

RESEARCH AND ANALYSIS

Responding to Criticisms of the CASLO Approach (Report B)

Views from awarding organisations

ofqual

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With thanks to

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The CASLO Research Programme

This report is part of a series that arose from Ofqual's 2020 to 2024 programme of research into the CASLO approach:

1. The CASLO Research Programme: Overview of research projects conducted between 2020 and 2024.
2. The CASLO Approach: A design template for vocational and technical qualifications.
3. How 'CASLO' Qualifications Work. (This was published in February 2022.)
4. Origins and Evolution of the CASLO Approach in England: The importance of outcomes and mastery when designing vocational and technical qualifications.
5. Responding to Criticisms of the CASLO Approach (Report A): A taxonomy of potential problems.
6. Responding to Criticisms of the CASLO Approach (Report B): Views from awarding organisations.
7. Responding to Criticisms of the CASLO Approach (Report C): Views from qualification stakeholders.
8. Responding to Criticisms of the CASLO Approach (Report D): Properties of qualifications from the CASLO research programme.
9. Understanding Qualification Design: Insights from the 2020 to 2024 CASLO qualification research programme.

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List of acronyms

AO – Awarding Organisation

AC – Assessment Criteria

CASLO – Confirm Acquisition of Specified Learning Outcomes

DCS – Direct Claims Status

EQA – External Quality Assurance

GLH – Guided Learning Hours

GNVQ – General National Vocational Qualification

IQA – Internal Quality Assurance

LO – Learning Outcome

NOS – National Occupational Standards

NVQ – National Vocational Qualification

QCF – Qualifications and Credit Framework

RQF – Regulated Qualifications Framework

TQT – Total Qualification Time

VTQ – Vocational and Technical Qualification

Introduction

This study is part of a programme of research that Ofqual has conducted into an approach to qualification design which we call the ‘CASLO’ approach¹. The CASLO approach is defined via the following key characteristics (Newton & Lockyer, 2022):

1. the domain of learning is specified as a comprehensive set of learning outcomes (LOs), which tend to refer to elements of knowledge and skill
2. a standard is specified for each LO, via a set of assessment criteria (AC), which are used to judge student performances directly
3. a pass indicates that a student has acquired the full set of LOs specified for the domain (mastery requirement)

This approach gained national prominence within National Vocational Qualifications (NVQs), launched in 1986 (De Ville, 1986; Jessup, 1991), and it now underpins a large family of outcome-based vocational and technical qualifications in England. The expansion of the CASLO approach was particularly facilitated by its adoption as the basis for a regulatory framework called the Qualifications and Credit Framework (QCF) (Ofqual, 2008), in operation from 2008 till 2015, which required most regulated vocational qualifications to conform to the CASLO design principles. The CASLO approach shares a lot of the above-mentioned characteristics with other education and training movements, for instance, outcomes-based education and training, competence-based education and training, and mastery learning. However, the combination of properties outlined above is specific for the family of qualifications in England that we are referring to as CASLO qualifications.

There is a large academic literature related to the CASLO approach, a lot of it emerging since around the late 1980s and associated with the introduction of NVQs and GNVQs (General National Vocational Qualifications). It identifies a variety of potential problems for the CASLO approach – some quite esoteric, relating to its philosophical roots; and some very pragmatic, relating to its impacts on teaching and learning or quality of assessment. This literature is fairly dated now, with few comprehensive large-scale evaluations, and it seems to be skewed or polarised in the direction of criticism. Furthermore, the approach itself has evolved through repeated reforms and in response to changing accountability pressures over time. Therefore, it is not immediately obvious whether the academic criticisms raised in the literature (and the associated potential problems) are still relevant for the CASLO qualifications that Ofqual currently regulates and is likely to continue to regulate in the future.

¹ Until recently, this approach had no name. It was christened ‘CASLO’ in Newton and Lockyer (2022) because it is designed to Confirm the Acquisition of Specified Learning Outcomes.

With the aim of facilitating a more balanced consideration of the force of these criticisms from the literature, we invited awarding organisations (AOs) to reflect on and respond to them based on their experience of designing and certifying CASLO qualifications. Each participating AO nominated an 'exemplar' CASLO qualification – one that they considered to be particularly well-suited to the CASLO approach, or that they believed to have high validity or positive impacts on uptake, teaching, or learning due to adopting the approach. These qualifications were the focus of our discussions with each AO, allowing us to consider their responses in light of the specific context of each exemplar.

Our overarching goal in this project was to explore the features and mechanisms that, according to awarding organisations, help to secure the quality and value of their CASLO qualifications in the face of varied academic criticisms and potential problems. The following were the main research questions we attempted to answer:

1. What are AO reasons for adopting the CASLO approach?
2. Do AOs recognise the potential problems associated with the CASLO approach in the literature?
3. What mitigations do AOs put in place to alleviate the risks associated with the potential problems?
4. What can AO responses tell us about the relative significance and severity of the potential problems?
5. Are there conditions (qualification contexts, purposes, design features) in which some of these problems are more or less relevant?

This study did not involve an evaluation of individual qualifications or the CASLO approach. The aim was to understand AO views about potential problems and draw conclusions about the applicability of criticisms from the literature to current CASLO qualifications and their contexts. Our analysis of AO responses to these potential problems, including the mitigations that they proposed, allowed us to describe and gain insights into the mechanisms that appear to underpin the technical quality (validity) of CASLO qualifications and their value (positive impacts). It also provided insights into the circumstances under which these mechanisms may operate more or less effectively. However, given the methodology of this study, we were not in a position to draw strong conclusions about their effectiveness. Where appropriate, limited commentary on the potential plausibility (or lack thereof) of the proposed mitigations and mechanisms is offered, based on logic rather than independent evidence.

For these reasons, it is important to emphasise that the following account captures the views of a sample of AOs concerning the features and processes that they build into their qualifications to help secure their validity and value. These insights provide a useful resource for reflecting on the sorts of

problems that can affect CASLO qualifications, as well as the sorts of mitigations that can be put in place to confront them. However, it was not possible within the remit of this project to evaluate either the prevalence of alleged problems or the effectiveness of proposed mitigations. So, the publication of this report is not a formal endorsement of the validity or value of the 14 ‘exemplar’ qualifications that we studied in detail. The report is simply a foundation for reflecting upon how best to build a qualification – for a particular cohort of learners, situated in a particular context, with particular set of purposes in mind – that incorporates the high-level CASLO design template.

In the next section, we present the details of our methodology. This is followed by a section describing the perceived benefits of the CASLO approach and the reasons why it was adopted by our sample of AOs for their exemplar qualifications. We then go on to describe AO perceptions of the relevance of assessment-related problems to their exemplar qualifications and the mitigations that they proposed in relation to each assessment problem. A similar description is then presented for teaching, learning and delivery problems. The report concludes with a discussion section which offers reflections on our last 2 research questions as well as on our overarching question of what seems likely to underpin the quality and value of CASLO qualifications.

Method

Exemplar qualifications

Fourteen AOs responded to our call for participation and volunteered one exemplar CASLO qualification each, to be discussed in the interviews (one AO volunteered 2). This resulted in a sample of 15 exemplar qualifications. The qualification titles and some key information about each qualification (including the relevant AO, qualification level, purpose, size and grading patterns) are listed in Appendix 1. Note that throughout the report and in the quotations, we use qualification abbreviations (for instance, Creative_L3) rather than a full qualification title to denote each qualification. In our sample, we included qualifications across different levels (RQF levels 1 to 5), subject areas (for instance, health and social care, construction, hairdressing, business, creative and performing arts, public services, and hospitality), sizes and purposes.

With respect to qualification purposes, we divided the qualifications roughly into 2 categories – ‘confirm competence’ and ‘dual purpose’. As confirm competence qualifications we categorised those that are largely delivered in the workplace and/or can lead directly to employment or certify competent practice (for instance, Fenestration_L2, Hairdressing_L2 and First aid_L3). As dual purpose qualifications

we categorised those that are largely delivered in college settings and prepare students for employment roles (usually entry-level) or progression to higher levels of education (for instance, Creative_L2, Business_L3 or Construction_L5). Note that the categorisation into 'confirm competence' and 'dual purpose' qualifications is not an official Ofqual categorisation. It was established for the purposes of this study, to capture some of the key differences between broad qualification groups (on a different basis from the current Ofqual register categorisation).

The AOs that volunteered exemplar qualifications also provided us with relevant qualification documentation to help us to understand their design and how the qualifications work in practice. This information was reviewed ahead of the interviews and informed our discussions with the AOs.

Procedure and participants

Given the relatively broad research questions of this study, and the need to give scope to the interviewees to offer insights beyond the specific questions arising from our literature review, we adopted a qualitative approach using semi-structured interviews. Fifteen group interviews were conducted with the employees of the relevant AOs.² Interviews typically involved 3 or 4 Ofqual researchers and between one and 4 AO employees. The AOs selected their own panel of interviewees, typically consisting of members of their staff with direct experience in key development and delivery areas of their exemplar qualifications, and other members of staff with senior roles and broader experience across their wider qualification offering.

The interviews took place between October and December 2023 and were conducted via video conferencing software, typically lasting for 2.5 hours, after interviewees had given informed consent. Each interview was recorded (video and audio) and the audio elements were transcribed verbatim for analysis.

Taxonomy of potential problems and the interview schedule

Having reviewed the literature, we identified a taxonomy of potential problems for CASLO qualifications and grouped them into assessment problems, teaching and

² Because one of these qualifications (Procurement_L4) only had a subset of core CASLO features, it was not included in the current report. However, its features are described and discussed in relation to several other CASLO qualifications from our sample within report 8. This example helps to illustrate that the distinction between CASLO and non-CASLO qualifications is not always clear-cut.

learning problems and delivery problems, as shown in tables 1 to 3 below.³ This formed the basis for the interview schedule that guided our discussions with the AOs. The interview schedule also included questions about the reasons why the AOs adopted the CASLO approach in their exemplar qualifications and some clarification questions to confirm our understanding of their qualification design. The interview schedule is presented in Appendix 2.

At the start of the interviews the AOs were invited to share their general views about the benefits of the CASLO approach and explain why they adopted that approach in their exemplar qualifications. In the remaining part of the interviews, we asked each AO whether they recognised each problem identified in the literature as a potential problem in the context of their exemplar qualification.⁴ If an AO did recognise the potential problem, we asked what mitigations they implemented to prevent or alleviate any potential risks. If the potential problem was not recognised, we asked why it did not seem relevant in their context. The discussions were often wide-ranging, providing insights about broader respondent conceptualisations of the problems we asked about, and some detailed descriptions of the relevant contexts and the sectors or market that their qualifications were part of.

Table 1 Potential assessment problems

Potential problem
Inaccurate judgements
Ineffective standardisation
Atomistic assessor judgements
Poorly conceived assessment tasks/events
Lenience
Malpractice
Inappropriate support

Table 2 Potential teaching and learning problems

³ While this taxonomy suggests that the potential problems related to the criticisms in the literature are neatly separable, this is not always the case. This will become apparent in our discussion of AO views later in the report. For instance, atomistic AC specifications could potentially encourage atomistic approaches to judgements, atomistic assessment design and atomistic teaching and learning, but these potential problems can also interact, with atomistic assessment design encouraging atomistic judging, and so on.

⁴ Note that our interview questions were framed in terms of 'potential' problems rather than 'actual' problems. Therefore, by saying that AOs 'recognise' a problem, that means that they recognise it as (at least) a potential problem (though some might also recognise it as an actual one).

Potential problem

Local or personal irrelevance
Lack of currency
Content hard to pin down gets missed
Downward pressure on standards
Incoherent teaching programmes
Lack of holistic learning
Superficial learning
Demotivation or disengagement

Table 3 Potential delivery problems

Potential problem

Undue assessment burden

Analysis

Data analyses involved a 2-pronged approach. The first phase of the analysis used a variant of the framework method (Ritchie & Lewis, 2003; Gale et al., 2013) to thematically analyse and categorise whether or not each problem was recognised as well as to code and categorise the mitigations that each AO identified in response to the problems. This approach to thematic analysis was chosen because it was important to retain the link between the broader mitigation-related (and other) themes and the coding in relation to individual qualifications, problems and their recognition status, to enable relevant comparisons.

While categorising the mitigations that the AOs discussed, it became apparent that some of these seemed to be 'active' measures or processes – ones that the AOs (or others, such as centres) put in place to reduce the risk of certain problems arising or to increase the robustness of exemplar qualifications (such as, for instance, quality assurance, support and guidance, or certain qualification design choices). However, AOs also sometimes referred to certain properties that seemed to be inherent in the nature of their cohort, practitioner profile or attitudes or qualification sector (such as small cohort size, integrity of practitioners, or low level of the qualification). The AOs thought that these reduced some of the risks of problems arising, but they clearly did not actively put these in place to mitigate the risks. While we did not systematically distinguish between these in the coding and analysis, in the reporting we often refer to the latter mitigations as protective factors, reserving the term mitigation for the more active measures that the AOs referenced.

When categorising whether or not the potential problems were recognised, and thus whether the AOs saw them as potentially relevant to their exemplar qualifications, we used the following categories: 'yes', 'not entirely' and 'no'. The decisions on how to categorise each response using these categories were driven by the combination of the initial reaction of the respondents when directly asked whether they recognised a potential problem or not, their overall position that emerged from the fuller discussion, and the nature of the mitigations that they spoke about.

Where the respondents initially explicitly said that they did recognise a potential problem and described mitigations or protective factors to reduce the associated risks, this was categorised as a 'yes' in terms of the recognition status. The responses that did not explicitly confirm they recognised a problem but discussed it in a way that clearly indicated they saw its potential relevance to their qualification, and suggested certain mitigations or protective factors, were also classed as 'yes'. Responses that explicitly stated that a respondent did not recognise a potential problem and did not think there were any mitigations that should be put in place, perhaps only mentioning certain protective factors, were categorised as a 'no'. Finally, those responses that explicitly stated a respondent did not entirely recognise a potential problem, or those that said they did not recognise it but went on to discuss significant mitigations for certain of its aspects, were categorised as a 'not entirely' in terms of the problem recognition status.⁵

As part of the framework method, in addition to coding individual mitigations and problem recognition status, the researchers summarised AO responses to each problem to give broader context to the associated mitigation codes and facilitate further analysis and write up. The coding for mitigations was deliberately detailed, as the aim was to record both general and unique approaches to mitigating various risks. Ultimately, the codes for individual mitigations were grouped into broader themes, referred to as 'mitigation types' throughout the report, to enable comparisons and discussion at a higher level. This analysis was captured in Excel spreadsheets through matrices at qualification level and further subjected to quantitative analyses, conducted with R Studio software (version 2022.12.0), to help explore some of the patterns.

In addition to this, a flexible thematic approach was taken to analysing the data for broader themes, with the goal of identifying patterns beyond specific mitigations across the interviews (Braun & Clarke, 2006). This part of the analysis involved an inductive coding approach, with most of the codes established during the first phase. These general themes, alongside the contextual information we had about the exemplar qualifications, were used to help situate and interpret AO views of the significance of individual problems and the nature, profile and scale of any

⁵ Appendix 3 presents tables with problem recognition status by qualification.

mitigations. This part of the analysis was conducted using NVivo (version 1.7.1) qualitative analysis software.

The coding was conducted by 2 researchers, dividing the transcripts between them in a split coding approach. Each researcher initially coded their transcripts independently of the other, with the other researcher reading the entire transcripts coded by the first researcher and reviewing each other's coding. This proceeded in phases which involved regular meetings and discussions to clarify the emerging codes until a joint set of codes was settled on. All transcripts were ultimately read, and the coding reviewed, by both researchers. This helped to ensure a reasonable degree of commonality in interpretations and coding used, additionally fostered by detailed discussions throughout the process.

The researchers usually coded sections of the transcripts rather than individual sentences, to take account of the context of a comment. The same unit of text could be included under more than one code where appropriate. The researchers had access to the video files while doing this, allowing them to clarify the tone of an extract, or verify the accuracy of the transcription, if needed.

Ultimately, 3 separate coding frameworks were developed. The first framework captured the themes related to discussions about CASLO approach benefits and AO reasons for adopting the approach. The second framework captured the mitigation coding and broader mitigation types. The third framework captured the broader themes which we labelled 'general AO reflections', across the entire data set.⁶

Most of the data analysis and discussion considers potential assessment problems separately from potential teaching, learning and delivery problems, comparing and contrasting the patterns of AO responses in relation to them where appropriate. We also consider the interaction of these different problem types, especially given the often integrated nature of teaching, learning and assessment that is typical of CASLO qualifications. Although the delivery problems do form a separate problem category in our taxonomy, we mostly discuss them and present them in charts alongside the teaching and learning problems. This was partly to avoid presenting separate charts with only 2 delivery problems in them but also because these problems were often raised in relation to qualification delivery in the centres and often said to affect teaching and learning in particular. This is partly reflected in the response patterns related to these problems, which tend to align with response patterns for teaching and learning problems more so than with those of assessment problems.

In the following sections we present our analysis as it pertains to the benefits of the CASLO approach, the assessment problems, and the teaching, learning and delivery

⁶ The coding frameworks are available upon request.

problems respectively. Given the complexity of the analysis and the resultant length of the report, we decided to limit the extent of quotations to the minimum that we thought necessary to illustrate key themes or points, or some more controversial ones occasionally.⁷ However, the prevalence of different themes and sub-themes in the data is further captured and illustrated through the analyses presented in the discussion section, as well as in Appendix 4, where there are tables showing the number of references to different mitigation-related themes.

Perceived benefits of the CASLO approach

Although our principal focus related to criticisms of the CASLO approach, we wanted to begin by understanding the reasons why awarding organisations chose to adopt the CASLO approach, that is, why they believed it to be beneficial. In this section, we present AO views about the benefits of the CASLO approach and their main stated reasons for adopting this approach for their exemplar qualifications. The starting point for most AOs in thinking about the design of their exemplar qualifications seemed to be the needs of:

- students with various educational and occupational backgrounds and interests, starting points, constraints and commitments, including students disengaged from education
- other users of these qualifications, including employers, professional bodies and higher education institutions, for qualifications that are relevant in their specific contexts and valid or reliable in certifying the relevant competence

For the AOs, the key mechanisms for meeting those requirements revolved around the availability of flexibility and transparency in qualification delivery, design and assessment to create opportunities for learning and ensure a sense of relevance for students, which, together with adopting the mastery approach, were deemed to ensure the overall validity of qualification results. The CASLO approach was thought to embody these mechanisms and was thus seen as appropriate for their qualifications.

In addition to anticipated benefits, some awarding organisations also mentioned other reasons for adopting the CASLO approach, including pressure from employers, their sector or regulatory bodies, or historical reasons. In the sections that follow, we focus primarily on the anticipated benefits, noting other reasons at the end.

⁷ Quotations are mostly presented as separate paragraphs, linked to specific qualifications. Occasionally, however, we present short quotations within the text, which are not linked to specific qualifications (where the identity of the qualification was not particularly relevant).

Flexibility

All AOs in our sample saw flexibility facilitated by the CASLO approach, in delivery, design and through contextualisation, as one of its key benefits and a key reason why they adopted this approach in their exemplar qualifications. Flexible delivery and contextualisation enabled scope to tailor teaching and assessment within centres to meet the needs of students. Flexibilities in the design included unitisation and the possibility of credit accumulation, as well as optional units, helping to increase qualification efficiency as well as further increase relevance to individual students.

Requirements for flexibility were discussed in relation to different areas that contribute to student experiences of the qualification, including the need to accommodate different types of students, different learning styles, different learning or employment contexts, and so on. Across the different qualifications in our sample, a range of different student groups were mentioned including adults already in employment, students who are self-taught, students at different starting points in their learning journey or with different educational backgrounds, special-needs students, or those who respond better to hands-on, experiential learning. Interestingly, only 2 of the AOs in our sample specifically referenced having to accommodate students disengaged from education as a particular motivation for choosing the CASLO approach. Ultimately, the AOs thought that flexibility was key to student engagement but also contributed to the validity of qualification results.

[...] they're great for people who are disengaged, with people who learn in different ways, people who've been out of education for a long time, I think the nature of them allows more people to access them and I think it's that balance between being able to work through a qualification and know actually as you go you are achieving something. Construction_L1

So, we've got quite a diverse student body, we need to engage them, they need to feel it's relevant what they're doing, and we've got quite a large adult learner population as well, so those dual facets of flexibility and engagement are really important to make sure that students are engaging with their learnings or getting the most out of it. Construction_L5

Flexible teaching and learning through flexible qualification delivery and design

Most AOs mentioned aspects of flexible delivery which are helpful to supporting diverse student needs including flexible start dates, qualification duration (short and intensive, over a longer period, or without time constraints), possibility to resit or retake assessment, and whether qualifications might be taken full-time or part-time.

It was suggested that students benefited from different delivery settings as well as the ability to combine different settings to suit their needs. This included college, private training provider or workplace settings, as well as being able to study independently. Students were also thought to have benefited from different modes of delivery, that is, in-person or online. The absence of, or relatively flexible, entry requirements were also mentioned as an aspect that supports students with different backgrounds and starting points.⁸

[...] the time that we allow is flexible, so the guided learning and the total qualification time, there's no maximum, the students who need longer to learn the skills or the knowledge, our qualification allows for that and the students can retake, so the people that can't achieve maybe the highest attainment timeframe, then they have longer to master the skills and the knowledge. Construction_L1

I think one of the real benefits of things not being in the college is it's a sort of roll on roll off programme. Not like no new starts to September. Fenestration_L2

AOs also mentioned aspects of qualification design such as discrete units that can be taken independently of each other at different times as supportive of different student circumstances. Within this, optional units or content that could be selected to tailor the qualification to specific student vocational needs, interests or contexts were seen as additionally beneficial. Discrete units were also seen as helpful for instilling the sense of engagement from achieving small steps and a sense of progression along the learning journey.

We also have obviously an element of optional content in many of the qualifications, which, again, gives a unique aspect in terms of making those qualifications relevant and meaningful for learners. Business_L3

And actually, achievement is a little bit of a safety net, isn't it? I've done that unit now, whoa fantastic, I'm not going to get all the way to the end and fail. Construction_L1

Flexible assessment

Several AOs emphasised flexibilities in assessment in terms of a wide range of assessment methods (or ways to generate evidence if naturally occurring) that might be used, as well as flexible assessment timings, as important in their qualifications. These were mostly seen as helpful in supporting integration of formative and

⁸ Few exemplar qualifications had specific entry requirements imposed by the relevant AO. However, centres or study programmes sometimes have their own entry requirements which the AOs do not have control over.

summative assessment, different student circumstances and strengths, as well as different progression pace through being assessed when ready.

[...] it allows students opportunity to progress in their own time and when they're ready to be assessed, and I think that was one of the purposes of the qualifications. And it's a really good opportunity to test those skills that are required to be demonstrated in their own pace really. Teaching support_L2

Some AOs also suggested that flexibilities around assessment approaches supported the integration of assessment into the delivery process, helping to make exhaustive assessment across the entire domain of learning less burdensome. Formative feedback as integral to continuous formative or summative assessment was seen as particularly beneficial in terms of engaging students and further facilitating the mastery approach in these qualifications.

[...] doing it this way allows them to have multiple assessments over a period of time [...] where they can naturally generate the evidence to show that they're competent; whereas, maybe, doing an assessment at the end would have to be very tailored, structured, you know, and you wouldn't be able to cover everything in that. So, I think in that way that does come back to the flexibility again [...]. Adult care_L3

this is where the feedback comes into play as well, is inspiring them and encouraging engagement and progression. You've got the formative assessments within those initial units, and then you've got the summative units that they've got to pass. [...] that developmental feedback really plays a strong part in the student engagement, I think. Creative_L3

Contextualisation of learning and assessment

Some AOs discussed the benefits of “hands on”, “immersive” learning within practical, skills-based areas as being engaging for students. Within this, the theme of contextualisation of learning and assessment emerged strongly in the responses. The flexibility of the CASLO approach was deemed to facilitate contextualisation of learning and assessment to student's environment and local context. This was seen as particularly relevant for qualifications that operate internationally. Several AOs explicitly linked contextualisation of learning and assessment within realistic, vocationally relevant, situations with increased engagement from students, facilitated by direct relevance of the qualification to their vocational aspirations or context. Assessment in realistic settings was also seen as fundamentally important for ensuring the validity of the assessment and providing additional reassurance about students' competence to qualification users.

But just as a plumber that can bend pipe and solder pipe is no good unless they can apply it to a practical building situation or something, you know, the synoptic summative assessment in the project-based assessment in the final unit allows them to bring all that together and demonstrate how they can apply that practically. And I think that's what gives confidence to HE providers where these students progress to or for those that go into industry, it's knowing that not only have they got a base level competency against those building blocks, but they've also demonstrated their ability to bring all that together in a real-world example.
Creative_L3

It isn't hypothetical, it's a real thing that you can think, I understand that, I connect with that, and actually that creates a sense of excitement and interest, and the potential for lots of other resources and teaching and learning to come into play.
Business_L3

Some AOs explained that this kind of contextualisation is facilitated by writing the LOs and/or AC at a sufficiently high generality level, yet sufficiently transparently, so that they could be interpreted, taught, and assessed in the local context while still retaining the focus on the fundamental principles or skills that are relevant for the qualification. One AO also suggested that replacement of AC, which allow direct grading, by numerical marking, would present barriers to contextualisation of assessment.

I think [...] what's meaningful, what's at the heart of [this qualification] is about that authenticity, experiential learning, and learners being able to feel like they understand what they're learning, and they can put their fingers on it. If you start to put marks on those internal [assessments], [...] there's far more that you've got to dictate to make it work, and so it takes away the authenticity of learning. It takes away the contextualisation, because we dictate far more from an assessment point of view. Business_L3

Transparency

Most AOs highlighted aspects of transparency for all users, including teachers, students and different stakeholders, as another key advantage of the approach. A couple of AOs specifically mentioned clarity and precision of language used in their specifications as a vehicle to transparency. Some views also emphasised the transparency emanating from the content being sufficiently broken down and often mapped directly to assessment requirements. This transparency was deemed to facilitate the interpretation of the meaning of student grades by qualification users and afford a clear link with the relevant professional standards, including in qualifications operating internationally.

It makes things clear in terms of what needs to be achieved in order to pass the qualification, which makes things clear for the learner, but it also makes things clear to everybody involved at every stage of the qualification, so if you're talking about one particular aspect, then actually everybody that's involved will know what aspect that is. First aid_L3

They're very clear in the language between what is a pass, what is a merit and what is a distinction, and that then assists centres in terms of managing tutorials and the kind of more pastoral elements of supporting students in centre, because it allows them to use very specific terminology from the specification, from the assessments, to then enable students to set individualised targets for their progression and development throughout the year. Creative_L3

Some AOs noted that transparency of assessment requirements and standards also helped establish consistent assessment expectations across different centres, despite contextual differences. Transparency of assessment requirements (including through feedback from assessors) was also seen by several AOs as important to give students a sense of ownership of and agency within the learning and assessment process, reduce assessment-related anxieties, and help chart the path for students on how to improve. Some AOs particularly emphasised the benefits of the clarity of the learning journey itself for students (separately from clarity of assessment requirements), including for those that might be self-taught. It was also suggested that the explicitness of the CASLO approach helps make it clear for teachers exactly what they needed to teach.

So, one of the benefits that I kind of marked down in having this sort of learning outcome approach and then the assessment criteria linked to it is it's very clear from the outset what the expectations are for the learners in what they're going to be doing so they know exactly what's expected of them and that gives us very consistent assessment expectations across different centres as well because we're telling them this is what you need to do, and this is what you need to exhibit. Evidence types may vary but we are asking for them to perform the same demonstration of hitting a criteria. Creative_L2

You can take charge and you can see exactly what you need to do, you don't have to rely on someone else to tell you what to do, or interpret it, we try and make it perfectly clear. Chef_L2

Mastery learning and assessment

Guarantee of a valid and dependable result

The main justification for the use of the mastery model across a range of exemplar qualifications was the guarantee that the model was seen to provide of a rigorous, consistent and dependable qualification result, across the entire domain of learning, producing “fully rounded” persons that stakeholders know what to expect from.

[...] it feels like when you're testing somebody's competence you do need to have that mastery approach. [...] I suppose it's a risk-averse approach really. But when you're testing someone's competence on things like health and social care or health and safety, it feels like risk averse is the right way to do it. Adult care_L3

This justification was generally linked with comments about the importance of the guarantee across the entire domain because being able to function sufficiently well across the entire domain was necessary for that occupation. While this was often flagged as important for safety-critical reasons, there was a more general view that qualification results needed to map fully onto what is valued in a profession and that there was nothing superfluous in a qualification that did not need to be learnt and evidenced. This view was held by the AOs irrespective of whether their exemplar qualifications were classified 'confirm competence' or 'dual purpose'.

The qualification is challenging, it's hard. There is a lot for a student to be aware of and to manage, but that is reflective of the industry that they're aspiring to go into. You couldn't deliver a project to a client in which you've done really good at 75% of it and really badly at 25% of it and expect a good result. You have to show up for each of the different elements. And we feel that's reflected in the assessment model. Creative_L3

[...] the fact of achieving all of the learning outcomes and all the assessment criteria, that's essential. If they weren't essential to the role, it wouldn't be in there. Fenestration_L2

Some AOs suggested that the mastery model was required to ensure that students evidence comprehensive ability to apply a range of different attributes that are interwoven, and are, in that sense, all equally important to learn and assess in a mastery model.

So, through the learner's journey on the qualification, you know, we are developing a comprehensive understanding, an autonomous application of what we define as the creative process. So, it's a requirement for the students to achieve all of the learning outcomes, because we feel that a student can't

evidence a comprehensive ability to apply those attributes if they can't apply all of them. They are interwoven. Creative_L3

Supporting mastery learning

It was not always easy to disentangle views about the benefits of mastery assessment from those of mastery learning. There was a sense from some comments that mastery learning would be required for most of these qualifications, and the jobs that they prepare the students for, irrespective of whether there was mastery assessment, as demonstrated by the following comment:

[...] in the hairdressing sector there's five things [...]: cutting, colouring, styling and so on. Those skills are fixed. But you need all of them. So, any learning model where you've got sort of grading and compensation, it sort of makes employers twitchy because, you know, just from going into a salon, if the colour starts to go green but they've been an excellent stylist in terms of the style you're not going to be happy as a client [...]. Hairdressing_L2

Some comments suggested that exhaustive mastery assessment helps to drive exhaustive teaching and learning.

And you know you're teaching absolutely everything. The provision knows you've taught absolutely everything, because you've had to, because you have to test it. Teaching support_L2

However, some respondents explicitly suggested that mastery learning, alongside qualification achievement, was valuable in itself as it motivates students and instils them with confidence in their abilities to do the job that they are preparing for.

[...] there's something about achieving the entirety of the qualification, all the learning outcomes, all the assessment criteria that actually does give them a sense of wider achievement than achieving a qualification in part or maybe just being entered for a science exam where the highest grade you can get is a C. Construction_L1

[...] when we were developing this qualification and we were talking to stakeholders, they were very clear that this mastery model or this approach actually kept their student engaged, because they realised that they had to work hard throughout all parts of the course to get the desired grade that they had. Creative_L3

Some AOs recognised the high stakes nature of their CASLO qualifications, due to the mastery model, but they thought that this model helped to prepare students for the demands of progression to higher levels of learning or demanding jobs, and was thus justified. Another AO thought that the mastery approach delivered in a way

involving collaboration between students and tutors helps students arrive at a complete understanding of how to do a job.

[...] they could very easily fail the qualification based on one small aspect. Which makes it high stakes in terms of what they're doing with assessment, but the feeling is that all of these learning outcomes need to be exhibited by learners for them to be able to move on to the next part of their career. Particularly in these qualifications, [...] where the next stage of their career does often mean sort of more vocational training which is very intensive [...]. Creative_L2

I would say the approach is actually a very strong one from an educational point of view that the tutor and learner are working together to bring that learner to really make sure that they understand how to do a job. Adult care_L4

Other reasons for adopting the CASLO approach

Some of the AOs in our sample suggested additional reasons for adopting the CASLO approach, which appeared to be motivated by certain external pressures rather than benefits for learning or assessment. These other reasons mostly revolved around a combination of historical practices and/or specific requirements of the sector that the qualifications served, or from regulatory bodies. Some AOs suggested that they chose to continue with the CASLO approach in their exemplar qualifications rather than introduce alternative approaches to minimise disruption to centres and students or to avoid confusing the marketplace with differing approaches in related qualifications. While these were rarely cited as primary reasons, it was not always possible to disentangle the relative weight of external pressures from learning and assessment-related benefits on AO motivations.

[...] there's already, within the aesthetics industry itself, some very specific criteria and outcomes that people have to meet to gain an accreditative qualification in these topic areas, which is all completely set out by Health Education England, the JCCP, the CPSA and the National Occupational Standards. So, if you take all of that guidance and interpret it, there's a very clear set of learning outcomes that have to be met anyway. So, just the nature of it means that CASLO was the only sensible approach that we could think of anyway. Skin peel_L4

Yeah, and I also guess it's the fact that we've got SVQs and we've got qualifications down here, we didn't want them to be vastly different, because that would just confuse the marketplace. Fenestration_L2

Some AOs particularly emphasised the attachment of employers or their broader sector to this approach, observing that the benefits of the approach outweighed the increased challenges and costs of running these types of qualifications.

