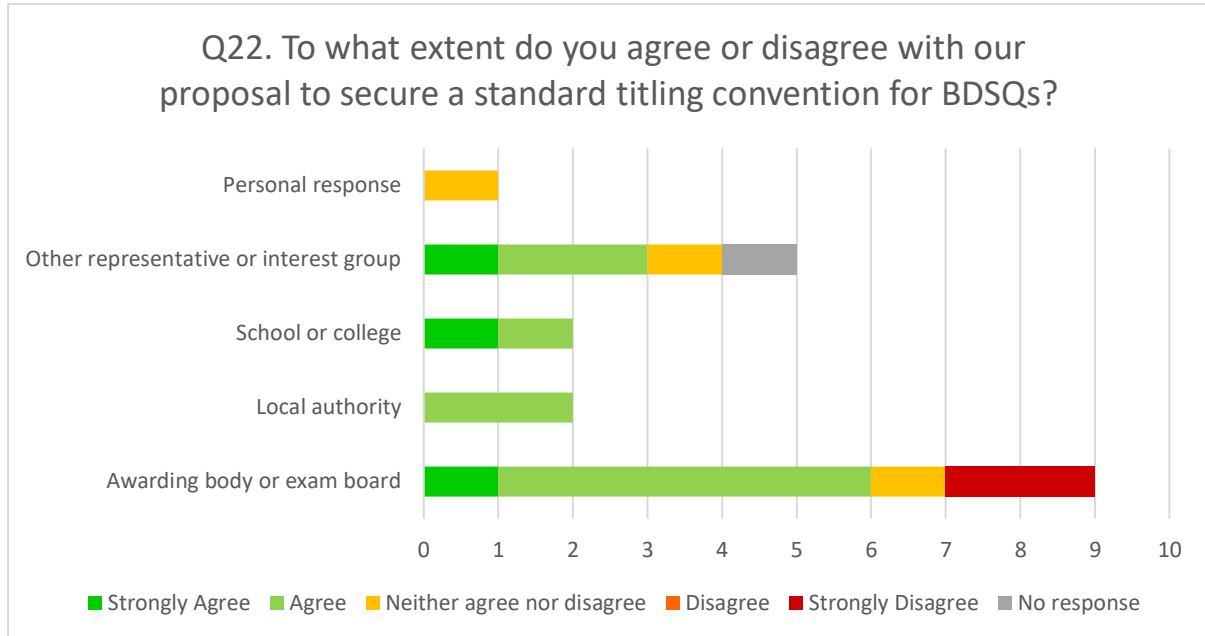
Eleven respondents either agreed or strongly agreed with our proposals around the setting and maintenance of standards in BDSQs. Where comments were provided, they noted that the approach was reasonable. One respondent sought further details on the process for reviewing assessment strategies. Another respondent questioned the use of statistical evidence for the first cohorts – they felt comparability of performance statistics between awarding organisations had limited validity.

Two respondents either disagreed or strongly disagreed with our proposals. One respondent felt the proposals were disproportionate for these qualifications. The other notes a concern that employers are not involved in determining whether students are meeting the required standards. The respondent also notes a lack of reference to pedagogical research relating to the acquisition of digital skills.

Five respondents neither agreed nor disagreed with our proposals, with two respondents providing comments. One awarding organisation's response noted the importance of inter-board collaboration, in order to secure comparability and a unified expectation of what constitutes a Pass. The other awarding organisation which provided comment noted that the references to statistics and pass rates in our proposals would lend themselves to an exam-based approach.

