

DRAFT guidance: awarding organisation controls for centre assessments

Not yet in force

Guidance on Centre Assessment Standards Scrutiny

Condition H2.2(a) allows us to specify requirements and guidance in relation to Centre Assessment Standards Scrutiny undertaken by an awarding organisation.

We set out below our guidance for the purposes of Condition H2.2(a).

Our guidance in relation to complying with, and going beyond our minimum requirements, applies to arrangements for Centre Assessment Standards Scrutiny other than Moderation.

Complying with our minimum requirements

In line with our requirements published under Condition H2.2(a), an awarding organisation must conduct periodic Centre Assessment Standards Scrutiny, including scrutinising marking undertaken by a Centre.

We expect that at least some of these annual activities will take place in person, rather than remotely, and that some will take place with short notice given to the Centre.

Forms of Centre Assessment Standards Scrutiny, other than Moderation, are not required to take place before final results are issued.

We set out below examples of the factors an awarding organisation should consider when determining its Centre Assessment Standards Scrutiny arrangements. We also provide examples of how an awarding organisation might adapt its approach to conducting Centre Assessment Standards Scrutiny in light of these factors.

These factors are not intended to be exhaustive, and the weight an awarding organisation attaches to them may vary, depending, for example, on the qualification, assessment or centre in question.

An awarding organisation should consider these factors and explain its approach to a particular qualification, assessment or Centre in light of them as part of its Centre Assessment Standards Scrutiny strategy.

Factors that we would expect an awarding organisation to consider when determining its approach to conducting Centre Assessment Standards Scrutiny include the following –

- The typical course of study for the qualification – for example, whether it is sessional or whether it is roll-on/roll-off and whether there are fixed start or end points for the qualification.
- The typical duration of the course of study – for example, the number of terms a Learner typically takes to complete the qualification.
- The typical Learner for the qualification and type of Centre delivering it – for example, whether these are school/college learners, or employees taking qualifications through a training provider or employer.

- The number of units in the qualification and the number of these that are marked by a Centre.
- The typical evidence generated by a Learner in assessments for the qualification – for example, a portfolio of evidence, a performance or a task/assignment.
- The assessment model – for example, whether units are graded or marked.
- The number of Learners taking the qualification – the overall number and whether these are following the same course of study, or are part of different intakes per term.

An awarding organisation's consideration of these factors may influence the controls it puts in place as part of its Centre Assessment Standards Scrutiny arrangements, for example in relation to –

- the typical frequency and type of monitoring activities it conducts in respect of the Centre,
- the timing of such monitoring activities – for example, when these take place in relation to the delivery of assessments,
- the number of units sampled during monitoring activities – the number of units and also which units are sampled, for example whether these relate to Learners that have started the course of study at different times,
- the time period over which all units for a qualification are sampled – for example, whether every unit is sampled every year,
- the number of Learners sampled during each activity for each unit,
- whether sample checking involves Learners that have already received results for their qualification or only those that have yet to receive results,
- whether all or some Learners are sampled prior to receiving results, and
- the intended outcome of activities – for example, whether it would be likely to inform future changes to processes, require reassessment of Learners that have not yet received results, or lead to revocation of certificates that have already been issued

Going beyond the minimum requirements

Our requirements also state that an awarding organisation must take a risk-based approach to Centre Assessment Standards Scrutiny and must put in place arrangements which go beyond our minimum requirements where it considers it necessary to meet any risks that it has identified in relation to a particular Centre, assessment or qualification.

The list below sets out examples of when we will normally expect an awarding organisation to go beyond our minimum requirements.

Factors in relation to the Centre

- (a) Where a Centre has not previously marked assessments for the relevant qualification.
- (b) Where there have been changes to the staff at a Centre responsible for overseeing marking of the relevant assessment by that Centre.
- (c) Where there is a significant change in the profile of the Centre's entries for the relevant qualification, or the number of entries.
- (d) Where the awarding organisation establishes that, in respect of the relevant assessment –
 - (i) any malpractice or maladministration has occurred in relation to a Centre's delivery, marking or issue of results,
 - (ii) the criteria against which Learners' performance is differentiated are not being applied consistently by a Centre in its marking, or
 - (iii) a Centre has issued inaccurate results.