We're still sort of working on that with employers to try and understand why and where this has come from, but there's a real attachment to that NVQ brand. [...] that sort of style and this whole promise of job readiness [...] Hairdressing_L2

There's cheaper ways and easier ways to do this, but we choose to do it this way because that's what the creative arts industry needs and it's what our students need, and it's best for the students and best for the creative arts because it develops the talent in the way that we want to. Creative_L3

While all AOs highlighted several benefits of the CASLO approach, their initial reflections about benefits were sometimes qualified by recognition of some of the challenges that the approach also brings. We discuss these in the next section, alongside AO responses to the potential problems associated with the CASLO approach in the literature.

AO views of potential assessment problems

In interviews with the AOs, we asked them whether or not they recognised a number of potential assessment problems raised in the literature, and, if they did, whether there were any mitigations they implemented to prevent or alleviate any potential risks in their qualifications. In this section, we analyse and discuss AO views about the relevance of the potential assessment problems for their exemplar qualifications, alongside the mitigations the AOs put in place and protective factors that the AOs believed helped to alleviate the risks associated with these potential problems.

Figure 1 below shows the number and proportion of AOs that recognised (blue bars), did not recognise (grey bars) and did not entirely recognise (orange bars) each potential problem. The proportions for each problem are calculated from the total number of AOs that were explicitly asked about each problem.⁹ It is important to note that AOs categorised under the 'yes' category are those who explained that the potential problem could be relevant to their qualification (rather than seeing the potential problem as a current issue in their qualification). Furthermore, alongside indicating whether a problem could be potentially relevant to their qualification, AOs described mitigations, protective factors or wider contextual information during their interviews, which are described later on in this section.

⁹ The total number of AOs against some problems differs because not all AOs were explicitly asked about some problems. For instance, participants for 13 out of the 14 qualifications were explicitly asked about inappropriate support, of whom 11 recognised this potential problem, one did not entirely recognise it and one did not recognise it.

The most frequently recognised potential assessment problem was that of inaccurate judgements, while the least recognised was that of atomistic assessor judgements, though there were also 6 AOs that, even though they did not recognise this problem outright, saw some relevance in it, saying that they did not entirely recognise it. The other potential problems were recognised by the majority of the AOs.

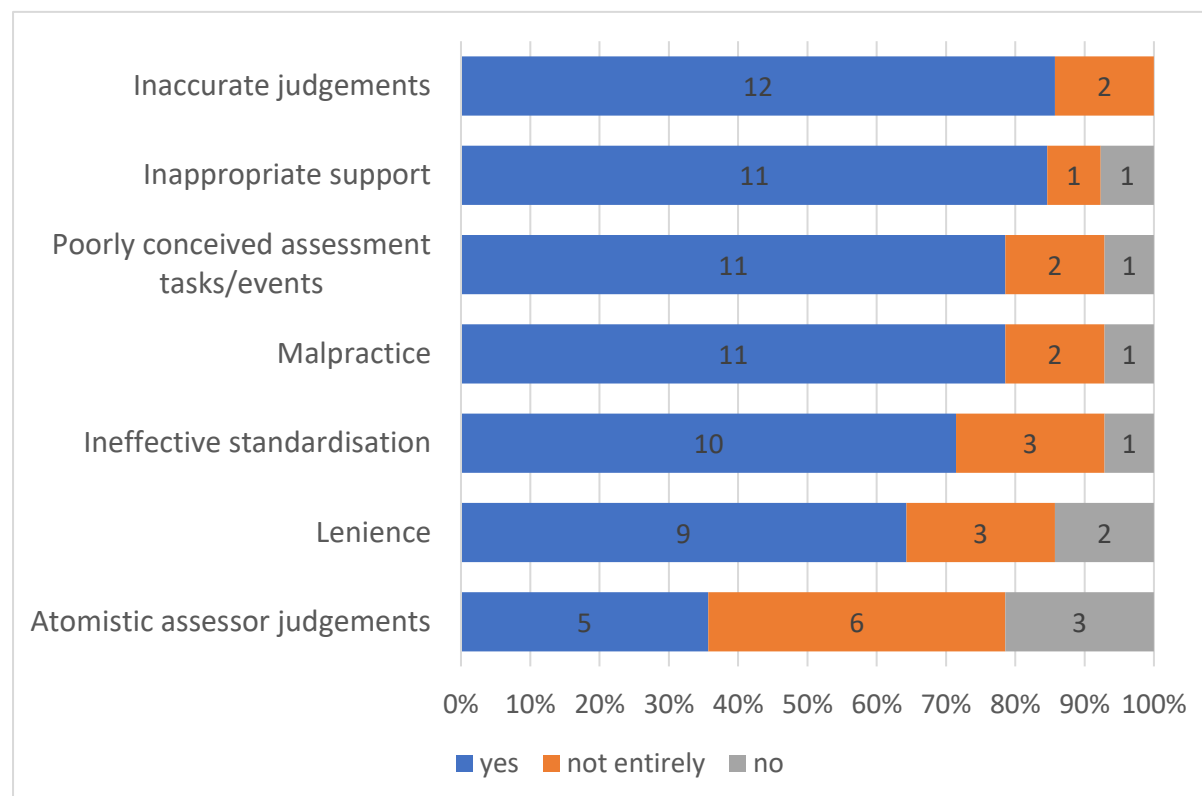


Figure 1 Counts and proportions of AOs that recognised or not each potential assessment problem

Throughout the sections below, we do not systematically separate the views of the AOs that did or did not recognise the potential problems from the literature. This is because their responses in terms of the nature or number of mitigations proposed largely did not appear to differ according to whether the problem was recognised or not. In a small number of cases where there appeared to be a tendency for the AOs to suggest a different profile of mitigations depending on whether they recognised a problem or not, we point this out in our commentary and discuss further in the Discussion section.

The majority of the commentary below revolves around specific mitigations and protective factors that were proposed by the AOs. However, we also discuss these in relation to some of the broader AO views about the apparent tensions and balances in the CASLO approach, the extent to which these potential problems are specific to CASLO, the extent of AO responsibility, impact and investment, and so on. We also draw out the more nuanced views of the AOs about the nature of some problems where relevant.

Inaccurate judgements and standardisation

The literature identifies problems related to assessors making inaccurate or inconsistent judgements about whether or not students meet the relevant AC in CASLO qualifications, meaning that some students pass when they should not, and some students do not pass when they should. According to the literature, that happens because AC are very hard to write and interpret precisely. Therefore, AC alone cannot communicate the threshold between passing and not passing, or between different grades, precisely enough. This can potentially present significant problems for the CASLO approach because assessors need to make heavy use of these criteria when judging (and grading) student performances directly.

Of the 14 qualifications in our sample, this problem was recognised as potentially relevant for 12. Two AOs thought it was not entirely relevant for their exemplar qualifications (both with the ‘confirm competence’ purpose), though they still discussed a range of mitigations and protective factors that supported the interpretation of AC.

None of the AOs relied on AC alone to communicate the threshold between passing and not passing or between different grades. They discussed multiple mitigations, across at least 4 different types in each case, referring to them as a “package” which mitigates potential problems with unclear AC. These were often discussed with reference to resource challenges and the need to ensure a balance between prescriptiveness and flexibility or contextualisation in qualification delivery. Resource challenges, in particular, appeared to permeate and, to some extent, shape the way that the mitigations were put in place.

The following quote describes some of the typical layers of quality assurance (QA)¹⁰, support and guidance, as well as some other mitigations, such as standardisation and occupational expertise of practitioners that, as a package, help to address this potential problem:

I think what the criticism doesn't account for [...] is the quality assurance that sort of wraps around that and the standardisation practice. [...] So I think it's highly

¹⁰ The quote below mentions IQA and EQA. IQA, or internal quality assurance, involves QA processes implemented within centres. AOs variously referred to this as internal quality assurance (IQA), internal verification (IV), internal moderation, etc. We will use IQA throughout to refer to centre-internal quality assurance processes, though alternative terminology might feature in quotes. EQA, or external quality assurance, involves QA processes that are operated by the AOs. AOs typically referred to this as external quality assurance (EQA) or external verification (EV). We will use EQA throughout to refer to these processes. Note that throughout the report we also use the terms IQA and EQA, often in plural, to refer to the individuals that carry out the IQA and EQA processes. In this use, IQA and EQA stand for Internal Quality Assurer and External Quality Assurer.

unlikely that, if the sampling strategy is working well, the assessors are all sort of qualified and have those standardisation activities and training and planning, and the same as our EQAs have constant standardisation and they're all qualified in that process, I think it's highly unlikely that learners would get through an assessor, an IQA and an EQA without having that consistent accuracy. I mean, it is going to be picked up across that. [...] So, it basically does rely on industry codes of practice, guidance material, training from the awarding organisation, internally at the centre, engagement, there's a whole machine outside of it, because if that wasn't there, it's hugely open to different interpretation and inaccuracies. Hairdressing_L2

All AOs flagged QA as a key mitigation, followed by support and guidance, which was mentioned by all except one AO. The number of references to different aspects of these 2 mitigation types was higher than the number of references to all the other mitigations combined. Of other mitigation types for this potential problem, the most referenced were occupational/professional expertise, communities of practice and qualification/assessment design features and processes.

Contextualisation and holistic assessment

The challenge of finding the balance between ensuring sufficient specificity of the AC to support consistent judgement and allowing for their sufficient breadth to enable flexibility and contextualisation of assessment underlined most of the discussions on this potential problem. Evidently, the broader the AC, the more open to interpretation they might be. The AOs described different ways of mitigating this risk while striving to write **broader AC**¹¹ to allow for sufficient contextualisation. Different AO views on where this balance should tilt depending on the specific context in which assessment takes place probably explain some of the diversity of approaches that the AOs described for mitigating this potential problem. For instance, the AOs took distinct stands on providing support and guidance to centres and appeared to have varied degrees of reliance on occupational expertise and judgement of assessors.

[...] it's very easy for assessment criteria to become too specific, so specific that they effectively become tasks or restricts centres' abilities to use them effectively. If they're too prescriptive, you end up [with] very constricted limited opportunities to evidence across centres, and you get a lot of the same stuff year-on-year and across centres, and that brings with it its own risk, of course. So, we're very

¹¹ In this overarching section and in the section about teaching, learning and delivery problems later, we use bold to highlight individual mitigations and protective factors within each higher-level mitigation type.

mindful to ensure that the assessment criteria are fit for purpose but don't restrict innovation and variation within centres. Creative_L3

Simultaneously, **contextualisation** was seen by the AOs as necessary to support AC interpretation. As the AC are often written relatively broadly, so they can apply to a range of contexts, their precise interpretation partly depends on the individual contexts to which they are applied. This then limits the range of meaningful interpretations and rules out irrelevant answers or actions. Some AOs emphasised the need for, and encouraged, assessor autonomy in interpreting the AC in the specific employer or other contexts. Necessarily, these AOs also strongly argued that one of the key requirements for appropriate AC interpretation is occupational expertise of assessors and QA staff. Some AOs also suggested that **holistic assessment** and ensuring that judgements are formed taking into account a wide range of evidence, help to make assessor judgements more confident and accurate.

[...] when I spoke earlier about the building regulations, the specifications, industry recognised best practice, the assessors will also be aware if there's anything that might have a specific, you know, this is how we do it as a business. So, it's being aware of that and knowing what the employer's looking for. Because again, whilst they've got to meet the criteria of the qualification, it's all about using the qualification for its intended purpose, and that's to raise the level of skills and knowledge, and if that can tie in with what the employer needs specifically, then they'll incorporate that into the assessment. Fenestration_L2

While most AOs emphasised the need for the AC to be sufficiently broad to allow for contextualisation, some AOs suggested that certain types of skills are essentially **context-independent** and, thus, easier to assess consistently. For some, these were basic technical skills. For others, these were creative process skills that lead to a final product, for instance in creative arts, which are equally applicable across different specialisms and art forms. One AO suggested that standards based around principles rather than the specifics of individual tasks help to make AC applicable across contexts. Where the focus of the qualification was on such constructs, the AOs apparently had an easier task of achieving the balance between AC specificity and contextualisation. Other context-independent aspects that the AOs mentioned were industry best practice, or protocols, that are captured by the National Occupational Standards (NOS), such as in some beauty sector or first aid qualifications.

I think in our qualification, it's so rigid that there is no flexibility of variation, everybody knows what has got to be achieved and that is it and that's been set as a national standard for certain things. So, to be very specific, everybody probably up and down the country knows for CPR, it's 30 compressions to 2 breaths to the tune of the Bee Gees Stayin' Alive and that has got to be shown and demonstrated and there is no flexibility, but I think we are in a very specific

world here that applies to our qualification and first aid qualifications and not necessarily all other CASLO qualifications. First aid_L3

Quality Assurance

All AOs in our sample described complex and multi-faceted **QA** processes and strategies that, in their view, significantly mitigated the potential risks of inaccurate judgements. Most AOs emphasised the importance of establishing, from the start, through the **centre approval** process, that centres have required staff expertise. This included holding relevant assessor and quality assurance qualifications. Requirements regarding staff occupational and professional expertise seemed particularly prominent in AO comments, reflecting the views that this in itself significantly mitigates inconsistent interpretation of AC.

[...] a part of the approval process is to make sure that they do have the vocational specialisms in the centre when they're delivering. So, they are mostly people who have either industry experience or who are still active in the industry [...]. Creative_L2

Centre approval also requires centres to establish **internal quality assurance (IQA)** processes, which most AOs emphasised as the linchpin in the broader QA package of measures. IQA processes and remit were described by the AOs as being quite broad. They involved training of centre staff in qualification and assessment delivery, standardisation of assessors to consistently interpret and apply AC, providing feedback and a second opinion where assessors are not sure about how to judge certain student performances, and so on. Some AOs expressed awareness of how skilled and time-consuming IQA process can be, requiring centres to have it properly resourced to ensure a reasonable amount of IQA.

I think it's only ever as good as the quality system in the centre. So, I think if there's a system in the centre to ensure that there is a standardised approach across assessors and that standardisation happens quite regularly. So, it is reliant on the IQA within centres, as well, to ensure that any weaknesses or inconsistencies within assessors are picked up, flagged, returned and that development's given back to assessors. [...] if there are those instances where [...] things are more borderline, then that does go to the IQA as the person who oversees that assessment process and is able to have that oversight of the standard of the practice against the centre. Adult care_L2

AOs described **external quality assurance (EQA)** as another key aspect of QA that involves monitoring of centres and ensures continued adherence to AO requirements across all aspects of qualification delivery, including interpretation of standards. All AOs spoke about their centres having dedicated EQAs with appropriate occupational

expertise, whose checks include moderation¹² of samples of assessment decisions to ensure consistent interpretation and application of AC in assessment.

[...] we have our army of chef examiners, senior external moderators and moderators who engage actively throughout the year with centres to ensure that that interpretation is articulated clearly to them [...] so that we can assure ourselves that there's understanding across the board, within centres and across centres of what we mean by those command words, and how those assessment criteria should be read and applied. So, I think that's a fundamental part that sits along the assessment criteria. Creative_L3

Most AOs noted that EQAs also check that IQA processes and standardisation activities within centres are taking place regularly and are effective. Several AOs explained that EQAs do not just engage in checking documentation about IQA processes. They gain deeper insights about these by considering evidence about the competence, dedication and enthusiasm of centre staff, and especially IQAs. EQAs have conversations with IQAs to understand the nature of the practices they put in place, whether they devise bespoke materials for use in their centres rather than using generic ones available online to support standardisation and other activities, and so on. The nature of the feedback IQAs give to assessors is also considered in terms of whether it is superficial or genuinely evaluative.

While some AOs described their EQA process as involving checks of assessor judgement accuracy and consistency, others questioned how far the EQA checks should focus on judgement accuracy, rather than focusing upon broader assessment and IQA processes, reflecting different views about the extent of AO responsibility. One AO questioned whether it was EQA's role to "second-assess", suggesting that, partly due to the resource-intensive nature of EQA, its role was more to check that all processes were in place to support correct assessment decisions rather than the details of the decisions as such.

It's a fine line between quality assuring and second assessing. And we're not there to second assess. [...] we're looking at things holistically. [...] so, not necessarily drilling down into individual specific criteria on every candidate for a number of reasons. One – that's not the best use of our time. If the centre have got the processes in place, the assessor's made his decision, they've been

¹² In Ofqual regulations, the term 'moderation' has a specific meaning and refers to checking that assessment decisions are appropriate BEFORE certification. In our interviews, some AOs appeared to use the term moderation to mean checking of assessment decisions which might happen before or after certification. Throughout this report, we therefore also use the term moderation loosely as it was not always clear which meaning it had in AO comments.

through the internal quality checks, we're then looking more at process.

Fenestration_L2

Most AOs explained that they implemented **risk-based sampling** when monitoring centres, based on various criteria, including how experienced the centre is in delivering their qualifications, its past track record and so on. Within this, some AOs emphasised that they focused more extensive moderation/QA on particular units, which might be deemed more high stakes, such as summative synoptic units that determine the overall qualification grade or units that otherwise provide key evidence of competence. Others suggested that their relatively **small cohorts** allowed for most assessment decisions to be moderated. Each of these increased the chance of inaccurate assessment decisions being spotted. Some AOs emphasised that **not giving direct claims status (DCS)**¹³ to centres, and thus not confirming certification of qualifications unless moderation had taken place, provides further opportunities to check and assurance that assessment decisions in their exemplar qualification are correct.

Overall, there was a sense from most AOs, summed up in the comment below, that they felt confident that the QA processes as a package sufficiently guarded against the potential problem of inaccurate judgements.

[...] we feel that as a package, you know, we have a strong and rigorous oversight of how the qualification is delivered and assessed, and we're confident that the required standards are consistently met by centres across the country.

Creative_L3

Support and guidance for centres

Support and guidance that the AOs provide to centres to mitigate the potential problem of inaccurate judgements were referenced equally frequently as the QA processes in the interviews. Indeed, AOs often described their QA as “a dual process” involving both monitoring and support in relation to interpretation of standards and other aspects of qualification delivery. This integrated approach to QA and support appears to aim to get the centres to the point where they can operate qualification delivery with little additional involvement from the AO. Achieving this

¹³ As noted in Newton & Lockyer (2022, pp. 14-15), although this term is widely used in the industry, DCS is operated in different ways by different AOs. The term does not appear in the Ofqual regulatory framework. DCS may be conferred upon centres by AOs when they are satisfied that a centre can effectively deliver a qualification and assess it with consistent accuracy. Once granted DCS, the centre can request certification for an individual or group of students without the need for their assessment decisions to be externally quality assured before the award of each certificate. Recent Ofqual regulations permit DCS as long as some form of Centre Assessment Standards Scrutiny (CASS) is undertaken, and certain baseline requirements are met.

ideal may be seen as the most effective mitigation against many of the potential problems with the CASLO approach, including inaccurate judgements.

[...] under our model what we're looking to do is get the centre in a position where we can say we are confident you're doing everything correctly, [...] what our ideal is, we are just looking to say yes, you're managing your affairs correctly. We don't need to start delving in and looking at all the detail to a great extent, [...]. We don't want to be doing it for you. Adult care_L3

Most AOs provided **continuous support** involving multiple opportunities for centres to ask for help and clarification and for AOs to get insights about how centres are interpreting qualification standards. Continuous support was mostly provided by EQAs who, in addition to their monitoring role, also take the more supportive role of a "critical friend", advising on best practice, including the interpretation of the AC. One AO suggested that the whole CASLO approach is based on giving and receiving feedback, which leads to **incremental improvement**, including in relation to interpretation of standards. They expressed confidence that the centres and practitioners are generally receptive to feedback and ready to learn from each other. Some AOs also emphasised that the timing of their support and QA is of key importance, as continuous monitoring allows them to spot issues early on and provide **early intervention** to ensure appropriate interpretation of AC.

A lot of that [is] done very early in the delivery of the qualification so that we're able to identify those misalignments perhaps with the interpretation of the assessment criteria and achieve alignment early on before it's embedded in the qualification, so I think the timing of that is key. Creative_L3

Most AOs also provided **guidance documents** with different types of information to support interpretation of AC, recognising that the AC on their own are open to interpretation. AOs delivering occupational qualifications often referenced documents that sit outside of the qualification and involve industry codes of practice, building regulations or treatment protocols, depending on the specific sector, which help to situate the AC in the broader context of relevant best practice and, thus, help with their accurate interpretation. One AO with a 'dual purpose' qualification mentioned that the **core** and **indicative content** in their qualification provides an indication of the level of response or evidence required for each of the LOs to achieve a pass. Most AOs also provided specific guidance which includes **definitions of key command verbs** used in AC and AO expectations about their interpretation. Others provided guidance documents with elaboration of grade descriptors where relevant or **glossaries** that explain key qualification terminology. Providing guidance was deemed to be helpful even where the interpretation might be seen to be fairly constrained due to links to the NOS or due to being rooted in the long-established standards in a sector, perhaps in particular where assessors might be new or less experienced.

So, we give guidance to centres that says if it starts with 'state' this is the type of answer we'd expect. If we're saying 'list' it is literally bullet points. If we're saying 'explain' or 'describe' then they've got guidance from us as to what type of answer to expect. Fenestration_L2

Several AOs spoke about different kinds of **training** activities that they provide to centres, some compulsory and some optional, helping to ensure appropriate interpretation of standards and assessment requirements, often within the broader training about qualification delivery. These were sometimes delivered online to promote wider uptake. Within this, some AOs took into account how their assessors might interact with the guidance provided and diversify the media they use to ensure assessors engage appropriately by, for example, including **training videos** about different aspects of assessment practice. Training centres in how to run their own internal standardisation or related activities was also a relatively common upskilling activity undertaken by AOs, with some providing guidance and materials that centres can use to support these activities.

[...] and we actually have [...] training videos talking about how to conduct reviews, on how to conduct planning, those types of things to say well here's what we're looking for when you're conducting a review and here's the hallmarks of what we want to see at the higher grades as well. Creative_L2

Several AOs provided specific **exemplars of student work** to centres to support interpretation of standards and standardisation processes. One AO mentioned that, for knowledge questions, centres are expected to have **indicative answers** to demonstrate the pass grade threshold requirements that are reviewed by the EQA, who provides relevant feedback. However, a few AOs suggested that there are resource issues in providing centres with exemplars for every unit and every AC simultaneously, which would be "an impossibility". To deal with this, some provided exemplars for different units or AC incrementally over time, creating "banks of exemplars". Others explained that exemplar materials tend to be available for core or otherwise higher priority units or criteria (for instance those known to be harder to assess consistently). However, the AOs emphasised that the units which are not as frequently or as thoroughly exemplified were still sampled and moderated through EQA, or that EQAs might request exemplification for certain optional units if they felt this was needed.

Yeah, we do give exemplar work out. [...] we provide standardisation materials that they can use in standardisation sessions that includes an assessment commentary or an explanation why the grades were given and why we would support those grades or agreeing those grades at moderation. Creative_L2

[...] we try to circle round the qualification to pick up different units or particular learning aims every year. So that then builds up a bank of exemplars that

assessors can then refer back to. So, it varies depending on the qualification, but we'd usually have a unit's worth of assignments and exemplars. [...] our focus is really on the core. [...] But I believe that we do have optional units that the SSV will ask to interrogate particularly [...] if they feel that that's an area that they want us to interrogate or exemplify for centres. Business_L3

Despite most AOs providing some form of guidance or exemplars, there were somewhat different views on the extent of detail that should be provided or whether these materials should be provided at all. This tended to reflect an awareness of the difficulty of achieving the balance between flexibility of contexts that assessment might take place in and the need for a level of reliability and consistency in AC interpretation without being too prescriptive. The AOs emphasised that any guidance needs to be interpreted in the broader context of the task by occupationally competent assessors. Some AOs also saw value in centre ownership of assessment and encouraged centre and assessor development in this respect, as well as creativity in using different kinds of tasks, which might be stifled if centres relied too much on exemplars and detailed guidance.

[...] we do have exemplars and we do go through those with centres. But again, we're cautious of the risk there of being too prescriptive and then ending up centres just picking those examples and replicating them. So, we guard against that [...] through our entire engagement with centres, where we're encouraging variation and creativity, we're encouraging them to be diverse. Creative_L3

Some AOs deliberately did not provide exemplars of student work nor extensive guidance documents to help with AC interpretation because "it tends to just drive more questions". Rather, they provided support and feedback to centres through their EQAs and said they could supply some exemplars or clarification at centre request. In contrast, Construction_L1 described providing extensive guidance to make sure that even tutors who may not have the relevant sector background would be able to teach and assess.

It was also suggested that centre requirements for guidance seem to ebb and flow, and the AOs appear to be responsive to this in relation to both assessment and teaching. Some AOs said that their more recent qualifications (though not the exemplar ones in our sample) tended to involve more explicit guidance on how to interpret the AC. This was sometimes introduced in response to growing demands from centres, where assessors or IQAs might find that having more explicit guidance reduces the pressure they are under and supports their decision making. In other cases, this appeared to reflect the growing experience of the AOs in relation to the extent of guidance that is likely to lead to better outcomes. Some comments also suggested that there might be individual assessors or centres that do not see the value of detailed guidance, training or exemplars, or feel that they do not have time or sufficient resource to engage with them.

Standardisation as a challenge and a mitigation

Despite suggesting that **standardisation** is an important mitigation in relation to incorrect judgements, most AOs recognised that conducting standardisation in the context of CASLO qualifications was challenging and resource intensive. This was mainly due to the multitude of contexts that their centres typically functioned in and the demand for flexibility to meaningfully address these diverse settings in standardisation. Nevertheless, most of the AOs appeared confident that they were doing enough to ensure sufficient standardisation was taking place.

All AOs in our sample said that they expect centres to conduct internal standardisation, typically run by IQA staff, and would be checking that this was taking place through EQA. However, there were flexible requirements regarding standardisation frequency, format and formality in the centres, recognising their different size, contexts and circumstances. Thus, standardisation might happen once a year in some centres and monthly in others.

We tend to do it on their numbers and how they deliver, so where we work with colleges, we do tend to say a couple of times a term because that's how they work, and they work on those calendars. Where it's independent training providers, again, it's a numbers thing, some do it as regularly as monthly, others do it 4 times a year, that kind of thing. We encourage a minimum of 4 times a year for a standardisation event, but other than the fact that we actually say standardisation has to happen and we do tell people what we expect to happen at standardisation and what the purpose of it is, we're slightly more lenient on stipulating timings and how often, because it does depend on how they deliver and what size of organisation they are, because if there's only 2 or 3 trainers and they've only got a dozen learners each, for them to meet and standardise every month might well be overkill. End of life care_L2

Some AOs said that they also require centres to **attend compulsory annual standardisation** events organised by the AO. However, cross-centre standardisation did not appear to be common, with AOs typically using EQAs to monitor between-centre consistency. This was sometimes said to be related to the difficulties with standardising across diverse approaches to assessment across centres, as well as due to their geographical dispersion. Not all AOs suggested specific reasons as to why such standardisation events were not organised, implying that internal centre standardisation alongside EQA was sufficient. A few AOs suggested that, while AO-organised standardisation events may not happen sufficiently frequently, there is demand from centres for such events.

[...] we used to do quite a lot of cross-centre standardisation led by us, we've not done it in quite a few years now, obviously COVID pushed a lot of things back, but we do actually get that feedback from centres quite a lot that they do want to

attend cross-centre standardisation led by us. So, I think that is something that we are aware of, and we would like to do. Adult care_L3

AOs also said that they conduct **standardisations of their EQAs** and/or external assessors. Several AOs described the way that they conduct EQA standardisation, explaining that it involves explicit consideration of student work and application of standards rather than just focusing on assessment administration processes. Others described similar processes undertaken by their centres, where the focus is on scenario-based standardisation and discussion of exemplar portfolios and borderline performances.

[...] they all have to attend and pass standardisation. They have a pre-event task, which is on the element of a unit, that they do a couple of weeks before the actual training event and that gives the senior external examiner a bit of an idea of [...] what the external examiners are thinking. Then there's the professional discussion aspect, looking at units, having that discussion about, here's some student work, has that met P6 of Unit 1, yes/no, the senior will then explain, after that discussion, why it has or hasn't, depending on the scenario. So, those are the professional discussions and then it ends with a standardisation exercise, which is [...] – now you need to go away and actually produce your external examiner report based on this particular student work, this particular unit, and that's really them seeing that they can apply the standard. Construction_L5

Among various resource and other challenges of implementing standardisation in CASLO qualifications, the scale of some of these qualifications and the number of units which might require standardisation appeared to be 2 of the more prominent concerns. Several AOs pointed out practical challenges about organising standardisation events for their EQAs in terms of gathering them all at the same place or allowing for sufficient time for them to collect relevant exemplar materials to discuss in standardisation meetings. Some AOs said they started to encourage centres to **conduct standardisation online** to overcome some of the resource and cost issues of in-person standardisation.

Some AOs mitigated the resource challenges by **prioritising** higher stakes or core units or those that are known to be more difficult to judge consistently. Some suggested that they focus cross-centre standardisation on the graded qualifications, rather than those that only involve pass/fail decisions, possibly because of the perception that graded decisions are more challenging to make consistently. This mirrored the AOs' rationale for prioritising certain units where they provided exemplar performances, discussed in the previous section.

So, more of a challenge is the resource, without shadow of a doubt. You've never got enough people to do what you want to do you're always managing and

balancing the risk with the resources that you have available. In terms of getting it into people's heads, that's what we're reasonably good at [...]. First aid_L3

Some AOs pointed out that assessment methods producing relatively **constrained types and nature of evidence** are more likely to lead to consistent judgements that are easier to standardise. This was the case with the assessment of practical tasks in Hairdressing_L2 and the assessment of assignments in Business_L3 qualifications. In contrast, standardisation of portfolio-based assessment, where portfolios might contain varied types of evidence, was deemed to be more problematic.

It was also noted that while there is an appetite to have more one-off training or standardisation events for centres as well as EQAs, standardisation is often a continuous process taking place during other centre-based activities and outside of formal standardisation events. Some AOs also felt strongly that EQA standardisation happening twice a year was sufficient.

Occupational or professional expertise and experience

Although all AOs spoke about the importance of support and guidance as well as QA and standardisation as key mitigations of inaccurate judgement, most AOs also emphasised the need for the practitioners involved in assessment of CASLO qualifications to have relevant **occupational expertise**. Such expertise enables assessors, IQAs and EQAs to interpret the AC and their specific requirements and terminology in the context of the relevant occupation and associated standards that they should, by implication, be familiar with. Indeed, one AO thought that additional guidance about how to interpret the AC should not be needed if assessors are occupationally competent.

So, I think it's really important to recognise that [...] the whole context of this is delivered by professionals who are artistic practitioners who understand [for instance] problem solving from that perspective. [...] It's practitioners who are professionals at each level, both from us and both within centres, who understand this terminology. Creative_L3

I think it is quite obvious to assessors, [...] they just know if it's safe or not based on their experience. Because the assessors are at the top of their game in terms of these treatments, they will have massive amounts of experience in carrying them out. Skin peel_L4

Several AOs also noted that, in addition to occupational expertise, centre staff involved in qualification delivery should have specific **assessment or QA expertise**.

However, some AOs described providing additional training for assessors to support them in conducting IQA or EQA duties, sometimes expressing concerns about the effectiveness of assessor or QA qualifications.

[...] we've taken on EQAs that we've had to retrain in how to make judgements and how to apply what it is they're supposed to be doing, despite them holding the qualification and have been lead EQA for someone else for 5 years. [...] what we really want is someone who knows the subject area and we're going to teach you how to EQA and EQA properly, because that serves us better. Chef_L2

Another AO suggested that nowadays, due to changes in policy and funding arrangements in centres, AOs have less direct influence on centres with respect to assessor continuous professional development (CPD) or the length of their prior industry experience. The AOs can monitor these, but cannot enforce specific requirements, suggesting that this might have negative consequences for consistent interpretation of standards.

Again, it's back to sort of the change in policy. [...] it was there as an NVQ requirement [that] colleges absolutely funded these 30 hours [of CPD] [...] We still recommend 30 hours [...] and we monitor it when EQAs go in, but in terms of sort of the sanctions, unless it was completely absent, there's not really too much that we can do. And the other thing is the 5 years commercial experience, we used to be able to dictate that as part of the qualifications, but of course now that's really up to colleges on their own recruitment practices [...] So those 2 things probably don't help in terms of maintaining standards. Hairdressing_L2

Communities of practice

Most AOs agreed that strong **communities of practice**, especially in relatively niche or small sectors, where practitioners might work across different centres, help to promote consistent interpretation of AC. Some AOs highlighted the sense of shared ownership of the standard amongst practitioners, and practitioners' wish to protect the reputation of their sector and to "self-police", as important factors in ensuring that standards are not allowed to slip or be frivolously interpreted.