Question 22: To what extent do you agree or disagree with our proposal to secure a standard titling convention for BDSQs?
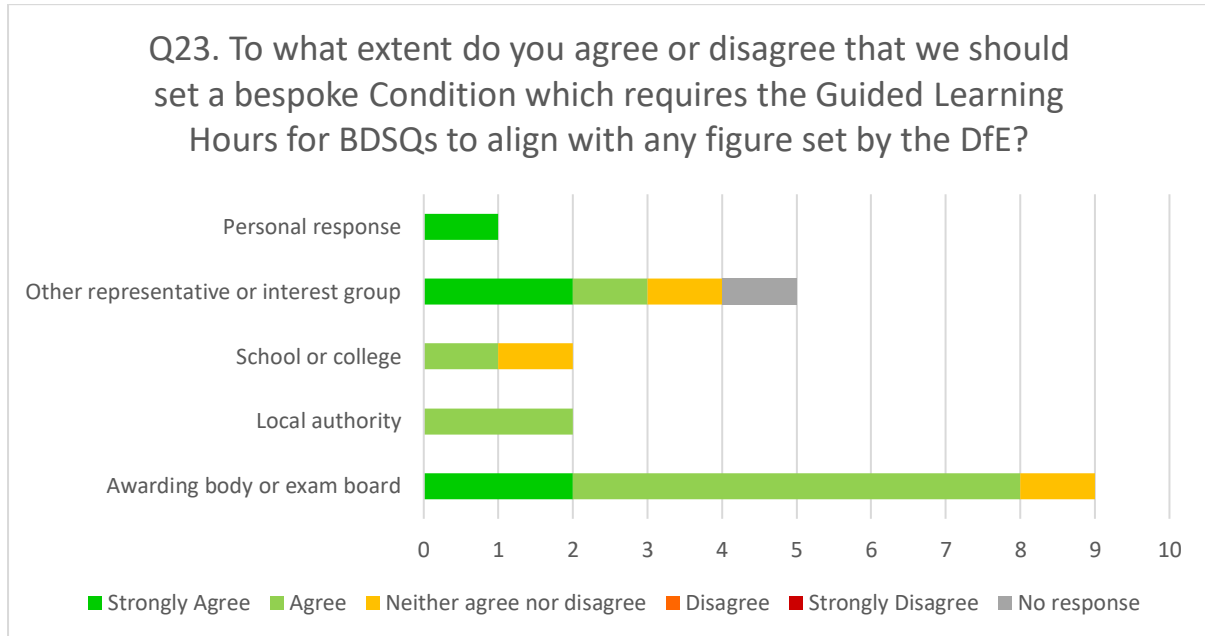

Thirteen respondents either agreed or strongly agreed with our proposal to secure a standard titling convention for BDSQs. While agreeing, many respondents noted they did not believe that 'Beginner' and 'Essential' should be part of the title. They noted:

- the negative connotations these words have
- potential confusion with the Welsh and Northern Irish 'Essential Skills' qualifications
- it would be inaccurate to describe student as a 'beginner' after they have completed their qualification
- the use of 'Entry level 3' and 'Level 1' in qualification titles would suffice
- it was not clear from the titles 'Beginner' and 'Essential' which was the higher-level qualification

Two respondents strongly disagreed with our proposal. Their comments reflected those raised above, as did those provided by the three respondents who neither agreed nor disagreed with our proposal.

Question 23: To what extent do you agree or disagree that we should set a bespoke Condition which requires the Guided Learning Hours for BDSQs to align with any figure set by the DfE?

Q23. To what extent do you agree or disagree that we should set a bespoke Condition which requires the Guided Learning Hours for BDSQs to align with any figure set by the DfE?

Fifteen respondents either agreed or strongly agreed with our proposal to set a bespoke GLH condition. The comments provided suggested that alignment with DfE would provide clarity and consistency. Some comments related to the figure set by DfE, and so have not been recorded here but have been shared with the Department.

Three respondents neither agreed nor disagreed with our proposal. One substantive comment was provided, but as it related to the figure determined by DfE it has not been included in this analysis.

Question 24: To what extent do you agree or disagree with our proposal to dis-apply General Conditions E1.3 to E1.5, E7 and E9?

