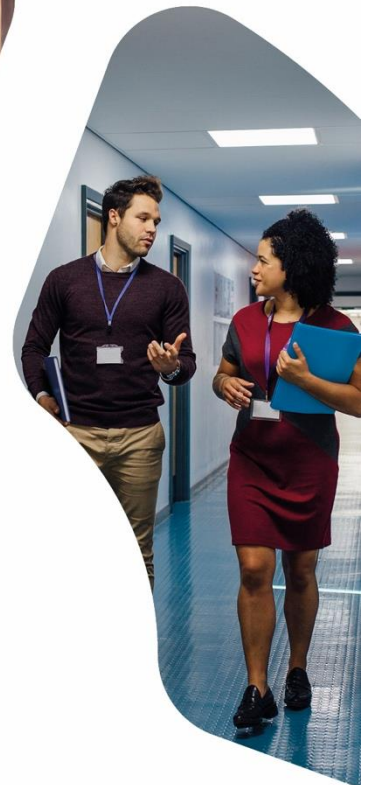


# Operational Parity for Vocational and Technical Qualifications (VTQs)

December 2023



# Chief Regulator's preface

## Parity of Treatment – 2024 and beyond

When I became Chief Regulator in 2021, I was very clear that improving parity between qualification types was right at the top of my agenda. Many have talked about parity of esteem, but on my watch Ofqual committed to moving beyond rhetoric to [securing real parity of treatment for students taking different qualifications](#).

When, in the summer of 2022, results for students pursuing some vocational and technical courses at Level 3 and Level 2 were late – and as a consequence students experienced unacceptable uncertainty – a tipping point was reached. Meaningful and urgent change was needed. I convened and chaired a cross-sector taskforce to work out the necessary changes so that all students expecting to receive their results in August 2023 would get them on time. [The resultant Action Plan](#) secured this.

Building on this, Ofqual has subsequently announced arrangements for 2024 and beyond. These cement the processes adopted in 2023 to secure the timely delivery of results, whilst also taking on board insights and feedback from the taskforce members, as well as from colleges, schools, exams officers and awarding organisations.

Parity of treatment is a broad concept. It means that all students, benefit equally from:

- Qualifications that are well designed, good quality and fit for purpose
- Safe delivery of assessments
- Getting their results in a timely way so there is a level playing field for progression
- Systems and processes that support consistency and ease of operation for schools and colleges

With this in mind, alongside the 2023 taskforce and Action Plan, Ofqual commissioned further work to consider a range of issues that may affect parity of treatment for students, looking at a range of qualifications, from a medium-term perspective. Ofqual commissioned ImpactEd Consulting to address a number of questions based on wide engagement with key stakeholders across the qualifications sector.

Today, Ofqual is publishing the detailed work that ImpactEd Consulting has carried out. I am incredibly grateful to the very many people who gave their time to contribute not only to our taskforce but also to this research and report. Finding the golden threads within the differing perspectives that span the complex qualifications ecosystem is vital.

### Results release

ImpactEd Consulting's work provides significant detail about the different scenarios for results release. It is a complex picture and there are no simple, consequence-free decisions. In light of the 2023 Action Plan and Ofqual's subsequent announcement on [arrangements for 2024 and beyond](#), significant progress has been made on achieving a single results day for students across academic, vocational and technical qualifications. From 2023, summer results for Level 3 and Level 2 qualifications used for progression are released to students on or before the dates historically known as A level and GCSE results days, but now known as Level 3 and Level 2 results days. This is a material step forward in parity of treatment.

Given the system pressures that any further change would entail, Ofqual is not proposing to take forward further changes to results release at this time.

### Sector coordination

Both the research and what Ofqual heard during the implementation of the 2023 Action Plan confirms that there is great opportunity and benefit in more sector coordination. Awarding organisations take different approaches, and their systems work in different ways, with material effect on efficiency for schools and colleges.

The 2023 Action Plan began work to improve this, but it is clear there is more to do. This is about removing complexity and inconsistency which, in a context where schools, colleges and training providers are able to choose from a broad range of qualifications across multiple providers, means that administrative differences put at risk parity of treatment for students.

To be clear, this is not about restricting legitimate competition between awarding organisations, which is one of the features of the British system. As well as ensuring that there is no single point of failure, the UK's market model also means there are drivers for innovation, service and competitive pricing. The ideal would be choice that didn't dictate administrative complexity.

Ofqual is already discussing with awarding organisations, JCQ and FAB opportunities for further coordination. Ofqual will consider the specific recommendations from ImpactEd Consulting's findings and explore potential next steps to secure sector coordination to streamline qualification administration, without undermining differences that are driven by legitimate domain distinctions, and flexibilities that are in the interests of students. This will inevitably be long-term work, but I am confident that Ofqual will continue to confront these issues.

### The impact of exams in schools and colleges

Feedback from those consulted in this research makes clear the real effects of population growth, an increase in assessment by examination and the growth in access arrangements for students. The pressure to provide space in schools and colleges, to recruit and retain invigilators, and to manage the complexity of exam logistics is a challenge now and will continue to increase. It will be important for schools and colleges to take a strategic look to inform planning for the years ahead to set out how they will meet the growing demands of exam arrangements.

Ofqual has limited levers here but would welcome input from schools and colleges and their representatives on what can be done to respond to these pressures.

The role of exams officers in successful, safe exam delivery is clear. Ensuring expert, capable resourcing in this role is critical. Ofqual will continue to provide resources to support exams officers, as do awarding organisations.

### Unique student identifiers

Ofqual sees real potential for students, and for all parts of the qualifications ecosystem, including policy makers, in the full use by the whole system of a unique student identifier. Had this been fully used in the summer of 2022, it would have been significantly easier to work out which students needed results. As it was, the same student could be identified under different references across awarding organisations and UCAS, making it challenging to identify which results were still needed.

Apart from the operational clarity this could help provide, it could also support the regulator in better understanding both awarding organisations' progress in safe delivery of results, as well as to evaluate qualification choices and use. Clearly, it would be critically important that the operational benefits to students did not also cause personal data concerns.

Ofqual welcomes the Department for Education's work considering the existing Unique Learner Number, which presents a real opportunity to address the issues identified through ImpactEd Consulting's research. Ofqual will look for opportunities to influence and secure support for appropriate ULN deployment.

Finally, to all those that contributed to this work – again, I give my thanks. There is more to do – both in discussion and action. Ofqual will continue to play its part, to build on the successes of 2023 and to look forward to more tangible progress in achieving parity of treatment for all students.

A handwritten signature in black ink, appearing to read 'Jo Saxton', with a long horizontal flourish extending to the right.

Dr Jo Saxton

Chief Regulator

Note: Whilst Ofqual commissioned this report, its contents and findings are the views of ImpactEd Consulting. This research report does not reflect Ofqual's policy, views or recommendations. This is also the case for the views expressed by stakeholders gathered through this research.

## About ImpactEd Consulting

ImpactEd Consulting offers strategic and operational support to its partners across the education and not-for-profit space.

Founded by former teachers, education leaders, management consultants and researchers, ImpactEd Consulting combines deep sector understanding with technical expertise and significant experience of organisational leadership.

ImpactEd Consulting is organised across four practice areas:

- Strategy and organisation design
- Governance and operating models
- Strategic projects
- People and culture

The lead consultants for this Ofqual project and the authors of this report were Lena Kuenkel (Associate Director at ImpactEd Consulting), Jonny Sobczyk Boddington (Founder and Director at ImpactEd Consulting) and Dr Chris Wilson (Founder and Director at ImpactEd Consulting).

ImpactEd Consulting is part of ImpactEd Group. Together with ImpactEd Evaluation and The Engagement Platform (TEP), ImpactEd Consulting contributes to the Group mission to support purpose driven partners to make better decisions using high quality evidence.



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# 1 Introduction

In response to the issues with vocational and technical qualification (VTQ) results delivery in 2022 Ofqual, the regulator of qualifications in England, set out several actions to support the safe and timely delivery of awarding organisations' (AOs') results for VTQs. To support the effective implementation of these new arrangements, Ofqual formed a [2023 VTQ results taskforce](#) with key sector representatives.

In parallel to the work of the taskforce, Ofqual commissioned the Responsible Business Unit (RBU, now ImpactEd Consulting) to support and facilitate a strategic piece of work related to VTQs. Through this project, the RBU has worked with Ofqual and sector representatives to consider further possible steps over a longer timeframe that might help to secure parity of treatment for students taking different types of qualification, and to streamline the workload for schools and colleges.

There are three topics that were explored with sector stakeholders as part of this strategic review:

1. The question whether changes to the **timing of results release** for GCSE, A level and level 2 and level 3 VTQs would improve fairness and whether such changes would be operationally feasible
2. The identification of opportunities to improve manageability for schools and colleges through greater **sector coordination**
3. The possibility of, and steps to, greater use of a **unique student identifier** across schools, colleges and HE

These three areas were explored in the context of wider shifts to the VTQ system which include, but are not limited to, population growth, the impact of the post-16 qualifications review and increased use of assessment by examination.

This report summarises the findings from the RBU's work during the period of March – May 2023. Throughout this work, the consultants worked closely with colleagues at Ofqual and engaged sector representatives and experts in workshops and 1:1 interviews. An overview of interview partners can be found in Appendix 1.

## 1.1 Scope

The qualifications in scope for this strategic review are level 3 VTQs used for progression to further and higher education. It is important to note that the term “for progression” is not clearly defined. In the academic year 2021/22, for example, just over 1.5M certificates were awarded across c. 3,200 level 3 qualifications ([Vocational Qualifications Dataset quarterly data report](#)). These numbers are an indication of the diversity of the VTQ offering that can lead to many different progression routes for students on numerous different pathways. More work will be required at a later stage to clearly identify – in consultation with the sector – how large the subset of level 3 VTQs for progression to higher education really is. An initial attempt based on a certain set of exclusions is described in this report. However, the implications of the post-16 qualifications review, and a more widespread adoption of T Levels will affect the scope of this definition in the future.



## 2 Current VTQ landscape

According to the [Annual Qualifications Market Report for the academic year 2021/2022](#), published by Ofqual in March 2023, a total of 11.0 million certificates were issued for GCSE, AS, A level, vocational and other qualifications in England. Vocational and other qualifications made up 4.9 million of these certificates, accounting for just over 44%. This constitutes a growth in the vocational qualifications space of 5.8% over the previous year.

These 4.9 million vocational and other qualification certificates cover different qualification levels and span across different sectors and serve different purposes. With a total of more than 1.5 million certificates in the academic year 2021/22, level 3 VTQs made up just over 30% of all vocational certificates in England (see Table 1 below). In comparison to the previous year, level 3 certificates showed the greatest increase in numbers (up by 114,400 certificates since 2020/21), returning to pre-pandemic levels.

| Qualification level | # of certificates 2021/22 | % of total certificates |
|---------------------|---------------------------|-------------------------|
| Entry Level         | 588,090                   | 12%                     |
| Level 1             | 898,115                   | 18%                     |
| Level 1/Level 2     | 398,420                   | 8%                      |
| Level 2             | 1,389,190                 | 28%                     |
| Level 3             | 1,511,405                 | 31%                     |
| Level 4 to 8        | 149,595                   | 3%                      |
| Total               | 4,934,815                 |                         |

### 2.1 Level 3 VTQs for progression

While there are many reasons that students may choose to take VTQs, the focus of this strategic review is on level 3 VTQs for progression to higher education. In 2021/22, the 1.5M certificates were awarded across more than 3,200 different Level 3 qualifications. Using the [Vocational Qualifications Dataset](#) and testing our assumptions against data from UCAS, we have classified these 3,200 qualifications based on their likelihood to lead to higher education.

Around 400 out of these 3,200 level 3 qualifications can be classified as likely leading to HE progression. These include all T Levels, level 3 VTQs that are included in [DfE performance tables](#) if they are Applied Generals or Tech Levels and qualifications categorised by AOs as “Other General Qualifications” which are defined as “qualifications [that] are academic in nature and are often taken in schools and colleges as part of secondary and tertiary education. Often the aim of these qualifications is to secure a body of knowledge and progress students through to higher levels of academic study.” For further reference see [Ofqual’s qualification category on Register \(Annex C\)](#). More than 345,000 certificates were awarded across these 400 qualifications in the academic year 2021/22.

A second group of level 3 qualifications that could be used for HE progression are level 3 VTQs that attract UCAS tariff points. Based on our analysis, there were more than 1,600 qualifications that attracted UCAS points (but that do not meet the other requirements described above) in the academic year 2021/22, with more than 285,000 certificates.