[...] the centres that deliver this qualification for us, they're quite geographically disparate but they also share trainers, so there is a national standard because they actually all work together to maintain a standard because it's used by the outdoor sector in general for different outdoor activities, so it's there informally [...] and it's a nationally agreed standard. [...] so they tend to self-police, so we tend to be able to get good intelligence on centres that are maybe not playing the game and [...] the outdoor education sector is a very, very small world, which means, again, [...] they've all got a vested interest because none of them want to look like they're letting the side down, as it were. First aid_L3

While most AOs recognised the potential value of strong communities of practice, some highlighted certain limitations of these. It was noted that where qualifications are delivered internationally, there can be less reliance on communities of practice because there are too many practitioners working across very diverse contexts. For this reason, they relied more on written requirements as a “grounding” or baseline for the interpretation of AC.

Another AO noted that strong communities of practice and a strong sense of “sector expertise” can lead assessors to think that they have internalised the standard to the extent which might result in impressionistic judging without sufficient reference to the relevant criteria. For this reason, there was a need to still consider the AC and the written requirements and ensure that these are adhered to appropriately through training and standardisation.

[...] I think there is a bit of a danger, an overreliance firstly on a community of practice where it's so strong that people internalise the standard so much so that sometimes they feel like they can disregard the criteria. But actually, what we've had to do is refocus them and say go back and look at the assessment criteria, [...] because they forget what we've actually specified in the specification.

Creative_L3

Despite potential limitations, several AOs said that they **actively promoted networking and community building** among their centres, though some acknowledged that there was more that they might be able to do in this respect. A range of ways of engendering and promoting communities of practice were suggested across AOs, including in-person events such as conferences, forums or other meetings, online groups, etc. Most AOs also saw their normal training events or EQA support as contributing to the development of communities of practice across their centres. Some AOs noted that networking opportunities are sometimes created via **centre initiative**, additionally helping to strengthen communities of practice.

It was observed by some AOs that communities of practice take a long time to foster and that sufficient engagement with centres is required to achieve a level of common understanding of AC that can be relied on. The AO offering the Hairdressing_L2 qualification further emphasised the need for investment in these communities, which, with reduced funding for bodies such as sector skills councils, which used to support many of these communities through activities and forums, might be threatened in some sectors. This AO suggested that there was an onus on the AOs in those sectors now to do more to engender and support communities of practice.

And [as] the awarding body, we've been going for well over a decade now, and I think the understanding of our expectations has got momentum and I think that carries through. [...] And as a community of practice, [...] there is understanding attached to some of these words and some of these phrases [...], and that kind of

underpins the consistency as well, which we draw on. [...] that's not something you can just create overnight. That's the legacy of our engagement with those centres and the momentum of that community of understanding [...]. Creative_L3

Qualification and assessment design processes and features

Several AOs emphasised the need for language precision and clarity in writing AC to ensure that there is a good chance of them being interpreted accurately. They described certain **qualification design processes** which help to ensure that this was achieved, typically involving multiple rounds of development and review by expert and stakeholder panels before the qualification is launched. Some AOs said they involve centres that currently deliver their qualifications in development meetings and take their views into consideration. Some AOs also spoke about regular qualification reviews, which might sometimes be initiated for certain AC that have been found through regular monitoring to be difficult to interpret. However, some AOs reflected on the high levels of resource required to support detailed reviews across qualifications.

Several AOs discussed the use of certain **design features** which, in their view, help to guard against inaccurate judgements. Most AOs flagged carefully selected **command verbs** which help signal different aspects of standards within AC, including the expected nature and complexity of the performance required to achieve a grade. However, some AOs also recognised the challenges with using command verbs to differentiate between the qualification levels.

[...] that has been an ongoing challenge from QCF days, what the particular command words mean, how do you identify levelness, and obviously there was this whole thing with the old QCF writing guidelines, where particular command words were reserved for particular levels, so there is a bit of that in here, you know, where we've gone back to that old-school benchmarking and said, you know, what does a 'describe', [...] what level was that traditionally aligned to on the QCF framework? Of course, I know we're on the RQF framework but that was our additional basis. The other thing that we always do when we think about command words that we use, such as propose, we also benchmark it against other level 3 qualifications. Creative_L3

Several AOs also talked about using **grade descriptors** to support the interpretation of the AC. These are provided separately from the AC rather than being attached to each individual AC. These grade descriptors also rely on the use of command verbs through which the AOs strive to adequately capture different complexity levels and demand across different grades.

One AO suggested that **common structure** across different units of their Creative_L2 exemplar qualification, which encapsulates aspects of the creative process that they cover (“plan-do-review”), can help mitigate the potential impact of limited resource to conduct standardisation. The common structure helps to ensure consistent AC interpretation across the board irrespective of the specific focus and context of each unit, even if no explicit guidance was provided or if standardisation was not conducted on each unit or AC.

[...] we could look at how to plan that unit and how to review that unit and then you could go away and deliver a different unit, but you’d still have a good understanding of what you’re expecting learners to do in relation to the planning tasks and the review tasks. So, it’s not like every single unit is an island that you can’t deliver because you haven’t had a standardisation in that unit. Creative_L2

Atomistic assessor judgements

Another criticism from the literature is that atomistic CASLO specifications encourage atomistic and/or mechanistic judgements, with assessors often reduced to ticking off AC lists, criterion by criterion when assessing. This can lead to the potential problem of arbitrary and, therefore, deficient, judgements as, according to criticisms, there may be more to having met an LO than having satisfied each individual AC. In particular, if competence requires the integration of elements of knowledge, skill, and understanding – yet these elements are only ever assessed discretely, criterion by criterion (and potentially via discrete tasks/events) – then this raises the potential problem of not assessing comprehensively and authentically.

Only 5 AOs in our sample recognised these as potentially relevant problems for their exemplar qualifications (all except one of these were ‘confirm competence’ qualifications), while the majority did not entirely recognise it or did not think it was relevant at all. Even though most AOs did not see these as potential problems for their exemplar qualifications, this did not appear to be because they believed that their qualification AC specifications necessarily afforded holistic judgement or holistic assessment (see below). Instead, it was because of assessors being able to, in some ways, see beyond atomistic AC, and, sometimes, due to mitigations or protective factors embedded in their qualifications. Everyone discussed at least 2 but mostly several mitigations and/or protective factors that helped reduce the risk of this potential problem arising.

It is helpful to draw an explicit distinction between holistic judgement and holistic assessment at this point, as these were both discussed in response to questions about atomistic assessor judgements. Holistic assessment describes an assessment scenario – a task or a naturally occurring situation – that elicits evidence related to multiple AC simultaneously, typically because the scenario calls for an integration of

relevant knowledge, understanding, and skill. Holistic judgement, on the other hand, describes an approach to evaluating assessment evidence, where assessors do not focus on individual LOs or AC independently, each in their own right, instead deferring to a higher-level judgement of competence. In terms of the logic of the CASLO approach, holistic judgement is potentially problematic, as it seems to open the door to a compensatory approach, depending on how it is implemented in practice.

When discussing mitigations for the potential problem of atomistic judgements failing to assess integrated competence adequately, the AOs used the notion of holistic assessment to refer to either holistic assessment or holistic judgements as defined above, not making a clear distinction between them in all cases. In some cases, they referred to holistic assessment procedures or tasks, which integrate multiple AC, LOs or even units – that is, holistic assessment. Otherwise, the notion of holistic assessment was used to refer to holistic judgement in the sense of evaluative, contextualised, generalisable judgement although still anchored by specific AC. Such judgement was thought to be based on varied evidence and multiple performance conditions, rather than being formed based on a single instance of successful performance against a single AC. This understanding of holistic judgement seemed also to be implied where AOs referred to assessors “making a judgement” rather than “ticking boxes” during assessment. Where it is sufficiently clear from the respondents’ comments that they are referring to holistic judgement when saying holistic assessment, we will use the former in our commentary throughout this section.

The quote below describes some of the mitigations that were often suggested, such as use of holistic assessment (that is, tasks or events) across AC or LOs and contextualisation. It also highlights an awareness of the potential washback of atomistic assessment on learning, as well as increased burden of assessment, which we discuss later in the report. Finally, it highlights a tension between the benefits of holistic assessment and the need for a level of specificity and clarity in the mapping of the more holistic assessment tasks to AC. This was a prominent theme in our discussions with the AOs in relation to the atomistic assessor judgements, but also some other potential problems, including poorly conceived assessment tasks/events and lack of holistic learning.

Yeah, I think it is about seeing it as a high overall level of what that learning outcome is [...] we try and encourage that more because it probably really burdens them to actually look at each assessment criteria individually and say, right, we’re going to do an assessment on this, we’re going to do an assessment on this, [...]. And is the learner then joining those dots up about what they’re actually learning, [...]. I think it is kind of contextualised in that doing it as part of bigger assessment pieces holistically across learning outcomes and assessment criteria, but obviously ensuring that when you do develop those assessment tasks

or materials that they are clearly mapped in the background to all the assessment criteria. Adult care_L3

Overall, the main mitigations proposed by the AOs included holistic delivery and/or holistic assessment or judgement, often coupled with the requirement for occupational or professional expertise of assessors. Some AOs also discussed mitigating effects of certain qualification design features and spoke about providing support and guidance to centres, and monitoring for atomistic assessment or judgement through their QA processes.

Perceived drivers of atomisation

While some AOs did feel that atomistic judgements and tasks may be prompted by highly atomistic AC, this was not always seen as the only or the main reason why assessors might feel compelled to apply a tick-box approach in assessment (in judgements or when devising assessment tasks), potentially rewarding deficient performances as competent. It was suggested by some AOs that additional pressures can exacerbate the effect of atomistic AC lists, which otherwise should be seen more as a tool to ensure higher consistency and to avoid missing certain aspects of content. Despite the use of atomistic specifications, there was no expectation from the AOs that assessment, teaching and learning should proceed in a list-wise fashion, nor without using more integrated assessment tasks or events or without reference to a higher-level holistic/professional judgement when appropriate.

For example, it was suggested that mastery requirements at AC level, where not achieving even one AC may threaten the overall qualification result, might create nervousness in assessors. Assessors might be worried about missing something and disadvantaging students if not directly assessing against each and every AC. Relatedly, an AO suggested that pressures on teachers to ensure that students pass can also lead teachers to a “path of least resistance” approach of assessing atomistically to ensure each AC is at least minimally met under the mastery approach even where genuinely integrated or satisfactory performance may not be in evidence. However, this might result in missing (or ignoring) the wider point of why aspects of a task are performed or whether they are performed in the most engaging way, turning assessment and performance into a “cookie cutter exercise” or a “sausage machine”. However, it was emphasised that this was a rare occurrence that can be detected by EQAs, and not a desirable outcome. These comments resonated with the potential problem of superficial learning, which we discuss later in the report.

[...] I think the pressure on them sometimes makes them think – what is the easiest way I can get the kids through it – and [...] the easiest thing to do is to do X, Y and Z and what happens is the learners don't necessarily understand why

they're doing it or they're not using it in the most engaging way. But nevertheless, they meet the criteria, they all pass [...] This isn't just CASLO, this is all quals now, but it is something you see because of that nervousness [...] with having to get numbers and the pressures on learner achievement. Creative_L2

It was also implicit in some comments that, in some qualifications, securing grades at the lower end of the achievement spectrum, such as a pass, might, in fact, solely require a student to meet the individual AC in a fairly mechanistic way. This suggests that demonstrating evidence of integrated performance at the level of a pass may not be essential in some cases, therefore indirectly allowing for atomistic assessment and judgements. On the other hand, there may be more explicit requirements for integration at higher grades like merit or distinction, which may be captured in the AC or grade descriptors.

[...] So, that's a practical piece of work, you have seen that a learner has automated. They have not done it creatively, they have not done it in an interesting way [...] they've just slapped automation on a track, that's pass. It's then the merits and distinctions where they have made a creative use of that and they can sort of, we ask them to explain why they've done what they've done as well. Creative_L2

One AO pointed out that assessors might feel under pressure to conform to apply a tick-box approach when being observed by inspectors or EQAs, even when they might be assessing more holistically otherwise and then ticking the AC off at a later point. Therefore, it may be difficult to observe this holistic professional judgement in action during brief EQA or inspection visits. Finally, another AO suggested that the tick-box approach can be attributed to a trend of the assessor role and confidence being more generally undermined by accountability and funding pressures across broader education context rather than just in relation to assessment.

Holistic delivery and assessment, contextualisation and real-life task setting

Some AOs suggested that, despite the atomistic look of CASLO specifications, a **holistic/project approach to delivery** (in terms of teaching and learning) helped to support holistic assessment, which was likely to align with holistic delivery where tutors were also assessors. More specifically, it was suggested that teaching in their qualifications does not focus on individual AC and is more likely to relate to the LOs, which are more holistic in terms of covering a broader topic.

The unit should be delivered holistically, [...] you don't do 1.1 and then 1.2 and then 1.3. I think it's set out in that way because it's probably the easiest way to set it out than to define what it is that you expect. I think the learning outcomes

provide an umbrella that gather all those assessment criteria up and looking at learning outcome 1 [in this unit], it's about accidents in the construction environment. And you'd certainly learn about cause and effect at the same time, rather than looking at common causes of accidents and then assessing that and then moving on to what you would do to prevent them and the consequences of those. [...] Construction_L1

Other AOs considered a **holistic/project approach to assessment** to be more of an explicit mitigation of the potential risks of inauthentic assessment based on deficient atomistic judgements. Even though AC are atomistic, in some qualifications assessments happen at the level of a wider practical task. It was implicit in various comments that it was beneficial for assessor judgements to be situated in the broader context of tasks or activities rather than following the specification breakdown into AC, LOs or even units, because this approach helps form more confident judgements based on wider evidence. Thus, when making judgements, assessors have to take into account how the activities that happen during those tasks fit together, how students address different requirements of the tasks, how they justify their decisions, and so on. This partly capitalises on the presence of **implicit links** across LOs within or across units in some qualifications. This was especially the case where a unit with its multiple LOs might correspond to a complete task that is commonly carried out in the workplace and where activities may happen in quick succession, making it more difficult to assess each one discretely.

[...] obviously you have got to focus on the assessment criteria but not just on those [...] I think it is about having that holistic overall judgement about meeting that learning outcome, [...]. Because seeing it in isolation, yeah that might be enough evidence, but sometimes it's stronger evidence if that is joined with other assessment criteria as part of one assessment activity that is seeing something being completed from start to finish, for example, that you can take more context from the learner completing an activity that might [...] meet the assessment criteria on paper, but as a strong piece of evidence you can actually see it holistically across the piece. Adult care_L3

That word holistic. That's what we encourage [...], that's why they're not assessing against a unit during observation. They're looking at the whole [task], completing their evidence, gathering their evidence, and they will cross-reference that against the criteria. You know, we saw that one, we didn't see that, we can pick that one up next time. Fenestration_L2

Different AOs discussed different parts of their qualifications that tasks or assessment events should integrate. Some spoke about LO level integration, while some suggested that assessment situations can sometimes straddle different units and that this should be embraced by assessors (as in the Fenestration_L2 quote above). There were also AOs that suggested the unit level as the appropriate level at

which assessment should be integrated if desired, though they also said that centres tended to use more discrete assessments than that, with several assignments within a unit. Any residual risks related to potentially deficient atomistic judgements in the absence of cross-unit synoptic assessment were seen as a necessary trade-off against the benefits of unitisation by some AOs.

While **synoptic assessment across units** could be considered as a mitigation of the risks around inauthentic assessment based on deficient atomistic judgements, some AOs flagged that in this type of assessment the mastery model requirements can adversely interact with challenges in assessment design, especially when assignments are not externally set. If a broad cross-unit synoptic task happens not to be sufficiently well designed or mapped to AC, students that would fail it would also potentially fail to achieve multiple units at once, instead of failing just one unit as in more traditional unit-based CASLO assessments (see the next section for more on the potential challenges around the design and use of integrated, holistic tasks or events).

Instead of developing explicit synoptic units, some AOs suggested a reliance on the perceived inherent validity of assessments which are typically conducted in a **real-life setting** as a protective factor. In some cases, where a qualification embodies a construct such as the creative **process**, the AOs flagged that assessors can only reach a judgement about the student's grade having seen the whole process, therefore reducing the likelihood of atomistic judgements being applied despite atomistic AC specifications.

The qualification that we're discussing, the whole process is part of the assessment. [...] most of the units follow the "plan, do and reflect" model but built into that there are things like rehearsal skills and how well can you work with others and how well can you collaborate. And the assessor really needs to see the process of all that happening in order to be able to award a grade.

Creative_L2

Discussions about holistic judgement were also partly related to the notion of judgement generalisation which is an expectation that assessor judgements about whether certain AC have been achieved would be formed over a period of time during which the evidence is accumulated. Thus, rather than just ticking off an AC when it has been evidenced for the first time, assessors should consider the AC to be met only after having seen the student perform adequately on several occasions. Relatedly, it was suggested that assessors should not ignore additional, potentially contradictory, evidence in forming an overall view of whether a student has achieved a standard. This might arise in situations where something had been observed and "ticked off" before but then might appear again in the context of another observation with a different focus. In their comments, the AOs implied that integrating evidence from different assessment events and, thus achieving judgement generalisation,

tends to be easier when assessment is carried out in the context of holistic situations, as opposed to when it is atomistically focusing on individual AC or even units.

[...] I think it is the fact that if an assessor is to assess via units, and they may decide after a couple of visits that FI3 all signed off all done. Well, no because next time you go out to see something, you're going to see some elements of FI3. So, you know, not on about over-assessing but you need to keep that in mind that that is still part of the overall process. Fenestration_L2

While the requirement for generalisable judgements was implicit in most qualifications, thus potentially guarding against arbitrary atomistic judgements, exact requirements in this respect were seldom specified. Only Skin peel_L4, Hairdressing_L2 and Chef_L2 specified the so-called **range statements**, outlining the range of conditions in which performances need to be demonstrated and how many times this needed to happen for summative assessment. Furthermore, the latter AO said that these were often indicative, and it was more important to get a holistic judgement of achievement across different AC, as well as units. Some AOs also suggested that the range statements were not needed in their exemplar qualifications because the skills assessed are largely generalisable to different contexts and do not need to be explicitly demonstrated across different contexts that each elicit different aspects of the skill. In most cases, however, it seemed that it was the professional judgement of assessors that AOs relied on to determine the scope of generalisation or how much evidence was enough to make a reliable judgement across relevant contexts and situations. It seemed, based on AO comments, that being able to make such determinations would only be possible based on holistic judgement, rather than applying a mechanistic, tick-box approach.

[...] the guidance that's given is that they need to produce evidence that shows the candidate can meet the criteria consistently over an appropriate period of time. Now I know that's quite a broad brush, but we don't want [...] the old NVQ world where everything had to be done 3 times. That was it. It was almost carved in stone. [...] it's not necessarily that. It's the assessor using their judgement which is something we encourage because they've got the right background. [...] some people may get 2 on-site assessments, some may get 5, and it's not over-assessing. It's just making sure that they've reached the decision for the right reasons as we say, not just ticking them off to the next one. Fenestration_L2

Occupational or professional expertise and experience

Most AOs emphasised the need for the practitioners involved in assessment of CASLO qualifications to have relevant **occupational expertise** to be able to see the bigger picture and the significance of certain aspects of performance to meeting the AC (also illustrated in the quote above). Some AOs specifically emphasised **assessment expertise** as a potential mitigation. It was suggested that the way assessors had been trained to assess during their own assessment qualifications will to some extent shape their own approach thereafter.

[...] they are highly experienced assessors in that field, and they know what a safe treatment looks like. So, then I would say they're not going to get bogged down into a tick list, they're going to look at the observation holistically and see if it is all safe, which is kind of the underpinning of everything really. So, they aren't just looking at, have they done this, have they done this, have they done this? They need a holistic understanding of the range and of the treatment protocol and of the learning outcomes and indicative content to ultimately decide if that learner is providing a safe treatment or not. Skin peel_L4

It was also suggested that getting enough sufficiently occupationally expert people in the system to assess can be a challenge in some sectors, which is why AOs sometimes resort to over-specifying the content and assessment. It was noted that this tends to be more of an issue in college than work-based settings. Less experienced assessors were deemed particularly vulnerable to potential atomistic judging, "clinging to the bit of paper" with AC lists rather than taking a more holistic approach that more experienced assessors might take. At the same time, it was recognised that AC specifications can help support the judgement of newer assessors early on.

Support, guidance and quality assurance

Several AOs spoke about the value of **support and guidance**, sometimes in the form of **training** including **videos** of assessment in practice, to encourage or enable assessors to take a more holistic approach to assessment. One AO described using **exemplars of student work** to illustrate to centres that the AC do not have to be assessed or evidenced one by one. This was, again, interrelated with their **EQA** monitoring, typically resulting in developmental feedback for centres rather than punitive actions.

[...] we do sometimes experience centres that are focused on assessment criteria only [...] and our response to that is usually through the EQA process. They

would get feedback on the way to develop that, and this could be followed up at a centre visit or in training [...]. Creative_L2

So, it's not something that we specifically put in and say that they have to do it, but it is something that we encourage, and we strongly encourage it. In fact, one of the most common conversations our EQA staff have is, when they go out and observe assessment being delivered in a very rigid list-like way, they will encourage that centre to go and take a look at our guidance, go and take a look at our videos and talk to us and set up a follow-up meeting about holistic assessment opportunities. First aid_L3

One AO advocated **not providing AC checklists** as recording mechanisms in order to encourage more holistic judgement that would, in this way, be more tailored to individual students. Instead, this AO required assessors to produce a “**summative statement**” when assessment for a unit is complete, to give an overall judgement of the student and their competence across the entire unit content. This was intended to encourage assessors to look at evidence in the round and form an overall judgement at unit level.

Some AOs suggested supplementing AC checklists as recording mechanisms with additional **evaluative comments** about how judges interpreted and judged the AC, including the rationale for their decisions. However, some AOs did not see the benefit of asking assessors to provide descriptive comments where judgements are just binary achieved or not achieved, arguing that such comments are more appropriate where qualifications are graded.

Given the significance of occupational and professional expertise of centre staff as a mitigation for these potential problems, the AOs also spoke about the importance of establishing and monitoring that through their **approvals process**. In addition, some AOs expected centres to address holistic assessment across units as part of their internal **standardisation**.

The **IQA** process was also mentioned as important to discourage atomistic assessment and judgements. The need for IQAs not to just review assessment records, which are necessarily atomistic, but to shadow and observe assessors to get an insight into how they are forming their judgements in real time was highlighted. One AO emphasised the usefulness of **unannounced EQA visits** to centres which allow them to see assessment practices in action, including whether holistic assessment within a broader scenario is being used. However, this contrasts with the point made by the same AO, discussed earlier, regarding how external observation can influence assessor performance, potentially inducing assessors to approach assessment more atomistically than they normally would to demonstrate their adherence to written specifications.

Qualification and assessment design features

In proposing a holistic or project approach to assessment as a mitigation of potential risks around inauthentic assessment based on deficient atomistic judgements, several AOs implied that assessment should focus as much on the overall performance, and how any discrete activities which might correspond to individual AC are integrated and fit within it, as on the discrete activities/AC themselves. This suggested that AOs believed there was a need to ensure that their qualifications testified to the overall coherence and effectiveness of integrated performances as evidence of competence. While this goal was often implied in the broader purpose of some qualifications, it was not easy to capture this in the specification of the AC or LOs. This then left the possibility that all the AC and LOs might be demonstrated and ticked off over time, but potentially not in the context of integrated performances, despite the intention of the qualification designers.

In some exemplar qualifications within safety critical domains, when assessing occupational tasks such as cosmetic procedures on clients, performing an integrated procedure as a single process was seen to be critical. In these qualifications, a mechanism that is employed to ensure that the integrated character of the task is captured in assessment involves a strong **task-level mastery requirement** across all the relevant AC. That is, while the AC might correspond to individual activities, they are to be jointly met each time in the context of a broader procedure, arguably amounting to overall successful and integrated performance. In such cases, a holistic judgement of how effectively and consistently individual activities within a broader task were carried out and integrated is in effect imposed by the mastery requirement at procedure or task level.

No, the treatment has to be safe, and they have to follow the treatment protocol every time. It's a little bit like saying that if we applied that compensatory model, [...] if you were in a clinic and someone was going to stick a needle in your face, actually, if they turned up on time, they were wearing the correct uniform, they wore the gloves and they did all the PPE and they sterilised everything, they didn't stick the needle in the right place, but they did everything else OK, we cannot let them pass at that stage. [...] they have to do everything right, all of the time, effectively. Skin peel_L4

The AC specifications, as the structural feature of all CASLO qualifications, were discussed from slightly different perspectives by different AOs. Several AOs spoke about the need for a level of specificity in the way the AC are written and used to support reliability and consistency in judgements, despite this requiring an analytic (and atomised) approach. To mitigate a potential negative washback effect on

teaching and learning, these AOs encourage holistic delivery or assessment design, as previously discussed.

Just to clarify, we don't have holistic assessments; we have a holistic approach to delivery [...]. Obviously, a project will require them to research, to develop, to refine, to present, to analyse, to evaluate, you know, that's the nature of a creative project. So that's a holistic delivery approach. But the assessment is learning outcomes and criteria. They are producing evidence which is assessed against those specific things. Creative L3

Others deemed AC lists to be useful for assessors to help with tracking assessment progress and for "gap identification", as well as to help make the requirements transparent for the students. Some AOs suspected that some assessors were assessing holistically – then ticking off the criteria "to meet the paperwork" – though this was not easy to observe or quantify.

[...] it's not quantifiable. What people do every day to what anybody actually verifies them doing can be very different things and there's probably far more holistic assessment going on where they're watching people on a course demonstrating things multiple times, [...] but what you write down as an assessor and tick the boxes for will be to meet the paperwork and I think this is something that's not as easy to reconcile. First aid_L3

Interestingly, one AO in our sample effectively tried to 'quantify' some of the complexity involved in judging practical performances in their qualification. They described a hybrid¹⁴ approach to capturing a sense of contextually justifiable partial performance via **assigning mark tariff** to AC in some of their assessments and allowing for partial credit. They also used mark tariff without partial credit to, in effect, assign higher weighting to the AC that required full demonstration and where contextual factors should not play a role. As an example of a justifiable partial performance, they described a situation in which, on one occasion, a student might be observed carrying out a full consultation with a new client, but then later when that client becomes a regular, the consultations may become less extensive. They judged this to be acceptable because the student will already know the client and their relevant circumstances, and the assessor will take that into account by

¹⁴ There were several qualification design features that we coded as 'hybrid' in our analysis and grouped under the overarching 'hybrid aspects' mitigation type. These were typically the features which are more commonly used in the classical approach, such as externally set assessments, use of marks rather than direct grading, terminal (rather than continuous) assessment, use of external assessors, and restrictions on certain aspects of assessment delivery such as number of resit opportunities. Where multiple such features were mentioned in relation to a particular potential problem in our interviews, these were grouped and discussed in sections called 'Hybrid aspects' in this report.

assigning partial credit rather than making the student go through detailed consultation each time just to tick boxes.

This AO also explained that, although this approach appears to involve a degree of compensation when judging, this was essentially contextual compensation that naturally occurs when judging anyway, and its presence was only made more explicit through an overt mark scheme. This type of contextual compensation was clearly distinguished from compensation that allows for certain skills not to be exhibited at all, which was not seen as appropriate in this qualification.

Another AO advocated that holistic professional judgement should sometimes involve an element of **compensation across AC** (or range) and that this may be legitimate in some instances even though there has been a tendency for AOs to operate mastery at the AC level as well as the LO level. Although this was not their current practice, they argued that this should be allowed to support more meaningful judgements even where certain skills might not be exhibited, if the overall weight of the evidence suggests a sufficient degree of competence in relation to each individual LO.

One AO suggested that the use of **grade descriptors** that encompass and apply across the relevant AC, rather than applying at individual AC level, helps to promote holistic assessment. Although they did not see this as directly allowing for compensation, this approach was likely to inherently invite judgements that consider the overall weight of evidence across the AC. This might, to some extent, de-emphasise individual AC and invite some compensation, as might the mastery requirement at LO level described above.

Others suggested that **broader LOs or AC** can help drive more holistic assessment by requiring students to demonstrate their knowledge or skill by looking at the wider picture. Relatedly, having broader LOs/AC was thought to promote the use of professional judgement by assessors, which was likely to be holistic if made against broad criteria. However, it was also suggested that such LOs can be more easily implemented in assessments that focus on the knowledge constructs rather than practical skills.

Poorly conceived assessment tasks or events

Some critics say that having detailed and apparently transparent LO and AC specifications as standards to assess against, makes it look like the assessment process is extremely straightforward. However, assessors often fail to appreciate how hard it can be to elicit construct-relevant assessment evidence. For this reason, CASLO qualifications are vulnerable to being based on poorly conceived assessment tasks or poorly conceived assessment events that do not elicit the right kind of evidence against the specifications.

In our sample, 10 AOs recognised this as a potentially relevant problem for CASLO qualifications (including for all 'dual purpose' qualifications). Whether or not they entirely recognised the problem, all AOs discussed mitigations and protective factors that helped reduce the risk of this problem arising. The most prominent types of mitigations were support and guidance for centres, alongside QA, with some references to occupational and professional expertise, communities of practice and some qualification design processes and features, too. Real-life or highly realistic task setting, contextualisation and the holistic nature of assessment situations, were also discussed. The latter were sometimes also mentioned as aspects that present further challenges to assessment design, particularly to comparability.

In discussing different mitigations, the AOs provided us with some insights into the different facets that they perceived as challenges to designing or implementing effective assessment tasks or events in their contexts. This showed an awareness that the assessment design process is anything but straightforward.

Perceived challenges in assessment design

Several AOs pointed out that different assessment methods may suit different types of constructs. Therefore, one of the key challenges of assessment design, especially given the amount of flexibility typically offered to centres, is to make appropriate choices as to what assessment method is the most suitable for each construct. Some AOs suggested that they would prefer externally set assessments where these met the purpose of the qualification, as they recognised the challenges that can potentially arise when centres are selecting assessment methods and devising their own assessment tasks.

[...] you say to the centre, well you use loads of methods in the most appropriate way and [...] if they're really good at it and they love the flexibility, they're going to love it, but actually that's pretty much a blank sheet of paper to be starting from and that can be quite daunting. Adult care_L3

As to why developing assessments that are well aligned with their purposes may be challenging to centres, the AOs mentioned a lack of expertise in assessment design among centre assessors, and constraints in the resources that are accessible across centres. Some AOs offering 'dual purpose' qualifications, which are often delivered in college settings, recommended creating assessments such as assignments that would be not only construct relevant but also sufficiently vocationally aligned and engaging. Again, these require effort and thought to design. It was also suggested that it is more difficult to create (vocationally) relevant tasks at lower qualification levels. This was said to risk centres habitually using the same method for assessing a particular type of AC, despite the alignment between AC and method at times being questionable. There were also views that tasks in lower-level qualifications

might be more difficult to pitch appropriately in terms of demand, sometimes resulting in these tasks being too demanding for the level.

I would say probably the area that might be more prevalent is not having relevant vocational scenarios or not linking what's being asked of them to a vocational scenario. [...] So, I think that is the area that can certainly be missed and can be more damaging than, I think, centres can understand at the time. Creative_L2

One AO highlighted complexities in apparently straightforward and commonly used assessment methods, such as professional discussion (for instance, the use of leading questions), which need to be addressed for the assessment method to be implemented effectively. In the context of workplace-based assessment, challenges around identifying suitable real-life situations for assessment that would enable students to evidence all the relevant AC were also mentioned. Several comments suggested that assessing (theoretical) knowledge aspects was more challenging within the CASLO approach than assessing practical and other skills.

I'm not sure people always understood the difference between an assessment method and an assessment task. So, the assessment method might be professional discussion, well that's fine, but then, as a centre, if I've got to go away and write the structure for professional discussion that hits all the assessment criteria, that asks the questions that aren't leading, it suddenly becomes quite difficult to do it well. Adult care_L3

In the previous section, we described a range of comments highlighting some threats to assessment authenticity that might arise if close alignment between atomistic lists of AC and assessment tasks or events results in the tasks or events failing to elicit integrated evidence of competence. However, the AOs also discussed the need to ensure that, while assessment tasks or procedures were able to elicit integrated evidence, they were still being sufficiently linked to the individual AC, which might be a particular challenge when designing cross-unit synoptic assessments. It was also suggested that AC which are too prescriptive can limit opportunities for contextualisation and innovation in assessment design by centres, highlighting the importance of specifying AC in the right level of detail to support optimal task design.

Throughout, the AOs suggested tensions between ensuring sufficient contextualisation of assessment and a degree of consistency or comparability between centres or students. While mostly accepting the likely trade-off required in this respect, some AOs recognised that more might need to be done to promote greater comparability, without necessarily giving up on contextualised assessments.

Support, guidance and quality assurance

Support and guidance that the AOs provided to centres were referenced most frequently in our interviews as helpful in mitigating the potential problem of poorly conceived assessment tasks or events. Within this, the AOs discussed different support mechanisms, including **early intervention** and **continuous support**. They emphasised their availability and that of their EQAs to provide advice on the choice of assessment methods for different AC, as well as more specific advice on how to design assignments throughout the delivery of a qualification. As part of their early intervention and support, some AOs offered a specific service for centres which involves **checking of assessment tasks** (typically assignment briefs) designed by centres before administration. Most AOs also spoke about providing **guidance documents** on how to write assessments targeting specific constructs, or how to choose the most appropriate assessment methods. Some AOs also provided guidance and templates for checking the appropriateness of assignments during **IQA** and some optional **training** for centres focusing on assignment writing.