Q24. To what extent do you agree or disagree with our proposal to disapply General Conditions E1.3 to E1.5, E7 and E9?
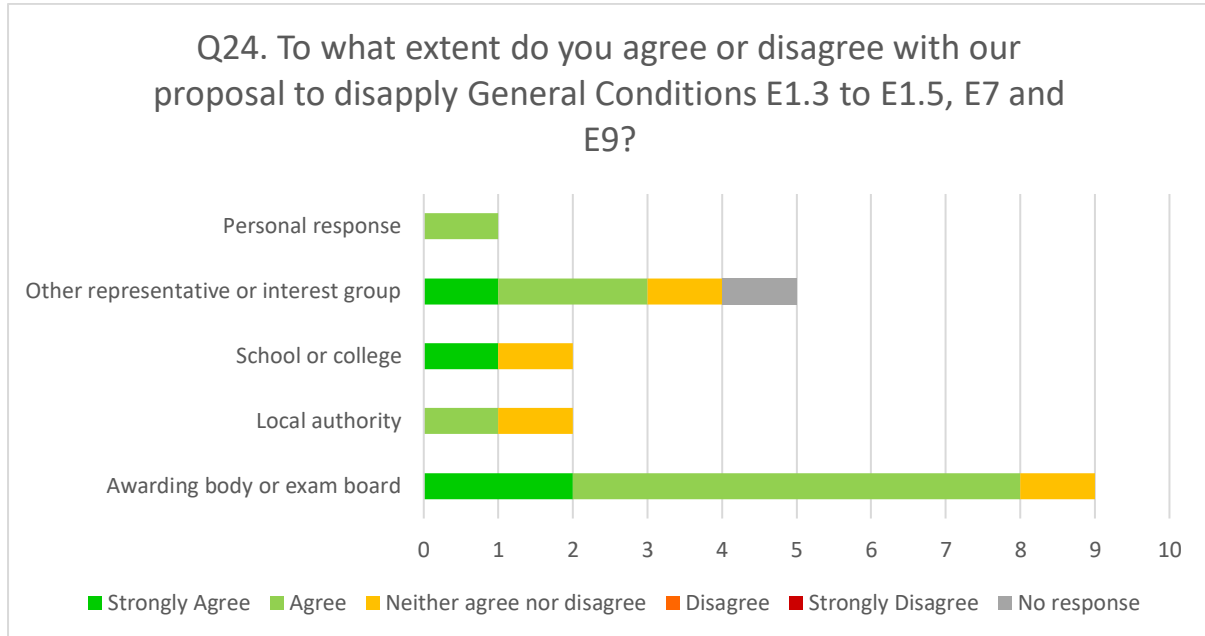
Fourteen respondents either agreed or strongly agreed with our proposal to dis-apply some of the General Conditions. The comments provided suggest respondents felt this approach was sensible, as it would be problematic if they remained in place.

Four respondents neither agreed nor disagreed with our proposal. One respondent provided further comment, suggesting we should not dis-apply Condition E7 – they mistakenly thought that the bespoke BDSQ conditions did not have a reference to Total Qualification Time.

Question 25: To what extent do you agree or disagree with our proposal to require awarding organisations to put in place and comply with an assessment strategy?