Combined this suggests that roughly 2,000 qualifications with more than 630,000 certificates in 2021/22 could be considered to support progression to HE. It is important to highlight that this is an initial classification will require review and discussion with the sector, also in the context of the outcomes of the post-16 qualifications review. Defining this scope clearly will help to manage expectations for students, colleges, schools and AOs but also to tackle more systemic issues, such as the risk of creating divergence with the devolved administrations. Another factor to bear in mind is the fact that some students won't know at point of entry whether they will use their result for progression to HE or not. When defining the scope it is important to carefully assess whether any modifications (e.g., to the results day) would reduce the flexibility of a qualification and how that would impact students.

## 2.2 Awarding Organisations

In 2021/22 the approximate 630,000 certificates that might lead to progression were awarded by 116 different awarding organisations (AOs). As shown below, the three largest AOs (Pearson, NCFE and City & Guilds) held a combined market share based on certificates of 52% (>328k certificates) and the top 10 AOs collectively take up nearly 80% of the market.

This market concentration is not surprising: with few exceptions, those AOs that offer the highest number of different qualifications (often spanning across sectors) also hold substantial market shares (based on certificates). Pearson, for example, as the largest provider of level 3 certificates also offers the highest number of different level 3 qualifications.

| AO name                                      | # of certificates awarded (AY 2021/22) | Market share (based on certificates) | # of level 3 qualifications offered (AY 2021/22) |
|--|--|--------------------------------------|--|
| Pearson Education Ltd                        | 224,420                                | 35.5%                                | 820  |
| NCFE   | 52,907                                 | 8.4%                                 | 162  |
| City and Guilds of London Institute          | 51,020                                 | 8.1%                                 | 531  |
| UAL  | 38,909                                 | 6.2%                                 | 23   |
| OCR  | 37,498                                 | 5.9%                                 | 98   |
| WJEC-CBAC                                    | 36,021                                 | 5.7%                                 | 19   |
| EAL  | 17,454                                 | 2.8%                                 | 150  |
| VTCT   | 15,991                                 | 2.5%                                 | 263  |
| AQA Education                                | 12,919                                 | 2.0%                                 | 21   |
| LIBF - London Institute of Banking & Finance | 10,655                                 | 1.7%                                 | 2  |

Source: [VTQ Quarterly dataset](#).

The University of the Arts London (UAL), WJEC, AQA and LIBF on the other hand all attract large numbers of students across a smaller number of qualifications. This is explained by their unique areas of expertise: WJEC, for example, is known for its Criminology qualifications. For AQA, the dominant qualification is the Certificate in Mathematical Studies; and for LIBF the Level 3 Certificate in Financial Studies.

A more in-depth analysis of this data and assessment of the types of qualifications in scope would be important to determine which AOs are likely to play the most critical roles in terms of enabling better manageability of level 3 VTQs at a school and college level. A proposal of how to cluster AOs based on this initial analysis of market share is presented in chapter 5.2 .

## 3 Future changes in the VTQ landscape

The level 3 VTQ landscape is in the process of changing and three key drivers are important to consider when thinking through long-term, strategic options: **population growth**, the impact of the [post-16 qualifications review](#) and the increased use of **assessment by examination**.

### 3.1 Population growth

According to the [ONS' 2020 national population projections](#), the population aged 15-19 in England is projected to grow by 0.66% p.a. over the next ten years (until 2033). As a result, more young people are likely to seek post-16 qualifications that meet their interests and skills and provide attractive progression routes. As described in chapter 5.1 below, UCAS is already preparing for this population growth with their [Journey to A Million project](#), seeking to identify key challenges and opportunities created by increased demand for higher education places.

How this population growth will affect the number of students pursuing level 3 qualifications depends on several additional factors: the future labour market and skills demand, the number and types of qualifications available (incl. how these are assessed) and wider economic factors, such as the on-going cost-of-living crisis. The DfE's *Unit for Future Skills* analyses these trends and seeks to improve the quality of jobs and skills data. Their latest [Labour market and skills report from 2022](#), highlights that the economy's growing demand for more highly skilled jobs may lead to "higher demand for better education, skills and vocational training opportunities for lifelong learning" which would likely affect all types of VTQs, including VTQs that support students to transition to HE as well as VTQs for people already in employment.

For schools, colleges and AOs, the question around the impact of population growth is currently overshadowed by the more immediate changes around the post-16 qualifications review (see chapter 3.2). Whilst stakeholders acknowledged the importance of more long-term, strategic planning for the sector at large, no school, college or membership body we spoke with has started to map out or think through changes in future demand for level 3 qualifications resulting from demographic changes.

### 3.2 Post-16 qualifications review

The on-going post-16 qualifications review prompts the most significant change to VTQ delivery and administration for schools, colleges and AOs. The overarching aims of the review are to:

1. Simplify a complex system and create clearer choices for students
2. Ensure that every qualification approved for public funding has a clear purpose, is of high quality and supports progression to positive outcomes for students
3. Improve the 16-19 technical offer so that students leave FE with the knowledge, skills and behaviours employers say they need

The key changes for level 3 VTQs will come into effect at the beginning of the academic year 2025/26, when the key level 3 qualification types aside from T Levels and A levels used for progression to HE will be Alternative Academic Qualifications (AAQs). As laid out in the [post-16 qualifications review](#), AAQs will be offered in a more limited range of subjects than current applied generals, as only subjects in strategically

important areas that don't overlap with T Levels or A levels will be funded in future. Technical Occupational Qualifications (TOQs) may also be used for progression to HE, although they are primarily intended to lead to employment. The first AAQs and TOQs are due to be taught from 2025 and therefore awarded from 2026/2027.

Qualifications that are out of scope of the post-16 qualifications review will remain unaffected, (e.g., the International Baccalaureate, Extended Project, Advanced Extension Awards, Performing Arts Graded Examinations and Core Maths). However, all qualifications in scope of the review will be subject to reapproval for funding, and some subjects will explicitly be excluded from being considered as AAQs. This means that enrolments in those areas could shift. At this point in time, it is too early to assess whether students are more likely to choose based on subject (which would drive more students into A levels or T Levels), availability in schools or colleges or assessment methods (which would likely introduce moves between AAQs or TOQs).

### 3.3 Assessment by examination

The third critical factor that affects future VTQ delivery is the use of assessment by examination.

[Assessment by examination is defined by Ofqual](#) as an assessment which is

- a) set by an AO,
- b) designed to be taken simultaneously by all relevant students at a time determined by the AO, and
- c) taken under conditions specified by the AO (including conditions relating to the supervision of students during the assessment and the duration of the assessment)

While most schools and colleges have already seen an increase in assessments by examination in recent years, an important consequence of the post-16 qualifications review for schools, colleges and AOs is that the share of external assessment is going to increase further. Alternative Academic Qualifications, for example, which will be taught from 2025 have a prescribed minimum rate of 40% assessment by examination. Similarly, the [DfE guidelines for inclusion in performance tables](#) specifies a minimum of 40% of externally assessed content for Applied Generals and 30% for Tech Levels.

In summary, the move towards more external assessments will bring about a new set of challenges and risks that need to be managed. Two risks stood out in our conversations:

#### **Risk 1: There is a risk of ineffective exam administration given staff capacity and capability and variations in requirements**

Based on the definition above, AOs set the assessment and specify the timing and conditions for students. In comparison to centre-assessed work, this means that schools and colleges have less choice as to when and how assessments are executed, leading to a number of significant logistical challenges on the ground. Most critically for schools and colleges, these operational challenges relate to:

- Access to sufficiently large rooms that are adequately equipped (e.g., laptops/computers given the possibility of an increased use of on-screen/online assessment)
- Access to a sufficient number of rooms and relevant equipment to accommodate students with reasonable adjustments
- Recruitment and retention of invigilators
- Increased demand on staff (including teaching staff) in the lead up to and during exams (e.g.,

around setting up rooms, filming or observing exams), leading to timetabling challenges and students having reduced access to their teachers

- Shifts in timetables due to either space or staff restrictions. The need to use specific room types (e.g., IT suites) during specific times for exams creates disruption to normal teaching schedules and timetables. Similarly, large schools and colleges might need to deploy additional resources to accommodate high volume qualifications being timetabled for assessment at the same time. With different AOs setting different timelines, it is possible that staff in schools and colleges need to manage waves of exams across GQs and VTQs – creating space and invigilation demands that are unmanageable (particularly when assessment is on-screen and requires IT suites).

*“The preparation time that we have for each exam series is significantly reduced. With more exams taking place at different times throughout the year, we have to manage a large number of competing deadlines. The students are the ones suffering from this the most.”*

FE College

One of the colleges we spoke with is considering having separate exam rooms that cannot be used for other purposes. Creating this separate examination space is expensive but would help create improved conditions for students and teachers. For paper-based exams, schools often use sports facilities; an option upon which very few colleges can rely, which is why particularly small colleges have to close the college on certain days to accommodate the growing number of assessments by examination.

*“All the teaching staff are occupied preparing or invigilating different exams. We see this get worse and worse in the future and are worried about the gaps this creates in our timetables.”*

FE College

In relation to teaching staff, some stakeholders in schools and colleges highlighted the need for larger scale change like revisiting Initial Teacher Training (ITT), National Professional Qualification (NPQ) courses or the Early Career Framework (ECF) to ensure teachers have a better understanding of effective exam preparation and administration in this new environment.

At the AO level, the increased use of assessment by examination means a greater reliance on enough suitably skilled markers and assessors, paying particular attention to likely pressure points in the economy because skills are in short supply. Particularly in newer subjects related to digital, IT or engineering, the education sector cannot compete with pay levels in the private sector, making it difficult to find suitable candidates.

## **Risk 2: There is a risk of growing pressure on EOs, a role that is already difficult to recruit and retain**

For schools and colleges, an increase in assessments by examinations has been mentioned as a reason for the growing churn of Exam Officers (EOs). EOs are responsible for good administration of exams, and as such, they carry significant responsibilities, particularly when considering that most EO roles are paid at administrator level. ([According to the recruitment website uk.talent.com](https://www.uk.talent.com), the average exams officer salary in the UK is £25,330 p.a. Entry level positions start at £22,626 p.a. whilst the most experienced workers make up to £31,000 p.a. These averages are based on a total of 2,055 salaries.)

In our conversation with the National Association of Examinations Officers (NAEO), a key challenge that was highlighted was that many EOs who are new to their roles have very little understanding or prior experience with the administration of VTQs. There is a need for the sector to come together to jointly think through key aspects of job descriptions and training programmes for EOs that include information on the nuances and flexibilities surrounding VTQs. Whilst there is a push from the NAEO to develop more detailed guidance for senior management around the roles and responsibilities of EOs working on VTQs, there is still very little support for EOs available in schools and colleges.

There is a significant risk that the increased use of assessments by examinations makes the role of EOs even more challenging. Already, EOs must navigate a variety of arrangements from different AOs, accounting for different requirements and standards around exam administration. More exams and shorter exam-free periods increase the workload for EOs' which is likely going to affect recruitment and retention.

### 3.4 Summary

While the overarching impact of these three shifts (population growth, post-16 qualifications review, and assessment by examination) is hard to predict, they will certainly shape the VTQ landscape in the future, both in terms of which qualifications attract sizable student cohorts and in the way that schools and colleges deliver VTQs. It is important to encourage and support schools and colleges to take a strategic view and plan for how they will be able to facilitate population growth and the increased use of assessment by exam.

## 4 Results release

Please note that this report is based on research that was undertaken before the results release of summer 2023 and before any decisions regarding 2024 and beyond were taken.

### 4.1 Introduction

UCAS projects that there could be up to one million higher education applicants in a single year in 2030, up from almost three quarters of a million today. It has launched [the Journey to a Million campaign](#) to prepare for this scenario.

This increase in demand for HE places is driven by two key factors: first, an increasing 18- year-old population, with the ONS forecasting that there will be nearly 900,000 18-year-olds in the population in 2030 – an increase of 200,000 from 2020. Second, the type of jobs and occupations in the UK economy which [will increasingly demand skills traditionally taught at higher education institutions](#) such as technological and higher cognitive skills, including critical thinking, decision making, and creativity.