Overcoming the potential issue of assessment being too atomistic was frequently mentioned as the focus of AO support and guidance for centres. However, given the recognised challenges in relation to the clarity of mapping onto individual AC in holistic approaches, some AOs also said that they provided guidance in relation to assessing holistically whilst ensuring each AC is met. This was considered especially challenging where the same practical tasks covered multiple LOs or units but might be used to provide evidence for AC which might have a different focus in relation to different LOs or units. Some AOs provided guidance to ensure that the holistic tasks which centres might use do not become overly complex or demanding for students.

[...] what we try and provide guidance for our centres to do [...] I'm talking about hitting multiple assessment criteria with nice scenarios where learners can apply what they've learnt and can apply multiple different skills in order to reach an outcome [...] It's not an easy thing to do, but it's something that we think benefits the learners in the long run. First aid_L3

Several AOs spoke about providing different types of **exemplar assessments** or **templates**, such as assignment or project brief templates. As with examples of student performances discussed previously, AOs mentioned resource limitations that drive some of their decisions about the extent of exemplar assessment materials that they might provide. For instance, one AO described developing exemplar materials for selected units that could then be used by centres to develop further assessment materials at a similar standard for other units. Another focused on what they perceived to be more challenging constructs to assess appropriately, such as knowledge aspects. However, some AOs chose not to provide exemplars at all,

particularly where they could not be easily contextualised, but also where there was risk of templates not being sufficiently adapted by centres.

We have a project brief template, which we developed as part of the qualification development [...] and is accessible for centres to use. And obviously when they put evidence or tasks in all the relevant sections, we feel that that constitutes a really solid accessible and progressive project brief for students. Creative_L3

It was also apparent in AO comments that, while they sometimes encouraged and advocated certain approaches to assessment design, these were rarely compulsory. The quote below expresses what was implicit in many AO comments, which is that there are potential benefits in AOs investing in upskilling centres, so that centres can reap the benefits of flexibility of the CASLO approach while still ensuring high quality assessment. Nevertheless, some AOs suggested that centres often have a preference for off-the-shelf assessment materials to support them, potentially because they do not have the expertise to develop appropriate assessment materials, or time to develop the required expertise.

[...] by allowing a centre to design its own brief, that gives that flexibility and that ability to meet local needs but still showing that the learning outcomes have been satisfied. I think the approach was more a case of, if we give the tutors the skills they need to design really good assignment briefs, that's better than almost spoon-feeding and saying, this is the way to do it, so that was the approach that we took [...]. Construction_L5

AOs also described different aspects of their **QA** processes that are aimed at mitigating potential problems with inappropriate assessment tasks or events by more explicit monitoring of centre practices. Several AOs spoke about the **centre approval** stage, when they have a discussion with centres about centre expertise gaps, whether they might need further support in any areas, and what their proposed approach to assessment would be.

IQA processes were flagged as an important mitigation, as there is an expectation that assessments would be internally discussed and verified before administration. Some AOs said that IQA checks would cover a range of assessment design aspects, including relevance to the local context and construct targeting, as well as accessibility to students and any modification to AO-set tasks.

We'd also then expect the IQA within the centre to pre-verify those assessment materials, so to do that check before they're used to make sure they're appropriate, that they're inclusive, that [...] a learner completing that assessment, they would meet the required learning outcomes, assessment criteria and that would then be delivered. Adult care_L3

Another important mitigation that most AOs spoke about concerned **EQA** processes. Unsurprisingly, most of the EQA checks that related to assessment quality would be conducted by AOs upfront rather than just before or after certification, to prevent students from being assessed using inappropriate tasks. Here, again, it was not always easy to separate EQA monitoring from the continuous support and guidance that the EQAs provide. However, some AO comments suggested more explicit attempts to sample and monitor assessment development at different stages of the delivery cycle, rather than just providing feedback at centre request. As part of their EQA checks, several AOs spoke about scrutinising not just the tasks as such, but also centre assessment development and IQA processes.

We ask to see 25% of the assignment briefs. [...] But it's prior to them using the assignment brief. And because we've seen 25% and approved them, we deem that they're able to write at that particular level. But it may be that, obviously, one of those assignment briefs aren't pitched at the right level, and at that point we'd ask to see the assignment brief for that particular unit where there is potentially an issue, and we would give them feedback that way. Housing_L5

And to us, monitoring the effectiveness of the brief writing and the internal verification process for the centre that checks their own briefs, that is key in that, I think that's really important. Creative_L3

Nevertheless, some AOs also spoke about issues with task appropriateness emerging during final moderation, for instance, where the task did not elicit performances that could earn higher grades. At that point, the centre would be asked to provide further opportunity for the relevant students to be assessed on more tasks. In addition, centres would be assigned a higher risk rating and, therefore, provided with additional support and additional monitoring in the next academic year.

Occupational or professional expertise, experience, attitudes and communities of practice

While most AOs discussed practitioner **occupational and assessment expertise** as a requirement for avoiding potential issues with poor assessment design, it was also suggested that this expertise was complex and was not easy to develop. Some AOs recognised that there are going to be inevitable differences in assessment expertise between centres, with strengths and weaknesses in different areas. Interestingly, very few AOs specifically mentioned **assessor qualifications** as a way for assessors to enhance their assessment design expertise. Those that mentioned them suggested that these qualifications were useful and effective in increasing assessor competence, but that they were not a requirement in all sectors nor with all AOs.

Some comments revealed that, for AOs, an important aspect of assessor expertise was to be flexible and able to tailor assessment to individual student needs. This involved recognising the most appropriate way to elicit knowledge from students where some assessment methods might present a barrier, for instance, using oral questioning rather than written tests with some students in the workplace context. While in most contexts the AOs discussed the need for tutors or assessors to ensure appropriate targeting of the relevant constructs when designing assignments, in the qualifications assessed in the workplace, effective planning was additionally often pointed out as an important facet of assessor expertise. The ability to plan assessment events effectively was deemed to facilitate appropriate assessment that does not negatively interfere with other activities, including teaching and learning, and, thus, the overall learning context.

It's down to the assessor to devise an assessment. [...] it's about going right back to the beginning with the learner, sitting down and doing a plan. And so, it's down to the assessor really to play as they go along with the learner how they're going to be able to demonstrate that evidence. [...] [and] arrange with the employer, not just with the learner, where are we going to get the opportunities to get this sort of evidence [...] Chef_L2

It was also suggested that assessor expertise and effective assessment strategies and resources are often developed over time, as centres become more experienced and familiar with specific qualifications, which, in turn, helps to mitigate the problems with assessment design. Sometimes, resources developed in the context of related or precursor qualifications may also be helpful. This links to the idea of **communities of practice**. The AOs that flagged communities of practice in this context actively promoted them by facilitating meetings or forums for centres to share best practice and resources. Some AOs also pointed out that assessors often have positive **attitudes** towards creating engaging and high-quality project briefs, and towards their own professional development. This is because assessors feel professionally invested in sharing their expertise and skills, both as practising professionals with their students and as assessment practitioners with other assessors.

We've got lots of really capable centres that write really superb assignments, and our focus has been on those centres sharing with one another, and creating those communities where tutors are able to do that. Obviously, there are some that don't really want to share some of the stuff that they've worked really hard to build and make. But there are many that do share. [...] We have subject advisers that manage forums where people do share and there is that bit of professional discussion around good assignment writing. [...] fundamentally teachers are in a community of practice where professional development is really important, and really active engaged tutors will push one another to make the best assignments that they can. Business_L3

Real-life task setting and contextualisation

Several AOs, particularly those delivering the ‘confirm competence’ qualifications, which are often assessed in the workplace, discussed the mitigating effect of **real-life task setting**. In their view, the fact that assessment is not simulated, and thus not “designed”, in itself helps overcome some of the potential issues with poorly conceived assessment, and inherently ensures a high degree of validity as well as more holistic assessment.

I think that’s a strength of our qualifications because they are delivered in the workplace. You know, back to the college environment, yeah you could set up a poorly designed assessment task, here’s a 600 by 600 straightforward, bog-standard window, take that out and put it back in, right, you can fit windows. So, I think because it’s workplace assessment. It’s live installations, it’s all the bits we spoke about and customers, dogs running about and yapping, having to move children out the way, vulnerable adults, and all that. You couldn’t get that in a college, in a simulated environment [...]. Fenestration_L2

More generally, many AOs discussed both the need for and the advantages of real-life **contextualisation** to make assessments more effective in eliciting appropriate and relevant evidence. Through that relevance, assessments were also thought to be more supportive of “less academically minded” students whom they believed tended to perform better on such assessments than on more abstract ones. While generally strongly arguing in favour of contextualised assessments, the AOs also recognised the potential challenge this brings to ensuring an appropriate degree of consistency and comparability between different centres or students within centres. Some AOs argued that a degree of inconsistency is inevitable as well as, to some extent, acceptable as a trade-off for the advantages of contextualisation.

I think it is a fair point, a fair criticism at times, but [...] this isn’t academic assessment, this is vocational assessment, so this is people being assessed about how well they can do a job. And people do jobs in different ways, employers do expect different things from their employees. You know, things will be done differently, learners will be assessed differently. [...] In some ways it’s a strength, up to a point where you might cross a border and go – it’s getting a bit inconsistent now. But I’m not sure every learner has to be assessed in exactly the same way for it to be a valid assessment. Adult care_L3

Some AOs suggested that, in their qualifications, contextualisation should not affect comparability because the fundamental skills which are assessed are, essentially, **context-independent**. Others, offering qualifications typically delivered in college or school settings, explained that their assessment tasks typically involve **cohort-level contextualisation**, rather than contextualisation at the level of individual students.

Assessment tasks would thus be the same across the cohort rather than catering for individual student interests or particular familiarity with certain employers, for instance. This would reduce the range of assessment task variation and mitigate the potential issues with comparability.

I have seen for sub-cohorts there being something that's very specific to a learner, the skills and capabilities that they bring, or their desires post getting their qualification, maybe they already have a connection with an employer. But I think that's the exception, that's not the rule. Centres are delivering to large cohorts. And so that would really create quite a lot of assessment and teaching burden if they were to do that. Business_L3

AOs also flagged certain parameters that imposed a degree of consistency in relation to the **range** of specific skills and conditions under which those needed to be exhibited for assessment. This was mentioned in the context of qualifications with a strong emphasis on client safety, such as those in the beauty sector. However, these AOs also noted challenges with ensuring that an appropriate range of conditions is available for all students and suggested that there can be some flexibility to allow students to complete qualifications in a reasonable amount of time. In some qualifications in the beauty sector, this might involve students demonstrating skills on non-fee-paying clients, thus, somewhat relaxing the real-life context. Other AOs spoke about allowing students to be questioned about situations that might not easily arise in the workplace, or presenting witness testimonies or other types of indirect evidence where it was difficult for assessors to observe them carrying out a practical demonstration of skills.

Qualification and assessment design processes and features

Some AOs flagged aspects of their **assessment design processes** that help to ensure that exemplar assignment briefs provided to centres are of appropriate quality. These included involving employers, as well as international representatives where qualifications are delivered outside of England, in qualification development or review panels working on the development of assignment briefs to ensure their vocational relevance. Others flagged regular reviewing of assessment effectiveness in centres and amending assessments where issues are found.

Several features of the CASLO approach were also mentioned as helpful in mitigating potential problems of poor assessment design. Some AOs mentioned the relative **transparency of the AC** as going a long way towards ensuring that the tasks targeting these AC are appropriate. Another AO noted that **command verbs** in the AC provide some pointers about the nature of the assessment tasks, though

recognised that the mapping between command verbs and specific design choices is not entirely transparent. One AO emphasised the need to ensure sufficiently **broad AC**, so that they would not overly restrict the potential for contextualisation and creativity when designing tasks to elicit different kinds of evidence.

Yeah, a couple of reasons why I don't entirely agree with that one is that the assessment criteria themselves form the basis of tasks. So, [...] there's plenty in there for them to create a project out of as well in many cases. Creative_L2

One AO suggested that the **mastery model** in CASLO qualifications helps to motivate centres to design appropriate tasks, rather than “skimp” or “play fast and loose trying to hit assessment criteria”, given the stakes that mastery imposes if students did not meet certain AC due to task inadequacy. There were also views that **skills-related constructs**, perhaps particularly basic technical skills, are more straightforward to assess reliably and validly than constructs such as knowledge. This implied that the potential problem of poorly-conceived assessment is less of an issue for CASLO qualifications that largely deal with skills constructs.

[...] you can either titrate in chemistry or you can't, it's a fairly basic skill. However, ask someone to explain the theory of an atom and what you get and what you ask them to provide can be so diverse, what level of knowledge somebody has achieved is very, very different against the same assessment criteria and that's where they fundamentally, I think, fall down and the criticism is acceptable [...] First aid_L3

Hybrid aspects

Despite apparent awareness of potential challenges to centres designing and administering assessments, few AOs went down the route of introducing **external assessment** into their qualifications. Those that did have some externally set and/or marked assessments explained that this was due to stakeholder or accountability requirements. They argued that such assessments are perceived by employers or other stakeholders to be more reliable in confirming aspects of competence that were seen as essential for certain sectors.

One such example was Hairdressing_L2, where health and safety-related knowledge was assessed by a compulsory AO-set and internally marked multiple-choice test. If a student does not pass that test, the AC that are not achieved need to be met via other means, usually through questioning or other evidence collated in their portfolio.

[...] It goes back to this thing around the employers are just absolutely obsessed with [...] safety and basic skills, if they're, sort of, putting somebody working on a client, there are insurance factors, there's all sorts, but even if something goes wrong with a client once, that's sort of a real loss of business, so they're very

much attached to this making sure the technical skills are basically competent and safe, and they really do want these assurances or they just won't employ [...] the learners [...]. Hairdressing_L2

One 'dual purpose' qualification in our sample incorporated some AO-set and marked assessments to enable this qualification to be included in the Department for Education Performance Tables. The AO offering this qualification suggested that their external assessment, which involves complex, creative and practical tasks, challenged the common notion of external assessment as involving only "paper and pen tests" or multiple-choice tests. They suggested that it would be beneficial to think more widely about different ways in which external assessment could be designed to retain sufficient validity and relevance to students, which are both deemed inherent in the more traditional, internal and contextualised task-based assessments within the CASLO approach.

External assessments are designed, the team's designed them in a way that we felt would be accessible and meaningful to vocational learners. So, we have tasks in many of the assessments. They're not just 2 hours in an exam hall with one paper booklet kind of stuff. [...] I think the challenge from a design point of view is finding the right balance, and it's finding the assessments that we classify as external which is right for individual subjects, because what's right for this one may not be right for that one. So, it's thinking a bit wider about that. Business_L3

Lenience and malpractice

Some critics say that the imprecision of AC can act as a smokescreen for assessors, allowing them to be intentionally lenient towards students who have not quite reached the qualification standards, giving undue benefit of the doubt. This can be exacerbated towards the end of sessional courses, for students who are just about to leave, but who still have not quite achieved all their LOs. Occasionally, assessors may try to pass students who are a long way from meeting the qualification standards, resulting in malpractice. They can get away with this – according to some critics – because it is extremely hard to detect and correct inaccurate assessor judgements under the CASLO approach.

Most AOs in our sample recognised both of these as potentially relevant problems. The AOs were slightly more likely to recognise the potential malpractice problem (around 78%, N=11) than the potential problem of lenience (around 64%, N=9). The latter was recognised for all 5 of the 'dual purpose' qualifications in our sample. However, it was recognised for only 4 out of 9 'confirm competence' qualifications.

The following comment reflects some of the commonly held views about the potential sources of lenience, as well as commonly used mitigations.

I think you're always going to have that, because if you've, let's say you've been teaching on a programme for 2 years, you've got to know those learners and you will always have some that are not going to achieve the qualification in full [...] despite how hard they may have worked through that time, and that human element kicks in where you think, oh, they've worked so hard, [...] there's got to be here somewhere where we can let them, but I think the measures are in place thereafter with centres, if they've got internal verifiers, you've got your external quality assurers, there's those checking-in points just in case that [...] does occur.

End of life care_L2

These potential problems were generally discussed against the backdrop of potential perverse incentives related to funding, accountability and other pressures, that were seen as likely to influence centre behaviour. Most AOs also implied that a certain extent of unreliability in the system arising from lenience or malpractice would inevitably remain despite best efforts to eradicate it. This was due to limited resources to QA every single student result, as well as due to the complex nature of the judgements being made by everyone involved, including assessors, IQAs and EQAs.

Most AOs discussed at least 3 different mitigation types for these potential problems. All the AOs flagged QA as a key mitigation. It was interesting to observe that practitioner attitudes, including practitioner integrity, sense of pride or vocational passion, were mentioned almost as frequently as QA. Support and guidance for centres, but also aspects of these qualifications that were deemed to support learning, such as absence of time constraints or flexible delivery, were also frequently mentioned. Several other mitigations such as various disincentives external to qualifications, as well as some qualification design features, were also discussed, though by fewer AOs.

Incentives and disincentives

The AOs mentioned a range of potential incentives that might influence centres and their staff to be lenient or commit malpractice. The presence of these incentives, often related to funding or accountability measures, was deemed to complicate the task of quality assuring qualification results. In contrast, the perceived absence of such incentives helped AOs to manage risks around lenience and malpractice in their qualifications. In addition, qualifications that did not provide a licence to practice were seen to be more resilient to these 2 problems.

While most AOs were clearly aware of different potential perverse incentives, some also included potential factors that might drive perverse incentives into their risk-based sampling models, helping to ensure that centres deemed susceptible to these issues receive extra monitoring.

Turnover of staff, Ofsted inspections, there are probably others, registration volumes, if centres are registering on time [...] Financial health could also be an indication, because that might create an incentive to do the wrong thing, if the financial health of an organisation is poor. That's maybe not schools and colleges [...]. That's more work-based learning [...]. Business_L3

Schools and colleges faced potential perverse incentives in the shape of accountability pressures, performance-related pay or funding patterns focused on achievement rates. Private training providers were also mentioned as potentially vulnerable to fraud for financial gain, especially where they might not be able or willing to invest sufficiently in robust IQA systems nor employ full-time IQA staff. It was also mentioned that certain roles that are normally fundamental for QA in the CASLO approach, such as IQAs, are potentially under a lot of pressure to ensure expected achievement rates across all types of provision.

Speaking about [this qualification] though, which is primarily delivered in schools and colleges, and therefore maybe [...] isn't so at risk of assessors maybe taking advantage of that for financial or other gain, it's really tricky would be my answer, because there are incentives and motivations for centre assessors to maintain achievement levels for example, [...] That is set at centre level, or it's other initiatives around performance related pay and things like this. Business_L3

QA and support and guidance for centres

Given the awareness of these different incentives, as well as the overall recognition of the potential for assessors and IQAs to be lenient or commit malpractice, the AOs outlined a range of QA practices that served to mitigate these potential problems. The comments below sum up most of these practices as well as AO perceptions about the likelihood of such problems arising in practice given these mitigations, especially with extensive **EQA** (particularly with small cohorts) and with monitoring of internal centre processes via **IQA**.

There's always going to be human judgements, human errors, but having quite a robust moderation process with internal moderation, assessors supporting each other if there's multiple assessors, and then the external moderation as well, and not releasing certificates until there has been moderation and scrutiny, this mitigates the risk of that happening, I would say. Skin peel_L4

[...] I suppose, in theory, if you had an assessor that was determined to take that approach with one learner then possibly the chances of them getting away with that are fair. If that was to happen with the majority of a cohort, I think it would be highly unlikely that they would be able to get away with that. And especially if that was something that was happening regularly over time [...]. We have a lot of check in points [...]. There might only be a handful of learners so the sampling

can look sometimes almost at the entire cohort. [...] it would be a bold and brave decision I think on the part of the assessor to try and get away with that given the risks if we catch them. Creative_L2

As in relation to the potential problem of inconsistent judgement, multiple layers of QA, alongside standardisation, were deemed necessary to mitigate the potential risks of lenience or malpractice. Within this, centres were expected to have their own responsibilities for checking for malpractice, for having appropriate conflict of interest policies and procedures and for observing relevant AO's appeals and complaints processes. IQA was seen to be fundamental in this, and some AOs suggested that the main focus of EQA is the IQA practice rather than student work. Were these to raise alarm bells, then the centre risk rating would be increased, and they would be subjected to more monitoring.

Most AOs spoke about different aspects of their EQA processes as deterrents against lenience and malpractice. These included a **risk-based sampling** approach, which also includes some random sampling of student work within each centre, potential for **unannounced EQA visits**, as well as potential **punitive measures** to address lenience or malpractice where it is discovered. Most AOs also mentioned not giving centres DCS status, so that student work had to be moderated prior to certificates being given to students. The potential burden and workload for centres if students had to be recalled and reassessed (were issues to be spotted during moderation) might also serve as a deterrent against committing malpractice.

[...] and there's the risk that if they are conducting malpractice that they'll lose their jobs, that's a really harsh reality that actually happens. And not just their jobs, their entire colleagues' jobs, so we could shut that centre down and everyone in that centre is out of a job. So, there's quite a lot of deterrents there. Adult care_L3

While most AOs agreed that lenience or malpractice could occur in practice, some AOs did not think that these are difficult to spot in assessment evidence by EQAs. As EQAs are seen as experts in the field and know where the standard should be, they are expected to be able to assess the appropriateness of the nature of evidence provided to support assessment decisions and whether this evidence was generated by the students. However, several comments suggested a need for **triangulation of evidence** from different sources in addition to student work, including looking at assessment management processes, speaking to staff and students, observing assessment taking place or gaining intelligence from centres that operate in a tight, "self-policing", community of practice. It was also pointed out that EQAs may sometimes be faced with the need to weigh up evidence across the entire qualification and attempt to form a holistic view of its sufficiency and appropriateness, as opposed to querying potentially weaker evidence for each AC or

LO. These comments suggest that spotting evidence of lenience and malpractice based on one source of evidence only may not be entirely straightforward.

I think in terms of the leniency, again, that's where the external examiner comes in, having been standardised themselves, to spot and, ultimately, not allow certification where that's seen. [...] we're looking not just purely at student work, but those things like the assessment management processes that go alongside it, speaking to staff, speaking to students, so it's not purely the student work, there's some triangulation there as well, the management of the academic standards...
Construction_L5

In a similar vein, some AOs suggested that making judgements on the borderline between 2 grades, and being able to argue a position on that, is difficult for both assessors and QA staff. Some comments implied that AOs might be more concerned about more significant discrepancies, such as where a distinction grade was given where moderation suggests it should be a pass, than about the borderline between adjacent grades, which might be more difficult to spot or challenge. Either way, the AOs emphasised that the focus of moderation was to ensure that assessment decisions made by the centre were appropriate and justified, supported by evidence, made faithfully, and that any borderline cases were acknowledged.

[...] it's difficult because everything is judgement based, isn't it? But I think if an assessor makes a judgement that might be weak, but does cover what is needed, I guess you've got to have a clear justification as to why you would argue that that's not enough [...]. But I think it's whether an independent person looking at that work could challenge that in a way that would make the assessor actually rethink that decision. I think that's how it usually is and the EQA is the final arbiter of that really because they're the one who does see the standards across all the centres. [...] But it would be for the assessor or IQA to convince the EQA really of their judgement and whether that's appropriate. Adult care_L3

Given the complexity of the judgements and decisions that EQAs have to make, it was unsurprising that some AOs suggested that there were challenges associated with the nature of EQA work. While some challenges related to ensuring consistency of EQA practices and processes across centres, others were about ensuring that EQAs remain unbiased and objective in their judgements towards centres that they might know well. These issues were partly mitigated by implementing a **hierarchy of EQAs**, with more senior ones monitoring more junior ones. Another mitigation that was suggested was **rotating EQAs** across centres, so that no EQA would monitor a centre for more than 3 to 4 years.

A few AOs spoke about **analysis of results patterns** as a way to monitor changing trends in centre results that can indicate potential lenience or malpractice, although any action based on such analyses would happen only following the release of

results. Some mentioned monitoring stability of grade distributions in centres over time (such as the proportion of distinction grades), whereas others compared results of internally and externally assessed components and interrogated radical differences between the two. As these AOs pointed out, such analyses needed to be interpreted sensitively, as there could be other reasons for potentially aberrant patterns which may not reflect lenience or malpractice, such as improved teaching in centres or learners performing better under some assessment models. The AO offering the First aid_L3 qualification suggested that high pass rates in their context may not necessarily be indicative of lenience in standards, because a large proportion of their cohort already have this qualification but are obliged to refresh it every few years for legal or insurance reasons. One AO suggested that monitoring of dwindling registration numbers over the lifecycle of a qualification might suggest that the qualification might not be perceived as valuable and imparting genuine skills needed for the workplace, potentially due to lenient application of standards.

As with other potential problems, **support and guidance** for centres was seen as an important mitigation of potential lenience or malpractice, in particular where the centre was new. The likelihood of these problems arising was also reduced by **continuous support** through regular EQA visits and feedback on various aspects, including interpretation of standards. Some AOs suggested that timely **planning** by centres and EQA support with planning can help to reduce the chance of last-minute pressure to collect evidence or make assessment decisions that do not meet the qualification standards. AOs recognised that sometimes there can be problems with how centres capture and present evidence of AC achievement rather than with intentional lenience or malpractice. To address this, some AOs provided guidance for assessors (to support later EQA) on how to write up observation reports and how to elaborate on the evidence that supports their judgements on whether a student meets certain criteria.

[...] we've had some chuckles over the years with some things that you see. "In my opinion, this man can fit windows." Well, that's not what we're looking for, is it. So, they're given freedom but with quite a tight rein on them so to speak. We know when to pull that rein in a bit. Fenestration_L2

Attitudes

Whether or not the AOs explicitly recognised the potential problems of lenience or malpractice, they emphasised the protective effect of certain practitioner attitudes that would likely minimise the risk of these problems arising. Several AOs spoke about the need for a degree of **trust** to exist between the actors in the qualification system. Relatedly, it was also felt that there had to be some reliance on **practitioner integrity** and **professional standards** to guard against malpractice, and a

recognition that some of the practitioners occasionally did not live up to those standards.

This professional relationship and trust that we have with our providers has to be there, because we depend on that, otherwise we would have to moderate everything and touch everything. And [...] we don't want to move away from the design of the qualification or the benefits of the qualifications in doing that, so this professional trust has to be there. Business_L3

I think we all know that the assessment process has to be built on an element of trust. You know, we can't be there at every assessment on every occasion. Fenestration_L2

Some AOs also pointed out that assessors and tutors are often invested in their students and, therefore, strive to ensure appropriate qualification delivery in their best interest. It was noted that they often have a sense of **professional passion and pride** in relation to their teacher or assessor role and their sector, and are protective of their reputation, which also reduces the chance that they would assess in a way likely to lead to lower standards. This, in turn, may sometimes lead to high expectations from students and assessing to higher standards than required in the relevant qualification.

Positive attitudes that mirrored those of teachers and assessors were also recognised among students. **Students' passion and pride** about their qualification, with students being keen to prove their skills and not appreciating being assessed on trivial tasks or against lower standards, were suggested by some AOs as another protective factor against lenience and malpractice. Adult professionals, in particular, who might be taking higher level professional qualifications, were perceived to be protective of their professional reputation, which for them was a strong disincentive against cheating or malpractice.

[...] but I think, within this particular subject area, when people get to the point at which they are signed off as being allowed to deliver training or assessment, they're so incredibly proud of that and so aware of their own reputation within the industry, that actually the idea of standards slipping is not, I'd say it's almost the opposite problem we have, that people want trainees to be better than actually they're expected to be, [...] and the standards might be higher rather than lower. Skin peel_L4

This means a lot to a lot of learners. They've been working hard for 12 months, they've got to this [final culinary challenge unit], [and if assessor said] – just make us some Marmite on toast, that will be fine – they'd be gutted. Chef_L2

Relatedly, some AOs noted that despite perceptions that employers who deliver qualifications to their own staff ("employer centres") might be incentivised to pass

students that did not meet the standard, they believed that this was unlikely to be the case. This was attributed to the positive attitudes of employers towards employee upskilling and delivering qualifications “for the right reasons”. Employers were perceived to genuinely want to improve their employees’ skills, so that they would become “more effective and productive for the business” rather than just to meet the AC to get a formal certification. It was also implied that where employers relied on private training providers to deliver qualifications, they had expectations that the training provided would lead to employees operating at the appropriate level. If this was not the case, this might threaten the reputation of the provider and the relationship between the provider and the employer.

Additionally, a few comments suggested that potential biases arising from assessors personally knowing the students might be reduced where assessment is carried out by **external (visiting) assessors**¹⁵, which was common in some workplace-based qualifications delivered by private training providers. In such cases, it was relatively uncommon for students to be assessed by their own managers or supervisors. However, this still did not preclude external assessors becoming familiar with and invested in the students that they might assess on multiple occasions.

Supporting students and learning

The AOs mentioned the mitigating role of **supporting students and learning** in terms of **flexibility in delivery** as frequently as support and guidance for centres. In their comments, AOs most often referred to aspects of flexible delivery such as **absence of time constraints on learning, multiple assessment and resit opportunities** and **unit-level achievement or credit**.

[...] we don't put any constraints on learners or centres to say you must finish in X number of weeks. [...] So, if someone hasn't met the standard then they've not met the standard yet. There'll be more assessments planned in. I can see the criticism in terms of if it's a college delivered qualification, because they've obviously got finite timescales, but in a workplace assessment it doesn't really impact on us. Fenestration_L2

[the approach] allows for students to resit the assessment where required. It's not all end loaded. So, I think that in itself provides opportunity for the student to be allowed to fail and opportunity [to] resit the assessment. Teaching support_L2

¹⁵ These are normally employed by independent training providers rather than AOs, so they are “external” not in the sense of working for an AO, but in the sense of not simultaneously being students’ supervisors or tutors that might assess informally or continuously during a working day or a lesson in college.

If they've met the standard of the first unit but not the second, [...] they can get a unit certificate [...], but they won't achieve the full qualification if they haven't met the standard, no matter how nice a person they are [...]. First aid_L3

These were believed to have a disincentivising effect on centres, making them less likely to rush students through qualifications before they genuinely met the standards. Among these, absence of time constraints on learning, and assessment when ready, were most frequently mentioned as helpful in mitigating potential problems of lenience or malpractice, particularly in occupational qualifications delivered in the workplace.

However, some AOs also noted that there were certain pressures that can impose time constraints even if the design allows for the qualification to be delivered in less constrained time scales. These were employer requirements to complete the qualification by a certain time or funding arrangements which might affect decisions of providers in relation to length of the programme. This resonated with various comments mentioned earlier referencing potential perverse incentives that might affect behaviours.

Qualification and assessment design features

In the context of the potential problem of lenience, the requirements of the **mastery approach** and its **multiple hurdles** were mentioned as mitigations, particularly in relation to the pass/fail threshold. Some AOs considered **continuous internal assessment** to be more resilient to malpractice than terminal internal assessment where students might take an internally administered exam at the end. This was because continuous internal assessment involved build-up of evidence about student competence over time, which could not be easily counterfeited.

[...] the pass/fail threshold is effectively protected through an inbuilt protection mechanism, which is the fact that the students need to pass those hurdles of the developmental units [...] so we can be confident that they've met that minimum competence threshold for a pass before they've got to that final unit [...]

Creative_L3

[...] where it's exams at the end, we're seeing more malpractice there because a lot of the onus is taken off the centre there, and we see them trying to push learners through where they shouldn't, rather than on these where it is part of that whole entire process that they've got to make sure it's followed right, because it does come back on them more, so yeah, don't tend to get many issues. Adult care_L3

Interestingly, some AOs delivering 'confirm competence' qualifications seemed to suggest that the nature of the construct of these qualifications meant that there were

“no borderline performances” at the pass grade boundary. In these qualifications, the threshold between knowing and not knowing how to do something, or whether someone addressed or did not address pass criteria, was thought to be clear, and thus unlikely to serve as a smokescreen for lenience. Where qualifications are graded, some AOs suggested that there was more “intellectual angst” around how well AC were addressed in relation to higher grades than whether they were addressed at pass grade boundary. This implied that it would be relatively straightforward to detect lenience or malpractice, at least at the pass grade boundary, in CASLO qualifications.

I think as well [...] that with competence qualifications there are some things in there where subject matter experts, the tutors, the practitioners who are really understanding, will say well there isn't really a borderline, they've done it right or they haven't. Adult care_L3

Inappropriate support

The literature identifies problems related to the blurring of lines between formative and summative assessment in the CASLO approach, which typically uses internal, and often continuous, assessment in both workplace and college settings. This can lead to students being given too much support by tutors or assessors (intentionally or unintentionally) and then being assessed as having achieved a higher standard than they would have achieved independently.

The AOs discussed different mechanisms through which inappropriate support might arise which included:

- overly directive feedback and “handholding” through assessment, often in conjunction with repeated assessment
- overly scaffolded tasks
- tutors completing or providing answers to summative assessments for students

While the latter mechanism was considered to be clearly in the realm of malpractice, the other 2 were deemed to, at least in part, spring from the best intentions of teachers to support their students. They were also deemed to be related to deficiencies in teacher expertise in providing appropriate feedback or designing appropriate tasks.