Factors in relation to the qualification

- (e) Where the qualification is substantially different in type or content from any which the awarding organisation has made available before.
- (f) Where the professional standard for a qualification (for example, a licence to practise) has changed.
- (g) Where an awarding organisation's analysis of data and evidence suggests that a particular approach is necessary.

It is for an awarding organisation to consider what form any arrangements which go beyond our minimum requirements should take and how long they should remain in place, depending on the situation.

An awarding organisation may, for example, put in place different arrangements for different Centres, or different assessments or units within the same qualification.

In all cases an awarding organisation must be satisfied that the Centre is able to deliver, mark and issue results for the assessment in a manner which allows the awarding organisation to comply with its Conditions of Recognition.

Where an awarding organisation considers it necessary to go beyond our minimum requirements for reasons linked to a Centre's performance, it should consider whether it would be appropriate to make other awarding organisations on whose behalf the Centre delivers qualifications aware of the relevant performance issues.

Moderation

Where an awarding organisation chooses to include Moderation in its arrangements for Centre Assessment Standards Scrutiny it may undertake that Moderation at

different levels. For example, it could choose to undertake Moderation for an individual Centre, assessment, unit or cohort within a qualification.

Where Moderation is used it must meet the requirements set out in Conditions H2.4 and H2.5 and in all cases an awarding organisation must be satisfied that the Centre is able to deliver, mark and issue results for the assessment in a manner which allows the awarding organisation to comply with its Conditions of Recognition.

Not yet in force

Guidance on Centre Assessment Standards Scrutiny strategies

Condition H2.6(a) requires an awarding organisation to establish and maintain a Centre Assessment Standards Scrutiny strategy in respect of each qualification for which assessments are marked by a Centre.

That strategy must cover all forms of Centre Assessment Standards Scrutiny that the awarding organisation undertakes, including Moderation.

Condition H2.6(c) requires an awarding organisation to have regard to any guidance in relation to Centre Assessment Standards Scrutiny strategies published by Ofqual. We set out our guidance for the purposes of Condition H2.6(c) below.

General guidance on Centre Assessment Standards Scrutiny strategies

As set out in our requirements, an awarding organisation's Centre Assessment Standards Scrutiny strategy can cover one or more of its qualifications and may be contained in one or more documents.

Under Condition H2.1, an awarding organisation must have in place clear and effective arrangements to undertake Centre Assessment Standards Scrutiny.

Under Condition H2.2(a), we set out our minimum requirements in respect of an awarding organisation's approach to Centre Assessment Standards Scrutiny. Such controls are the minimum that we consider necessary in order to ensure the maintenance of standards and public confidence in regulated qualifications. Our guidance under Condition H2.2(a) sets out circumstances in which we expect an awarding organisation to consider going beyond our minimum requirements.

The controls that an awarding organisation puts in place in relation to Centre marking will vary based on the specific risks that it has identified in relation to the qualification and the Centres delivering it, and what is necessary to ensure valid qualifications that are manageable for Centres to deliver. Based on these considerations, it may be appropriate for an awarding organisation to go beyond our minimum requirements and impose stronger controls, such as more frequent visits, higher levels of sampling, and closer monitoring.

An awarding organisation may choose, or be required, to put in place Moderation as a form of Centre Assessment Standards Scrutiny, which will require that all checks take place before results are issued.

An awarding organisation will need to explain in its Centre Assessment Standards Scrutiny strategy where on that scale its controls for a particular assessment lie, and why that level of control is appropriate.

We expect an awarding organisation to set out in its Centre Assessment Standards Scrutiny strategy how the following factors have been considered in developing its arrangements for Centre Assessment Standards Scrutiny –

- The qualification – An awarding organisation may take a different approach for a new qualification for which the standard is potentially less well-established or understood to that of an established qualification.
- Nature of the assessments – An awarding organisation may be able to undertake stronger forms of Centre Assessment Standards Scrutiny for some assessments within a qualification rather than others. This could depend, for example, on the nature of the evidence generated by Learners.
- The Centre – An awarding organisation may take a different approach to new Centres, or those it considers high-risk (for example, due to evidence of qualifications not being delivered in line with the awarding organisation's requirements) to those it considers to be a lower risk.
- Experience of an awarding organisation – A new awarding organisation, or an awarding organisation offering a qualification in a new sector may consider that closer Centre controls are necessary whilst it is establishing its systems and processes.
- How the qualification is intended to be delivered – An awarding organisation may take a different approach to a qualification in which assessments are intended to be delivered on-demand to meet the needs of Users to one which follows a more structured delivery model.