In this context, activities to widen participation and create a level playing field for HE applicants from diverse backgrounds are more critical than ever. Today, [nearly a quarter of 18-year-olds from the most disadvantaged areas enter higher education](#); compared to just over 11% in 2006. However, with demand for HE places set to rise over the rest of the decade, there is a risk that those most disadvantaged students, typically at the lower end of the attainment spectrum, may be ‘squeezed’ out. In this context, questioning whether and how changes to results release dates could create greater parity of treatment for students seeking to progress into HE from less conventional routes is more important than ever.

The [delayed publication of VTQ results in 2022 affected more than 20,500 students](#). That is 20,500 individuals whose future plans were affected – or at least uncertain – for longer than necessary.

The lack of clarity around when results for VTQs are published is a failure to support *all* students equally. Delayed access to results creates additional bureaucratic and administrative challenges for VTQ students, for example around receiving offer confirmation decisions from universities, or securing alternative places through the Clearing process.

As part of this review, we have explored how changes to the existing results days could help create a more level playing field for level 3 VTQ students seeking to progress to HE. This is not the first time that the timing of the results day has been discussed; historically, there have been several initiatives to consider moving the results release dates of A levels and GCSEs. These initiatives have included discussions around bringing forward A level results to enable HE offers to be informed by actual results, with a hope that this will increase fairness, potentially improving social mobility. An example for a rejected petition from 2020 [can be accessed here](#).

Changing the results day is a complex undertaking that requires a careful assessment of the risks associated with reduced marking time for exam boards, shorter teaching, and learning periods in schools and colleges (if the dates are moved forward) and the potential upsides of greater parity of treatment for students. We acknowledge that these changes would take a considerable period of time to implement safely.

This chapter highlights the opportunities and challenges of four scenarios that seek to secure parity of treatment for students using different qualification types to progress to higher education. These scenarios were developed as hypotheticals with input from a range of stakeholders. By focusing on specific



scenarios, we were able to identify underlying assumptions and key questions that are important to consider when assessing the nuances of the different approaches. Importantly, the assessment of each scenario depends on the types of level 3 VTQs in scope for this change. As described in chapter 2.1, this review focuses on level 3 VTQs for progression to HE only. Assessment of the scenarios might change if this scope was broadened.

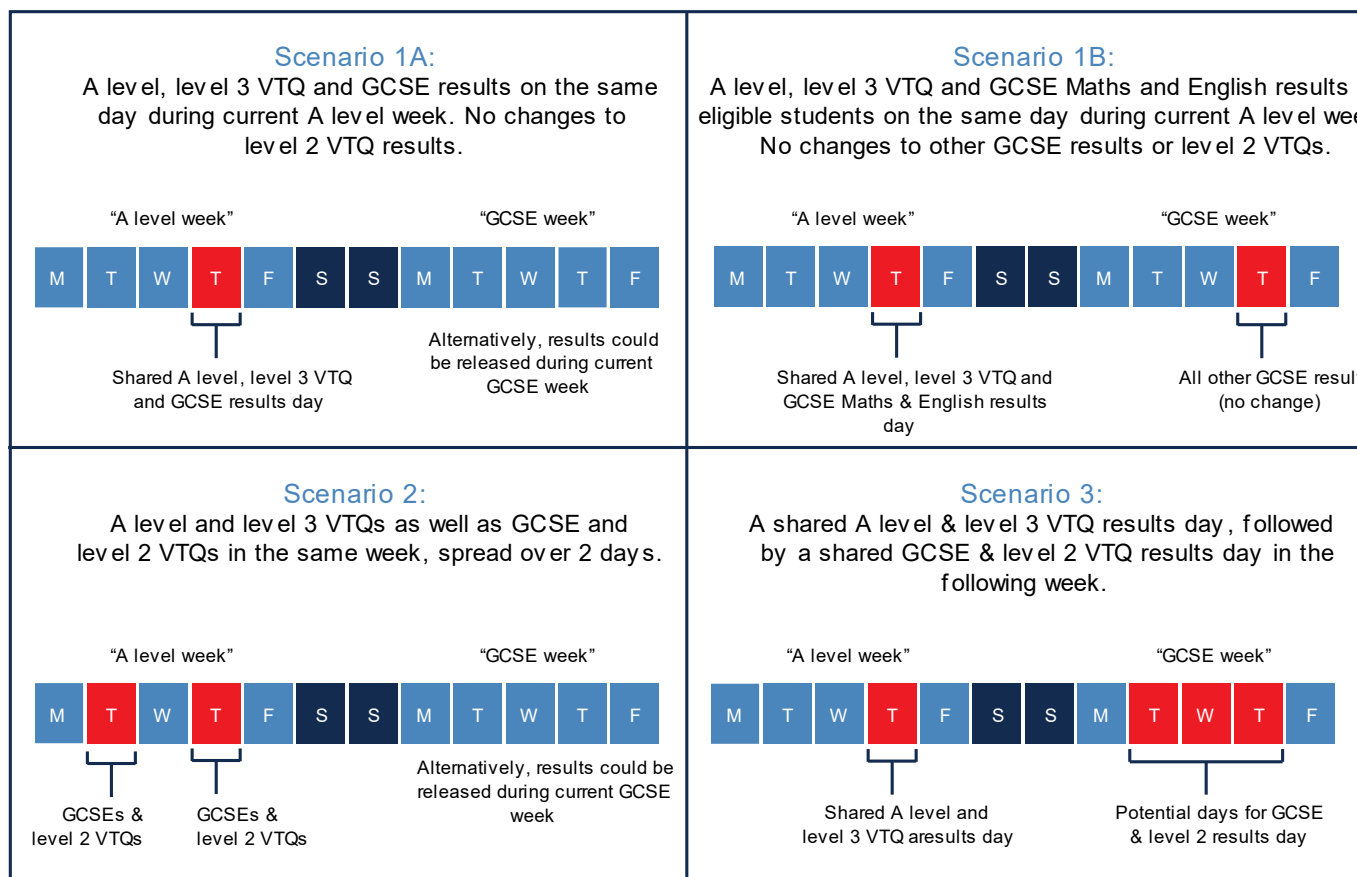


Figure 1 Scenarios for a results day change

As Figure 1 illustrates, there are different scenarios in relation to the timing of these revised results days. For scenarios 1A and 2, the shared results release day can either take place during current "A level week" or current "GCSE week". A shift of A level and other level 3 results to a later date would reduce the time available for Higher Education Institutions (HEIs) to process applications and make offers – while a shift to the earlier date would reduce GCSE marking time, and possibly require a shift in the exam schedule, leading to a reduction in teaching and learning time. We have considered the implications of these shifts in our assessment of each scenario below. More work would be required to determine the most suitable day of the week. Mondays and Fridays are the least likely options given the time required before and after results day to process results and offer guidance. For scenario 1A, however, there is scope to explore shifting the single shared results day to the Tuesday or Wednesday of current GCSE week.

In assessing the different scenarios, we have focused on four key factors:

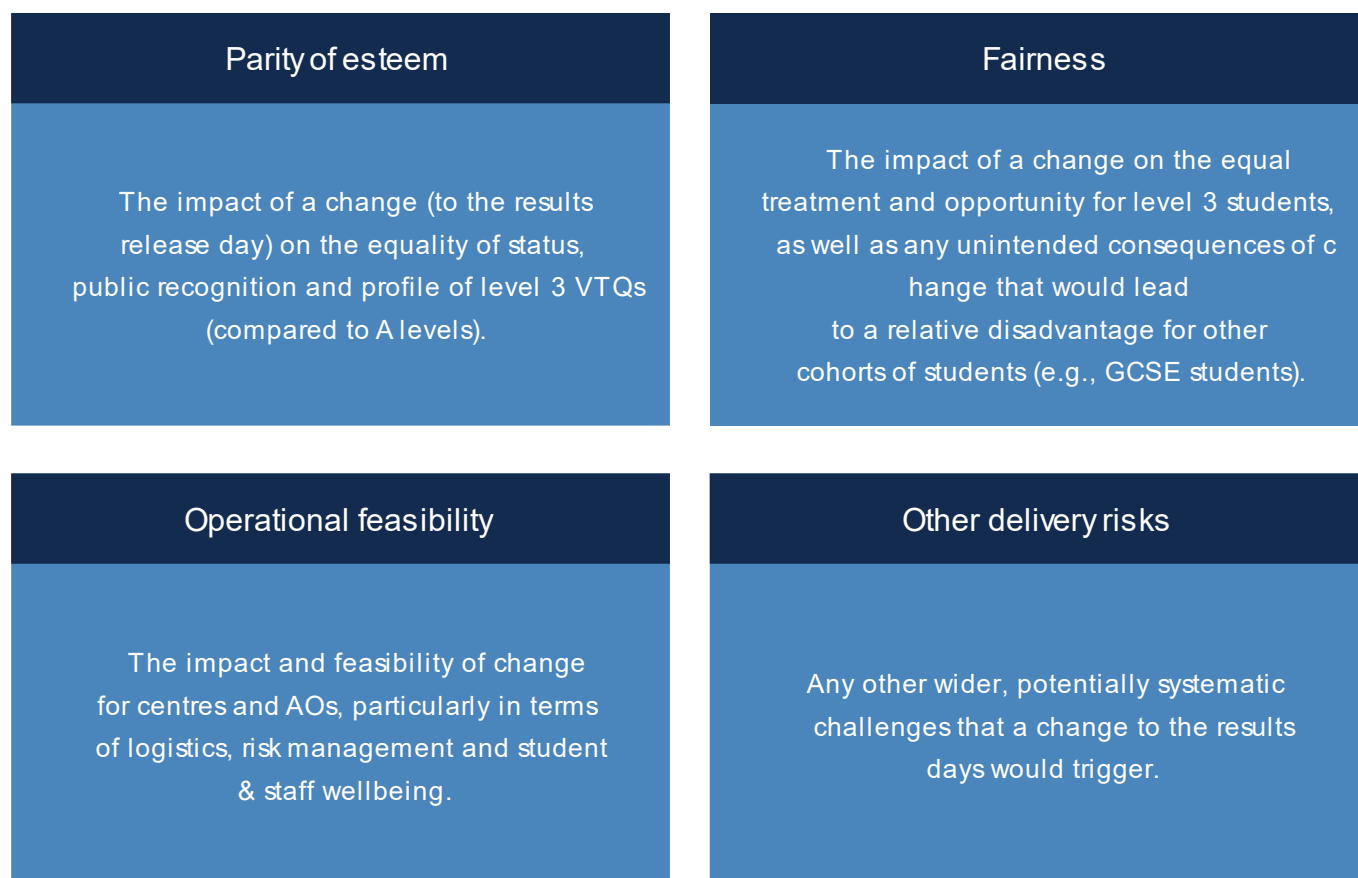


Figure 2 Assessing parity of treatment

The conversations with sector leaders and key stakeholders have also raised more profound questions around the potential benefits of entirely moving away from a fixed results day for **all** qualifications or the shift to a post-qualification admissions (PQA) or post-qualification offers (PQO) system. These alternative pathways are reflected on as part of our summary in chapter 4.5. Given the wide-reaching consequences of any change to the timing and sequencing of level 2 and level 3 results, the next step following on from this review is a strategic discussion between key Government stakeholders (DfE, Ofqual), HEIs and UCAS as well as a more formal consultation of AOs, schools and colleges to better understand the impact on students and any investment required.

## 4.2 Context: Current sequencing of results release dates

Currently, A level results are made available to students on the third Thursday in August, with GCSE results being issued exactly a week later. Schools and colleges receive results under embargo from 12.01AM the previous day, giving them 32 hours to prepare the results for release to candidates. By way of contrast, in Scotland where exams are sat earlier, results are also released earlier by the SQA, typically on the second Thursday of August.

VTQ results are released by AOs to schools and colleges, and from them to students, based on their own schedules. As part of the VTQ Action Plan for 2023, Ofqual introduced the Monday of current A level week as the latest date by which AOs had to issue level 3 VTQ results to schools and colleges (for those students expecting a result on results day for progression to HE). This deadline allowed schools and colleges to align the release to students with A level results day on the Thursday, bundling support

activities and underscoring the fact that both types of qualifications can lead to similar progression routes.

However, particularly when compared to GQs, the lack of public awareness for VTQ results release might undermine these efforts to create greater parity. The flexibility built into VTQs, the different progression routes and specifically the opportunity of modular study and flexible exam schedules explains why results are released at different times and for many VTQs it does make sense to stick to the current system of results publication, i.e., for work-related vocational qualifications where regular assessments and results throughout the year are needed to progress into and within employment.

However, for level 3 VTQs that are used for HE progression, there is a strong fairness argument to be made for the introduction of a fixed results release date that coincides with A level results day, enabling candidates to have their results considered by UCAS and HE in the same way.