These different ways in which inappropriate support could arise suggest that this potential problem interacts in important ways with the potential problems of lenience and malpractice, as well as with the potential problems around poorly conceived assessment tasks or events, which we discussed in earlier sections. Ultimately, all these can be seen to be related to the imprecision of AC, which allow some leeway

for assessors both to design the tasks and interpret the standards in ways that may, inadvertently or intentionally, reduce the level of demand to which students are assessed.

In our sample, of the 13 AOs that were explicitly asked, 11 recognised inappropriate support as a potentially relevant problem while one did not entirely recognise it, and one did not recognise it at. The problem was recognised as potentially relevant for all 'dual purpose' qualifications and for 6 of 8 'confirm competence' qualifications.

The proposed mitigations mostly focused on QA alongside support and guidance for centres, and often involved advice and guidance about providing appropriate level of feedback, and in some cases also about writing appropriate assessments that are not overly scaffolded. Potential mitigating effects of assessment contextualisation were also discussed, as were some restrictions to flexibility of assessment administration such as limited resit or resubmission opportunities.

QA and support and guidance for centres

All except one AO that recognised this potential problem, and one that did not entirely recognise it, spoke about **IQA** and **EQA** as important mitigations. Within this, some AOs suggested that, during their monitoring, EQAs consider the appropriateness of the feedback given to students during their formative and/or summative assessments. Some AOs suggested that the feedback should not be overly directive or prescriptive, and where it is, the AOs might intervene to address that. Others suggested that EQAs "get to know the staff within centres" and how they work with students, which gives them insight into whether they are likely to be over-supportive.

Obviously when we do moderation [...] centres have to have available to us their course folders for the whole qualification. We are able to say, we'd like to see assessment feedback for formative units, IV documentation, bits and pieces, other evidence. [...] So, we're able to pick up if they've been overly directive in their feedback, overly prescriptive, and we will then take interventions to mitigate that. Creative_L3

One AO suggested that inappropriate support can be detected by EQAs by noticing similar answers given by different students to the same AC. Nevertheless, the occurrence of similar student responses in an assessment should always be carefully scrutinised without prejudice, as the same AO also noted that in lower-level qualifications this may be a consequence of the purpose of such qualifications, which is to engage and support students as much as possible.

In addition to EQA monitoring, **support and guidance** for centres on how to give appropriate feedback and avoid inappropriate support when conducting different kinds of assessments, including observation in the workplace, was also mentioned

by the majority of the AOs. As in relation to other problems, **continuous support** and **early intervention** was typically provided by EQAs through regular visits and feedback to centres. Some AOs mentioned specifically advising centres about assessment and delivery **planning**, so that students are not assessed summatively until the centres are confident that they have all the skills needed to complete the assessment, rather than attempting multiple resits. This was intended to help centres with maintaining a degree of separation between formative and summative assessment. One AO emphasised the need for centres to strive towards separating formative and summative assessment as far as practically possible, and they provided feedback to centres regarding that regularly. They recognised that sometimes summative events can turn into formative ones when students do not achieve all the criteria, and were keen to ensure that summative records do not contain formative feedback that might represent too much support for the next summative assessment.

But we do make it clear to all of the centres, you know, there's coaching and training and there's assessment and the two are different. While the same person can do both, you can't do both at the same time. [...] So, it's a fine line but they are aware of the difference. Fenestration_L2

[...] we tell centres as well they shouldn't be putting assessments in front of learners until they've got all the skills needed to complete the assessment. So that, along with the fact that we tell them not to reassess and reassess is, hopefully, you've got a learner who's in the correct place and isn't going to be assessed multiple times in order to achieve. Creative_L2

In First aid_L3 qualification, which is delivered over the course of 16 guided learning hours, the AO also encouraged assessors to separate instruction and assessment opportunities. However, the "progressive teaching methods" that they spoke about and advocated to their centres appeared to fundamentally involve continuous assessment, with multiple opportunities to achieve the AC during the (typically 2-day-long) training course. This potentially presented a challenge to the effectiveness of mitigations based on separation of formative and summative opportunities.

[...] the assessors within our centres, especially for this qualification, tend to be pretty good at drawing a line as to when supported practice is over and when you are doing it for real [...] And the standard practice that we encourage is that if the assessor sees somebody get something out of sequence, they'll just tell them to stop, take a moment, let their partner who they're working with have a go and then come back and do it again, but there's multiple opportunities during the day for people to meet each criteria and, [...] it tends to be accumulated throughout the day and that's because of the progressive teaching methods that many of our centres are using. First aid_L3

The AOs also mentioned **guidance documents** detailing their expectations in relation to what constitutes appropriate feedback and support, and separation of formative and summative assessment, and how internal assessments should be carried out so that they are not overly scaffolded. However, one AO suggested that there might be grounds for introducing more explicit controls around how feedback is provided in the context of summative assessment, in addition to guidance. Some AOs mentioned that they provided **training** on aspects of formative feedback or **exemplars** of feedback sheets and good practices for providing feedback for centres to use.

Hybrid aspects

Several AOs discussed mitigations such as a **restricted number of opportunities for resit or resubmission** of evidence as a way to potentially increase the distinction between formative and summative assessment and reduce the opportunity for students passing based on inappropriate feedback. In some cases, tighter resubmission rules were put in place to increase parity with academic qualifications because of perceptions that constant resubmission brings into question the level of demand of these qualifications.

These kinds of restrictions stand in contrast to some of the mitigations related to lenience and malpractice, such as absence of time constraints on learning. To the extent that introducing additional constraints on learning time and resit opportunities might present incentives for lenience and malpractice, there may be a need for additional mitigations for these risks in qualifications with such restrictions.

We [...] have developed the resubmission rules [...], which means that if a learner misses the distinction by a little bit and wants to retake, resubmit, there is a lead internal verifier who has to confirm that the learner is able to do that on their own accord and they haven't been given specific feedback. [...] So, they would have to resit an assignment if there was no cause for the lead IV to agree a resubmission. So, there are some stronger rules around that, which [are] monitored through SV. [...] Those rules are put in to try and bring some parity to academic qualifications, because [these qualifications] came under scrutiny about, if you keep resubmitting, resubmitting, resubmitting, then what kind of level of demand is there? Business_L3

Well, we're certainly really clear that although resubmission is a matter for centre policy they shouldn't be, learners shouldn't have [...] more than one resubmission opportunity. Creative_L2

Some AOs explained that in their qualifications, which are typically delivered in the workplace, assessment was often carried out by **external (visiting) assessors**, rather than students' own supervisors. In such cases, summative assessment is not

continuous, with summative assessment situations being more clearly separated from learning and formative assessment, helping to mitigate the potential problem of inappropriate support.

Contextualisation and real-life task setting

Some AOs noted that one potential source of inappropriate support can be assessment tasks that are overly scaffolded. To mitigate this, the AO delivering Creative_L2 qualification discussed how **contextualisation** of assessment tasks helps to mitigate this because tasks anchored in a specific context lend themselves less to scaffolding and potentially formulaic “cookie cutter type” responses. They spoke about how they “successfully moved a lot of centres away from templates” that provided too much scaffolding, and which might also restrict opportunities for students to show higher levels of understanding and access higher grades. This comment implied that some effort on the part of AOs is required to educate centres and tutors about how best to write tasks that address the relevant AC most effectively, including avoiding inappropriate scaffolding.

A few AOs thought that certain constructs such as **practical skills** are “naturally safeguarded” from the potential problem of inappropriate support during assessment. This was especially the case where assessment happens in real time, is part of a larger contextualised process (for instance, a theatre production rehearsal), and is usually recorded on video. These tasks or events were also less likely to lend themselves to repeated assessment to allow students to eventually achieve a pass or a higher grade. In some qualifications, where assessment is carried out in the **real-life setting** of a workplace situation, where a student might be delivering a service for a client, the assessors would not provide feedback or guidance as this would be antithetical to standard practices in the workplace. This, then, also mitigated the risk of inappropriate support being given in the context of summative assessment situations.

Some AOs suggested that detecting inappropriate support in knowledge assessments might be difficult. Relatedly, some recognised the risk that certain types of assessment tasks used summatively, such as open-book assignments, might allow potential reproduction of knowledge that was not, in fact, independently learnt and embedded. However, these risks were thought to be mitigated in their qualifications because this knowledge ultimately needs to be applied and assessed in the context of practical tasks and work environments rather than just in a one-off summative assessment situation. This allowed for the absence of knowledge to be detected and ensured that the knowledge is, in fact, embedded and retained.

[...] apart from [the Health and Safety] Unit 1, a lot of it is skills based and, in terms of Unit 1, it’s something that actually threads throughout [...], health and safety applies across all of the units, and learners’ behaviour has to change in

response to the knowledge that they gain from Unit 1 as to how they work in a construction environment. So, I think if learners are not displaying that knowledge in their practical assessments, I think that's quite easy to pick up.

Construction_L1

Some AOs seemed to feel strongly about the benefits of the integration of learning and assessment into the real-life environment, arguing that implementing a more artificial, decontextualised, terminal assessment would reduce the validity of their qualifications, even though it might prevent inappropriate support for students.

I think it's almost like, and the question back to those people is, well how would you like us to do it? And I suppose you could follow that journey and almost end up with end point assessment of which is certainly not fault free. You know, when I'm working, putting someone in an end point assessment situation is a completely false situation for them. Adult care_L3

Incentives and disincentives

Two AOs suggested certain resource-related disincentives that may act as protective factors against inappropriate support, related to limited time, pay, and resources available for assessment in centres. These were believed by the AOs to disincentivise approaches which might involve spending a lot of time repeatedly assessing students until they achieved the qualification or assessors investing their own time writing students' work for them, thus providing inappropriate support.

I was thinking that possibly most centres don't have the time to be constantly assessing like that, which is another aspect of this that takes care of itself to some extent. [...] they are quite pressured quite often because, obviously, the arts are not necessarily everyone's priority, so, in some instances, they only have the learners for three-quarters of an hour or an hour a week. Creative_L2

I just don't think it's something that a tutor-assessor wants to do. A lot of tutor-assessors nowadays get paid for the hours they turn up and teach face-to-face. They don't get paid for the time that they spend doing assessment work. So, again, I just can't see why there'd be any incentive for them to want to write a learner's piece of work for them [...]. Housing_L5

AO views of potential teaching, learning and delivery problems

In this section, we analyse and discuss AO views about the relevance of potential teaching, learning and delivery problems for their exemplar qualifications, alongside

the mitigations AOs put in place and protective factors that they believed helped to alleviate the risks associated with these potential problems.

Figure 2 below shows the number of AOs that recognised these problems as being potentially relevant to their qualification. The most frequently recognised one was that of incoherent teaching programmes, which was recognised by half of the AOs in our sample. The least recognised were superficial learning, alongside lack of currency and downward pressure on standards.

It is worth noting that, for a few of the problems, there appeared to be somewhat different patterns in the extent to which the AOs saw some relevance in them (not entirely recognising them) vs. not recognising them outright. For instance, only one AO did not recognise the potential problem of superficial learning outright, while 10 AOs did not entirely recognise it, accepting that it had some relevance. In contrast, 8 AOs did not recognise the potential problem of the downward pressure on standards outright, while only 3 AOs saw some relevance in it. A similar pattern to the latter one was apparent for the potential problems of local and personal irrelevance and lack of currency. We consider these patterns further in the discussion section.

Again, throughout the sections below, we do not systematically separate the views of the AOs that did or did not recognise the problems and only draw attention to occasional differing tendencies where relevant. As with assessment problems, we also discuss the teaching, learning and delivery problem mitigations and protective factors in relation to some of the broader AO views about the apparent tensions and balances in the CASLO approach, the extent to which these potential problems are specific to CASLO qualifications, the extent of AO responsibility, impact, investment, and so on. We also draw out more nuanced views concerning the nature of certain problems where relevant.

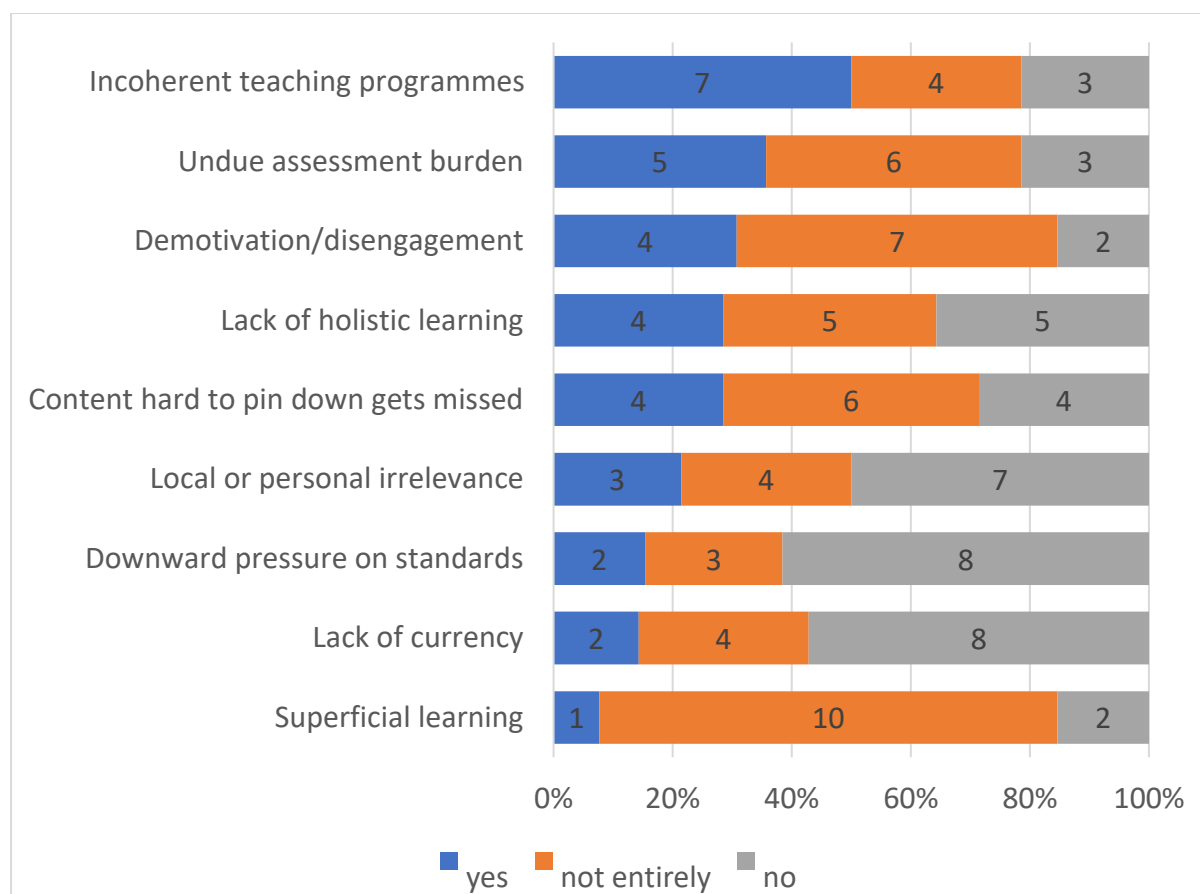


Figure 2 Counts and proportions of AOs that recognised or not each potential teaching, learning and delivery problem¹⁶

Local or personal irrelevance and lack of currency

Because CASLO qualifications are highly specific about the LOs that need to be acquired, this has led some critics to claim that they are too inflexible to respond to local economic needs, the bespoke needs of small employers, or students with particular interests or aspirations. This lack of flexibility may then lead to content being taught that lacks local or personal relevance to students or qualification users. Relatedly, some critics have argued that the level of detail about the LOs and AC in CASLO specifications inevitably ties them to existing work functions, and to contemporary concerns. This may limit their currency and mean that CASLO qualifications provide poor preparation for the future.

Only a small number of AOs in our sample recognised these as potentially relevant problems for their exemplar qualifications, with 3 recognising local or personal irrelevance and 2 recognising lack of currency as potentially relevant. Except for the

¹⁶ The total number of AOs against some problems differs because not all AOs were explicitly asked about some problems.

AO offering the 'dual purpose' Construction_L1 qualification, which recognised the potential problem of local or personal irrelevance, the other AOs that recognised these potential problems offered 'confirm competence' qualifications, suggesting that they might be less of an issue for AOs offering 'dual purpose' qualifications.

The discussions about these 2 potential problems highlighted the need to achieve a, sometimes difficult, balance between specificity and breadth of content in teaching and learning. This was often influenced by broader qualification purposes and attitudes of qualification users regarding how far that balance should tilt towards narrower occupational roles versus broader educational goals. Overall, the AOs did not think that these potential problems were specific to CASLO qualifications and argued that content specification for any type of qualification may face similar issues.

Most AOs flagged the flexibility of their qualifications in supporting contextualisation as a key aspect facilitating local or personal relevance. Several AOs also discussed certain context-independent aspects of their qualifications that are seen as essential, irrespective of personal or local preferences, and that largely retain longer-term currency. This was particularly the case in lower-level qualifications where the key focus is on core technical skills. In relation to the potential problem of lack of currency, qualification design processes such as qualification review were seen as a key mitigation. Several other mitigations, including some qualification design features such as broad Los or AC and optional units, were also mentioned in relation to both potential problems, as were supporting learning, practitioner CPD, and aspects of support, guidance and QA.

Contextualisation and holistic aspects

Most AOs thought that their qualifications achieved appropriate specificity through **contextualisation** and that, therefore, the potential problem of local or personal irrelevance was sufficiently mitigated. For instance, in the creative sector, one AO emphasised that their LOs and AC did not involve specific genre or stylistic requirements. Another AO pointed out that their LOs and AC are sufficiently **broad** to allow content important to individual employers to be mapped into the existing specifications to increase local relevance, although the extent to which this might be done had to be justified financially.

And I think, as we said earlier, there's flexibility within the context, the way they can be assessed. [...] we recognise that there are differences around the country in terms of terminology and, maybe, the way that people are doing things, but that's why the assessment criteria is written as it is [...] so we can take that into account. Fenestration_L2

Sufficiently **broad AC** were also suggested as a mitigation in relation to potential lack of currency. Certain aspects of qualification content, particularly those related to

legislation, policies, regulations or technology, were deemed to date more quickly as they advance or are updated. Therefore, AC usually refer to them as “latest” or “current” to allow for changes to be reflected in teaching or assessment without the need for qualification redesign, thus “future proofing” them.

Alongside contextualisation, most AOs discussed certain **context-independent aspects** of their qualifications that helped to limit the impact of the potential problem of local or personal irrelevance. In several exemplar qualifications, a significant proportion of content was deemed not suitable for tailoring to local or personal preferences. For example, in the qualifications that were mapped to National Occupational Standards (NOS), these were thought to ensure that important, nationally relevant, content, necessary to perform in a role, was included in the qualification irrespective of local or personal preferences. However, some AOs pointed out that qualifications mapped to the NOS had the potential to lose some of their currency by the time they are launched due to the lengthy process required to approve them. This suggested the need for implementing some currency-related mitigations, which typically involved regular qualification reviews, as discussed in the next section.

[...] the treatment area is the treatment area, and they have to know things and be able to do things that are really specific. And that is, because it's compliant with the NOS, it's automatically complying with the national need [...] So the learning outcomes are really specific and then the criteria can be a little bit more flexible. Skin peel_L4

Qualification and assessment design processes and features

Some AOs flagged **qualification design processes** that helped to ensure relevant content is included in their qualifications from the outset and regularly reviewed to ensure its currency. **Involving stakeholders**, including employers, teachers or students in qualification development or review panels or consultations was among the most commonly mentioned aspects. Indeed, one of the qualifications in our sample was developed specifically in response to and with input from a particular centre to support the specific needs of their students. AOs also spoke about regularly collecting feedback from centres (often through EQAs) and other stakeholders about their qualifications, including in relation to how far contextualisation and local needs were supported. This then informed ad hoc or regular **qualification revisions** or **reviews** (with the latter usually taking place every 5 years). Regular qualification revisions or reviews were also used to mitigate a potential lack of qualification currency and to update qualifications in response to

changes in the NOS, best practices, or regulations, where these were more directly referred to within the LOs or AC or in the guidance.

And, I think, [...] the annual review process does mean that if something new comes out, for example, [...] a critical piece of learning that every student in this particular sector has to have, then that can be built in. We try not to mess around with fundamental things in the specification within that 5-year period, we tend to just do modifications, but sometimes a major amendment is needed, but we can respond to that and do that. Construction_L5

In terms of specific qualification **design features**, one AO highlighted the importance of ensuring that **command verbs** are used appropriately in AC to allow for an optimal balance of specificity and contextualisation. This was related to specifying **sufficiently broad LOs** or **AC**, which can generalise to different contexts or student interests. Several AOs also spoke about **optional units** in their qualifications and their potential to additionally facilitate local or personal relevance. The optional units allow centres to tailor the qualification, so that they better suit local vocational settings. Some AOs said that they can sometimes develop specific units that might support individual employer needs for their staff continuous professional development (CPD), though these would not be certified as part of the broader qualification.

[...] learners can do a unit on stand-up comedy, they can do theatre and education, they can do devising, they can even do masks and puppetry. So, a lot of this stuff is quite targeted specifically to specific areas of industry that they might want to move into [...]. Creative_L2

The AOs also noted certain constraints on personalisation of their qualifications despite the abovementioned mitigations. The AOs offering qualifications delivered in the workplace explained that the nature of the job and the workplace needs to sufficiently align with the content of the qualification, so that the student would have the opportunity to provide relevant performance evidence. For instance, as the Chef_L2 qualification includes units requiring students to cook meat, it would not be possible for students to take this qualification while working in a vegan restaurant. In such cases, the requirement would be for students to either take an additional job to enable them to cover that content or not take that qualification at all. Others suggested that the range of optional units that might be offered to students by centres is, to some extent, limited by centre resources rather than always involving free choice in relation to students' interests or context.

AOs with **lower-level qualifications** additionally mentioned the fact that such qualifications necessarily include the core skills needed for the different occupations, which should be seen as universally relevant. This type of core content was also deemed less likely to lose its currency quickly.

The AO offering the level 2 hairdressing qualification pointed out potential challenges with ensuring sufficient student engagement in lower-level qualifications focused on core skills which do not simultaneously allow for a certain degree of personalisation through creativity or other aspects. However, it was also suggested that student **expectations should be managed**, as students need to accept that certain core skills need to be sufficiently embedded before they can be built on creatively or in other ways in higher-level qualifications. We discuss potential problems of student demotivation and disengagement later in the report.

Support and guidance, QA and CPD

Several AOs spoke about the need for **CPD** of their own staff, including EQAs, as well as of centre staff, to ensure the relevance and currency of qualification content in teaching, QA, development and review. One AO mentioned qualification writer **training** which was aimed at helping qualification developers to achieve the balance between specificity and breadth of the LOs or AC, to facilitate appropriate contextualisation without compromising reliability.

It's a difficult line to walk, to make [LOs] clear enough through specificity but not so granular that they are inflexible, so that's what we're always trying to do and what we train writers to do, and we have a formula that we ask writers to follow, there are certain elements that they need to follow in how they define the learning outcomes. Construction_L5

Some AOs also mentioned that EQAs are there to support and advise centres regarding changes in legislation, technology or other aspects. EQAs also collected feedback about how the qualification was being delivered, and if centres and students had any concerns regarding the relevance or currency of content.

[...] at every EQA interaction with a centre, there's space within the documentation for them, for us to get their feedback and their views on the qualifications. [...] are they still valid, are they still relevant, are they still fit for purpose. So, we do sort of encourage centres to have that input. [...] talking to the assessors and ensuring they've got regular CPD, that's part of it. Fenestration_L2

Supporting students and learning

As another way in which local or personal relevance might be facilitated, one AO suggested that centres might **teach content beyond the core specification** of the qualification if this was considered appropriate. There may also be flexibility in delivery to teach (and assess) other things in addition to the specified qualification

content if required by employers, keeping in mind that the extra content will not contribute to the qualification as such.

[...] the qualification is the qualification, that doesn't mean you can't teach other things. And you can assess those other things if you want, it won't contribute to the qualification, but if you were a training provider or the employer wants the person to know this as well, there's nothing to stop you doing things outside of the qualification. Adult care_L3

As the flipside of potential increased relevance of qualifications to individual employers, some AOs recognised the risk that some of these qualifications might cover a relatively narrow range of LOs or be delivered in a narrow range of contexts, perhaps not allowing for sufficient transferability to new employment contexts. One AO described push back from some employers regarding the greater breadth of content in apprenticeships which did not align with their specific areas of work, and who, thus, did not see that as “adding value” to their business.

[...] I suppose, to flip this, that's one of the criticisms now of the apprenticeship standard. Because within the apprenticeship standard, the individual has to understand all about plastic and aluminium and timber, and we're getting kickbacks from employers – why is my training provider teaching them about plastic when we don't do plastic [...]. And we explain that's the standard, [...] the standards are about making someone fit for a broader industry than just their employer. So, it's that balance really of giving the all-rounder knowledge. Fenestration_L2

For some AOs, this was part of an ongoing debate concerning whether students are being trained to perform in a particular occupational sector or in a specific job. Some AOs suggested that good training organisations would be preparing students for the wider occupational sector, implying that this is what their qualifications enable them to do. Nevertheless, others specifically designed some of their qualifications to allow for delivery in specific employer-relevant contexts. For instance, the exemplar Fenestration_L2 qualification could be delivered and achieved within employer settings solely focused on installing plastic windows and not require students to also learn about installation of aluminium or wooden windows, unlike, perhaps, some of the qualifications that form part of apprenticeship on-programme training, which are required to be broader.

[...] ever since work-based qualifications were conceived, it's always been that sort of dilemma, are they being trained to do that role or are they being trained for that particular job, and [...] it does come down to the training organisation, because a good training organisation will deliver the training for the role, a poorer one might just do it for the job and to get them through. End of life care_L2

Some AOs suggested that qualifications which are explicitly linked to the NOS were more likely to be transferrable to different jobs within an occupation rather than being too tied to individual employer contexts. However, others expressed concerns that the content specified in qualifications can be overly driven by a subset of influential employers that might be involved in their development, or the development of the NOS, thus threatening the local relevance of these qualifications or relevance to the wider sector. Ultimately, most AOs seemed to agree that these kinds of issues of content relevance and the balance that needs to be ensured between content specificity and content breadth were not unique to CASLO qualifications.

So, I just don't think it's something that's CASLO specific. I think it's something that's specific to any type of qualification really. [...] You know, it's very difficult to make every single qualification meet the needs of every single person, and some people are going to end up inevitably learning something, a bit of something, that may not directly apply to them. Housing_L5

In relation to qualification currency, several AOs argued that a qualification awarded at one point in time cannot be expected to “futureproof” someone’s career, despite the qualification being up to date when studied, and sufficiently broad to be transferrable. They suggested that this is mitigated by both students and employers accepting that there is a need for **life-long learning** and **CPD**, and investing time and resources towards this.

[...] when you achieve a qualification, you achieve it at that point in time. You've then got to look at yourself, or your employer looks at you in terms of keeping you up-to-date, you know, and we have particular qualifications like update qualifications. There are different requirements in different sectors for CPD and that sort of thing. The qualification is there to give you a grounding and introduce you into a particular occupation. Fenestration_L2

Content hard to pin down gets missed

Some critics say that LOs that are complex and difficult to put into writing in the commonly used format of relatively brief LO statements may, in consequence, get left out of CASLO specifications, even when they are essential to the qualification. This might mean that students miss out on essential learning. This kind of content might include, but is not limited to, relatively esoteric outcomes such as ‘independence’, ‘autonomy’, ‘problem solving’ or ‘professional judgement’.

Only 4 AOs acknowledged the potential relevance of this problem to their own qualifications, all of which were ‘confirm competence’ qualifications. The most common response (N=6 AOs) was to not entirely recognise this potential problem, while an additional 4 AOs did not recognise it at all. All AOs largely agreed that there are aspects in qualifications that are difficult, but not impossible, to capture in words.

They discussed some mitigations, revolving around having robust and intentional design processes, and the need for occupational or professional expertise of those involved in qualification development. Seeking relevant professional input and feedback from stakeholders was also viewed by the AOs as valuable.

Despite relatively little recognition of this potential problem in relation to what AOs considered to be the core qualification content, some comments suggested that the more esoteric content was, in fact, often considered non-essential to the qualification construct, and was, therefore, largely left implicit. These were skills or attributes such as communication, autonomy, resilience, collaboration, teamwork or problem-solving (variously referred to by the AOs as behaviours, attitudes or transferrable skills). Such content was typically considered to be a “value-added” or a benefit of the teaching and learning process, its acquisition facilitated by the contextualised nature of CASLO delivery rather than missing. Several AOs which did feel that such content should be explicitly specified and assessed spoke about the benefits of the contextualised nature of assessment in CASLO qualifications in facilitating elicitation of such esoteric aspects. Where AOs spoke about the challenges of specifying and assessing such content, they tended to agree that this was not a CASLO-specific issue.

Qualification and assessment design processes and features

Most frequently referenced mitigations of this potential problem revolved around appropriate **qualification design processes**. AOs recognised that some LOs or AC are harder to write than others, but this was addressed by having robust and iterative design processes, including **development and review panels, working groups** involving experts and stakeholders, as well as **consultations** with centres. One AO emphasised their structured design process, with different layers of review across writers, reviewers and lead reviewers. Several AOs spoke about striving for **language clarity**, devoting a lot of time and attention to finding the right words to articulate complicated aspects of their qualifications. They also spoke about working closely with stakeholders and incorporating **stakeholder feedback** in the design process to ensure that no essential aspects are missed.

[...] we didn't shy away from any difficult or complicated content or requirements in the design of the qualification. We started our development by [...] talking to industry, talking to HE, talking to FE delivery staff members and understanding what they felt was the requirement from a qualification, and we wrote a qualification which encompassed all of those elements. Creative_L3

I think there will be decisions to be taken when choosing the wording, not least because we do work with professional bodies and they'll have their own set of standards that are perhaps very technically worded, so it's finding a way to incorporate those without making it a bit of a Frankenstein's monster of a unit, it's finding a way to weave that in without losing what's required by the professional organisation [...] Construction_L5

A few AOs emphasised the role of **command verbs** in helping to capture different aspects of content and requirements. Some AOs with **lower-level qualifications** believed that this potential problem was less relevant in their context as they thought that content at lower levels is easier to capture comprehensively in writing. Others did not think that higher qualification level was related to increased difficulty in communicating LOs believing this to be subject specific rather than level-related. One AO thought it was easier to capture the more esoteric aspects of content explicitly at higher levels, although, in their case, this seemed to be facilitated by the absence of certain design constraints present in some of their lower-level NVQ-style qualifications.

Yeah, it is a lot easier [at higher levels] because the qualifications aren't so linked to the NVQs and, sort of, basic job competence, so there's much more freedom and flexibility in terms of our assessment design. Hairdressing_L2

Implicit content, contextualisation and holistic aspects

Despite being largely confident that robust and intentional design processes can help to mitigate the risks of essential content not being captured in qualification specifications, several comments suggested that there were various aspects that were either deliberately left implicit or were captured or communicated via means other than LO or AC specifications.

Some AOs noted that a great deal of learning of certain skills or attributes such as communication, autonomy, resilience, collaboration, teamwork or problem-solving might be happening due to the **contextualised, holistic nature of delivery** of these qualifications, though not all of these were directly assessed or could be reliably assessable. Some AOs saw these as "value-added" benefits of the teaching and learning process rather than part of the construct that was being assessed in their qualifications. However, AOs also recognised that such transferrable skills and attributes were often highly valued by stakeholders.

[...] we're assessing the creative process. Autonomy and all those other transferrable skills, they are fantastic. They are by-products of the teaching and learning experience that are very much valued by industry, by stakeholders and

students. But that particular component doesn't need to be assessed, because it has no value in terms of us assessing the creative process. Creative_L3

The AOs also emphasised the benefits of the CASLO approach in allowing aspects of such skills and attributes to be engendered more organically during delivery and more easily evidenced through **assessment in contextualised situations**, rather than being missed. Some AOs noted that there might be scope to make certain skills and attributes such as “employability skills”, “presentation skills” or “communication skills” more explicit in assessment.

[...] how do you assess resilience, but a student may well be getting very resilient over the course of their study, because they're doing stuff with a local employer and it's great growth for them, or they're working with somebody and they're having to adapt their style, or they've got a difficult challenge they're having to work on as a group. [...] so that could be more inherent, but there are certain units where communication skills are going to be assessed [...] So, yeah, sometimes it is explicit and sometimes it can't be because it's just too hard to accurately or even close to accurately put on a piece of paper, so that's another, I think that's a challenge for all classical and CASLO type qualifications.
Construction_L5

Several AOs suggested that some of these more complex or esoteric outcomes were **implicit** in qualification levels, in the sense that level 3 would, for instance, imply a higher degree of expectation regarding autonomy than level 2. Instead of being an explicit LO at level 3, such aspects are captured in general assessment requirements to perform more autonomously than at the level below. It was also suggested that even where the LO specification might on its own be unclear as to the requirements regarding the more esoteric content, **exemplar assessment materials** and other resources such as **guidance documents** should help to form a clearer view about the overall intention of the qualification.