Detailed guidance on Centre Assessment Standards Scrutiny strategies

We set out below detailed guidance on the specific information and evidence an awarding organisation should include in its Centre Assessment Standards Scrutiny strategy to meet our requirements. The amount of information and evidence that should be included may vary across the areas identified, depending on the approach adopted and the relevant aspects of the assessments covered as well as the risks and pressures inherent in their form and use (i.e. in licence to practise qualifications).

This guidance is not intended to provide a template specifying the form that a Centre Assessment Standards Scrutiny strategy must take, since the optimal structure and content of the strategy will depend on the approach that is being taken by the awarding organisation.

Section 1: Overall Approach

An awarding organisation should explain –

- why it considers marking by a Centre appropriate within a particular qualification or type of qualification,
- the appropriateness of the approach based on the nature of the evidence produced by Learners in the relevant assessment,
- why its approach is appropriate to ensure valid and manageable qualifications, based on the risks it has identified in relation to the qualification and the Centres delivering it

- how its approach will ensure that the results it issues in reliance on a Centre's marking are accurate and that standards for the relevant qualification are maintained,
- how it will ensure through its arrangements with a Centre that it is able to comply with the Conditions.

Section 2: Allowing Centres to mark assessments

An awarding organisation should explain –

- how it takes a decision to approve a Centre to deliver and mark assessments on its behalf and how it decides whether to approve a Centre to make assessment judgements and issue results on its behalf,
- the level of training and guidance it provides upon approval to Centres delivering and marking its assessments.

Section 3: Monitoring

An awarding organisation should explain –

- the justification for its approach to Centre Assessment Standards Scrutiny, including how that approach meets our minimum requirements,
- how it selects persons to undertake Centre Assessment Standards Scrutiny,
- the training it provides to persons carrying out Centre Assessment Standards Scrutiny and any other means by which it ensures such persons are sufficiently competent to carry out such tasks,
- what information the awarding organisation will require the Centre to retain in order to support its Centre Assessment Standards Scrutiny,
- how it will ensure that Centres retain any data (including evidence generated by Learners and marked by Centres) that the awarding organisation considers necessary to allow it to undertake Centre Assessment Standards Scrutiny effectively,
- the extent of its ongoing monitoring of a Centre once it starts delivering and marking assessments, including the frequency of visits and what the awarding organisation monitors, for example, Centre processes and procedures and/or Centre capability, as well as marking,
- how it will provide feedback to Centres and monitor Centres' performance over time,
- the level of ongoing training and guidance it provides to Centres delivering and marking its assessments.
- the sampling approach it uses to ensure that samples are appropriate;
- how it will consider selecting examples of marking by the Centre which go beyond those selected by the Centre itself,
- its approach to going beyond our minimum requirements and how it will have regard to the factors set out in Ofqual's guidance in this regard.

Risks

An awarding organisation should explain how its approach to Centre Assessment Standards Scrutiny will allow it to –

- identify and monitor all relevant conflicts of interest, and any scenario that could foreseeably lead to such a conflict in the future,
- take all reasonable steps to ensure that no such conflict has an Adverse Effect,
- take all reasonable steps to prevent the occurrence of any incident that could have an Adverse Effect,
- take all reasonable steps to prevent the occurrence of any malpractice or maladministration in relation to the delivery or marking of assessments by a Centre,
- enter into arrangements with a Centre on terms which allow the awarding organisation to comply with the Conditions as a whole, and monitor, and where necessary take action, to ensure the Centre does not put the awarding organisation's compliance at risk,
- ensure that assessments for the relevant qualification remain fit for purpose upon delivery,
- ensure that the criteria against which Learners' performance is differentiated are being accurately and consistently applied by Assessors,
- ensure any results it issues are accurate and fully reflect the evidence produced by the Learner and the Learner's attainment when judged against the standard set by the awarding organisation.

An awarding organisation must explain how it has ensured that its approach to risk in relation to Centre Assessment Standards Scrutiny is based on appropriate evidence.