The Government's decision to publish T Level results at the same time as A levels, formalising a shared A level and T Level results day, is already a step in this direction.

A level and GCSE results days are fixed dates in the public calendar. These dates are not set by the regulator but have historically been used and are widely accepted by Exam Boards with effective coordination from JCQ. They attract significant political and media attention and allow students, parents, schools and colleges to make future plans. The current sequencing of results release dates seeks to ensure that schools and colleges have sufficient time to process exam results, but also – critically – to support students. This includes offering information, advice and guidance on progression routes, identifying alternative pathways if the results fall short of what was expected and supporting appeals. Particularly at a time where pressure on students is high, and where many young people report mental health concerns, the support offered by schools and colleges is critical during this period.

### 4.3 Assessment of scenarios

As part of this review, four different scenarios were assessed (also see Figure 1):

- Scenario 1A: A level, level 3 VTQ and GCSE results on the same day during current A level week. No changes to level 2 VTQ results.
- Scenario 1B: A level, level 3 VTQ and GCSE Maths and English results for eligible students on the same day during current A level week. No changes to other GCSE results or level 2 VTQs.
- Scenario 2: A level and level 3 VTQs as well as GCSE and level 2 VTQs in the same week, spread over 2 days
- Scenario 3: A shared A level & level 3 VTQ results day, followed by a shared GCSE & level 2 VTQ results day in the following week

### 4.3.1

#### **Scenario 1A: Introducing a shared results day for level 3 and GCSE results**

*A level, level 3 VTQ and GCSE results on the same day during current A level week. No changes to level 2 VTQ results.*

The first scenario considered under this review is the creation of a **single, shared results day** that brings together A level, GCSE and level 3 VTQ results for progression. This scenario constitutes the largest departure from the status quo and would affect all schools across England, regardless of whether they offer VTQs.

The main argument for a single results day is the idea of giving all students results at the same time, allowing them to make informed decisions about their next steps. This change would affect all A level, GCSE and level 3 VTQ students, but make the most drastic differences to students whose offers depend on GCSE Maths and English resit results.

The earlier access to GCSE results would also give schools and colleges more time to manage enrolment, admissions and make timetabling decisions for the next academic year. Whilst this appears to be a strong argument for large FE colleges, schools and smaller colleges highlighted that this benefit would not outweigh the cost and likely operational challenges of a shared, single results day.

#### **Assessment**

Despite the benefit of parity and opportunities for improved planning and coordination, the concept of a **single, shared results day** comes with a number of potential challenges:

#### **Parity of esteem**

Whilst the access to results at the same time puts successful level 3 VTQ students in an equal position for HE progression decisions, the impact of a single shared day on the public perception and profile is hard to predict. A level and GCSE results – because of their volume and significance – are likely to dominate the media landscape, failing to [address concerns by VTQ students of being an afterthought in comparison to GQs](#). Whilst this risk could (and should) be mitigated through greater sector coordination and VTQ-specific press releases and/or ministerial announcements focused on VTQs, a shift of the results publication time is unlikely to lead to greater parity of esteem for VTQ students in and of itself.

Schools and colleges have highlighted that they have a role in talking about qualifications and achievements of students, particularly highlighting progression stories. Given that the public understanding of VTQs, and particularly the new T Levels, is still relatively poor, schools and colleges are in a unique position to share more detail about the qualification content, highlighting what students are exploring and to where it might lead. ARK schools, for example, regularly publish [detailed reports](#) highlighting progression routes and career choices of VTQ students, as well as key content of their qualifications.

*“We need to celebrate and value VTQs – and as such, we need more politicians and the media to talk about VTQ results. The talking will matter a lot more than the timing of the results release.”*

FE College

## Fairness

A key responsibility for teachers around results days is to support students with information, advice and guidance related to their results and future pathways. This is particularly important to students whose grades fall short of expectations and who need to reconsider their progression options. Ensuring equal access to this critical support is vital for students, particularly as mental health issues among 16–19-year-olds have increased since the pandemic. Depending on the type of school or college, the ability of existing staff to cope with the demand from students on a single shared results day will vary. The stakeholders we engaged for this report, raised concerns about staff being able to offer the required support to students if all results were published on the same day. The volume of GCSE results would likely overburden teachers, but also data teams and MI systems; a situation that might inadvertently lead to an (unconscious) prioritisation of A level students; many of which will be working on their HE applications and have the most pressing needs to address. Schools and colleges shared that it would be hard to create a system that would allow students to access support if teacher capacity was stretched across a very large number of results. This problem might be exacerbated by the fact that students are increasingly accessing their results from home, meaning that it is harder for teachers to identify who needs support.

Another minor point to consider in this context is that there is a small number of VTQ students who take a combination of level 2 and level 3 VTQs and who will require both sets of results to progress to HE. We have not been able to quantify how many students would be affected by this. It requires a more in-depth analysis of popular level 2/level 3 VTQ combinations and an assessment of Individualised Learner Record (ILR) data. With level 2 results currently not having a fixed results day, this group of level 3 students would still have to wait and be disadvantaged in comparison to others. At the same time, the push towards an even bigger results day through the inclusion of level 2 would overstretch resources even more.

## Operational feasibility

Combining three critical events into one day means increasing the pressure on staff and IT systems which is likely going to increase the risks of human error. At a time where the education system is already under significant strain and where teachers' workload (and retention more broadly) is a key source of concern for schools and colleges, shifting timelines is likely going to receive pushback from teachers and unions.

*"Bringing A level, VTQ and GCSE results together into one day would be chaos. We would not be able to get enough bodies in to support two full year groups with effective destination planning."*

Large Multi Academy Trust with 14 Sixth Forms

Furthermore, creating a single day also means creating a single point of failure. AOs, schools and colleges would face higher risks from potential cyber-attacks and additional resource would be required to manage peak activity during this period. AOs and large schools and colleges might have more resources available to manage these peaks; smaller schools and colleges, however, often rely on few members of staff and tend to use less advanced digital methods for results transfer or data entry. The recruitment and onboarding of a seasonal workforce might be an answer but brings with it significantly increased costs and risks around quality assurance. AOs highlighted in our conversations that reduced marking and awarding time would introduce a major delivery risk given the significant volume of GCSE results. If deliverable at all, it would require prior commitment from schools/colleges to provide examiners that can support AOs

to meet results deadlines earlier.

### Other risks

The effective execution of exams and results publication relies on a wider infrastructure of other, secondary actors: printers, markers, moderators, invigilators as well as staff in local authorities, career services or mental health support charities. This wider cohort has not been consulted as part of this work but would likely be affected by a concentration of efforts and reduced capacity at the school and college level to support all students equally.

### Conclusion

Based on our conversations with stakeholders, the idea of a single, shared results day that brings A level, GCSE and level 3 VTQ results together would present significant challenges. The key argument of creating instant, public recognition for VTQs is insufficient to justify the likely increase in costs and additional burden for an already strained workforce. One single day also means creating one single point of failure, increasing overall system risks that need to be managed (particularly around cyber security).

#### 4.3.2

#### *Scenario 1B: Introducing a shared results day for level 3 and GCSE Maths and English results*

*A level, level 3 VTQ and GCSE Maths and English results for eligible students on the same day during current A level week. No changes to other GCSE results or level 2 VTQs.*

A modification to the first scenarios would be to introduce a single shared results day for A level, level 3 VTQs and GCSE Maths and English results (for progression to HE) only. GCSE results for students who are **not** seeking to progress into higher education as well as GCSE results in other subjects would not be affected by this change.

This scenario was suggested by AOs as part of our discussions and would address some of the issues around operational feasibility. Given that this proposal would not affect Year 12 students' GCSE results or other GCSE subjects, the number of additional results that schools and colleges would have to process for this shared results day is lower. Schools and colleges would therefore be in a better position to offer the required information, advice, and guidance to all students, addressing one of the key concerns raised in relation to Scenario 1A.

However, there are two important practical challenges with this scenario. First, how to identify students at the school and college level. Whilst schools and colleges with small cohorts of level 3 VTQ students might be able to easily identify which level 3 students would require an early release of their GCSE results, this is a difficult task in large colleges with thousands of students. The lowest risk option for centres would therefore be to mark all level 3 students with pending GCSE results as priority candidates for early results release, creating unnecessary peaks in the marking process and inconsistency around release dates for exam boards.

A better, but higher risk option would be to identify only those students who seek to progress, e.g., based on previously submitted UCAS applications. This, however, raises concerns about the process of data sharing and the impact on students who might want to progress but have not yet submitted data to UCAS. In addition, there is a risk that students remain unidentified and would then be at a substantial disadvantage relative to others.

The second practical challenge with this scenario is around interpreting results in the national picture. The partial release of GCSE results would mean that some student access their results without the context of the national picture. And, on the flipside, the speculations that any patterns in these early results could provoke about the national picture. To support decisions about reviews of marking, grade boundaries for GCSE English language and Maths would also have to be released a week earlier too, which would likely fuel speculation about GCSE outcomes before the full GCSE picture is released.

## Conclusion

An early release of GCSE Maths and English results for level 3 VTQ students seeking to progress into higher education would help create greater parity of treatment for level 3 students vis-à-vis A level students as they would have access to all relevant results required for HE admission at the same time. However, as described above, the challenge of identifying those students requiring an early release and ensuring a prioritisation of their GCSE results, creates substantial operational challenges for schools, colleges and AOs. As detailed in chapter 5 below, current processes around the release of results are already highly inconsistent across schools, colleges and AOs. Adding another layer of complexity to them increases the risk of missing students and placing those at a significant disadvantage.

Another argument that is important in this context is around volume: the number of level 3 students who are still waiting for their GCSE Maths and English results by the end of Year 13 is small. They do exist, but they are a minority. Out of that minority, only a subset will consider moving into higher education. According to our conversation with schools and colleges, this number is very small. The accrued benefit of a major shift in results release timing that brings with it significant operational risks is unlikely to justify this change.

Across scenarios 1A and 1B, our discussions with AOs and schools & colleges highlighted two additional questions for future consideration:

- How would our assessment change if we operated in a system where the exam system made greater use of digital delivery?
- What would the upsides be for schools and colleges having access to results as and when they are ready versus receiving all of them in one batch? Would this reduce the pressure on staff before and during results release week?

### 4.3.3

#### ***Scenario 2: Moving days into one results week***

*A level and level 3 VTQs as well as GCSE and level 2 VTQs in the same week, spread over 2 days*

The second scenario seeks to replicate the benefits of scenarios 1A and 1B and create greater parity of treatment for A level and level 3 VTQ students, whilst addressing some of the issues resulting from the concentration of all activity into one day. The proposal of scenario 2 is to release A level and level 3 VTQ results for progression on Tuesday and GCSE and level 2 results on the Thursday of the same week. Many schools, colleges and AOs experienced the publication of GCSE and A level results during the same week in the summer of 2021, where results days were brought together because of Covid. Whilst there are some lessons that can be drawn from this comparison to 2021, it is important to bear in mind that 2021 did not formally include VTQ results (even if some schools and colleges decided to include them as part of A level results day) and that students were awarded Teacher Assessed Grades (TAGs) due to the cancellation of exams during the pandemic.

By shifting all results into the same week – but across different days – scenario 2 would improve the parity of treatment for VTQ students, including those who take a combination of level 2 and level 3 qualifications and intend to progress to HE. If these two days were moved forward into current A level week, this scenario would enable earlier progression decisions when compared to the status quo, regardless of students' decisions about their pathways. We were not able to obtain a reliable estimate of how many students would benefit from this in any given year.

### Assessment

Despite the benefits, the idea of increasing the scope of current A level and GCSE days and shifting either the A level day backwards into GCSE week or the GCSE day forwards into A level week creates a set of potential challenges:

### Parity of esteem

When thinking about activities that can help improve equality of status, public recognition and profile of VTQs, scenario 2 is unlikely to have a significant impact. However, it is worth pointing out that the spread over two days might possibly create more space for the media and politicians to focus on and highlight nuances of different qualifications and achievement rates that would get lost if all activity culminated into a single day. Making it into the headlines for VTQs would still require a significant push from schools, colleges, AOs and politicians but there is likely going to be more space to do this in the context of scenario 2 when compared to scenarios 1A and 1B.