[...] for the most part, autonomy is what makes this qualification a level 3, for example. [...] It's all inferred across the qualification as opposed to being a distinct learning outcome, so there's no learning outcome that says, the learner will be able to work autonomously on their own without the input of others, because that's implied by the qualification as it is. First aid_L3

Other AOs approached this differently, by making it more explicit in their LOs that autonomy is an outcome, for instance, by specifying that an outcome is about “realising a self-initiated project”, as in the Creative_L3 qualification. However, this AO did not go further in terms of defining their grade descriptors in relation to this outcome, leaving the assessment of autonomy to some extent implicit as an expectation rather than a clear criterion. In the Skin peel_L4 qualification, some more general pre-requisite units on performing specific treatments include LOs such as

“maintain professional role and professional counsel” and refer to interaction with clients, professionalism, attitude, signposting, awareness of taking into account client’s mental health and so on.

[...] at unit 6, it’s an entirely self-directed, self-initiated extended project for the students. [...] And you’ll see within, for example AO4, it’s “realising a self-initiated project”. So, we lean into this idea of autonomy within the words that we use. We might not necessarily say, you know, autonomous is not necessarily something that we define within our glossary for grade descriptors, etc., but the expectation is that the students are being autonomous. Creative_L3

In relation to Hairdressing_L2 qualification, it was also pointed out that not only are some of these aspects difficult to write into specifications precisely, but that it is sometimes difficult to understand what stakeholders such as employers mean when they refer to “autonomy”, “initiative”, “commercial agility”, “decision making”, and so on. Although some aspects of these skills were incorporated into this qualification, the AO emphasised that it was important to **manage employer expectations** about the limited extent to which some of these were covered in their qualification. The AO suggested that employers should have an awareness of their own role in the continuing development of those that they employ. This AO also suggested that such broader skills and content are deprioritised partly because of the time pressure in this qualification and the need to focus on the core technical skills in the time available.

So, they are in there as sort of broad statements, and we sort of know what minimum looks like in terms of competence, but because they’re not graded qualifications and because [...] you can’t really pin down what employers want, I don’t think the qualification really sort of meets that agenda, and we haven’t really identified what that agenda is either. So, there are limitations, [...] but all in all we’re sort of comfortable with those limitations because it’s about being good enough and sort of reasonably competent in these communication areas to start in employment and then the employer takes it after that, certainly at level 2.

Hairdressing_L2

Occupational or professional expertise and attitudes

Several AOs made references to the importance of both AO staff and assessors having sufficient **occupational or professional expertise** to be able to understand, teach and assess the important aspects of the relevant domain. Assessor **professional judgement** was particularly emphasised as important by one AO, to the extent that it could replace explicit specification of esoteric outcomes such as autonomy or professionalism. The main reason given for this was that experts can

recognise nuances such as how the student speaks to or treats somebody, which cannot be easily written down in specifications.

Particularly in care, for example, it's interesting you've spoken to someone in that sector, because I think that one, in particular, again you absolutely cannot replace years of knowledge and experience in judging someone else's suitability and ability at doing something. We could all read a 2-page document on how to run a bath for a resident, but, actually, it's in the nuances of how they speak to somebody, how they treat them, how they just have an understanding of what that person might be going through at that point [...] that you can't get from a list of potential judgement outcomes [...]. Chef_L2

AOs also referenced the potential value of positive **attitudes** within centres related to teaching broader and enriching content, including transferrable skills, irrespective of whether these were specified in the LOs. One AO contrasted such "excellent practice", including "meaningful assessment", with other, more minimal approaches which might be detrimental to student progression, even where they may not prevent them from passing the qualification. It was implied that this AO expected centres to teach such broader content.

There are certainly things that centres do that are examples of really excellent practice. So, for example, there is a centre that delivers a level 3 [qualification] [...] where all the evidence is presented as a website that the learners create. So, they effectively create a portfolio for themselves that includes a CV [...], and they've got video excerpts that have been properly edited rather than just the camera lift up and focus on learners in the corner of a classroom. [...] But they've also created something that's embedded wider skills because they've designed websites, they've thought about presenting themselves to industry and, to an extent, it's something they can take with them and they could direct people to as part of applications for further, higher education or even gaining work or auditions. [...] that's a really good example of meaningful assessment, isn't it, which is obviously what we're trying to encourage centres to do, and it's quite stark, the contrast between the centres who you can see it's just one learner in a classroom with somebody playing piano as a backing track for them [versus] centres that are putting on a gig, a show with parents and other staff members and other learners all in the audience who give feedback and they get an actual proper experience out of it. Creative_L2

Downward pressure on standards

Because awarding organisations have to specify standards that should be achievable by all students in a target cohort, critics have said that this puts a downward pressure on qualification standards. This means that no single LO can be

pitched at a level that is beyond the reach of the lowest attaining student within the targeted cohort, especially where, with a strong mastery model, not achieving even one LO would mean not achieving the entire qualification.

Only 2 AOs, both offering 'dual purpose' qualifications, recognised this problem as potentially relevant to their exemplar qualifications, with others not entirely recognising it (N=3) or not recognising it at all (N=8). Most AOs emphasised that standards in their qualifications are necessarily linked to occupational requirements and are thus non-negotiable, irrespective of student ability to achieve them. However, this position was slightly more flexible in one AO offering a 'dual purpose' qualification. There, a more inclusive approach to specifying standards was deemed to be required, while managing qualification user expectations about the standards that students were likely to achieve. This was because these qualifications often prepare students for entry-level jobs or progression to education, in which further learning was both required and expected.

AOs spoke about ensuring sufficiently robust design processes and involving stakeholder feedback so that appropriate standards can be set in their qualifications and that they are appropriately pitched to the relevant qualification level. Beyond that, it was necessary to ensure appropriate and sufficient teaching, which some AOs encouraged their centres to do. Certain flexibilities in some CASLO qualifications, such as absence of constraints on learning time and opportunities to resit or retake assessment, were deemed helpful in providing sufficient opportunities for students to achieve appropriate standards. This removed the pressure to set low qualification standards by design. Some AOs also mentioned several protective attitudes that helped reduce the risk of this potential problem arising, such as sufficient student engagement with teaching and learning process, and AO integrity.

Qualification and assessment design features and processes

Getting the demand right for the qualification level was emphasised as important in the development process, alongside pitching different elements of the qualifications appropriately to that level, including the total qualification time, the guided learning hours and the credits. Some AOs described different mechanisms that helped them determine the appropriate standard within the level, including their notion of the "scope" or the "range" of a level and their understanding of typical students undertaking qualifications at a particular level. The AOs again referred to the way they used **command verbs** to indicate the standard of the AC in their qualification (for instance, not including "evaluation" or "analysis" in level 2 qualifications). The AOs that mentioned this suggested that the standard is set "in the middle" of the typical range of a level. In contrast, another AO noted that, due to the combination of

the low level of their exemplar qualification and the absence of grading, the standard that was being set was minimal, but still ensured basic safety and sound technical skills and was, thus, acceptable to stakeholders. They emphasised that this minimum threshold was adhered to and that students still sometimes failed if unable to reach it. Several AOs spoke about making sure that relevant **stakeholder feedback** was consulted to ensure that the appropriate standard was set in their qualifications.

[...] when we're developing qualifications, you're looking at the framework you're developing against, the level you're developing for, the scope within that level and where you're pitching those, the TQT and the Guided Learning Hours, your credits, you don't want to be at the bottom end or the top end of that range, you've got to get it right to allow the movement, [...] and you've got the balance right. [...] because there's many qualifications that I've seen over the years where they're just on the cusp of about to tip into another level and they become too hard then, and unreachable for those that might be at the cusp of the level below, so you've got to pitch it right. End of life care_L2

Asked specifically about whether it was more challenging to specify appropriate standards for knowledge-related content, one AO suggested that it was not necessarily more difficult to specify this, but that, due to variable cohort ability, it was more difficult to ensure that standards were adhered to by centres when knowledge-related evidence was collated in portfolios. However, they emphasised that the evidence from externally set knowledge tests, observations of performance and portfolios **triangulate**, and represent **multiple hurdles**, providing greater assurance overall about whether the appropriate standard was reached. Another AO suggested that, in their qualification, **knowledge and skills were intertwined** to the extent that a potential reduction in standards for knowledge content would manifest in weaker performances in related skills areas. This mitigated the risk of potentially lowering the knowledge-related standards to match lower cohort ability.

So, I think the knowledge and the skills are intertwined, you have to have the knowledge in order to be able to master the skills. [...] I don't think one could be more than another and I think they're equally as important and if you're expressing that theoretical knowledge at too low a standard then they're not going to be able to perform and learn those skills, are they? Construction_L1

Several AOs emphasised that if, despite sufficient teaching and opportunities to be assessed, a student still was not able to pass, the employer or centre would need to consider removing them from the course. For these AOs, the occupational standards involved the **core content** essential to the qualification, particularly in safety-critical domains, which had to be achieved and were not negotiable. Alternatively, if students were unable to meet the standards at a particular qualification level, they

could attempt lower-level qualifications. This appeared to be a common position among the AOs that offered ‘confirm competence’ qualifications.

[...] if someone comes into this and takes one of our qualifications and [...] after 4, 5, 6, 7, 8 times of teaching or being assessed and they can't meet it, then there's a decision for the employer to take there, to say – look, you just can't do it. So, it's necessarily a fail. [...] I don't think it's, you know, as the criticism states. The qual is written for an occupational role. If they can't carry out that occupational role, then they can't achieve the qual. Fenestration_L2

[...] I think maybe because it's in an employment context. Nobody's ever fed it back in a development meeting. They've never said I've got a learner that wouldn't be able to do that. You know, it is what it is, that's the expectation, and if they can't meet it, they shouldn't be on that qualification, maybe they need to look at a lower-level qualification. Housing_L5

On the other hand, one AO offering a ‘dual purpose’ qualification suggested that, because such qualifications prepare students for either progression to education or entry-level jobs, a more inclusive approach to specifying standards was required and, perhaps, more negotiations between stakeholders about the appropriate standard for different qualification purposes and intended progression routes. This AO seemed to prioritise ensuring that the qualification was pitched at a standard which was accessible to a range of students, ensuring that the qualification included content which was relevant and important to the students' next steps. The AO emphasised the need to **manage expectations** of qualification users about the standards that students were likely to achieve, as these qualifications prepare students for entry-level positions, in which further learning was both required and expected.

Inputs and supporting learning¹⁷

Most AOs emphasised the need for **appropriate and sufficient teaching** to enable students to achieve the standards in their qualifications and that it is “about raising people to the standard” rather than bringing the standard down to the lowest common denominator. One AO noted that they expected their centres to be “ambitious in their delivery” and to set projects and themes that are appropriate for the level, which the AO monitors as part of their QA process. Several AOs pointed out that **absence of time constraints on learning** as well as **multiple assessment and resit opportunities** help to ensure that appropriate standards are reached by

¹⁷ In the analysis, we grouped several mitigations under the mitigation type we call ‘inputs’. These included aspects such as syllabi or content lists, pedagogy guidance, schemes of work, learning resources, as well as sufficient or appropriate teaching.

students, including space to receive additional support for more demanding areas of the qualification.

I don't think the qualification standards do get lowered to the lowest common denominator. It is about raising people to it; hence you don't fail, you just need to learn more. It's not about let's lower the standards, so people don't fail. It's about, there's the standard, you've got as much time as you need to get to that level.

Chef_L2

I don't think I've ever heard anyone say, oh well that's quite a difficult bit of the job, so we'll exclude it. I think what we'd say, that's quite a difficult bit of the job so the learners might need a bit extra support to get there, or it might take them a bit longer.

Adult care_L3

Despite most of the exemplar qualifications in our sample not having specific entry requirements, it was implicit in some AO comments that centres should consider how appropriate and achievable the qualification may be for the students, given their starting point. This could be done through some form of **initial assessment** or by "recruiting with integrity" and in the best interest of the students in terms of them having the potential to achieve the qualification. In some cases, the initial assessment would revolve around making sure that students work in jobs which would enable them to achieve the desired qualifications where these require appropriate workplace evidence.

I know it's a Level 1 qualification [...] But the students still have to work independently and if they're not capable of working independently then the centre isn't recruiting with integrity and are [...] setting students up to fail rather than the qualification being pitched at a level that is too high or is too low and if it's too low so therefore it has no value.

Construction_L1

Attitudes

Alongside appropriate and sufficient teaching, AOs emphasised the need for sufficient **student engagement** in the learning process. Where students were engaged, there would be a higher chance of them reaching the appropriate standard.

You can put on all the teaching and support in the world, if the learner's not engaging, they will not pass. With engagement in place then the rest of it remains true in that, if the learner is engaging and they're on the right qualification and they've got teaching and support, they should be able to pass the qualifications.

Creative_L2

One AO emphasised that the nature of the construct certificated by their exemplar qualification – the creative process – creates a **natural barrier to low standards**, potentially in combination with the mastery model. It ensures that even a minimum

level of achievement still requires a great deal of continuous student engagement, thus countering the criticism that there is a downward pressure on standards in such qualifications.

What we're talking about here is a whole entire rehearsal process leading up to the performance, the planning around that and the review after that. [...] So, the minimum level of engagement there is still quite high, [...] there's not like this crazy low threshold on learners [...] It actually does take quite a lot of work [...] And also, you've got something which is a creative output which we're assessing as well and looking at. [...] You cannot just show up not knowing your craft in any way and perform. [...] So, with creative subjects I don't see it as much as a problem just because there's so many natural barriers in the way of them just attaining it without any effort. Creative_L2

Several AOs spoke about their **integrity** as organisations, being very aware of perverse incentives such as funding pressures or pass rates that might incentivise lowering standards to achieve larger volumes and, therefore, profit. The AOs also spoke about their awareness of the impact that inappropriate standards at lower levels can have on student progression to higher level qualifications, and this was another reason why they did not consider deliberately lowering the standards.

[...] more broadly, yes, [...] we're always aware that there is the race to the bottom, as we call it, and [...] going to the lowest common denominator. [...] I don't recognise that for our qualifications because that's something that we're actively trying to fight against. [...] personally, that's not what I'm about and I certainly wouldn't want us as an organisation to be about that either. You just lose your integrity, I think, and integrity is a big thing [...], but not everybody's like me. First aid_L3

I don't think that's the case and I don't think that's something that we would even think about that this is too hard [...]. I just think even at Level 1, there are standards that have to be met otherwise what are you equipping them for? [...] How are you going to allow them to progress if they are [only] meeting the standard because you're making it too easy? Construction_L1

Incoherent teaching programmes

According to criticisms in the literature, because CASLO qualifications pay so much attention to LOs – which can downplay the importance of an underpinning syllabus – many teachers fail to compensate for this, and they fail to plan and deliver coherent teaching programmes. This might be partly affected by the failure of the LO-based units or qualifications to capture important aspects of learning progression or how learning is best sequenced in a particular domain.

This potential problem was the most frequently recognised among teaching, learning and delivery problems, with half of the AOs (N=7) believing it was potentially relevant to their exemplar qualifications. The other half did not think that this potential problem was (entirely) relevant to their exemplar qualifications. It was recognised by 4 of 5 'dual purpose' qualifications while only 3 of 9 'confirm competence' qualifications recognised it.

The most frequently referenced mitigations involved offering support and guidance to centres or students, aspects of which involved providing guidance related to, what might be classed as inputs to the teaching and learning process, that is, pedagogy and/or schemes of work. Inputs in the form of mandatory or indicative content lists were also suggested as helpful, as were certain holistic aspects of qualification delivery and/or assessment. Occupational or professional expertise of teachers was mentioned equally frequently as support and guidance as an important mitigation alongside teacher ability to see and make use of implicit content links, based on the nature of qualification content or context. All AOs except one mentioned at least 3 of these mitigation types in different combinations and some mentioned all of them.

One of the themes that emerged in relation to this potential problem was the need to ensure a balance between prescriptiveness and flexibility or contextualisation of teaching and learning in these qualifications as a certain degree of flexibility was seen as one of the key benefits of the CASLO approach, despite associated challenges. Views related to the possibility of achieving this balance in their qualifications appeared, at least in part, to shape the position of the AOs in relation to how much and what type of content specification and delivery guidance they thought was appropriate to provide.

Flexible delivery and contextualisation imperative

Whether or not the AOs provided any specific inputs to teaching and learning, they tended to emphasise the need for **flexible delivery** and **contextualisation**, which they thought were very important in their context. This was a strong theme that permeated most of the discussions in relation to teaching and learning problems.

So, what you'll see against each of the learning outcomes is some specific general mandatory content. So, we're not going into specifics. What we're saying is that you need to teach the students material that is relevant to their specialist practice, but we don't specify exactly what those materials are. So again, that's allowing individuality to come out depending on the cohort, the students' interests, and the resources a centre has available. Creative_L3

Flexible delivery and contextualisation were particularly emphasised by the AOs that did not see incoherent teaching as potentially relevant in their context. They expressed fairly negative views in relation to prescribing delivery approaches or

schemes of work to centres. Some of them also argued that it was necessary to allow certain content areas to be de-emphasised for some students, where they may have already acquired these in a previous job, for instance. Some of these AOs thought that, despite being more challenging for the centre, the opportunity to provide tailored delivery in this kind of vocational qualification was largely beneficial for the majority of the centres and students.

[...] in terms of saying to a centre – and this is how we want you to deliver it, we want you to deliver this on this day, I'd say well that's not really for us to say. Leave that to the people who are qualified teachers who know the learners, who know how the centre works. Adult care_L3

I think it's fair to say that delivering qualifications such as these is a lot harder than delivering a GCSE because you don't have a textbook to deliver from. So, I think these qualifications actually force you to engage more with the content of the syllabus and come up with something which is right for your learners [...] using the resources at that centre which is relevant to the part of the country that they're in. Creative_L2

Inputs: content lists or syllabi

Despite emphasising the need for contextualisation and flexibility, the majority of the AOs in our sample specified some form of teaching **inputs**, such as **mandatory or indicative content lists**, to supplement the LOs and AC in their qualifications. Though, as noted above, these tended to be specified at a relatively high level of generality. AOs suggested that this should help provide an indication to teachers about what to include in their teaching programmes, as well as to inform and to help standardise teaching programmes in terms of coverage.

AOs delivering Business_L3, Construction_L1, Construction_L5, Creative_L3 and Hairdressing_L2 qualifications – which all thought the problem of incoherent teaching was potentially relevant in their context – specified **core mandatory content** for their exemplar qualifications. In Business_L3, this content was referred to as the syllabus. In relation to the Creative_L3 qualification, it was emphasised that the introduction of core mandatory content was in response to HEIs, who wanted to have confidence that students who take this qualification know an appropriate range of materials that are relevant for their specialist practice. This was thought to support the comparability of student experience and the use of results for selection into higher education. Other AOs, however, noted that despite specifying core mandatory content, this still left room for variation across centres in terms of the quality of the learning experience that they provided to students in relation to broader content that they may or may not be willing or able to teach.

So, we'll have unit content which is the minimum that needs to be covered to address all of the learning outcomes and assessment criteria. But you would expect that, beyond that, they do bring in more of the teaching and learning. But again, we don't measure that and that can vary. [...] some learners and some centres might get a better learning experience and cover more than others would, but they would all have had to deliver the absolute minimum that's required to achieve the assessment outcomes. Hairdressing_L2

Fewer of the AOs which did not recognise this problem provided explicit inputs in terms of content lists or syllabi, in addition to the LOs and AC. Where they did provide additional content, this tended to be indicative, although some of these AOs did specify mandatory content too, sometimes including range statements.

Implicit content links as implicit curriculum

Most AOs did not explicitly specify the order of teaching the LOs or units, nor any other links between them. However, many of them suggested that **implicit content links**, or the implied best order to teach units or within-unit content, emanated from the nature of the construct of their qualifications, such as the creative process, or the context in which learning and/or assessment takes place.

We have a syllabus, I believe. It's an implicit syllabus in the sense of our qualifications all lending themselves to the creative process. The creative process is our syllabus. That's the underlying learning that anybody delivering our qualifications has to cover, it's about the creative process. The activities and themes that they're setting for the students to engage with in order to explore the elements of the creative process are where the centres' autonomy comes in. Creative_L3

[...] sector-based content tends to build on each other. You don't have content which is completely standalone and not feeding into anything else. If you're thinking about business, if you're thinking about creating a marketing plan, that's got to be in context with the size of the business, their purpose, whether they're a sole trader or not, so all of that learning comes into play. So, while it's probably not obvious in terms of visually in the specification, we have got this unit and that unit separately, [...] the content does work together because of the nature of the content. Business_L3

Some AOs suggested that the construct of their qualifications, such as, for instance, in Creative_L2, is mostly related to acquiring relatively distinct, discrete skills, like building up a "toolkit", but demonstrating in assessment that these can be applied in holistic situations with inherent structure or logic. Therefore, there was no need to specify clear progression in learning or a specific order for teaching when outlining the LO specifications in these qualifications.

Others, however, observed that there is often a natural or **implicit progression** in the complexity of some of the tasks or skills that a student might encounter. They suggested that this progression reflects a “natural learning curve” and, thus, can be considered a “common sense” progression, rather than something that needs explicit elaboration in qualification specifications to inform teaching approaches. One AO spoke about the way the structure of its Creative_L3 qualification, which includes 2 “developmental” units and a final, synoptic unit, which also determines the overall qualification grade, give a clear developmental trajectory for teaching and learning. The content from units 1 and 2 feeds into and is “pulled together” in the final unit, with the overall structure resulting in a “cohesive learning experience”.

[...] whether you want to call it best practice or [...] common sense, you know. Someone’s got to have experience of installing normal window and doors before you move them onto sliding folding doors and things like that and bay windows. [...] for me it’s just that natural learning curve, isn’t it. [...] I think there is an accepted common-sense approach that has served the industry well.

Fenestration_L2

The assessment outcomes [in unit 3] really pull together a lot of that information from units 1 and 2. [...] So there is a clear follow-through and narrative, which is about that transparency for the learner. [...] Obviously, they need to understand the language, the destination that they’re journeying to, but they understand the relationship between units 1 and 2 and unit 3, because they understand that the learning that they are doing within those 2 formative units will be applied, but in a more autonomous and self-directed fashion for unit 3. Creative_L3

Some AOs also discussed the benefits and drawbacks of **implicit alignment between teaching and assessment**, where assessed curriculum provides insights into taught curriculum. For instance, there was a suggestion that the nature of assessment, as apparent in assessment brief templates or examples, can provide insights for centres about the nature and complexity of the construct that will be assessed and, therefore, the nature of the skills that they are meant to teach. However, this might also lead to the content that is assessed being overly driven by what is assessed, potentially limiting the breadth of the curriculum.

In the Business_L3 qualification, explicit effort was made to reduce such potential negative assessment washback into teaching and learning. This was done by, on the one hand, providing a syllabus separate to the specification of the LOs and AC, and on the other, by blurring the mapping between AC and the syllabus to some extent by writing relatively **broad AC**. This AO also noted that the alignment between assessment requirements and the content of teaching was still preserved and captured in their **grading criteria**. The grading criteria imply and “pull together” the range of content and skills that need to be taught to enable students to achieve those criteria in their assignments in a holistic way.

[...] the idea is that holistically they would need to have learned that content to be able to approach that assessment. While you can't do a one-to-one mapping from the grading criteria back into the content, from a learning point of view they would need to have that bucket of learning [...] so it would be hard for them to say I'm only going to teach this bit, because that's the bit that you are assessing, because the grading criteria pulls together quite a lot of learning to be able to say, can you apply that in this context? Business_L3

Occupational or professional expertise and communities of practice

For teachers to be able to recognise these implicit links, including those that emanate from the nature of assessment or the grading criteria, they need to possess **occupational or professional expertise**. The AOs thought that, in addition to content specifications and other support tools, it was equally, if not more, important for centre staff to have specific occupational and professional expertise to deliver and expand on the content and produce coherent schemes of work or programmes of learning. For instance, it was suggested that, even where qualification specifications did not specify the order in which units or LOs should be taught, sector experts would know that certain aspects of content cannot be taught unless some other content had been introduced. There was no difference in this sense between the group of AOs that recognised the incoherent teaching problem and those that did not. **Community of practice** in relation to pedagogy around a long-standing qualification also had the potential to bridge a gap between what is in the qualification specification and how best to deliver it to students.

[as] the starting point, these units, these qualifications can't be delivered by non-specialist. That's simply not an option. So, if we talk, if we sound like we're saying that this should be obvious to the teachers, it really should because they are practitioners in this so they will have gone through the qualifications, and they'll obviously be qualified at degree level, most likely in the performing arts. Quite often in FE, they are also working in the industry as well as teaching [...]. Creative_L2

Some AOs pointed out that there was a limit to what can be specified by way of content by the AO, and that this needed to be translated into programmes of learning by teaching specialists. One AO suggested that providing a level of support to centres was necessary whether or not the qualification was based on LOs or a detailed syllabus. This recognises the challenge and importance of alignment between curricula and pedagogy, irrespective of the specific way in which the curriculum may be specified.

[...] there have certainly been examples recently with very extensive sort of syllabus style content where providers have had the challenge of trying to get to grips with that and teach it in the appropriate way, you know, even with many hundreds of pages of syllabus type content. So maybe it's more about the nature of the support that's given for any particular and especially new qualification rather than something that's inherent in the content itself. Teaching support_L2

Support, guidance and quality assurance

Most AOs thought that their direct impact on the level of occupational or professional expertise of centre staff was limited. However, they suggested that they still had some indirect control over it through **QA processes**, including checking for centre staff expertise as part of their centre approvals process, which helped mitigate potential issues caused by inadequate teacher expertise.

While several AOs also reported seeking **feedback from students and centres** about student learning experiences in the context of their qualifications, the AO delivering the Construction_L5 qualification, which needed to support progression within HE, emphasised this aspect of QA more strongly. They explained that their qualification must align with competitor qualifications in terms of not only level and content, but also other quality standards, including the quality of student learning experience. This seemed to drive the AO to put more explicit effort into quality assuring those aspects. They aligned their quality assurance processes with the HE Quality Code as well as complaints procedures, incorporating these types of quality checks more explicitly within their EQA.

More generally, **support and guidance** for centres in relation to teaching and learning featured more prominently than EQA monitoring processes in this area. Most AOs mentioned mitigations related to providing support and guidance to centres on how to teach their qualifications or how to avoid negative washback of assessment into teaching, irrespective of whether they recognised the problem of incoherent teaching. In general, support and guidance were seen as integral to the AO qualification offer, with AOs being responsive to centre requests for support.

The AOs used a mix of approaches for communicating or implementing support and guidance for centres. Several of them provided **guidance documents**, while AOs delivering the First aid_L3 and Construction_L5 qualifications offered explicit **training** or **CPD** for centres. Such training, which, in some cases, included optional video training content, covered teaching styles and approaches to be used for delivering the qualifications. All the AOs also involved their EQA staff in providing regular or on-request support to centres. Some of them thought that a particular advantage of the CASLO approach was the opportunity to provide centres with regular support and advice, as well as **early and timely intervention**, if needed. **Continuous support** and regular supportive surveillance allowed the AOs to notice

issues with a failing centre promptly and was seen as particularly protective against poor teaching practices.

[...] it's almost like questioning our CASLO quals, do they allow for poor teaching, well everything allows for poor teaching. [...] With CASLO quals, I think you're more likely to pick it up because we're looking through the year and it isn't just that end of year assessment where, all of a sudden, it's like, hang on, how come we've only got three people who have got a C. Here we know through the year if something's happening. So, I think, with the CASLO it's actually protecting against bad teaching [...] Creative_L2

Support and guidance for centres seemed to focus on 2 somewhat separate areas within or across the AOs. Some AOs provided tentative **guidance about aspects of qualification delivery**, sometimes involving **exemplar schemes of work**. These might include a suggested order and approach to teaching the units (for instance, teaching “long and thin” versus discretely) or example timescales which would be more likely to allow for sufficient skill acquisition ahead of summative assessment. This was sometimes done in recognition that centres may not have sufficient time or resource to develop schemes of work from scratch. On other occasions, these materials were provided in response to centre demands for additional resources, which was suggested by some AOs to ebb and flow to some extent, with more demand for resources from centres nowadays than in the past.

[...] the centre has to come up with their own schemes of work and they have to think about how they're going to make it relevant to their centre [...] that's a barrier for some centres and teachers because teachers aren't people who have loads of spare time but that's why we do have support in the way of providing exemplar schemes of work and having support from an EQA to talk through what they're thinking about doing. Creative_L2

Other areas of guidance focused on certain aspects of **pedagogy**. These included, for instance:

- promoting holistic, project-based delivery or structuring teaching and/or assessment around relevant workplace-based practices
- moving centres away from “chalk and talk” approaches to delivery, deemed potentially inappropriate for some vocational qualifications
- suggesting teaching discrete units focused on related knowledge and practical skills in tandem, or
- suggesting ways for students to recap and consolidate learning.

The quotes below illustrate some of these aspects of pedagogy guidance.

[...] we're always thinking about guidance on how to teach the qualification, not least because we work in so many different countries around the world [...] and [...] sometimes you're on a journey to get teachers to think in a more practical and applied way and move away from more chalk and talk type models of teaching and learning. [...] we have elements of our training packs that focus on teaching and learning styles and approaches [...]. We talk about teaching and learning in the spec, we talk about teaching and learning in delivery materials that we produce, so we definitely want the teaching and learning approach to be appropriate as we see it for the sector and for the type of qualification [...]
Construction_L5

[...Unit] 1 is a theoretical based unit, so it's focusing in on the skills around research, exploring a theme, planning, etc. And then you've got a unit 2 which is a more practical unit, so it's about materials, techniques and processes. Now the expectation is that a centre will deliver those 2 units in tandem, so a student will explore the thematic enquiry of project, you know, develop those research skills, methods and methodologies, and then they will apply those and explore them through practical activities. Creative_L3

A few AOs suggested that direct collaboration between the AO and centres to incorporate an **existing teaching approach** into qualification design can help bridge the potential gap between what is in the qualification specification and how best to deliver it to students. In the First aid_L3 qualification, the order in which the qualification content was specified was explicitly mapped onto the order that it would normally be taught in a specific pedagogical approach involving “progressive teaching” and “deep active learning”. However, this AO did not enforce this teaching approach and thought that teaching methods were ultimately the prerogative of the centres.

The AOs with qualifications primarily assessed in the workplace appeared to provide least explicit guidance in relation to schemes of work or pedagogy. They saw their role mostly in providing guidance for assessors and enabling them to carry out appropriately **holistic assessment** to avoid creating negative washback into workplace learning, which could affect its implicit coherence. These AOs thought that assessors should be trained and empowered to assess in holistic ways, making the best use of naturally occurring events to accumulate evidence about student competence, rather than following atomistic specifications or any prescribed schemes of work. To support this, these AOs provided **training** for centres on how to deliver qualifications and assessment in holistic ways and ways that are appropriate for individual students.

[if assessors] just go unit by unit by unit, [...] not assessing holistically, they're not engaging with the learner, they're not talking to the learner about which bits they can cover, and which bits they've already done. [...] that's where you get things

not being taught in order or in a natural course of events. [...] So, it's about having that skill of looking at what the learner needs to start with and then wrapping the assessment and teach around it, not having a standardised one size fits all. Chef_L2

Despite their primary focus on assessment, some of these AOs, when prompted, also noted that a more explicit alignment between the AOs and other actors in the teaching and learning process was needed for students to receive sufficient support. Misalignment was seen to occur in contexts where employers might not support the student sufficiently, treating them as “part of their headcount”, or where assessors did not assess efficiently or engaged in ineffective communication and planning with employers or students. Developing positive relationships between AOs and employers was also mentioned as valuable, so that employers could see the benefits of teaching and learning not just for students but for their businesses too.

[...] after a while, the employer comes to rely on that person as part of their headcount and part of their productivity. But it's got to be a 3 if not 4-way partnership, hasn't it, between the provider, the employer, the learner, obviously we play a part in that as well. So [learners] get mixed levels of support from an employer, I guess. Fenestration_L2

Few AOs spoke about providing specific **learning resources** for students. One AO emphasised the need to support employers in providing training facilities, especially where qualifications are delivered in college settings, where these are less likely to be available. A couple of AOs said that they provided supplementary reading or optional video training content.

Lack of holistic learning

Because CASLO qualifications represent LOs one by one – and without overtly representing how those LOs relate to each other – some critics say that students fail to learn holistically. This risks learning being neither systematic, nor integrated, nor coordinated, leaving learners unable to apply their learning effectively.

While this problem was recognised as potentially relevant for 4 of the exemplar qualifications (3 of which were ‘dual purpose’), this was not the case for the majority of our sample. Irrespective of whether the potential problem was recognised, the AOs suggested a range of mitigations and protective factors that they thought helped to reduce potential issues. These mostly revolved around using holistic assessment (that is, tasks or events integrated across multiple AC, LOs or units), as well as relying on the occupational or professional expertise of teachers and their ability to exploit implicit links across LOs or units. Some AOs also mentioned implementing certain design features in their qualifications which promote holistic approaches to

teaching, learning and assessment. Support, guidance and QA directed at promoting and monitoring for holistic approaches were also mentioned by a few AOs.