Q25. To what extent do you agree or disagree with our proposal to require awarding organisations to put in place and comply with an assessment strategy?
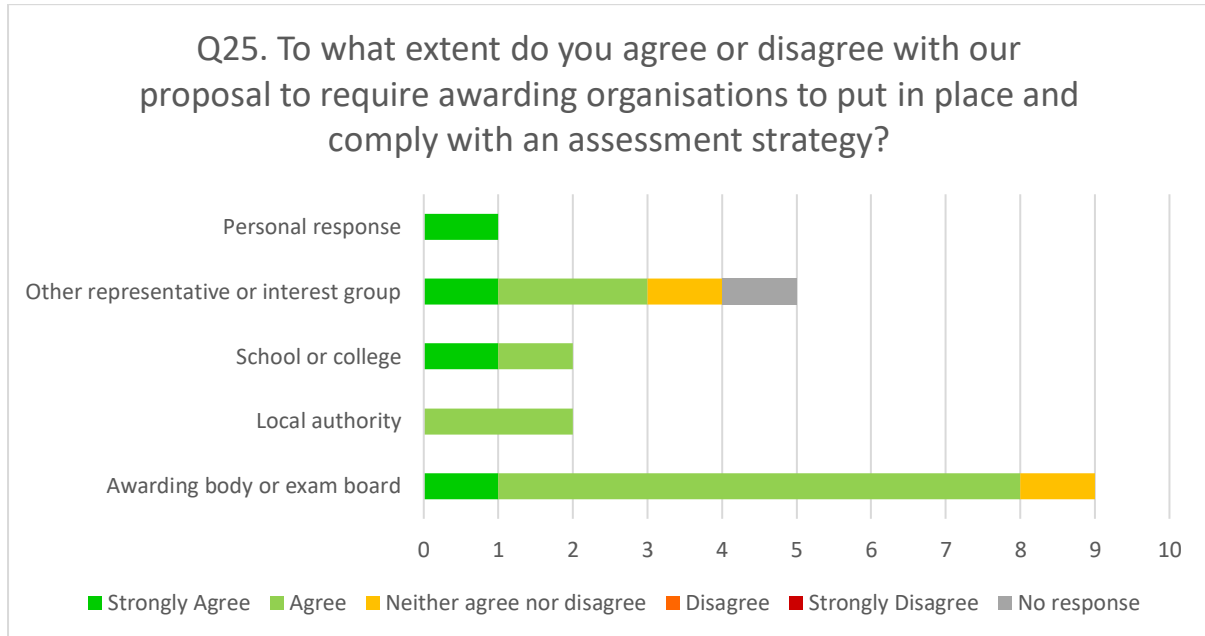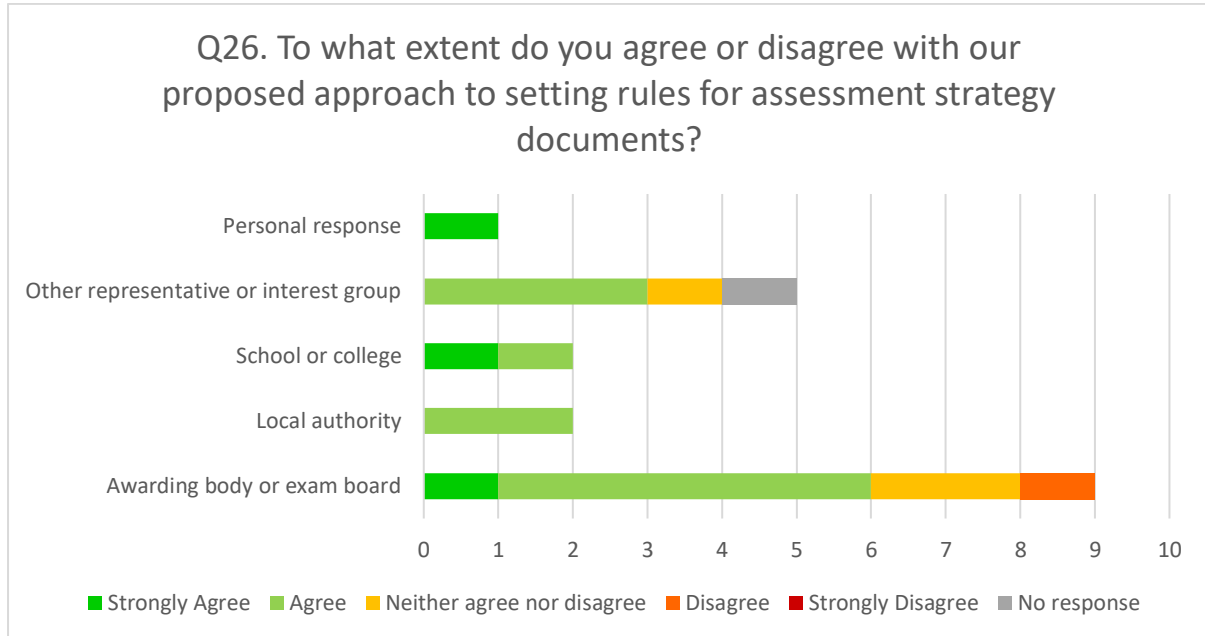
Sixteen respondents either agreed or strongly agreed with our proposal to require awarding organisations to devise and comply with an assessment strategy. Comments included:

- the assessment strategy does not need to be as comprehensive as our proposals suggest, as the information requested should be in place for other qualifications, or exist in other documentation
- requirements for the assessment strategy, and timelines for their submission and review, need to be clearly communicated to awarding organisations
- thorough feedback should be provided where expectations are not met, and only those areas should be considered in any resubmissions
- resubmissions should be reviewed by the same person/team within Ofqual

Two respondents neither agreed nor disagreed with our proposal. No comments were provided.

Question 26: To what extent do you agree or disagree with our proposed approach to setting rules for assessment strategy documents?