### Fairness

Some level 3 VTQ students rely on the release of their GCSE Maths and English results in order to meet the conditions of their HE offers. Not being able to access those until two days later creates a disadvantage in comparison to students taking A levels. If an A level student narrowly misses the conditions of their offer, they will have two additional days to reach out to their preferred university and negotiate their admission before their place is offered up for clearing. However, based on our conversations with schools and colleges, the number of level 3 VTQ students who would still require the results of their GCSE resits in the summer of Year 13 is very small given that they would have had opportunities to resit their GCSEs in November and May of Years 12 as well as November of Year 13. As such, the actual number of students for whom this would make a material difference is likely to be very small.

There are also unintended consequences to consider: if the GCSE results day was moved forward, the exam timetable for GCSE students would need to be adjusted, reducing teaching and learning time. Additionally, the current system intentionally spaces papers out across subjects to reduce the risk that students miss all assessments in a subject. A shorter time frame might mean that this is no longer possible and create additional pressures for GCSE students. When trying to improve fair treatment, this impact on a sizable



cohort of students taking GCSEs is important to consider.

### Operational feasibility

In comparison to the status quo, a decision to reduce the gap between GCSE and A level results day will create operational challenges for AOs, schools and colleges. If GCSE results were pushed into A level week, AOs would have to process more results in a shorter period which is likely to lead to staff shortages and the need to buy-in external capacity, particularly given the volume of entries for GCSE. This increased cost at AO level would likely get passed on to schools and colleges.

For schools and colleges, views are more mixed: on the one hand, there is feedback from 2021 - when results were released during the same week in response to Covid-19 - that suggests that the management of all results during one week puts significant strain on teachers and administrative staff in schools. Key concerns are around the workload for exam officers and the lack of capacity for contingency arrangements.

On the other side, schools and colleges who were supportive of the single week approach, highlighted that the concentration of results release during one week would mean that the summer holidays are less disrupted. This could be a significant benefit for teachers that might outweigh the heightened stress of a single week; particularly if schools and colleges were given at least a year to plan for the change in schedule.

It is important to highlight that the majority of stakeholders we spoke with felt that the benefits of a single results week would not outweigh the operational challenges and risks. Schools and colleges that liked the approach were generally on the smaller side in terms of number of students.

### Other risks

AOs highlighted that the shift of GCSE results day into A level week would have an impact on international students, and particularly non-UK domiciled students that might require visas. However, we have not been able to verify this impact as part of this review.

### Conclusion

Based on our conversations with stakeholders, the idea of moving all results release dates into the same week and grouping them to be on Tuesdays for A levels and level 3 VTQs and Thursdays for GCSEs and level 2 VTQs is a more realistic way forward than the single shared results day (in scenario 1A). Whilst issuing results during one week, as opposed to two weeks, brings some obvious benefits, the discussion around the timing of that week is critical. Further consideration is required in respect to whether the results move forward or back; moving *forward* into current A level week will give students more time to confirm and prepare for HE places (incl. finding accommodation), moving *backward* into current GCSE week will avoid a reduction of teaching, learning, and marking time.

*“Moving results release forward would be immensely helpful as it would give us more time to support students on their progression options. As a result of the cost of living crisis, we see a lot of students under 16 leaving education to earn money and support their families; more time would allow us to help them by working with employers.”*

Large FE College

Additional questions that would need to be considered in assessing this decision are:

- What is the impact of having a larger gap between the results release date in Scotland and England? What would it take to align?
- Could the results day be decoupled from clearing, with clearing opening for all students at the same point, once all results have been published.

#### 4.3.4

### *Scenario 3: Keeping two weeks but widening the scope of each day*

*A shared A level & level 3 VTQ results day, followed by a shared GCSE & level 2 VTQ results day in the following week*

The third scenario is the least radical of the scenarios considered. Whilst this research was undertaken prior to results release in summer 2023, we note that AOs, schools, colleges and Ofqual have already achieved significant progress towards this scenario through [the VTQ 2023 results Action Plan](#). The combined A level and level 3 VTQs for progression day during current A level week and a combined GCSE and level 2 VTQs day during the current GCSE week would improve parity of treatment for level 3 VTQ students when it comes to HE admissions.

Maintaining the current spread of results release over two weeks would avoid placing additional demands on staff and teachers in AOs, schools and colleges and might be a reasonable, medium-term solution to move towards greater parity of treatment for VTQ students. However, it remains open whether this shift would help raise the public profile of VTQs significantly, as the incorporation of VTQs into existing results days might not create a sufficiently big push to create greater parity of esteem.

#### Assessment

The appeal of this scenario to stakeholders that were consulted is that it does not require major changes to existing processes. In fact, with many schools and colleges already aligning A level and level 3 VTQ results release, the degree of change would be minimal. With fewer operational challenges, this scenario raises more questions around what else can be done around the shared A level and level 3 VTQ day that can help secure greater equality of status, public recognition and profile of VTQs.

#### Parity of esteem

It would require substantial efforts from centres, AOs, JCQ, the DfE and relevant ministers to make sufficiently strong public announcements around VTQs to direct more media attention to VTQs and influence public perception. Based on our conversations, the responsibility to improve the public recognition of VTQs sits with all actors: schools and colleges are uniquely placed to talk about powerful progression stories of their students; they have access to key statistics around progression routes of VTQ and A level students. They can also work with AOs to share more information about the content of the different qualifications. Often, students, parents, and even universities, only have a limited understanding of what a level 3 qualification involves. The spotlighting of key content as well as the amplification of people who have pursued interesting careers following a VTQ could help in this context.

## Fairness

This scenario improves fairness for VTQ students by giving them the same degree of certainty around *when* their results will be released.

## Operational feasibility

The separation of the release of level 3/level 2 results spreads risks and is more manageable for schools, colleges and AOs, particularly when it comes to ensuring that students receive adequate support and guidance in the hours and days after results release. Having greater clarity around the release of level 3 result dates allows AOs, schools and colleges to plan internally and communicate with students. The agreement of most AOs in scope for the VTQ Action Plan to release level 3 VTQ results to schools and colleges on the Monday of A level week, enabling a shared A level and level 3 results day, is a first step in this direction and highlights that this approach is operationally feasible. For schools and colleges, an Ofqual survey in January 2023 as well as our conversations, indicated strong support for the release of A level and level 3 results to students on the same day, underscoring that there are few concerns around the operational feasibility of this scenario.

## Conclusion

As mentioned above, this scenario is closest to the current reality and many AOs, schools and colleges have already adopted a similar timetable of releasing level 3 VTQs on or around A level day. As such, this approach might be the most feasible in the short term, particularly in the context of much larger change initiatives affecting GQs and VTQs in the next 2-3 years (e.g., qualifications review, upcoming election). Having a one-week buffer between the two results days would also help to resolve any potential issues around level 3 results release before the level 2 results come out, mitigating risks. The closeness of this scenario to the status quo makes it more operationally feasible; an important argument at a time where schools, colleges and AOs are already operating under a lot of pressure and where staff recruitment and retention is difficult. However, in keeping things this close to the status quo, there is a risk of creating too little of a change in the fair treatment of VTQ students.

## 4.4 Summary of Scenarios

Due to the time and scope for this piece of work, the scenarios have only been discussed with a sample of schools and colleges and a subset of AOs delivering level 3 VTQs. Public or private institutions (e.g., specialist colleges or NHS arrangements and private training providers) were not consulted as part of this review. Please also note that this review was conducted prior to the results release in 2023 and any decisions that have since been made for 2024 and beyond.

In addition to the scenarios explored above, there might be benefit in a “no change” scenario which would have at its core a continuation of the efforts of the VTQ taskforce and Action Plan from 2023 and Ofqual’s subsequent announcements for 2024 and beyond. In the context of the wider changes to the qualifications landscape and the announcement of the Advanced British Standard, this scenario might be most plausible at this point in time.

## 4.5 Provocation: To move away from a fixed results day for all qualifications

The scenarios described on the previous pages of this section consider potential changes to the current system. However, through our consultation, some stakeholders questioned if the current system is the right starting point.

Stakeholders suggested that Ofqual should consider other available levers that could help change the narrative around progression and the public perception of vocational and technical qualifications.

One of the more deceptively obvious solutions is around PQA/PQO, which has been tentatively explored several times. The central argument for the PQA model is that it supports greater fairness in the system for all students. The current system means that students' offers are largely based on predicted grades and teacher-based assessments. This prediction system has inaccuracies which can disproportionately impact disadvantaged and underrepresented students. A PQA model could improve parity and give students the ability to make more informed decision-making on the course and institution that is right for them.

The latest [DfE Consultation on the introduction of a post-qualifications model](#) closed in May 2021, deciding not to implement PQA given other, "more urgent sector priorities on continuing to deal with Covid recovery, on the skills agenda and the introduction of the Lifelong Loan Entitlement." Whilst a full consideration of PQA is out of scope for this report, given the long-term view we are taking, it would be remiss to not mention PQA when envisaging a longer-term horizon for strategic change.

There may also be less obvious solutions that would lead to greater parity of treatment. The following considerations for a different, fairer, future system were highlighted in our stakeholder conversations and may want to be explored further, particularly to assess applicability for GQs:

- **Issuing results to individuals but without release of national data:** giving students access to their results but intentionally delaying the process of analysing and publicising data (which would make it impossible to interpret results in the context of the national picture).
- **Allowing AOs to drip-feed results to schools and colleges in their own time** (but before a set results deadline): this could incentivise AOs to find ways of processing results fastest (as centres might be more inclined to choose AOs with fast processing times), encouraging the market to compete to bring forward release dates. However, this option would also require a different approach to HE admissions to ensure that HE places do not get taken up by those receiving results first. There is also an inherent risk that AOs prioritise results release over quality controls around marking, undermining confidence in the system.
- **An emulation of university grading:** where students receive grades online, and the graduation/celebration events are totally optional/ceremonial at a different point in time (if at all).
- **Exploration of alternative models from the international landscape:** Several stakeholders cited examples from other countries and systems where students received their grades in advance of university applications. This included the use of the Abitur grade in Germany, the ATAR in Australia, and the Lukio grades in Finland, all of which are received before university applications are made. Further review of such processes may be of benefit.

## 5 Sector coordination

### 5.1 Introduction

As described in Chapter 2, the VTQ landscape is varied. During the 2021 to 2022 academic year, [there were 229 Ofqual-recognised AOs](#), offering qualifications from Entry Level to Level 8. Despite the concentration of market share amongst a few providers, the lack of consistency when it comes to exchanging data or administering exams has a negative impact on the manageability for schools and colleges.

Most schools and colleges will opt to work with a multitude of AOs, creating an administrative burden that is becoming even more difficult to manage with an increase in assessment by examination (see chapter 3.3).

[The Joint Council for Qualifications \(JCQ\)](#) “is the single voice for its member awarding bodies” which are AQA, City & Guilds, CCEA Awarding Organisation, Pearson, NCFE, OCR, SQA, WJEC-CBAC. And while these members also all offer vocational qualifications, the primary focus of JCQ’s work has historically been with A levels and GCSEs. This focus is also linked to JCQ’s role in publishing the national GCSE and A level results in August of each year.

In the VTQ space, [the Federation of Awarding Bodies \(FAB\)](#) seeks to be “the collective voice of the UK’s world-class qualifications and assessments industry.” FAB currently has 123 members, including AOs across England, Wales, Scotland and Northern Ireland. FAB is a membership organisation that offers national learning resources, access to events and conferences as well as legal and business support. As such, it is less well placed to lead on the development and implementation of new sets of guidance and systems that promote greater coordination among AOs for the benefit of schools and colleges.

As part of this review, we have spoken to AOs, membership organisations, schools and colleges to identify opportunities to improve manageability for schools and colleges through potential routes to **streamline their workload when working with multiple awarding organisations**. Our conversations highlighted three areas – as shown in Figure 3 below – that need to be addressed in the near future.