Section 4: Taking action and making adjustments

An awarding organisation should explain –

- how it identifies and resolves issues such as malpractice relating to Centres' delivery and marking of an assessment,
- the actions that it will take where it identifies an assessment is not being delivered or marked in line with its requirements,
- its approach to making adjustments to a Centre's results

Section 5: Ongoing review

An awarding organisation should explain –

- how it keeps its processes under review to ensure they remain fit for purpose and are improved as necessary.

Publication of Centre Assessment Standards Scrutiny Strategy

We do not require publication of an awarding organisation's entire Centre Assessment Standards Scrutiny strategy. However, some elements of it may need to be replicated in the specification for a qualification published under Condition E3.

Regardless of which elements of the Centre Assessment Standards Scrutiny strategy are replicated in the specification, an awarding organisation is required, under the minimum requirements published under Condition H2.2(a), to provide effective guidance to Centres in relation to the minimum expectations that they must meet.

Outside of our requirements, an awarding organisation may publish its Centre Assessment Standards Scrutiny strategy, or parts of it, if it wishes to. Where it does so, it must ensure that any such publication does not breach its Conditions of Recognition.

Not yet in force

Guidance on making changes to incorrect results

Condition H6.1(d) requires an awarding organisation to issue results which accurately and completely reflect the marking of assessments (including the outcome of any Moderation and other quality assurance process).

Condition H6.2(a) requires an awarding organisation to correct any error in the results it has issued where this is discovered through an appeals process. In all other cases, where an awarding organisation discovers that any result it has issued is incorrect it must, under Condition H6.2(b) consider whether to correct it and have regard to any guidance published by Ofqual in that respect.

We set out our guidance for the purposes of Condition H6.2(b) below.

Introduction

We expect an awarding organisation to issue correct results to Learners. But where an awarding organisation discovers that, despite its controls, it has issued an incorrect result, it must have regard to this guidance when deciding what to do.

An incorrect result is one that does not accurately reflect a Learner's performance in his/her assessment. It could be higher or lower than the level of attainment which the Learner demonstrated. An awarding organisation may discover that it has issued an incorrect result in different ways, including:

- through the application of its own quality assurance processes;
- through its investigations into malpractice or maladministration; or
- where a review of marking or an appeals process reveals an issue which is relevant to other Learners' assessments.

Where an awarding organisation discovers an error through an appeals process, it must correct the result. In all other cases where an incorrect result is discovered (and regardless of whether it is higher or lower than the level of attainment demonstrated by the Learner), an awarding organisation must decide what action to take, and whether or not to correct the result.

This guidance identifies a number of Conditions that place obligations on awarding organisations which are relevant to this issue. It explains how an awarding organisation should decide what action to take and some of the factors it should consider. The importance of these factors will vary between cases, but awarding organisations should adopt a consistent approach to determine which are relevant and how to balance them.

In particular, this guidance focuses on an awarding organisation's decision whether or not to correct an incorrect result in circumstances other than following an appeal. It is for the awarding organisation to take this decision in each case, ensuring that it meets the requirements of the Conditions and has regard to this guidance. Having taken this decision, the awarding organisation should always consider whether it should take any other action to comply with the requirements of the Conditions.

What requirements must an awarding organisation meet?

Awarding organisations must comply with all of the Conditions which apply to the qualifications they offer. The Conditions below are likely to be particularly relevant to the issuing of results and to the action an awarding organisation should take if it finds it has issued an incorrect result.

- Condition A6.1 requires an awarding organisation to take all reasonable steps to identify the risk of any incidents which could have an Adverse Effect. Since the issuing of an incorrect result could (in many cases) have an Adverse Effect, an awarding organisation should actively consider any risks which might lead to this happening.
- Condition A6.2 requires that where such a risk is identified, the awarding organisation takes all reasonable steps to prevent the incident from occurring or to reduce the risk of it occurring. The awarding organisation must also prevent, or if this is not possible mitigate, any Adverse Effect that the incident could have were it to occur.
- Condition H5.1 requires an awarding organisation to ensure that the result of each assessment taken by a Learner reflects the level of attainment demonstrated by that Learner.
- Condition H6.1(d) requires an awarding organisation to issue results which accurately and completely reflect the marking of assessments (including any Moderation and other quality assurance process).