Q26. To what extent do you agree or disagree with our proposed approach to setting rules for assessment strategy documents?
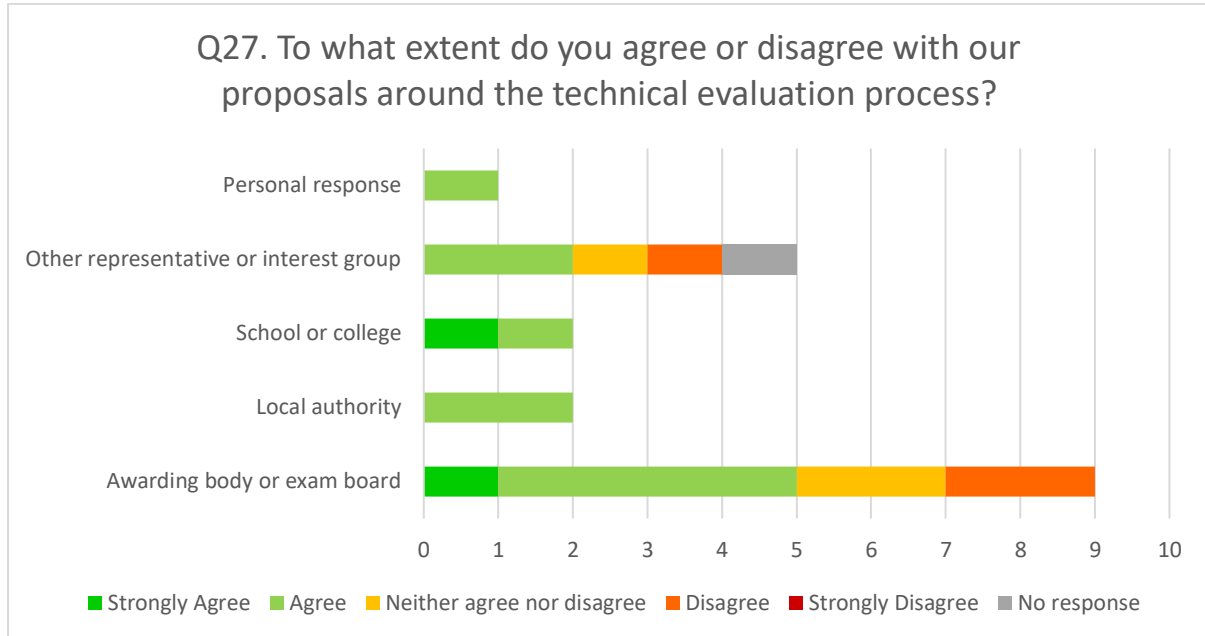
Fourteen respondents either agreed or strongly agreed with our proposed approach to setting rules for assessment strategy documents. Where comments were provided, they noted that the proposals were reasonable. Further guidance was requested by some respondents to better understand the timelines, scope and level of detail expected – this would help minimise burden and delays in making the qualifications available.

One respondent disagreed with our proposed approach. They noted the difficulty of finalising an assessment strategy without devising sample assessment materials at the same time.

Three respondents neither agreed nor disagreed with our proposed approach. No comments were provided.

Question 27: To what extent do you agree or disagree with our proposals around the technical evaluation process?

Twelve respondents either agreed or strongly agreed with our proposals around the technical evaluation process. Where comments were provided, they suggested that:

- the process will ensure a level of rigour and appropriateness
- the process should be kept proportionate to the risk associated with these qualifications
- clarification of the timeline and expectations would be beneficial
- feedback should be clear and detailed
- requested changes to qualifications already made available should be given appropriate and manageable timelines

Three respondents disagreed with our proposals. Their comments suggested that the approach to technical evaluation was not proportionate for these qualifications. One organisation noted that they could not comment on the proposals at this stage, as there was not enough detail available about what the process would entail.

Three respondents neither agreed nor disagreed with our proposals, two of whom provided comment. One requested further clarity around timescales for technical evaluation, while the other noted this process could become very burdensome if required every time the standards are updated.

Question 28: What are the costs, savings or other benefits associated with our proposals which we have not identified? Please provide estimated figures where possible.

At this point in the consultation, we asked for views about the costs, savings and impacts of our proposals. We have recorded the responses to this question separately in the summary at the end of this document.

Question 29: Is there any additional information we should consider when evaluating the impacts of our proposals?

At this point in the consultation, we asked for views about the costs, savings and impacts of our proposals. We have recorded the responses to this question separately in the summary at the end of this document.

Question 30: Do you have any comments on our proposed Conditions and requirements for BDSQs?

In response to this question, one respondent felt the Conditions and requirements should be rewritten in more accessible language. The remainder of the comments suggested potential amendments to the Conditions, dependent upon the outcomes of this consultation.

Question 31: Do you have any comments on our proposed Guidance for BDSQs?

The points raised in the four comments provided for this question have been captured elsewhere in this analysis.