The mitigations proposed for this potential problem largely mirrored those proposed in relation to atomistic assessor judgement, perhaps reflecting the implicit view of many AOs in our sample that there is a strong interaction between assessment and teaching and learning in CASLO qualifications. When discussing mitigations for a lack of holistic learning, AOs repeatedly conveyed their views that addressing the ways in which CASLO qualifications were assessed would influence how they were taught and how the content was learnt. Therefore, even though the AOs largely did not explicitly recognise the problem of lack of holistic learning as arising from atomistic specification of LOs directly, the potentially negative impact of atomistic assessment seemed to be more recognisable to them.

Holistic aspects, implicit content links and contextualisation of assessment and delivery

Most AOs discussed **holistic assessment approaches** which utilise or reflect **contextualised** or **real-life work situations** as key mitigations for this problem. This was argued to give assessment events or tasks implicit synopticity, requiring integration of learning as a matter of course to complete the task. Learning and assessment in realistic contexts were thought to place students in situations where successful execution of the task would implicitly represent proof of holistic competence across all task features. It was also suggested that this required assessors to make an effort to assess **holistically**, across AC, LOs or units, making the best use of already holistic situations while minimising negative washback effects on learning. A similar mitigation was mentioned in relation to the potential problem of incoherent teaching.

This was particularly emphasised in qualifications such as Skin peel_L4, Hairdressing_L2 or Fenestration_L2, which involve job roles that provide a service from start to finish, with an outcome of satisfactory quality. Here, expertise must be applied holistically, but also flexibly, given that each client receiving the service will be different.

It's very difficult to do it in separate pieces because you've got a whole person that wants a whole service done and so it would be impossible to sort of, you know, do any of the steps in a different order or not bring them all together because it's all about the total look, the haircut, the style, if there's anything off or not done properly they all relate to each other, the client's texture of hair, it's sort of implicitly integrated by the nature of the context because you're dealing with a person and their preferences [...]. Hairdressing_L2

AOs in other occupational areas which do not involve tasks with a natural start and endpoint also argued that assessment that focuses on **skill application within a wider task or project** mitigates the risk of atomistic, non-integrated learning.

[...] so you can't show that you can plan a lesson or work with children on a specific task without being an effective communicator and respecting the expertise of the class teacher and so on, so it brings together all of those components [...] [to pass it] you're having to have an impact and not just show up with a planned activity but implement it and interact and know what to do when the child or young person is refusing to participate. All of those things that you need to do, I think, cuts through that level of isolated achievement, I just don't think it's possible in this context. Teaching support_L2

Contextualised holistic assessment, sometimes in the form of project-based assessment covering several LOs or sometimes units, was also used in primarily college-based qualifications (Construction_L5, Creative_L3, Business_L3) to help both promote integrated learning and elicit holistic application of knowledge and skills. In this context, an additional challenge that was recognised by the AOs (already mentioned in relation to the potential problem of poorly conceived assessment tasks or events) was how assessments might be designed to holistically cover various aspects of knowledge and skill across LOs or units to promote holistic learning while still referencing individual AC. This, in the words of one AO, "does take skill" on the part of centres.

In general, AO discussions mostly revolved around ensuring sufficiently holistic assessment, rather than specific holistic teaching and learning strategies. This implied that there were expectations of appropriately holistic assessment having positive washback on learning. A few AOs, nevertheless, specifically discussed **holistic delivery** (teaching) as helpful in mitigating the potential problem of a lack of holistic learning. Some AOs saw this as a hallmark of good teaching practice. However, one AO pointed out that in lower-level qualifications, for instance at Level 2, it may be inappropriate to implement teaching across multiple units to promote understanding of the connections between them, as that would be too demanding for that level.

It's about making sure that when we're monitoring centres that they're approaching the delivery in the way of projects, rather than individual criteria, and not standalone learning outcomes which don't provide context to the learner. So, it's about that replicating, emulating what the industry does, in that you wouldn't do research on its own for no purpose. So, you're contextualising the learning outcome within the overarching purpose of a whole project, and then your research informs that project, rather than today we're doing research, tomorrow we're doing evaluation. Creative_L3

[Referring to the L2 version of the qualification] I think, as well, we have to remember it's a level 2, I don't think at a level 2, you would necessarily be teaching 5 units all at the same time, so the learners understand the connections between them. That feels like you'd be way beyond level 2 at that stage. Adult care_L3

Again, it was implicit in many comments that qualification specifications broken down into AC and LOs were to some extent used as an aide memoire or a tool to lay out the important aspects of knowledge and skills to ensure higher consistency and to avoid missing certain aspects of content, rather than there being an expectation that teaching and learning should proceed in a list-wise fashion. There was a shared expectation among the AOs that teachers, owing to their expertise and experience, can see **implicit links** across the atomised specifications that would enable more holistic approaches to teaching and assessment.

Qualification and assessment design features

Some AOs emphasised that their qualifications explicitly incorporated **design features** that encourage holistic delivery and assessment. These were aspects such as the “plan-do-review” unit structure of the Creative_L2 qualification that was repeated across different units, despite their different context and focus. This was meant to instil a general and transferrable reflective approach in students towards their creative practice. In the Housing_L5 qualification, a final reflective “professional practice skills” unit was used to promote holistic learning, while the LOs were intentionally grouped in specific ways within preceding units to make the implicit links among them more overt.

Some qualifications, namely Creative_L3 and Business_L3, included explicitly **synoptic units**. These AOs argued that this mitigates the risks of atomistic learning because assessment in these units requires purposeful knowledge and skill integration in the context of a broader task to address a range of relevant criteria or content across the qualification. However, some AOs that did not include synoptic units expressed certain reservations regarding the feasibility and potential effectiveness of these their qualifications. Some suggested that overarching synoptic units might not work in qualifications that cover a wide range of topics due to potentially high complexity of the construct and the difficulty of defining it sufficiently comprehensively for assessment. Also, holistic assessment across multiple units was perceived by some AOs to increase assessment burden for the student.

One of the things that this qualification doesn't have is an overarching synoptic type assessment, so one might associate that type of assessment with a more holistic approach, the learner has to think about what they've done across the qualification, but you could make the argument that it would be hard to define

something of that nature for a qualification that [...] covers the range of things that this qualification covers. Construction_L5

Occupational or professional expertise and experience

AOs again emphasised the importance of teacher and assessor **occupational expertise** to be able to teach and assess holistically. Several AOs suggested that **teaching experience** is required for more holistic teaching, giving teachers confidence to teach across and beyond atomistic specifications. One AO suggested that the pressure to make sure that students achieve the qualification might incentivise teachers to deliver the qualification more atomistically, LO by LO. This echoed one of the drivers for atomistic assessment or judgement discussed earlier.

So, I think a confident teacher would probably deliver it more holistically and I think a less confident teacher might do it more systematically. As I say, I don't think this qualification necessarily produces that teaching, but I can see how it would. And again, when people are under pressure to get learners achieved, it feels safer to almost deliver it learning outcome by learning outcome and then provide the evidence of attainment as they go through. Adult care_L3

Support, guidance and quality assurance

As in other areas, several AOs discussed the importance of **support, guidance and QA** to ensure that centres are delivering holistic teaching and assessment. Most AOs said that **continuous support** is typically provided by their EQAs during their regular interactions with centres, where they might provide examples of scenarios describing how holistic delivery can be achieved. AOs also said that they encouraged centres to reach out to EQAs to ask for advice and guidance in relation to this. Some AOs also provided specific **guidance documents** explaining holistic delivery and assessment design. One AO noted the need to orientate centres towards more holistic delivery if their previous experience of other qualifications involved more atomistic delivery approaches.

An aspect of **EQA** monitoring in some AOs includes checking the appropriateness of assessment briefs that centres produce in terms of whether they will enable students to meet a range of LOs within one holistic assessment brief. These AOs also check that qualification delivery more generally revolves around contextualised project-based teaching, learning and assessment. However, despite providing support for centres, as well as conducting some monitoring of holistic approaches, the AOs again pointed out that their impact on how qualifications are delivered in centres is to some extent limited. There seemed to be a broad agreement that

attempts to raise the level of prescriptiveness might jeopardise the flexibility that is highly valued in CASLO qualifications.

You can only recommend what is the best way to deliver a qualification and people will decide [...] whether they take your advice or not. So, I do think that's quite difficult, although you are telling people it can be assessed holistically, some people will pick it up and they will, I guess, go through it, assessment criteria by assessment criteria. Construction_L1

Superficial learning

Because CASLO qualifications specify LOs one by one – and because they focus attention on detailed lists of AC that need to be met for each LO – critics have said that this disposes students towards superficial learning. This might involve demonstrating the minimum possible performance on each AC for each LO – then moving on to the next LO – and not revisiting LOs that have already been achieved and therefore not consolidating their learning.

This problem was recognised as potentially relevant for only 2 exemplar qualifications: a 'dual purpose' one (Construction_L5) and a 'confirm competence' one (End of life care_L3). Several AOs interpreted this potential problem as analogous to the problem of "teaching to the test", which they saw as a universal assessment washback problem, irrespective of the specific qualification design approach. AOs also thought that having a mix of highly motivated and less than motivated students, with the latter more likely to be prone to superficial learning, was inevitable in most qualifications, whether CASLO or not. Some AOs also noted that what indeed may demotivate students and orientate them towards a superficial approach to learning in some CASLO qualifications was the absence of grading.

All AOs suggested several mitigations and protective factors that they thought helped to reduce the risk of superficial learning arising. These, again, mostly revolved around using holistic, contextualised approaches to assessment and delivery, which increase the sense of relevance of learning and assessment for students. Several AOs also suggested that positive student and teacher attitudes to learning and teaching, including vocational and professional passion, as well as student agency and availability of choice were also helpful. Some mitigating design features were also mentioned, as were support and guidance directed at promoting and monitoring for holistic approaches to teaching and assessment.

Holistic aspects, contextualisation and relevance of assessment and delivery

Most AOs discussed **holistic assessment approaches** which utilise or reflect **contextualised, real-life work situations**, as key mitigations for this problem. Several AOs highlighted the opportunities that the use of holistic delivery and assessment creates for knowledge and skills to be revisited and consolidated in the context of different practical tasks and holistic situations. For instance, in construction or hairdressing, even though certain skills may be practised in isolation, their application on different sites or clients, as part of a broader task or service, will often call for these skills to be repeatedly applied, necessarily alongside other skills that each situation might require. Some AOs suggested that the presence of **implicit content links** across units, particularly in qualifications where content embodies certain broader processes, such as the creative process, help to ensure that students return to and consolidate different areas of knowledge and skills.

Within this, some emphasised that it is the sense of **relevance** for students in such contextualised assessment or delivery approaches that guards against a superficial approach to learning. Furthermore, the **practical nature of the content** in several exemplar qualifications, irrespective of whether this was knowledge or skills, helped to reduce the risk of superficial learning that is only aimed at passing the assessment.

[...] they're adult learners who are in a job, and actually most of the things that they're learning within the qualifications they are then going to go on and use within their job. So, it's not something that they're just learning for the sake of learning and then forget about. Potentially, their assignments could actually be about something, an example that they've done in their job. Housing_L5

This position echoed AO comments in the context of the potential problem of poorly conceived assessments, and their insistence on educating centres to create **vocationally relevant and engaging assessments**. Assessments that are relevant, involve an appropriate degree of challenge, and that hold some stakes for students to become invested in, were thought to reduce the risk of a superficial approach with the sole aim of meeting the criteria. According to some respondents, such assessments would be less likely to drive students to “work to the learning outcomes” per se. They would work to the assessment or project brief, which would simultaneously lead to coverage of LOs.

[...] it's a lot to do with the centre not using assessment in the way that's intended and they're not maximising the use of assessments. So, if you're putting on a whole school show, you're going to get very few learners who don't put in any effort. I can guarantee that. If you're asking the learner to just perform in the

corner of a classroom with no one else around then, yeah, [...] there's no stakes there, is there? They can just do it in front of the teacher. They don't care. They'll just get it over and done with. So, it goes back to that question of setting up the centre to make sure that they're maximising their delivery and make sure they're doing it properly and making assessment vocational and worthwhile. If they do that, then it kind of solves its own problem. Creative_L2

Attitudes

The idea that vocational relevance reduces the risk of superficial learning is closely related to a frequently mentioned protective factor involving student positive **attitudes** towards their area of learning. In some cases, this involved a sense of **vocational passion** for their subject, which was deemed protective against wanting to learn solely in order to pass a test or meet an AC. The AOs offering creative practice qualifications also suggested that their subject-matter creates a “natural barrier” against superficial learning because delivering poor creative pieces, even where these might meet the minimum standards of the qualification, would be an unpleasant experience for the students.

I think there's a deep-rooted passion in the way that learners take [these qualifications] and go forward with them that negates that teach to the test idea, because that isn't really what people want as an outcome. Business_L3

You're not wrong though, you can do a very minimal performance. So, you could do something which is pretty awful, but we don't find that happens too often because it's kind of self-punishing because it's not a very pleasant experience when it comes to performance and creative outputs. Creative_L2

Some AOs also suggested that **professionalism** and the **vocational passion** of teachers, who are passionate about doing the best for their students and not limiting their prospects by teaching to the test, is also helpful in reducing the risks of superficial learning. Indeed, a couple of AOs argued that it is the role of the tutors to understand the broader relevance of qualification content beyond the classroom and assessments, and to “light the fire” under students and explain why it is worth learning that content, especially where students might not be naturally ambitious or fully engaged.

Some suggested a further protective factor related to **student agency and choice**. As students typically choose certain vocational qualifications because they are engaged by the subjects and find them interesting, superficial learning is believed to be less likely to occur than in the qualifications that are compulsory. Some AOs offering qualifications that support progression to HE suggested that students tend to know what grades they will need to achieve to progress to specific higher education courses and, therefore, are not willing to “settle with just scraping through” as lower

grades would not allow them to enter their chosen courses. It was suggested that this attitude enabled students to challenge poor or superficial teaching where it might be present and where teachers may just be aiming to get them to achieve minimal standards to pass rather than achieve higher grades.

However, within this, it was suggested that different levels of engagement among students, both those that naturally strive for excellence and those that are willing to meet only the minimum standard, is common in all types of qualifications, not only in the CASLO ones. In relation to those students that might be less engaged, CASLO qualifications that did not involve grading were sometimes suggested to further limit aspirations and opportunities for stretch and challenge beyond just meeting the minimum standard to pass. This perspective was tempered by views suggesting that despite this potential limitation, the focus on highly relevant content, optimised for certifying certain specific skills, justified the use of a binary pass/fail threshold. Student motivation was bolstered through content relevance in such cases.

Relatedly, in qualifications that do involve higher grades, some AOs suggested that striving for just the pass grade in certain circumstances, especially with adult students who might have other priorities, may not in itself be problematic, nor a problem with the CASLO approach per se.

Qualification and assessment design features

In relation to the apparent absence of stretch and challenge through a lack of grading, which might predispose students towards superficial learning, some AOs pointed out that these are single-level qualifications. Therefore, where students are demonstrating performance beyond the level of their current qualifications, there is a possibility of **progression to a higher level** instead of a higher grade, which might be equally motivating to students.

[...] some people will come into a qualification, and they're really fired up, they really want to learn, they've done the basics, but they're also producing evidence that is [...] of a higher standard or more in-depth. [...] They've met the threshold. The assessor might be saying – that's all fantastic evidence. We need to look at how we progress you onto the level 3 because that's where you can put all that into practice and use that evidence for that. Fenestration_L2

The notion that certain CASLO qualifications involve only highly relevant, **core content**, that has been distilled to “get to the crux” of what students need to know and should be able to do was also suggested as a design feature that helps to guard against superficial learning. This was suggested to reduce the burden of assessment and, thus, leave sufficient time for more robust learning of the content that is considered fundamental in the qualification. This was described as being particularly

important for specific types of students, such as adult learners, who might be studying part-time alongside a full-time job, family and other commitments.

Some AOs suggested other mitigating features such as **pass standards that are not minimal**, combined with demanding content that requires a high level of engagement and perseverance to ensure its comprehensive coverage and assessment due to the **mastery model**. For example, in one creative practice qualification, it was suggested that even minimal engagement by students would require substantial effort to reach the endpoint of a rehearsal process to finally deliver a performance. In some qualifications where different areas have to be evidenced on multiple occasions over time to cover the **range**, this aspect of the mastery model was said to further mitigate this potential problem. Relatedly, **continuous assessment** (rather than terminal assessment) was considered to be more protective against “rote learning”, focused on just passing the assessment.

I think it's the fact that the minimum in those, in many of the cases are not very minimal. You know, so I can demonstrate that I've been through a rehearsal process which takes place over 8 weeks, you can have minimal engagement with that, but you're still engaged for 8 weeks of rehearsals and [...] we'd expect to see evidence of the rehearsals and we'd expect to see your plans for each rehearsal, what happened at each rehearsal. And yeah, you can still be a fairly surface level on that. [...] but [...] they're having to engage in quite a large way to get to that point. Creative_L2

One AO suggested that where units can be completed in any order, this can exacerbate the potential problem of superficial learning as it makes it more difficult to utilise certain links between units to revisit and embed knowledge and skills further. Several AOs implicitly agreed with this view, arguing that their exemplar qualifications benefit from “organic”, **implicit links** between units, which feed into each other. One AO suggested that it was necessary, where possible, for qualifications to be designed to allow “units to integrate”, thus enhancing the implicit links between units and holistic delivery, as previously discussed. The same AO suggested that **repeating similar criteria across units** can help achieve this aim, and mitigate the potential problem of superficial learning, particularly in larger qualifications with many related components.

Somewhat mixed views were expressed across our respondent sample in relation to the advantages and disadvantages of a high degree of alignment between teaching and assessment. Some AOs suggested that where teaching and assessment work seamlessly together, and where assessment “naturally occurs” as part of the taught programme, there is less focus on the AC as such and less risk of superficial learning. This was suggested despite some of these qualifications having highly explicit and detailed AC (and the mastery principle operating at the AC level, that is, with no compensation permitted across AC).

[...] because we essentially just translated it into a regulated format, it was all broadly understood and the assessment process already existed, so the assessment and the teaching and learning are all interwoven, so that it's not driven by the assessment process, the assessment is something that naturally occurs as part of the taught programme [...] So, for us, it's not an issue because the course and the qualification was designed for everything just to work seamlessly together [...]. First aid_L3

Other AOs recognised that the explicitness of AC, especially in relation to the **command verbs** used, may encourage superficial learning as students could become unwilling to go beyond what the AC requires. For instance, they might not be motivated to engage in “analysing” some content where the AC might only require them to “describe” it. To mitigate this risk, some AOs strived to disrupt this alignment to some extent, such as in the Business_L3 qualification, by making the mapping between AC and teaching content less direct than in earlier versions of their qualifications, with the aim of focusing attention away from assessment and more onto teaching and learning.

Support and guidance

There were few direct references made to **support and guidance** as a mitigation for superficial learning. However, because many of the other mitigations just discussed are the same as those discussed earlier in relation to other potential problems – for instance, various holistic aspects of delivery and assessment – it stands to reason that support and guidance provided to implement those mitigations might indirectly address this potential problem, too. In particular, as with several other potential problems, it was suggested that **continuous support** and **multiple touchpoints** with centres throughout the delivery of a qualification help to identify and minimise issues that might lead to superficial learning, alongside other teaching and learning problems.

One AO also mentioned the potential value of explaining to tutors the relevance of content that might at first sight appear to be irrelevant, so that they can then pass this on to their own students to enhance engagement.

So, sometimes there are things in the qual which may look superficial to students, but by supporting the tutor and educating the tutor as to the relevance of things, they then bring that to life and can show the students why it's important to have those skills [...]. Construction_L5

Undue assessment burden

According to criticisms in the literature, the mastery requirement in CASLO qualifications forces students and teachers to spend a great deal of time being assessed and documenting their assessments, resulting in an unduly burdensome assessment process.

Five AOs acknowledged the potential relevance of this problem to their exemplar qualifications (2 of which were 'dual purpose'). Six AOs did not entirely recognise it and an additional 3 did not recognise it at all (the latter, all being 'confirm competence' qualifications). Where the problem was recognised, the AOs mostly agreed that burden tended to fall on centres and tutors more than students, though some believed that this could vary and that it could affect students, too.

Overall, most AOs thought that those involved in assessing or taking these qualifications tended to accept assessment as integral to their experience, and necessary for the qualification approach to achieve its broader purposes. AOs also discussed providing support and guidance to centres to help them optimise their assessment and QA processes, through the use of e-portfolios, holistic approaches to assessment, flexible assessment, and streamlining of the amount of evidence collected. Appropriate planning of delivery by centres was also seen as important in mitigating the potential problems with assessment burden. Continuous support, engagement and feedback from tutors, and flexibility in delivery and providing sufficient guidance to students were also deemed helpful in encouraging students to take ownership of the assessment process rather than seeing it as burdensome.

Attitudes

Positive **attitudes** of practitioners and students towards the assessment process and its position in the broader context of qualification delivery were the most frequently referenced protective factors reducing the perception of undue assessment burden and its potential negative impacts. Most AOs thought that **assessment was accepted as integral** to CASLO qualifications by both teachers and students.

Some AOs saw assessment burden as unavoidable irrespective of the qualification approach, and as the price one has to pay for achieving a qualification, which is "something substantial" that "you've got to earn". In relation to the CASLO approach, the AOs thought that a balance needed to be struck between the potential risks from assessment burden and the broader purposes of these qualifications, which called for sufficiently exhaustive assessment.

The AO offering the Construction_L5 qualification emphasised that they did not see evidence of students reporting issues with administrative burden of assessment when conducting their annual student survey. The AO suggested that, rather than

being perceived as a burden, the continuous and formative nature of assessment was seen by students as motivating and engaging. It offered multiple opportunities for them to attempt assessment and improve based on feedback, instilling a “sense of achievement” from getting results along the way, and motivating them to keep going. An AO in the creative sector pointed out that formative assessments exist in the creative industry, too, and are an inherent part of carrying out creative projects for customers. Thus, it was natural to incorporate that kind of “iterative” approach into their qualifications. **Student agency and choice** in pursuing the qualifications that they are interested in were also seen as helpful in reducing a sense of burden.

A lot of these risks are real risks, or they're potential risks if you don't identify them and mitigate. [...] And it's reflective as well of the industry. You don't get a brief from a client to go away for 12 weeks, deliver them a set of graphics that they've requested, and they say thanks very much, and that's it. It's an iterative process. You know, feedback and assessment exist in the industry, so it exists in the way that we've designed the qualification as well. Creative_L3

Several AOs that recognised assessment in the CASLO approach to be “extensive” nevertheless thought that teachers saw it as fundamentally important to the qualification and ensured that this significant part of teaching was appropriately planned. Tutors were believed to be **passionate** about assessing student work in several qualifications, including those in the creative, business and beauty sectors, and to **take pride** in both their assessor role and in seeing the achievement of their students. One AO also suggested that while external assessment might create less burden for teachers, it might increase their anxiety levels.

Assessment and feedback [are] fundamentally important to the success of this qualification. They [teachers] see assessment as a significant part of teaching. It's not just about delivering the projects in the workshops; assessment is at least 50% of the work that they're doing. So, it's planned in I would say, it is extensive, but it's planned for. Creative_L3

I think for teachers it is always going to be more work to continually assess rather than just have a final exam, [...] but also assessors understand the need for that. And I don't think an assessor in this subject area would stand for just giving a student an exam at the end. Skin peel_L4

Teachers, many of them, really take a lot of pride and enjoy that element of seeing the work, seeing the artefacts, seeing the achievement. Business_L3

Support, guidance and quality assurance

Assessment burden was largely seen as more directly affecting tutors and centres than students, though some AOs thought that this might vary depending on centre

practices or student attitudes, with students sometimes experiencing a greater burden. One AO felt that the burden for students increased at higher qualification levels but was low in their level 1 exemplar qualification. Several AOs discussed different **support mechanisms** that could help centres streamline the assessment process.

Most AOs made references to **e-portfolio systems** which provide electronic platforms to capture assessment evidence and maintain records. Although these systems have been in relatively wide use for more than 2 decades, some AOs noted that not all centres used them. In some cases, centres lacked the necessary technology, while others preferred at least some aspects of the evidence to be collected on paper (for instance, client signatures in Hairdressing_L2). AO comments suggested that the use of such technology was optional for centres.

But the other thing we've done to try and alleviate that is we have a really good e-portfolio system now where they can scan things in [...]. Hairdressing_L2

I don't think we would specify that a provider must use an e-portfolio for example, but we would certainly allow a provider to use an e-portfolio if they had a platform. I think most providers will and it would work for a qualification like this, I've no doubt. Teaching support_L2

There was a suggestion from some AOs that centres may at times over-assess or collect and submit large amounts of unnecessary evidence for moderation, owing to nervousness about missing important aspects of AC. This was seen to increase burden for everyone involved in the process, including the moderators who, in such circumstances, were more likely to miss key pieces of evidence. Collecting unnecessarily large volumes of evidence was also sometimes attributed to "weaker assessors". Several AOs mentioned different forms of **training and guidance** that they provided to centres to support them with using the e-portfolios, but also, in relation to **sufficiency of evidence, assessing holistically** via tasks covering multiple AC, LOs or units. Support included **example assignment briefs** as well as **EQA support**.

Some AOs saw administrative burden related to various QA processes, including those for their own EQAs, as greater than assessment burden specifically. To address this issue, in their support for centres, some AOs included guidance about efficiently managing centre IQA processes. As part of **centre approval and EQA**, AOs also check that centres have sufficient staff numbers for the required workload and monitor and support centre assessment planning.

Inputs and supporting learning

Appropriate delivery and assessment **planning** was seen by several AOs as another important mitigation that helps to reduce the risk of assessment burden for both students and tutors, to ensure that there is sufficient time to collect evidence, as well as to assess and QA it.

Because if you know you've got a year, you don't wait until day 364 to mark it and go, actually we haven't done that bit, sorry. They should be doing it all the way through planning, and effective planning to ensure that that doesn't happen. So, again, for me, that comes back to a weakness of its delivery, not the approach itself, poor planning and delivery by whoever is doing it. Chef_L2

We say to them that they need to be forward thinking in their planning for the year. They need to leave sufficient time for that. They're required to implement some rigorous IV processes. So, they'll often have double marking, blind marking, they'll have benchmarking activities. Creative_L3

Regular **formative feedback** and **tutor engagement** with students were also deemed important because, if centres "get their formative assessments right", this leads to a "natural" and less burdensome progression through the qualification. Several AOs also emphasised the need for **tailored approaches to delivery**, making potential time savings by focusing less on areas where students might have prior expertise due to their background, for instance. For some, this included flexibility in the type of evidence that might be collected, which, where accepted by the AO, reduced the burden on centres and students. One AO pointed out that the sense of burden can be alleviated by promoting student choice and autonomy in relation to which evidence was provided and in which format.

For some AOs, the **transparency of qualification specifications** and how these were captured on their electronic systems was seen as helpful to students to keep track of their progress. One AO suggested that there might be benefits in providing guidance to students and then encouraging them to take more ownership of documenting the assessment process. This was believed to help build student confidence in self-directed learning and getting themselves organised, instilling important skills that might serve them well in their future careers.

[...] as an AO we've tried to overcome that with our i-learner system that learners can log into any time they like. They can see not only the standards they're working on, [...], the shrinking list of things to do, they can view that. They can mail their assessors any time they like to ask for advice. They can submit their evidence whenever they like. Chef_L2

Holistic aspects and relevance

A **holistic or project approach to assessment** was mentioned as helpful in optimising the assessment process and, thus, reducing potential assessment burden.

What gets in the way of teaching is start at unit 1, 1.1, show me how to do this. That, and not assessing holistically, is where the time gets taken up. And it's where either the centre's staff just are not appropriately equipped really, or their awarding organisation is giving them a great big folder of workbooks they've got to go through, and they're more worried about filling out the workbooks and filling out the funding forms than teaching. Chef_L2

[...] we do encourage a holistic approach to assessment, so trying not to have lots of tiny assessments, but maybe having some bigger ones and maybe with repetition of the learning outcomes, so if it's not met in one it could be met in another, so you can see that the student has gained that knowledge.

Construction_L5

A sense of **relevance** of the assessment process to students' current or future jobs was also deemed to contribute to a reduced perception of burden. This was flagged in relation to qualifications in the beauty and creative sectors, in particular. For instance, collating portfolios consisting of aftercare leaflets and other relevant paperwork – based on current practices and potentially useful in students' future practice – was one example of this. Some centres reportedly capitalised on this by “selling” the process of building a portfolio to students as useful and helpful down the line when looking for jobs, thus, making it more motivating. Evidence that is “naturally occurring” in the process of delivering a service to a client was also deemed by some AOs to be less onerous to collect than evidence that needs to be collected through specifically constructed assessment tasks.

For the students, they aren't really doing much more than they would be doing anyway. And having all of those processes in place and having a really good induction pack for their clients, having really good aftercare leaflets, going through that process and having all of their paperwork in place, I think learners find that very reassuring that they know that they're doing all the right things and they've got everything ready to go in their business. Skin peel_L4

So, I don't know, I think a lot of evidence that you would collect for this is naturally occurring so you're not having to set it up and organise it and document it [...]

Construction_L1

Demotivation or disengagement

Critics have noted that the heavy assessment burden associated with CASLO qualifications can lead to students experiencing demotivation or disengagement from learning. Furthermore, the requirement to achieve every LO because of the mastery model might also be demotivating, particularly when a student begins to fall behind, potentially leading to non-completion.

Four AOs acknowledged the potential relevance of this problem to their exemplar qualifications (one of which was 'dual purpose'), whereas 2 AOs with 'confirm competence' qualifications did not recognise this potential problem at all and an additional 7 did not entirely recognise it. One AO was not directly asked about this potential problem.

The most prevalent mitigations suggested by the AOs included aspects of flexible delivery such as not imposing time constraints on learning, and providing an opportunity to resit assessments and achieve unit-level credit. These aspects were perceived to provide a "safety net" for students and to reduce the likelihood of disengagement due to a potential sense of failure of an entire qualification. Inputs such as regular feedback and clarity about the learning trajectory were also mentioned. The option to contextualise students' learning and assessment and make it personally relevant was also seen as helpful in keeping the students engaged despite assessment burden. Some AOs also pointed out the value of continuous support and multiple touchpoints with centres, providing AOs with opportunities to detect potential for non-completion early in the delivery. This was in addition to internal centre monitoring of student progress as part of IQA. EQAs were also tasked to encourage centres to use evidence in formats other than written to help reduce assessment burden and increase engagement where writing might present a barrier to some students.

In contrast to the abovementioned criticism, the mastery model was deemed by most AOs to contribute to student engagement rather than cause disengagement from learning. Nevertheless, some AOs introduced certain design features to their qualifications to reduce the chances of student disengagement that might be related to the mastery model.

Inputs and supporting learning

In relation to this potential problem, the most prevalent mitigation type suggested by the AOs involved different aspects of supporting learning and students. **Flexibility in delivery** was mentioned by several AOs, including **no time constraints on learning, multiple assessment and resit opportunities** and **unit-level achievement or credit**. Some AOs emphasised that flexible delivery with no time

constraints protects against dropout arising from challenging life circumstances. As such, students can leave and come back to continue their qualification when they are able to do so, rather than abandon it completely. They emphasised that this sort of flexibility was also less likely to lead to disengagement due to a sense of failure, which some AOs thought was common in other qualification approaches.

I think, actually, when you look at other types of qualifications, with a CASLO, you're less likely to get dropouts. [...] you've done 3 units, and you need 4, you're struggling with the fourth, there's no reason why you can't pause that particular unit at that time and then go back to it. [...] I think you get that sense of failing with an exam, or a multiple-choice test or whatever, and, actually, that in itself would potentially make the learner think what's the point, I've failed. Housing_L5

However, resits or resubmissions were limited in some exemplar qualifications, and the maximum grade achievable was then usually capped at pass. One AO where this was the case emphasised the importance of centres evaluating the impact their teaching is having on student outcomes and whether students might be summatively assessed too early.

More generally, there was a view from several AOs that certain aspects of teaching or delivery approaches helped to support learning and combat the potential problem of disengagement. These included **transparency in communication and guidance** from teachers and assessors, as well as teacher ability to track individual student progress and to motivate students with **tailored approaches** and **individual support**.

You could retake, but it would have to be a new assignment, and it would have to be supported by your centre to do that. [...] There is a cap I think still on these quals in terms of how many times you can attempt that exam. [...] I think, first of all, the centre would really need to be reflecting on whether [...] it's anticipated that learners will pass on the coursework grades. I think the centre at that stage would really need to be assessing whether the assessment was too soon, whether there was enough teaching and learning, whether there was something else at play that needed to be evaluated. Business_L3

One AO agreed that disengagement arising from not being able to keep up with the work due to longer-term absence was possible in these qualifications. However, there were mechanisms that helped students to catch up, such as **extending the course time**, **special consideration policies** and **calculated grades for missed units** in some cases. The same AO thought that if students were present and engaging with learning, they would tend to progress, and achieve the qualification. Piecemeal achievement throughout the qualification, alongside regular **formative feedback**, was also deemed to help with engagement, as it provided a "safety net" for students unlike in qualifications with terminal assessment only. Regular formative

feedback was considered essential in managing student progress and ensuring that students are clear about their trajectory throughout the qualification, especially where there was a strong mastery requirement across the LOs, where the lowest graded LO would determine the qualification grade. In such instances, regular feedback, and involving students in assessing their own work against the AC alongside their tutors, would ensure that the final result does not come as a surprise and, thus, negatively affect student engagement.