Where an awarding organisation issues an incorrect result, it will have failed to comply with one or both of Conditions H5.1 and H6.1(d). There are a number of further requirements that could be relevant if an awarding organisation issues an incorrect result.

- Condition A7.1 requires that where any incident occurs which could have an Adverse Effect, an awarding organisation must promptly take all reasonable steps to prevent the Adverse Effect or to mitigate it as far as possible and correct it. In doing so, it must prioritise the provision of assessments which accurately differentiate between Learners on the basis of the level of attainment they have demonstrated and the accurate and timely award of qualifications.
- Condition A8.2 requires that where an awarding organisation suspects malpractice or maladministration and has reasonable grounds for doing so, it must promptly take all reasonable steps to prevent any Adverse Effect which may occur. Where an Adverse Effect does occur it must mitigate it and correct it as far as possible. This obligation may be relevant where an incorrect result has been issued as a result of malpractice or maladministration.
- Condition I1.4 (or, where Condition I1 does not apply to a qualification, the relevant Qualification Level Condition) requires that if an awarding

organisation discovers a failure in its assessment process through any Review Arrangements or appeals process, it must take all reasonable steps to identify any other affected Learners, correct or mitigate as far as possible the effect of the failure, and ensure that the failure does not recur. Awarding organisations must ensure that if specific Qualification Level Conditions are in place for Review Arrangements or appeals, such as those for reviews of Moderation, they are adhered to before considering the following guidance.

What should an awarding organisation do when it discovers it has issued an incorrect result?

Where an awarding organisation discovers that it has issued an incorrect result, we expect it to:

- understand what has happened. It should make sure it gathers adequate information on which to base any decision about what to do next and whether to correct the result;
- determine whether the issue of the incorrect result has caused any Adverse Effect or whether there is the potential for any Adverse Effect to occur;
- notify Ofqual, where any Adverse Effect has occurred or could occur (in accordance with Condition B3.1);
- determine what action to take, including whether or not to correct the result and whether any other action should be taken;
- keep a record of the decision it makes in respect of: whether any Adverse Effect has occurred or is likely to occur, whether or not to correct the result and on any other action it takes to prevent, mitigate or correct any Adverse Effect. It should be able to explain, on a case-by-case basis, what action it has taken and why.

What should an awarding organisation consider when deciding what action to take?

Where an awarding organisation discovers that it has issued an incorrect result, it must take all reasonable steps to prevent any Adverse Effect which could be caused or, where this is not possible, to mitigate and correct any Adverse Effect. An Adverse Effect is most likely to be caused where the issuing of the incorrect result:

- prejudices the Learner who has been issued with the result or prejudices other Learners;
- adversely affects the standard of the qualification; or
- adversely affects public confidence in regulated qualifications.

In some instances, issuing an incorrect result could cause more than one Adverse Effect and these could happen at different times.

Where the issuing of the incorrect result has had or could have an Adverse Effect, the default position is that the awarding organisation should correct the result. In most cases this will either prevent the Adverse Effect from occurring or otherwise mitigate or correct it.

However, we recognise that correcting the result may have a negative impact such that, balancing this impact against the Adverse Effect(s) involved, it would not be a reasonable step for the awarding organisation to correct the result.

Even where the awarding organisation does not consider the issuing of the incorrect result has had or could have an Adverse Effect, it will have breached a Condition. Correcting the result will help remedy that breach. Again, we recognise that in some cases the negative impact of correcting the result may be such that this would not be a reasonable course of action for the awarding organisation to take.

We expect an awarding organisation to consider all relevant factors in order to:

- identify any Adverse Effects caused (or potentially caused) by issuing the incorrect result; and
- decide what action it would be reasonable to take, balancing any Adverse Effect against any negative impact which may be caused by correcting the result.

The list below sets out factors which we expect an awarding organisation to consider when deciding on a reasonable course of action (alongside any other relevant factors).

- Impact on the Learner who has been issued with an incorrect result - The awarding organisation should consider whether allowing an incorrect result to stand or correcting the result could prejudice the Learner. For example, prejudice may be caused if the result is corrected where the original result has already been used to make decisions, such as whether to re-take a qualification, enrol in further or higher education, or enter employment. Conversely, in some situations allowing a Learner to rely on a result which he/she has not actually achieved may prejudice that Learner.
- Impact on other Learners - The awarding organisation should consider whether allowing an incorrect result to stand could prejudice other Learners. For example, Learner A could miss out on a progression opportunity to Learner B because Learner B has incorrectly been given a higher result than his/her performance merited.
- Public confidence - The awarding organisation should consider the impact on public confidence in regulated qualifications of it issuing an incorrect result and of the action it takes in response.