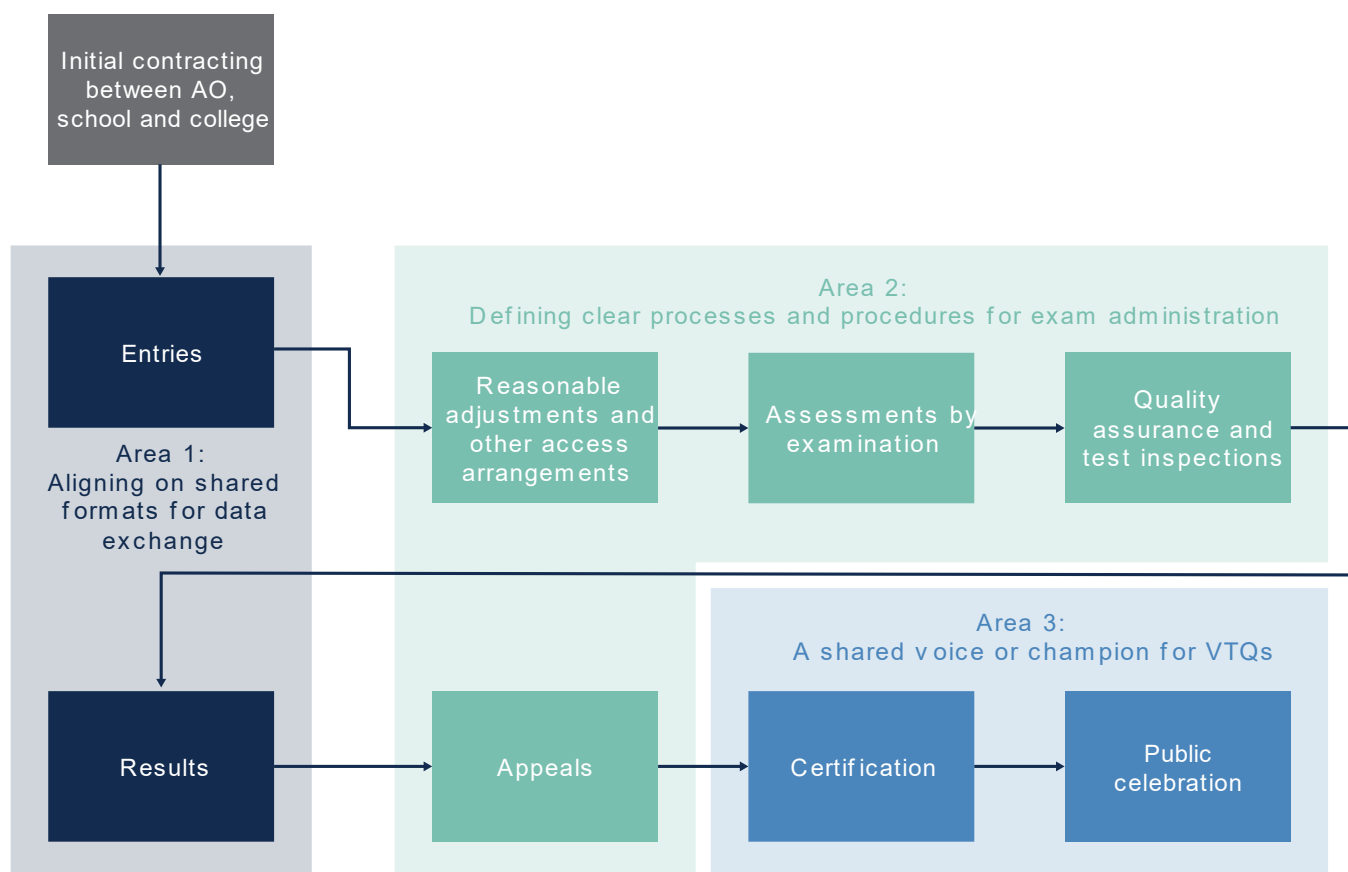


Figure 3 Areas for increased sector coordination

## 5.2 Context: The need for increased sector coordination

To better understand the challenges in the AO-school/college relationship, we developed a high-level classification of AOs whose support and involvement in future coordination efforts will be critical.

The fragmented VTQ landscape with large numbers of AOs creates a significant challenge for schools and colleges. Based on our conversations, there is consensus among AOs, schools, colleges and membership organisations that more work is required to improve the delivery of VTQs and the experience for VTQ students through greater coordination and collaboration. This applies to VTQs across all levels.

However, given different sizes and organisational structures of AOs, the capacity to contribute to and help shape wider coordination efforts is likely going to vary. To acknowledge that different types of AOs will likely play different roles in future coordination efforts, we propose the use of a three-tier model to differentiate between AOs and their required commitment to different sector coordination efforts.

*“Current conversations around coordination are too focused on the teaching and learning which means that most of us [AOs] try and wrestle with the operational questions independently. I’m sure there is more that we can do together.”*

Awarding Organisation

Please note that more work is required to identify which AOs would sit in which Tier. Important considerations in this context are: (a) the roles of current JCQ and current taskforce members, (b) the types of qualifications in scope. There is an important argument to be made to increase the scope for sector coordination to include not just level 3 VTQs for progression but also some level 2 qualifications.

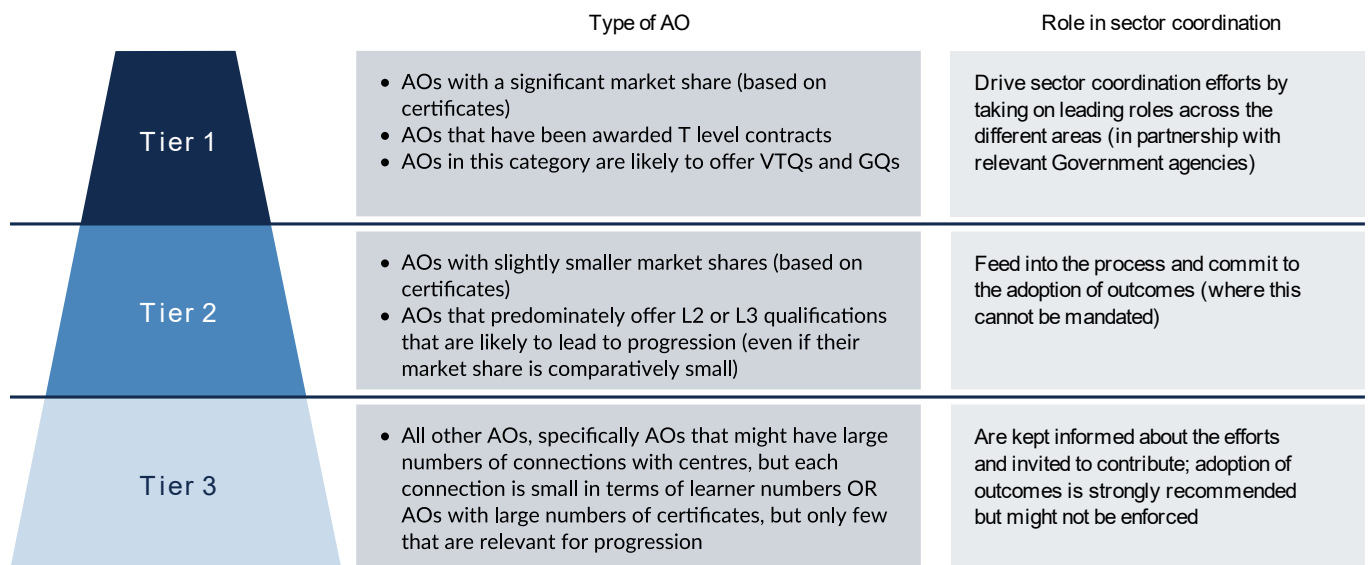


Figure 4 Three-tier model for VTQ AOs

A version of this three-tier model would support the development and implementation of the key areas of change described below, balancing the demand from schools and colleges for greater alignment across AOs with the implications of process changes for AOs, particularly when these are small. There are three important considerations when finalising this model:

1. While large AOs that hold significant market share will dominate Tiers 1 and 2, there will be clear benefit from finding space to listen to and engage with some of the smaller providers to avoid a solution that only works for a small number of high certificating AOs.
2. Careful messaging should be used when communicating to the wider sector to explain the rationale for this model to incentivise commitment from Tier 3 AOs.
3. Are there any smaller providers that are dominant in a specific sector (or possibly even geographical region) and therefore the “go-to” place for schools and colleges. Identifying these and including them in Tier 2 would be important to ensure that schools and colleges don’t face a trade-off between lower administrative burden and “best in class” qualification.

## Comment:

### Decisions about qualification offers at Multi Academy Trusts and FE Colleges

Decisions about which qualifications to offer and which AO to partner with have historically been made by school leadership. However, with single academy trusts becoming less common and multi-academy trusts (MATs) growing in size (# of schools) and reach (# of pupils), there is a shift that is likely to affect the AO landscape going forward.

Whilst there is no publicly available data on this, sector experts that were interviewed for this project highlighted the significant variance across MATs in relation to the degree of independence of their academies. In some instances, schools choose their own exam boards, in other instances this responsibility sits with a central person in the trust. Our interviews highlighted that there is a trend towards more centralised decision making and that the results of this centralisation are not yet apparent. One possible outcome is a further consolidation in the AO market, based on the argument of achieving greater economies of scale with individual AOs when centralising qualification procurement. Aims at the trust level to reduce the administrative workload and ensure compatibility and integration of MI systems would further support this argument. Another possible outcome is that students who are currently enrolled in qualifications offered exclusively by very small AOs might move out of MATs and into schools that still offer those qualifications.

This trend needs to be monitored closely as it will likely affect the direct relationship between AOs and MATs. If decisions for an AO provider are made centrally, it might lead to lower levels of co-operation at school-level, particularly if a school does not support the decisions taken by its trust.

This might play out differently at FE Colleges who shared during interviews that their main priority is to offer the most suitable qualifications to their students, regardless of the additional administrative burden that is associated with a new connection to a different AO. [Ofqual's Drivers of centres' choice for vocational and technical qualifications report](#) from 2020 confirms this finding.

## 5.3 Area 1: Aligning on shared formats for data exchange

Schools and colleges are the primary interface for students; they hold student data and are responsible for the effective administration of a qualification. As shown in Figure 3 above, there are numerous points at which data is exchanged between schools or colleges and AOs. In the context of qualification entries, schools and colleges currently submit different data returns to AOs, depending on which AO they work with and the type of qualification. For example, one AO might only ask for minimum information like first name, last name, date of birth, ULN and type of qualification. In other instances, an AO might add to that list gender, previous qualifications and achievements, and access requirements. There are also instances where the same AO uses different entry forms for different qualifications.

Based on our conversations, this process can and should be optimised to create greater consistency across the system. The current lack of alignment around what data is shared with AOs during this initial stage, which format is used for each data point, and how the data is transmitted to the AO, is challenging



for two reasons: first, varying requirements create unnecessary work for staff in schools or colleges who often manually create downloads from their MI systems to submit bespoke reports, a time-consuming process; second, different requirements might lead to unnecessary data transfers and potential GDPR violations. Without an agreed list of what is collected and in what format, there is a risk that AOs might overreach and ask for data that is not strictly necessary.

To reduce the administrative workload for school and college staff and manage data protection effectively throughout the enrolment period, there is a **strong need for clear guidance** on what data is required and how it should be shared.

There are other pockets of the education system that have successfully resolved this issue; in the FE sector and for GQs, for example, there is the commitment to one single form to manage entries. Improved coordination at this stage of the process therefore feels like a quick win for the wider VTQ sector that would also create benefits for students; more robust systems reduce the likelihood of delays or mistakes that result from manual data input or time-consuming matching processes.

The use of different data formats does not just affect the data exchange from schools and colleges to AOs. It is also critical when AOs share data with them around results release time. We spoke to large FE colleges that receive results in up to 20 different formats, ranging from Excel, to PDFs, to online portals. To match results with student records, staff use automatic matching software or applications (that are often custom-built in-house) but there are always a number of non-matches and results that need to be reviewed manually, costing time and creating room for human error. This issue is particularly pertinent for FE Colleges who rely on the timely receipt of results to manage enrolment for future years. Any step that would simplify the data exchange at this point will create a benefit for students and staff.

In conversation with AOs, we discussed what it would take to systematically adopt a shared process for the transmission of exam results to schools and colleges.

### Key enablers of greater coordination around effective data exchange

- Alignment on data formats to ensure best possible compatibility with the large variety of MI systems currently in use by AOs, for both entries and results.
- A clear mandate from a central body, like Ofqual or the DfE, to ensure that as many AOs as possible commit to using new data exchange protocols and templates. AOs that participated in this research felt strongly that it would require “all AOs” to be on board. A future piece of work should consider the different levers available. For those AOs offering qualifications that receive public funding, the DfE will have a direct interest and might already be working towards greater coordination through the AO Data Collection project. If the scope is increased further to include all AOs, Ofqual as the regulator is likely to be better placed to lead on this initiative. Exploring a staggered approach that considers different sizes and operational capabilities of AOs seems to be a good starting point.
- A system-wide use of the ULN, as discussed in Chapter 6 of this report.