Regulatory impact summary

This section addresses the following questions:

- Question 15: What are the costs, saving or other benefits associated with our proposals? Please provide estimated figures where possible.
- Question 16: Is there any additional information we should consider when evaluating the impact of our proposals?
- Question 28: What are the costs, savings or other benefits associated with our proposals which we have not identified? Please provide estimated figures where possible.
- Question 29: Is there any additional information we should consider when evaluating the impacts of our proposals?
- Question 32: Are there any regulatory impacts that we have not identified arising from our proposals?
- Question 33: If yes, what are the impacts and are there any additional steps we could take to minimise the regulatory impact of our proposals?
- Question 34: Are there any costs, savings or other benefits associated with our proposals which we have not identified? Please provide estimated figures where possible.
- Question 35: Is there any additional information we should consider when evaluating the costs and benefits of our proposals?
- Question 36: Do you have any comments on the impact of our proposals on innovation by awarding organisations?

We received 40 comments in total, across all 9 questions. In response to the questions above some respondents noted that, without having finalised conditions or the details of the potential market, it was difficult to provide the above information. One organisation provided estimated costs of £75,000, which related to the introduction of external marking and mark-based assessment approaches, and one organisation provided estimated costs in the region of £6100 per qualification for the development of an assessment strategy, sample assessment materials and the technical evaluation process.

The following regulatory impacts were noted by respondents throughout the consultation:

- There are additional costs in producing enough assessments in order to reduce predictability. This is especially burdensome where assessments are externally set and on-demand.
- Updating assessment materials every three years, in line with revision to the standards, is costly.
- There are additional resource costs, for example paying assessors and costs relating to standardisation, the training of centres, and the monitoring of assessors and centres.
- Unitisation would result in higher costs, as it would require a greater number of assessments to be created (together with supporting materials, assessors, cost of delivery etc.)
- Developing on-screen simulated environments could be prohibitively expensive.
- Extending scope of recognition is a significant burden for awarding organisations.
- A clear timeline for submission could reduce some burden on awarding organisations.

When considering the question on innovation, comments reiterated that innovation would be constrained by restricting the assessment to externally set and marked exams/tasks. One organisation noted that short development timescales, combined with the proposal to review the content every three years, would also prohibit innovation.

One respondent referred us back to their responses elsewhere in the consultation (specifically relating to unitisation, the timing, availability and number of assessments, awarding organisation setting and marking at Level 1, and contextualisation). These comments have been recorded under the relevant questions.

Equality impact summary

This section addresses the following questions:

- Question 37: Are there any potential impacts (positive or negative) on learners who share protected characteristics that we have not identified?
- Question 38: Are there any additional steps we could take to mitigate any negative impact, resulting from our proposals, on learners who share a protected characteristic?
- Question 39: Do you have any other comments on the impacts of our proposals on learners who share a protected characteristic?

We received 14 comments across all three questions. Respondents noted the following potential impacts on learners who share protected characteristics:

- Awarding the qualifications at Entry 3 might impact on the achievement of learners beginning their qualifications at Entry level 1 or below.
- One respondent noted a potential impact 'for those learners who use assistive technology or software' but did not elaborate on the point.
- Accessibility and support from tutors should be allowed.
- Contextualisation and centre marking should be considered for both levels.
- Simulated examination environments would require additional development costs to support visually impaired learners – practical tasks to assess the qualifications would allow learners to use the assistive technology already available on their machines.

Some respondents noted opportunities in the standards to be more inclusive and offer more support; as this was beyond the scope of our consultation, these comments have not been captured here.

Some respondents suggested negative impacts could be mitigated by awarding Beginner qualifications below Entry level 3. One respondent specifically felt a qualification at Entry level 2 could be developed based on the standards, distinct from Entry level 3 and allowing progression. They also thought unitisation might mitigate any potential impacts.

One respondent highlighted the importance of allowing learners to access assistive technology and specialist software as part of their assessment. Another noted that assessments should follow accessibility guidelines (such as the Public Sector Web Accessibility Regulations), and that Ofqual should require qualifications be developed to be accessible for learners using assistive software and technology.

Appendix A: List of organisational respondents

BCS

British Dyslexia Association

City & Guilds

Cumbria County Council

Federation of Awarding Bodies

Gateway Qualifications

Lancashire Adult Learning

London Borough of Hackney

Milton Keynes College

NCFE

NEU

NOCN

OCN London

OCR

Open Awards

Pearson UK

UK Computing Research Committee (UKCRC)

Walsall College

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