- Standards - The awarding organisation should consider the impact on the standard of the qualification if it does not correct the error.
- Number of Learners affected - The impacts on other Learners, on standards and on public confidence are likely to be greater if many Learners are affected.
- Reliance on the incorrect result by third parties - Where third parties have relied on, or are likely to rely on, the incorrect result, the awarding organisation should consider whether that increases the possibility of an Adverse Effect. For example, if a qualification is a licence to practise, the awarding organisation should consider whether allowing a Learner who may not have demonstrated the level of competence indicated by the incorrect result to keep that result could have an Adverse Effect.
- Timing - The length of time since the result was issued and any indication given by the awarding organisation that the result may or may not be final.
- Malpractice - Whether the Learner's own actions (including malpractice) contributed to the incorrect result being issued.

The extent to which each factor is relevant, and whether there are any others that should be considered, will vary. This could depend, for example, on the purpose of the qualification and how it is used by the Learner or other Users of qualifications. Consideration of all the factors may not all point towards one action.

An awarding organisation should determine which factors are relevant and give appropriate weight to these in each case when deciding on its course of action.

Incorrect results discovered through Centre Assessment Standards Scrutiny

Where an awarding organisation uses a form of Centre Assessment Standards Scrutiny other than Moderation, it may issue results and certificates on the basis of a Centre's assessment judgements without any prior check on the standard of marking for each particular group Learners.

This means that where Moderation is not used incorrect results may not be discovered until after those results have been issued by which point Learners, and other Users of qualifications, may have placed reliance on the incorrect results in the intervening period.

In deciding whether or not to correct incorrect results identified through Centre Assessment Standards Scrutiny other than Moderation, we expect an awarding organisation to consider the following factors, in addition to the general guidance in relation to all qualifications set out in the preceding sections:

- The need to prioritise the maintenance of standards, which will normally lead to correction of errors.

- The passage of time since results were issued.
- Whether a qualification has been used to secure employment.
- Any health and safety implications associated with the qualification.
- Whether the qualification is a licence to practise.
- The availability of opportunities to retake the assessment.
- Any other Adverse Effect that might be caused by a decision to correct, or not to correct, a result.

In terms of the weight given to these factors, an awarding organisation should prioritise the correction of results in situations where there are health and safety implications associated with the qualification such that it may be unsafe for a person to be undertaking a particular activity where he or she is not competent to do so. An awarding organisation should also be alive to other contexts that give rise to significant risks, such as qualifications relating to children or the care of vulnerable people.

Where an awarding organisation corrects a Learner's result in circumstances that could lead to the Learner losing employment that has been gained in reliance on the incorrect result, it should consider what further action might be appropriate such as, for example, promptly providing an opportunity for the Learner to take the relevant assessment again without charge.

What should an awarding organisation do after deciding what action to take?

In all cases, after deciding what action to take, an awarding organisation should take all reasonable steps to communicate any change in result to any affected Learners and, where appropriate, reissue results and/or certificates.

Condition I4.2(a) requires awarding organisations to take all reasonable steps to issue a certificate and any replacement certificate. Where an awarding organisation has decided to correct the result, it should ensure it does this.

An awarding organisation should consider any further actions it needs to take. In accordance with Condition B3.5, the awarding organisation should notify Ofqual of any steps that it has taken or intends to take to prevent an Adverse Effect, or to correct or mitigate any Adverse Effect that occurs.

In accordance with Condition A6, an awarding organisation should consider whether or not its contingency plan should be updated.

Condition D3.3 requires that where an event relating to an awarding organisation has had an Adverse Effect, it must review and revise where necessary its approach to the development, delivery and award of qualifications to ensure it remains appropriate.

In particular, where the incorrect result relates to an assessment marked by a Centre, an awarding organisation should review its arrangements for Centre

Assessment Standards Scrutiny in relation to the Centre in question or, where wider risks are discovered, the relevant qualification in order to ensure that those arrangements remain appropriate.

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