The advantages of a sector-wide effort around this are significant; a commitment to shared data exchange protocols and a clear set of templates would reduce the administrative burden for staff in the long-term and might also lower costs, as there would no longer be the need to build customised matching software or invest in relevant system updates.

Similarly, AOs would benefit from a single format for sharing results; after an initial investment in the development, there would be less resource required in the long-term to ensure that systems integrate

with schools and colleges. A shared format would also simplify the reporting to other sector organisations, such as Ofqual or the DfE and enable improved student journey reporting.

The four AOs with the highest numbers of level 3 VTQ certificates for progression (Pearson, City & Guilds, NCFE and OCR) are JCQ members. As such, they all bring experience from the [introduction and roll-out of A2C in GQs](#) and can meaningfully contribute to resolving the current inconsistencies for VTQs. While there is a lot that can be learned from the A2C process, it is important to highlight that a 1:1 replication of A2C might not go far enough; whilst there is greater alignment, the structure of the data returns still varies across AOs, including between JCQ members. Addressing these inconsistencies appears to be an important and addressable challenge that requires urgent attention.

Greater alignment around effective data exchange does not necessarily mean greater or full alignment on deadlines. In fact, schools and colleges highlighted that the use of different deadlines by AOs helps them to manage internal capacity.

### Next steps to take this forward

We have outlined two critical areas where greater coordination among AOs would significantly reduce the administrative burden for schools and colleges:

1. Alignment around what data is needed and in which format during the registration and entries process
2. Alignment around the way results data is shared back to schools and colleges

Whilst there are other areas where greater coordination would help (e.g., around quality assurance processes), these two are potential quick wins that would significantly reduce the administrative burden for schools and colleges and AOs during the busy periods of enrolment and results release. To drive these two areas forward, the following key steps are necessary:

- Refine the proposed three-tier model and be explicit around expectations towards different types of AOs. Also, a consideration as to what extent the adoption of these shared formats can be mandated across all AOs would need to be taken.
- Identify a system champion, ideally an organisation that has previous experience with or exposure to A2C, to ensure that the process incorporates lessons learned from the roll-out of A2C.
- Ensure that the system is future-proof and protects users from cyber attacks and fraud.

## Comment: Giving colleges access to preliminary GCSE results

Our conversations with colleges highlighted an additional area where improved data exchange would help reduce administrative workload and burden. Currently, colleges do not have access to the GCSE results of school leavers wishing to enrol on college courses until well after their enrolment window closes.

This means that their enrolment processes rely on students' self-reported results or students bringing copies of their certificates into the college.

Whilst small colleges don't perceive this process as particularly burdensome, it creates significant challenges during the admissions process in large colleges who take in thousands of new students per year. Having to either chase students for their paper records or relying on self-reported results, makes planning for the next academic year more difficult. Some colleges are currently using a work-around that impacts on the student experience: if a student fails to provide copies of their results, the college will ask them to attend maths and English classes, until they have proven that they don't need to attend. Whilst this might be a workable solution for small cohorts of students, it creates unnecessary workload in large colleges.

GCSE results are held back because they are provisional. A closer look at the data, however, shows that out of the 1.4 million GCSE Maths and English results in 2022, only 3,000 were changed (two out of every one thousand results).

Addressing this issue is another potential quick win particularly for colleges. GCSE results are part of students' Personal Learning Record (PLR), and as such, access to the results is granted by the DfE's Learning Records Service (LRS). Colleges can access the PLR for enrolment but face challenges around the timing, which the LRS is currently trying to address.

## 5.4 Area 2: Defining clear processes and procedures for exam administration

As described in chapter 3.2, the post-16 qualifications review will affect the way VTQs are assessed. From the beginning of the 2025 academic year, [new conditions and guidance](#) will apply to AAQs and TOQs, and for AOs that are developing their qualifications now. For Level 3 AAQs there is a requirement that a minimum of 40% of the contribution to the overall qualification is through assessment by examination.

There are three parallel trends that have a particularly strong effect on exam administration at the school and college level:

- a) The potential for use of on-screen exams in England in high stakes assessments (Ofqual and DfE are undertaking research into the potential opportunities, challenges, risks and benefits of this approach)
- b) The growing number of approved access arrangements for students. While there is no data that specifically relates to VTQ students' requests for access arrangements, [Ofqual released official statistics on Access Arrangements for GCSE, AS and A levels](#) in November 2022. The data shows that the number of approved access arrangements across all types has increased by 5.5% per year since 2017/18. The most common access arrangement being extra time, followed by the use of a computer reader/reader and a scribe or speech recognition.

c) The increased use of assessment by examination (see chapter 3.3)

These trends create new operational and logistical challenges for schools and colleges, but also have an impact on students and teachers.

To respond to the three trends described above, schools and colleges are likely going to need more invigilators. While some schools and colleges can rely on existing staff, others have found ways to tap into local networks and recruit retirees. It is important the invigilators are confident with using IT. Additionally, external resources are costly; one college has seen a 50% increase in invigilator costs year-on-year because they had to accommodate more students in different spaces, more frequently. According to our conversations, additional staff are not just required during exam week, but also in the days prior, and during the post-exam administration. One college with 160 students per year hires two additional full-time invigilators for five days to manage the post-exam uploading and scanning. Another FE College with roughly 6,000 VTQ students recruited 26 temporary invigilators over the last academic year. These temporary members of staff were brought on to support throughout exam season and during the November and January re-sits, where a growing number of students needed individual rooms. Given the challenges around recruiting, colleges often find themselves cross-staffing existing staff which then reduces teaching time for other cohorts. In addition to these logistical challenges, there are risks around quality assurance; for non-permanent invigilators, schools and colleges conduct an initial training, followed by randomised quality checks. However, the larger the number of additional invigilators required, the harder the practical execution of spot checks.

To reduce the administrative workload for teachers and administrators in schools and colleges and create greater consistency across exams for students, we have tested the idea of **defining clear and shared processes and procedures for exam administration across AOs** with key sector stakeholders.

This solution intentionally does not seek to address the total number or mode of exams, rather it focuses on identifying pathways to reduce the administrative burden associated with exam administration.

#### Key enablers for clear and shared processes and procedures for exam administration

- An open and transparent process with clear milestones that is led by one key party (e.g., JCQ) and includes as many AOs as possible (i.e., reaches beyond JCQ members and would ideally include AOs from all three tiers)
- A commitment from as many AOs as possible, but definitely all Tier 1 and 2 AOs, to use the shared standards

AOs highlighted that shared standards might risk stifling innovation, particularly in the area of digital assessments or access arrangements. AOs operate in a competitive environment and as such, any commitment to shared processes might reduce each individual organisation's ability to compete for market share. However, there is a structural question around whether the way exams are administered is the right place for AO competition. Putting the student experience first, it would be hard for teachers or invigilators to explain to students why there are inconsistencies across AOs in the processes that students experience as they take their assessments. Building on the existing JCQ guidance on access arrangements feels like an obvious first step, allowing improvements on how students are supported over time e.g., by using new technology (such as screen readers) to be co-ordinated across AOs.

## Next steps to take this forward

We have highlighted three critical areas in which greater alignment would significantly improve the ease and effectiveness of exam administration in schools and colleges. In order to take these forward, we propose the following next steps:

- Refine the proposed three-tier model and be explicit around expectations towards different types of AOs. To what extent (and how) can the processes and procedures for exam administration be mandated across the system?
- Call out to AOs to form a working group and/or separate working groups across the three strands identified to build leadership from within the sector.
- Consider how the existing JCQ guidance on reasonable adjustments and special considerations can be used as a starting point for further discussion, ideally as part of a conversation with JCQ to explore the benefits and challenges of a collective approach.

In the context of the post-16 qualifications review, we strongly recommend to take this piece of sector coordination forward as a priority issue to be resolved ahead of the academic year 2025/26 (when the new AAQs will be rolled out).

### Comment: Streamlining AO communications

Related to this topic is the need to streamline communication from AOs to schools and colleges. Currently, each AO communicates their deadlines, examination requirements, etc. directly via email to a key point of contact in the school or college. One of the centres we spoke with reported receiving at least 15 long emails with detailed requirements from the 15 different AOs they work with. This creates a challenge, particularly when emails are sent to different members of staff. Schools and colleges struggle to access the right information at the right time.

In response to this challenge, Ofqual, as part of the [VTQ Action Plan has piloted an Information Hub](#) that gathers all critical dates across all AOs who signed up to the Action Plan. Whilst this is a helpful step into gathering all key information in a central place, there is room for improvement. In addition to the deadlines, schools and colleges need to have easy access to the types and formats of expected data returns, as well as the requirements for delivering assessments by examination. Taskforce members have also suggested the introduction of standard wording in email subject lines, e.g., “VTQ Action Required” to help draw attention to time-critical emails and approaches to target communications at non-responding schools and colleges rather than all of them. However, so far, these discussions haven’t reached a consensus.

Using a shared platform solution that brings all of this information together and that can be easily updated by AOs themselves would make the process smoother in the future.

## 5.5 Area 3: A shared voice or champion for VTQs

The fragmentation and complexity of the VTQ space is one of the reasons why efforts to improve coordination and reduce inconsistencies across AOs are lagging, particularly when compared to GQs. Another reason is the lack of a centralised voice or champion for VTQs. As highlighted above, FAB, the *Federation of Awarding Bodies*, is closest to playing this role at the moment. However, our conversations highlighted that FAB's current areas of focus are insufficient to fill the gap that is currently felt by schools and colleges (as well as AOs) without developing additional capacity.

JCQ is an established voice and plays a very clear role for GQs in terms of issuing guidance and conducting research into how shifts or changes in the market will affect qualifications. However, there is a sentiment among schools and colleges that JCQ's core focus is on GQs and not on VTQs. It is important to note that JCQ is actively trying to address this by introducing VTQ operational groups. Whilst beyond the research period of this research, it is also noted that JCQ included VTQ data in the results days briefings in summer 2023 for the first time – which is a valuable development.

However, there is an opportunity here for an organisation or a group of organisations to take forward the topics of improved coordination and standards specifically for VTQs, considering future changes and needs of the sector.

Key priorities that would be interesting to explore for this organisation today are:

- **Public recognition and profile of VTQs:** In the context of changing the results release day, most schools, colleges and AOs referred to the need for improved sector communications about the achievements of students and the content of VTQs. This effort is currently led by bodies like the AOC or individual schools and colleges which at times struggle to deploy resources to VTQs, particularly when there are only few VTQ students in comparison to GQs. Having a central voice, an organisation that supports the public communication of VTQ results and celebrates students' achievements and progression pathways would significantly help create greater parity of esteem for VTQs.
- **Impact of population growth:** We briefly touched upon population growth as one driver of a potential future increase in the demand for VTQs as part of Chapter 2. However, more work is required to better understand this trend and describe the potential implications for schools, colleges and AOs. Based on our conversations, schools and colleges simply don't have the capacity to plan much into the future; receiving input in the form of research on future demand for different VTQ qualifications would significantly help schools and colleges prepare for the future. Further, after the increase in student numbers up to 2030, the trend will then reverse as birth rates and student numbers are set to decline.
- **Exam Officer training:** Levels of experience and previous exposure to VTQs vary drastically among Exam Officers in schools and often, EOs with fewer years of experience are insufficiently equipped to effectively administer exams. To address this issue and reduce churn among EOs, the NAEQ has identified a need for the sector to come together to jointly think through key aspects of job descriptions and training programmes for EOs that include information on the nuances and flexibilities surrounding VTQs.

## Key enablers to set up and establish a shared voice or champion for VTQs

AOs see Ofqual as playing a key role in driving this effort. If there was a central VTQ sector voice establishing common arrangements (as discussed, for example, in areas 1 and 2 of this chapter) and making recommendations based on research into future trends, Ofqual could take on the role of endorsing relevant recommendations.

### Next steps to take this forward

- Ofqual to use its convening power to support AOs to explore different funding and membership models, building on the experience of FAB and JCQ.
- Consult key sector stakeholders on the scope for this coordinating function: There is a temptation to create a single voice for all VTQs, however, given the size and complexity of the market, it is probably useful to initially ringfence a subset of VTQs upon which to focus.

## 5.6 Recommendations

The three areas for improved sector coordination require leadership and dedicated resources in order to explore some of the questions that this review has raised. In terms of priorities, there is an argument to be made around resolving area 3, the identification of a “VTQ champion” first, who can then take forward the issues flagged in areas 1 and 2.

However, all stakeholders consulted agreed that the operational challenges, resulting from the lack of coordination in areas 1 and 2 are creating significant operational challenges for schools and colleges that need to be addressed urgently. As we have highlighted in this review, some aspects, such as the early access to GCSE results data, might even be “quick wins” that can be achieved with limited resources.

To avoid delaying progress in high impact areas, there is an argument to push for immediate action on areas 1 and 2 and link activities up with the changes from the post-16 qualifications review that will be effective from 2025/26. Delaying progress until a solution to the membership questions raised in relation to area 3 have been resolved would be a disservice to the sector.

Another reason to prioritise activities against areas 1 and 2 over area 3 is related to the roll- out of T Levels. The award of T Level contracts to AOs that already hold significant market share (NCFE, City & Guilds and Pearson) means that an increasing uptake of T Levels might lead to a further consolidation in the VTQ space and a potential decline in the total number of AOs.

*“With T Levels, we’re more hamstrung to specific AOs; we no longer have a choice to move to a different provider if we find processes too burdensome. As a result, we might end up giving up some of our smaller contracts instead.”*

FE College

## 6 Shared Student Identifier

### 6.1 Introduction

The discussion of a sector-wide use of a shared student identifier is a recurring one. On the one hand this is because of the significant benefits it would bring to students, schools, colleges, AOs and HEIs. On the other hand, the discussion keeps floundering because there is an identifier already in the system – [the Unique Learner Number](#) – that has the potential to be scaled, with the right combination of making its use mandatory and providing relevant incentives.

The Unique Learner Number (ULN) is issued and administered by the Learning Record Service (LRS) and is designed to collate data for students' personal learning records (PLR), an online record of qualifications and achievements obtained from the age of 13/14. As such, the ULN is often compared to the education equivalent of the National Insurance number; even if the National Insurance number is not an identifier.

The ULN has been around since 2008, and yet, it is not consistently used. AOs, schools and colleges are trying to use the ULN, for example, by including them on certificates but often encounter similar challenges:

- students not being aware of their number
- schools or colleges not being able to track down the number because students have been out of the education system for a while (particularly relevant for adult students)
- students being assigned more than one number
- students sharing the same number (which is particularly common for people with shared or similar names and addresses)

Whilst there are pro-active and reactive processes in place to monitor these instances and link or remove duplicate entries, these challenges have an impact on the system-wide use of the ULN. Whilst schools and colleges are mandated to use the ULN for ILR submissions for all publicly funded qualifications; not all AOs require schools and colleges to provide the ULN, even when the ULN is known. Instead, some AOs prefer to use their own candidate ID. When speaking to UCAS – a stakeholder who would particularly benefit from the system-wide use of a ULN – we learned that fewer than 17% of HE applicants currently include their ULN in their applications. According to the LRS, students' awareness of the ULN has started to increase in recent years and AOs now increasingly include ULNs on certificates. Nonetheless, uptake is not consistent across the board. Given the fact that the ULN is only mandated for publicly funded qualifications, UCAS cannot make the ULN a mandatory field for HE applications.

Providers and AOs have two ways of interacting with the LRS to access students' ULN or PLR, they can either run a search on the LRS web portal using personal details (e.g., first name, last name, DOB, postcode), or they have API access and use their own MI system which most larger providers and AOs prefer. Navigating either of these routes still requires significant data capability; whilst the search algorithm makes alternative suggestions in cases where there are no direct matches (e.g., "Andy Jones" instead of "Andrew Jones" who lives at the same postcode) the system has weaknesses when people have moved or changed names.



## 6.2 Context: Benefits of a system-wide use of the ULN

In an ideal scenario, the LRS would record **all** general and vocational qualifications for all students aged 13 and above, regardless of their pathways (e.g. including private and independent schools). The data exchange between schools, colleges, AOs and the LRS would be based on the ULN. This “one portal” idea would require collaboration between the DfE, Ofqual and IfATE to ensure alignment over purpose, use cases and data-sharing agreements.

A first milestone on the way to this scenario is the adoption of the ULN for VTQs at AO-level for publicly funded qualifications to enable easier matching of results. With schools and colleges already being mandated to use the ULN, the key question becomes how AOs can best be incentivised to support the system-wide adoption. In comparison to the ideal scenario where all results for all students are held centrally, this first milestone would require fewer large-scale system changes and could help make a long-term case for the step-change described above.

The benefits of a systematic roll-out of the ULN are widespread and impact all different stakeholders:

### Students

- Easy access to digital learning records (PLR) covering all regulated qualifications means that there is no need to provide hard copies and that it is easier to evidence previous achievements when documents are lost.
- Improved experience during the results release and enrolment periods given lower risk of delays resulting from administrative issues.

### Colleges and schools with 6<sup>th</sup> forms

- Improved administrative processes, particularly during enrolment of new students where a consistent use of the ULN would make the matching of application data with previous qualifications (e.g., GCSE results) much easier and during results release; something that the LRS has already demonstrated successfully.
- Reduced risks of human error resulting from manual matching processes.
- Easy access to PLRs which would replace the need to ask students to bring in copies of their certificates.
- Fast access to students' previous achievements to help inform conversations about future pathways.

### AOs

- Reduced risk around data duplication and lower risk of fraud.
- Improved understanding of progression routes for students.
- Reassurance that student data is matched correctly by the LRS even if an AO chooses to leave the regulated market or goes into administration (this might become increasingly important given the chance of increased sector consolidation as a result of the new T Level contracting).

### Other Stakeholders

- UCAS: Faster and more reliable matching of Level 3 results to HE applications due to a likely reduction of “investigatory work” that seeks to match up applicants with results data.
- DfE and Ofqual: Access to data across qualifications that can help better understand student progression through the education system.

## 6.3 Why is the ULN not working at the moment?

There was a big push from the DfE between 2010-12 to make the ULN mandatory for AOs and enforce result uploads to the LRS using the ULN. However, the use of the ULN could only be mandated for publicly funded qualifications and as such adoption was slow and benefits of a more systemic use were not communicated sufficiently. Another factor that may have contributed to the slow adoption was the replacement of the Qualifications and Credit Framework (QCF) with the Regulated Qualifications Framework (RQF). From October 2015, AOs developed their qualifications more independently, without the need to incorporate required units or credits. Similarly, the removal of set deadlines for qualifications under QCF and the move towards a system that allows students to set the pace of their learning, meant that coordination across AOs became less of a priority and that the roll-out of the ULN lost traction. Adoption has been patchy ever since.

Based on our conversations with AOs, the DfE and the LRS, there are several points that are repeatedly raised as key barriers that get in the way of a system-wide roll-out:

- **Cost:** the mandatory use of the ULN will likely require some providers and AOs to update their systems and/or change their current data collection approaches; an effort that will require additional investments in software solutions.
- **Lack of clarity around who is best placed to drive this effort:** AOs fed back that this needs to be a DfE-led initiative, whilst others highlighted that Ofqual can play a critical role in mandating a link-up with the LRS from AOs. An aspect that is important to think about is whether a bottom-up approach from providers can also work, even if this might be more complex given the large number of providers and their reliance on third-party IT systems.
- **Protection of personal data:** Many stakeholders referenced GDPR and/or data privacy concerns as additional key challenges. On the one hand, it can be argued that the current transfer of (personal) information across schools, colleges, AOs and relevant government bodies is more concerning from a GDPR perspective than the use of a shared identifier. On the other hand, greater centralisation of data could also lead to greater risks around data privacy. The roll-out of a shared identifier would need to include strategies to mitigate these risks and address GDPR-related concerns.
- **A problem-dominated discussion:** Most conversations that are taking place around a shared identifier fail to focus on the long-term benefits for students and other system actors (as described above) and instead are quick to highlight the shortcomings and failures of the current ULN (e.g., issues around shared or multiple ULNs for one student). It is worth noting that the DfE is seeking to address this issue by gathering and incorporating user feedback in the development of the digital wallet.
- **AOs' commercial interests:** the benefits to any individual AO of rolling out the ULN do not outweigh the cost of making changes to their MI systems and training staff which is why this initiative requires government leadership
- **Completeness of the data:** Schools and colleges prompt ULNs to be generated which puts them in a unique position to ensure a bottom-up use of the identifier. However, there are two challenges. First, the push and pull of data; whilst schools and colleges might have the best access to students' ULN, they do not design the data returns for qualification registration and entries. In other words, they might have the ULN but don't pass it on because it is not requested by the AO they work with (an issue that can be mitigated by making progress on area 1 described above). Second, using the ULN is only mandatory for publicly funded students, meaning that students in the independent

system (approximately 17% of all sixth form students and an even higher proportion in colleges) are not included in the data set.

There are two other identifiers that were commonly referenced during our conversations with stakeholders; neither of them lends itself to being used as a shared student identifier. The [Unique Pupil Number \(UPN\)](#) which has the specific purpose of facilitating the transfer of school-based education and attainment data through the state-funded school system in England. As such, only local authority-maintained schools have a statutory duty to transfer data including the UPN. Another identifier often referred to in the sector is the [Unique Candidate Identifier \(UCI\) which is used by Pearson for VTQs and GQs.](#)

## 6.4 Recommendations

Our conversations underline that increased systemic use of the ULN benefits all actors in the system, even if it does require some upfront investment and potential change of processes. At the same time, it is also apparent that the current approach, whereby it is up to AOs to decide whether or not they use the ULN for VTQs, is not working. In fact, it can be argued that the current flexibility undermines the roll-out; the resulting patchy adoption means that AOs, schools and colleges are in a position where they feel the pain of adjusting processes (e.g., by following requirements to add the ULN for some AOs) without receiving any of the benefits (as overall adoption is still too low). To break out of this spiral and move the roll-out of the ULN forward, there is a need for different Government agencies to come together to align on key priorities. There is a real opportunity to do this now:

First, the roll-out of the ULN in the VTQ space could be streamlined with on-going work of the DfE's Project Titan. Project Titan will allow access for students to their qualifications digitally and share with key stakeholders. The project is ULN-based and will move into private beta stage shortly. Progress made on this project can be used to emphasise the long-term, positive impact of a system-wide use of the ULN.

Second, the digitisation of qualification records is a way to prevent fraud. A digital wallet based on the ULN would likely make it easier to prove and verify students' identity, reducing instances of identity fraud. Similarly, digital records are less likely to contain falsified students' marks or other fraudulent results documentation.

### Next steps

It is difficult to identify a single organisation to drive this change. Some stakeholders have argued that Ofqual would be best placed, given the regulator's direct links to all required actors and the ability to draw connections to GQs where necessary. Based on our conversations, there might also be appetite for the DfE to lead on this; an approach that would make sense given the Department's previous experience in 2010.

The following strategic considerations need to be explored further as they are likely to inform a future roadmap and plan for the roll-out of the ULN:

1. How AOs can be incentivised and the guarantees (e.g., around funding of qualifications) that can be offered to small AOs to incentivise commitment
2. How current MIS providers in the VTQ space can be engaged meaningfully
3. What are some realistic cost estimates around the burden for schools, colleges and AOs and can funding be deployed to help mitigate against these costs

4. How would any changes interplay with what is already happening in Scotland, Northern Ireland and Wales
5. A consideration of what lessons can be learned from the National Insurance number and if it is possible to assign a ULN at birth
6. A consideration of what new data standards are needed and if there is an opportunity to build on JCQ's work on GQ standards in 2022 for the VTQ sector

## 7 Appendix

The ImpactEd Consulting team (formerly RBU) would like to thank all individuals who have contributed to this project. This report captures the views from the broad set of stakeholders that were interviewed and is presented to the Chief Regulator for further consideration.

A special thanks to independent consultant Geoff Coombe who helped shape this report and enriched the discussions based on his knowledge and experience in the sector.

The following organisations and individuals were consulted as part of this review:

|  |                      |
|--|----------------------|
| AAT  | LIBF                 |
| AoC  | Mary Curnock Cook    |
| ARK Schools (MAT)                          | NAEO                 |
| ASCL                                       | NAHT                 |
| AQA  | NCFE                 |
| Collyer's Sixth Form College               | Newcastle College    |
| Coombe Boys' School & Coombe Girls' School | OCR                  |
| City & Guilds                              | Ofsted               |
| CST  | Pearson              |
| Department for Education                   | RSL                  |
| Department for Education (LRS)             | SFCA                 |
| EAL  | UAL                  |
| FAB  | UCAS                 |
| Furness College                            | VTCT                 |
| Highfield                                  | West Suffolk College |
| IBO  | Wiltshire College    |
| JCQ  | WJEC                 |



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