I think disengagement or falling behind for us equates to a longer-term absence I think more than it does anything else. If they're present, they tend to, they'll make the progress, I think. Creative_L2

[...] actually they [qualifications] can be motivating in terms of achievement all the way through. [...] I think these do allow for certain students to know and be safe in the knowledge that they are achieving as they go along and it's not all going to be done at the end and it's not going to be a massive disappointment [...].
Construction_L1

There were somewhat mixed views among a few AOs about the impact of **workbooks** that students might be asked to complete throughout their qualification. One AO thought that centres recognised that these can negatively impact on student engagement and looked for alternative methods to assess them and collate evidence. Another AO thought that providing students with (non-compulsory) workbooks at level 1 can offer structure and support in tracking one's own progress. E-portfolios were again suggested as more engaging as tools for collecting evidence.

I think there was a trend a few years ago for training providers to rely heavily on workbooks, especially for lower level qualifications, but I think training providers are recognising that it does cause disengagement, so I think we're seeing a move away from that and more innovative ways of assessing people and online learning has also kind of helped because it meant that you can make that much more engaging. End of life care_L2

Qualification and assessment design features

As noted in the section on the benefits of the CASLO approach, several AOs thought that the **mastery model** motivates students to be engaged and keep up a good standard of work throughout the qualification, because they know that they cannot allow themselves to perform poorly on some outcomes as this will affect the entire qualification result. However, several AOs recognised the potential demotivating effect of students getting lower grades in units that they take early in their programme, which they may not be able to compensate for later on as their competence develops.

For this reason, and to allow students room to develop their knowledge and skills sufficiently before attempting assessment that would determine their qualification grade, one AO implemented “**summative grading**” that derives the overall qualification grade from the final (synoptic) unit that is taken towards the end of the course. The aggregation model in this unit, however, involved no compensation, meaning that the qualification grade would be determined by the lowest graded LO in that unit. The other 2 units of the qualification were seen as “formative” – students were required to pass them before attempting the final unit, but they were not graded and did not contribute to the overall qualification grade. These units were deemed to allow space for students to experiment, act on formative feedback, learn from their mistakes and develop, given a less pressured aggregation model which guards against disengagement.

I think if this approach was taken for the formative units before they got to this summative one, it might have an impact on student engagement, because they would have thought, you know, if I get a pass here, there’s no way I’m going to get a merit at the end of the qualification. But this happens at the end point, you know, it’s a high stakes assessment. So, it’s in their best interest to be engaged throughout the entire qualification, because they know that if they don’t, they’re not going to get the grade that they want. Creative_L3

Other AOs incorporated **other aggregatory principles** in deriving higher grades for their qualifications (beyond the passing grade)¹⁸. For instance, some AOs applied a “charity” aggregation principle when determining the overall qualification grade, where the overall result represents (or tends towards) the highest level of proficiency across the domain. One AO justified the use of that aggregation approach by the desire to match the approach adopted within comparable university level degrees rather than operate a “more difficult” model. These mitigations were particularly intended to address possible disengagement among students that received lower grades in units taken early in their programme and who, without some degree of charity in the model, would be unable to access higher overall qualification grades.

[...] the charitable approach. There is an element of that as well when it does land on a true medium. It gives the learners the benefit of the doubt. [...] So, that comes when you’re calculating the overall grades for the learning outcomes. [...]

¹⁸ See Newton (2018) for an analysis of common aggregatory principles used in VTQs. The following 4 were observed in that study: mastery (where overall result represents (or tends towards) the lowest level of proficiency across a specified domain, or subdomain); compensation (where overall result represents an average level of proficiency across specified domain, or subdomain); configuration (where overall result represents a particular pattern, or configuration, of proficiencies across a specified domain, or subdomain); charity (where overall result represents (or tends towards) the highest level of proficiency across a specified domain, or subdomain).

So, it's [...] unclassified, pass, merit, distinction for each of the assessment criteria and then you calculate an average of those criteria to form your learning outcome grade. Creative_L2

[...] that's a broadly compensatory, slight compensation, charity, if you like, model, but the top line on that is that we've looked at comparable grading practice in other HE qualifications [...]. We didn't want to make [this qualification's] overall grading model more difficult than what you see in a comparable university level degree, which really is the comparable qual in this example. Construction_L5

The AO offering the Hairdressing_L2 qualification expressed some concerns regarding time constraints in its college-based exemplar qualification. It explained that, given the length of time required for students to master the practical skills to a safe degree, this **core content** had to be prioritised over some other, more peripheral, areas, such as communication or commercial skills, for instance. Thus, on the one hand, the burden for students was reduced, and they were provided sufficient time to master the core skills rather than risking disengagement and dropout. On the other hand, this required **managing employer expectations** regarding the amount of additional training on the more peripheral skills that might be required. This AO did not think that any dropouts were related to assessment or administrative burden in their exemplar qualification.

I think the NVQ model certainly was outcomes-based and achievement-based but not necessarily [...] time-based. And anything that eats into that time is a big concern for employers certainly. It's just the type of skill and qualification that you do need time to sort of practice. So yeah, it's a difficult challenge, you know, and that's where I think these qualifications and classroom-based college learning will never really stand up against the apprenticeships where they're sort of learning on the job, and they have the time on those skills. Hairdressing_L2

Contextualisation and relevance

The option to **contextualise** learning and assessment and make it personally relevant was seen as helpful in keeping students engaged and countering the possible sense of burden arising from the amount of assessment. One AO suggested that in qualifications where some content was there for apparently no good reason, students' sense of relevance might be weaker and sense of burden stronger. This then required stronger engagement and creativity from tutors to ensure that students do achieve those LOs, too. The sense of relevance and engagement was also deemed to increase when assessment was more practical.

I think some of the things we find with these qualifications is that there's quite a lot of room for the learners to follow their own intrigue, which is [...] a great

source of engagement. [...] you could be looking at [...] performers you're interested in, or you might be directed to an array of different other performers that you've not seen before and are interesting to you. So that's good. It's very personal because [...] it's their dance, their acting so it's a very personal thing to them so that feels quite engaging and it's very different from what they'd be doing elsewhere [...]. Creative_L2

Support, guidance and quality assurance

Some AOs pointed out the value of **continuous support** and **multiple touchpoints** with centres, providing AOs with opportunities to detect potential for non-completion early in the delivery. Their **EQAs** undertake "formative sampling" of student work during qualification delivery and can also advise centres on best practice or note any issues with the nature of the evidence being collated, potentially helping to alleviate unnecessary assessment burden. Some AOs mentioned that student progress is tracked through a regular contact between the assessor and student and if a student has not progressed in a certain amount of time, this it is flagged to the IQA and dealt with.

It's useful having that constant relationship with the centres, isn't it, and what they're doing and knowing about their delivery and then having, having their assessments running, unit by unit throughout the year, so you do have that build-up of evidence along the way. So, any other eventualities you can see what's going on but also you can catch things early as well when you're doing your quality assurance work. Creative_L2

So, part of the reason we provide our e-portfolio system to our centres is so that we can see assessments, we can see progress. We can see the evidence generating. So, our EQAs can do formative sampling. And then as we were talking about earlier, then guide the IQAs. Chef_L2

Some AOs, through their EQAs, encouraged centres to use **alternative evidence collection methods** such as making videos, or conducting a professional discussion, or questioning, instead of insisting on students producing written evidence across the board. The AOs perceived this to help to alleviate assessment burden for both students and assessors, and to help promote engagement, particularly at lower qualification levels, where writing might present a barrier for some students. Some AOs also noted that, while they advocated for holistic assessment, there were benefits in breaking things down for some students who might feel disengaged when faced with a requirement to complete a large written portfolio.

I think we try to get people to think creatively about how they capture evidence. My experience has been that a lot of people think they have to write it down in

order for it to be valid, well that's not the case. And certainly Level 1 learners, they might not be able to write it down [...], but they can probably explain it to you. [...] So actually, there are lots and lots of other ways of collecting evidence, everyone's got mobile phones, the kids love making little videos of themselves, we need to encourage the use of technology more, it's something we try to do.
Construction_L1

I can see the sort of negatives of a huge written portfolio right, fill that in for me. It's going to turn some students off. So, whilst we encourage holistic, you know, you can still break holistic down into bite size. And you can still use alternative methods, you know, it doesn't have to be a load of written work. [...] In a half hour discussion tease bits of out that candidate. Fenestration_L2

Some AOs also **monitor completion rates** and would review the qualification if these were not aligned with their expectations. Similarly, grade profiles are monitored for consistency over time in those AOs that have graded qualifications, helping to detect potential problems with achievement and completion.

Discussion

In the preceding sections, we presented AO views about the benefits and potential problems of the CASLO approach in the specific context of their ‘exemplar’ qualifications. We reported on what they saw as key mitigations or protective factors that helped reduce the risks of problems arising in these qualifications. We also drew out, where relevant, more detailed insights concerning the nature of certain problems and perceived tensions in the CASLO approach.

In this section, we draw together some of the findings about AO perceptions of the benefits of the CASLO approach, the extent to which they recognised different potential problems and the types of mitigations they proposed. We consider whether it is possible to distinguish between problems that are easier or harder to prevent or mitigate. And we consider how tensions within the CASLO approach, or contextual qualification factors (such as, purposes or cohort size), might affect the likelihood of problems arising, or the feasibility of mitigating relevant risks. Finally, we discuss patterns of mitigation type prevalence and applicability across different problems, and tentatively consider the plausibility of certain mitigations. We conclude by considering implications of our findings for our understanding of optimal functioning of the CASLO approach.

Perceived benefits of the CASLO approach

The AOs were largely positive about the use of the CASLO approach across their various contexts. Firstly, the approach was perceived to incorporate key mechanisms that enable AOs to design qualifications that help to promote student engagement and mastery learning, and satisfy the highly varied needs of their students. Secondly, the approach was simultaneously deemed to satisfy the requirements of employers and other stakeholders for relevant and dependable qualification results and for competent workers. The key mechanisms that were perceived as fundamental to meeting these needs, and which are embodied in the CASLO approach, are:

- flexibility (in delivery or mode of learning; in qualification or assessment design; to enable domain personalisation or contextualisation in learning and assessment)
- transparency (of the learning domain and of the alignment between the learning domain and assessment)
- the mastery model (in learning and assessment)

Having a high degree of flexibility and transparency in qualification delivery, design and assessment were deemed by most AOs to be particularly useful for students. These were thought to:

- create opportunities for learning which might not be facilitated by other qualification approaches
- allow achievement of qualifications from different starting points
- help promote student agency and engagement through a sense of clarity of their learning journey
- ensure a sense of relevance for students, helping to promote engagement and motivation

The mastery approach was additionally seen as motivating for students, instilling them with confidence in their abilities to do the job that they are preparing for.

Flexibility was also believed to help satisfy the needs of employers and other users for qualifications that are relevant in their specific contexts, with transparency of specifications helping to ensure a higher degree of clarity and trust in what these qualifications certify. Transparency of the content domain and its alignment with assessment requirements was also valued by the AOs themselves as a mechanism that helped to promote and maintain comparability across the different contexts in which their qualifications were delivered. These aspects, together with adopting the mastery approach to learning and assessment, were deemed to contribute to the overall validity and dependability of qualification results. However, in addition to the abovementioned reasons, some AOs in our sample noted other reasons for adopting the CASLO approach, such as the expectations of employers, their sector or regulatory bodies, or historical reasons.

Problem recognition patterns as an indicator of potential problem significance in CASLO qualifications

While all AOs highlighted various benefits of the CASLO approach, the views expressed in our interviews were sometimes qualified by a recognition of some of the challenges that the approach also brings. Some of these challenges are related to potential problems that have been identified in the literature for CASLO qualifications. But they also reflect tensions that were often referenced in our interviews, which we return to later. Some of the challenges and tensions are essentially linked to the key CASLO approach mechanisms and involve difficulties in ensuring:

- sufficient flexibility without compromising standards in teaching, learning and assessment
- sufficient transparency without excessive predictability of assessment and negative backwash into teaching and learning
- domain mastery (that is, exhaustive teaching and assessment) without excessive burden

While there was some recognition of all of the abovementioned challenges and tensions in the CASLO approach, the recognition patterns for the specific potential problems that were discussed in the interviews differed depending on problem type¹⁹. The potential assessment problems tended to be more commonly recognised by the AOs than potential teaching, learning and delivery problems. This pattern might suggest that teaching and learning problems are deemed to be less of a challenge in CASLO qualifications. However, it might also reveal something about the perceived boundary between AO responsibility and centre responsibility, with AOs feeling a stronger sense of ownership of assessment issues. We return to the broader theme of AO responsibility and impact in the next section.

The most frequently recognised assessment problem was that of inaccurate judgements, with 12 of 14 AOs recognising its potential relevance for their exemplar qualifications. The least recognised assessment problem was that of atomistic assessor judgements, with less than half of the AOs recognising it outright as a potential problem, although another 6 AOs saw some relevance in it. The other potential assessment problems were recognised by the majority of the AOs.

It should be noted that several assessment problems, including poorly conceived assessment tasks or events, lenience, malpractice and inappropriate support, can be related to the potential imprecision of the AC. Imprecise AC may allow some leeway for assessors both to design the tasks and interpret the standards in ways that could potentially, inadvertently or deliberately, reduce the level of demand or consistency of standards to which students are assessed. It is, therefore, unsurprising that most of these problems were recognised to a similar extent as the potential problem of inaccurate judgements based on imprecise AC.

Among the teaching, learning and delivery problems, the most frequently recognised one was that of incoherent teaching programmes, which was recognised by half of the AOs in our sample. The least recognised problems were superficial learning, lack of currency and downward pressure on standards, with only one or two AOs recognising them outright as potentially relevant to their exemplar qualifications. The rest of the problems were also recognised by only a minority of the AOs.

¹⁹ These patterns were presented earlier in Figures 1 and 2.

These recognition patterns tentatively suggest that some potential problems might have been perceived as more challenging than others. Incorrect judgements and inappropriate support topped the list of assessment problems, and incoherent teaching programmes and undue assessment burden topped the list of teaching, learning and delivery problems in this respect.

Furthermore, patterns apparent in whether a problem was not recognised outright or was not entirely recognised might further capture something about different AO attitudes towards different types of problems or the relevance of different problems to different qualifications. For instance, superficial learning, despite being explicitly recognised by only 2 AOs, was seen as somewhat more problematic than some of the other teaching, learning and delivery problems, most of which tended to relate to the specification of the content domain or standards, as noted in the previous paragraph. The latter problems were, perhaps, more in the domain of the AOs than in the domain of teachers, and maybe, for that reason, perceived to be more easily mitigated and, thus, posing fewer risks.

The AOs discussed a wide range of mitigations and several protective factors irrespective of whether or not they explicitly recognised potential problems. Among those AOs that did recognise the problems, there appears to be some relationship between AO perceptions about the relevance of the problems to their exemplar qualifications and the number of mitigations that they referenced in relation them, although this was not a completely clear-cut pattern.

Figure 3 (assessment problems) and figure 4 (teaching, learning and delivery problems) below show the number of references to mitigations or protective factors mentioned in relation to individual problems across the AOs that recognised them. The “all mitigations” bars (in blue) depict the total number of references to mitigations or protective factors per problem, including repetitions of the same mitigations or protective factors across AOs. The “distinct mitigations” bars (in orange) reflect the number of mitigations or protective factors counted only once per problem even if mentioned by multiple AOs.

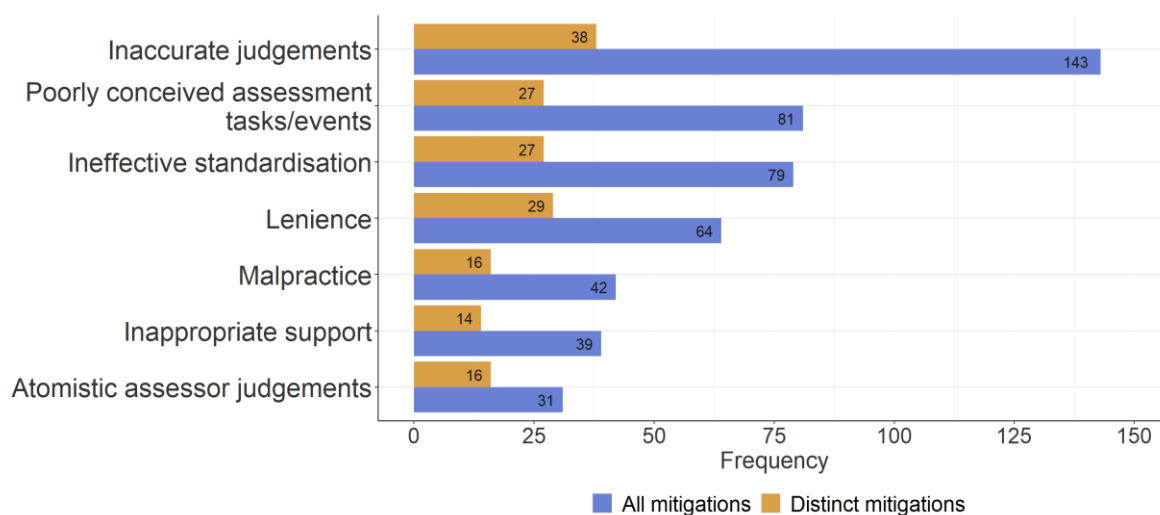


Figure 3 Total number of mitigations and number of distinct mitigations mentioned per assessment problem across the AOs that recognised them

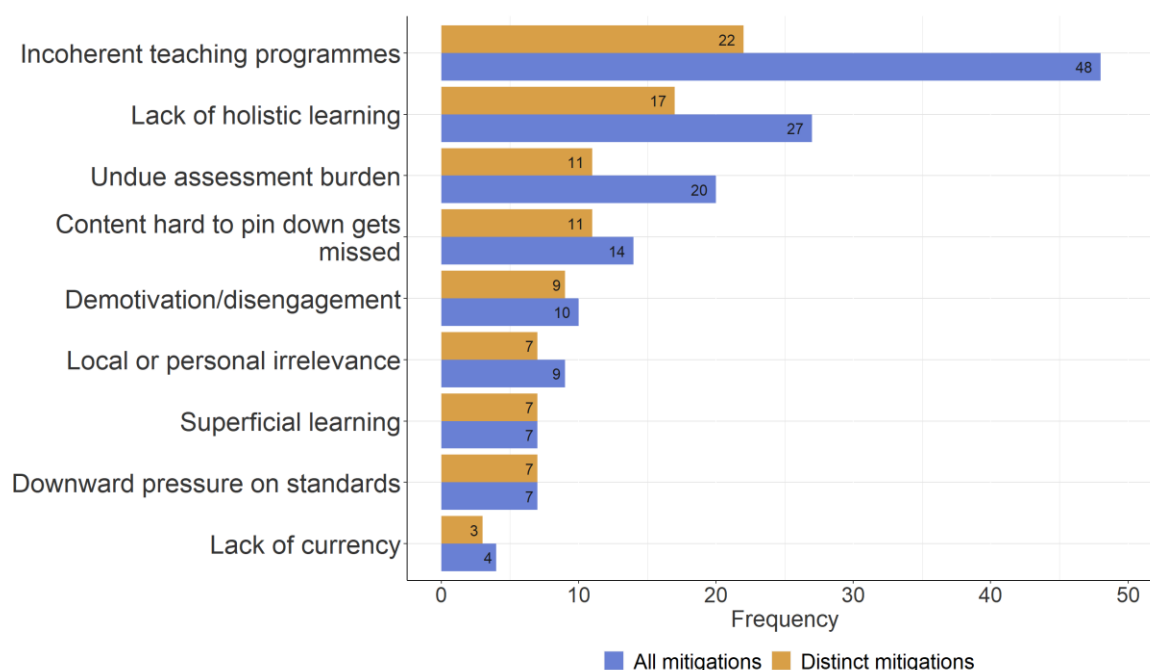


Figure 4 Total number of mitigations and number of distinct mitigations mentioned per teaching, learning and delivery problem across the AOs that recognised them

It can be seen that problems that were most frequently recognised (for instance, inaccurate judgements and incoherent teaching programmes) were associated with the highest number of total references to mitigations and largest variety of distinct mitigations. The reverse was true for problems that were least frequently recognised (atomistic assessor judgement, superficial learning, downward pressure on standards, lack of currency and local or personal irrelevance), as these were associated with the lowest number of references to mitigations and a somewhat smaller variety of distinct mitigations.

The overall smaller variety and number of mitigations proposed for the least frequently recognised potential problems cohere with the AO comments which suggested that some of these problems might have been, in some respects, outside of direct AO control or could be more easily mitigated through a smaller number of mechanisms. Superficial learning might fall into the former group, while lack of currency might fall in the latter.

On the other hand, the most frequently recognised problems were dealt with through many different mitigating mechanisms or protective factors, with AOs proposing on average 6 (and at least 4) mitigation types for inaccurate judgements, and on average 5 (and at least 3) for incoherent teaching programmes. This might be indicative of AO perceptions of the complexity of these problems, and perhaps also a reflection of a high degree of AO agency in mitigating associated risks. The AO

comments described in earlier sections suggested a great deal of complexity in how far the multiple mitigations needed to work in concert to address the problems.

Interestingly, even though they were not recognised by as many AOs as some other problems, lack of holistic learning and lenience were associated with a relatively large number of mitigations, both in terms of overall number and variety of mitigations proposed. In contrast, malpractice and inappropriate support, despite being recognised by most AOs, were associated with comparatively fewer and less varied mitigations than other more widely recognised problems. We speculate that this finding, in conjunction with the profile of mitigations described earlier, may indicate that the AOs saw problems such as the latter 2 as relevant, but had fewer mechanisms at their disposal to address the associated risks. Alternatively, there may be less need for elaborate mitigations for these 2 problems as the threat of certain punitive measures may be sufficient to deter centres from engaging in such practices.

In our qualitative analysis presented in earlier sections, we largely did not separate the mitigations according to whether AOs recognised the problems or not. Nevertheless, we occasionally highlighted certain areas where there appeared to be some tendency for the profile of mitigations to differ in this respect.

In order to investigate potential patterns in mitigation profiles related to whether or not the problems were recognised, across all potential problems, we separated and summed the references to mitigation types when the AOs recognised the problems and when they did not. We then calculated the proportion of references to each mitigation type in relation to the total number of references to mitigation types mentioned within each group of references (that is, when recognised and when not recognised). This is depicted in Figure 5 for assessment problems and in Figure 6 for teaching, learning and delivery problems. In these figures, the blue bars represent the proportion of references to each mitigation type when AOs recognised the problems, and the orange bars represent the proportion of references to each mitigation type when AOs did not (entirely) recognise the problems.²⁰

As can be seen, for most mitigation types, there were no substantive differences in the proportion of references that were made by the AOs that did recognise the problems and those AOs that did not recognise the problems. However, for some mitigation types, more tangible differences can be observed. In the case of assessment problems, AOs that did recognise them spoke proportionally more frequently about support and guidance and QA than the AOs which did not recognise

²⁰ For instance, across all assessment problems that were recognised by the AOs, references to support and guidance represented 32% of all the mitigations mentioned. In contrast, across all the problems that were not recognised, references to support and guidance represented only 15% of all the mitigations mentioned.

these problems. Those AOs that did not recognise assessment problems, on the other hand, tended to speak more frequently about holistic aspects, attitudes, mitigations supporting learning, as well as contextualisation and relevance and the protective factor of operating on a smaller scale (that is, with smaller cohorts or within smaller sectors). For teaching, learning and delivery problems, the AOs that recognised them also mentioned support and guidance and QA more frequently, alongside occupational or professional expertise and inputs. The AOs that did not recognise these problems spoke more frequently about holistic aspects, contextualisation and relevance, attitudes, qualification or assessment design features and mitigations supporting learning through various flexibilities.

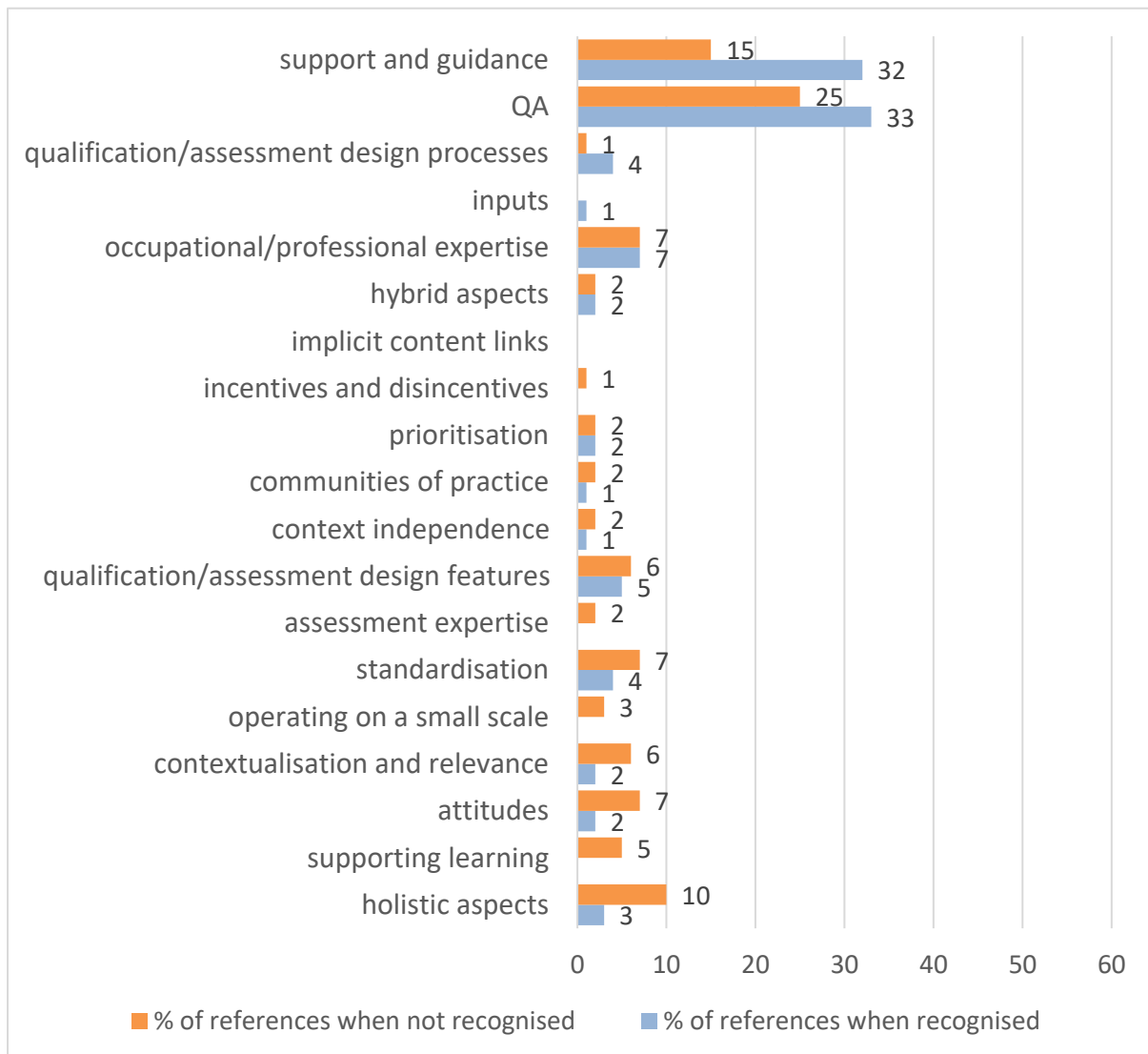


Figure 5 Mitigation types as proportions of all the mitigations mentioned when problems were recognised and when they were not recognised – assessment problems

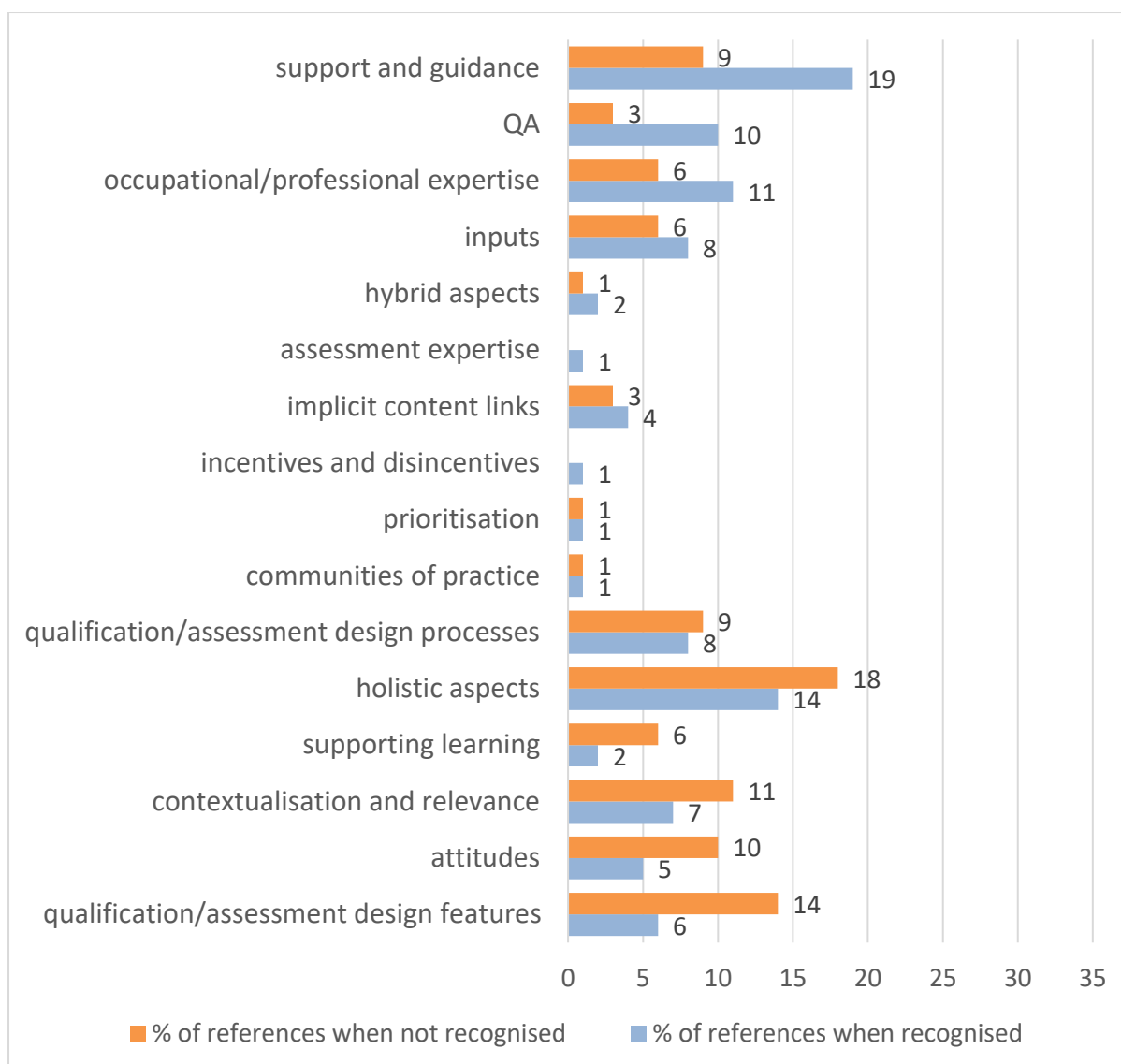


Figure 6 Mitigation types as proportions of all the mitigations mentioned when problems were recognised and when they were not recognised – teaching, learning and delivery problems

Although these are very tentative patterns, and the conclusions speculative given the nature of our data and relatively small differences, they illustrate what we might expect to see. That is, the AOs that recognised the problems perhaps tended to provide somewhat more active mitigations. On the other hand, where certain problems were not recognised as potentially relevant for certain exemplar qualifications, it is unsurprising that certain contextual features (such as cohort size) or other design features of these qualifications (flexible delivery or mastery model) were referenced rather than active mitigations to explain why the problems were not seen as relevant.

CASLO-specific or universal qualification problems?

The AOs in our interviews sometimes responded to certain problems by suggesting that they were universal, irrespective of the qualification approach. A few comments suggested that assessment problems related to difficulties in interpreting AC or content specifications were not unique to CASLO qualifications and were caused by the inherent imprecision of language. However, most AOs acknowledged that the dependence on language transparency in CASLO qualifications was greater than in the classical approach. Overall, most AOs saw the teaching, learning and delivery problems as more universally relevant rather than CASLO-specific.

For instance, discussions of the potential problems of local or personal irrelevance and lack of currency often referenced the need to balance specificity and breadth of content in teaching and learning. Yet, the AOs did not think this was specific to CASLO qualifications and argued that content specification for any type of qualification may face similar issues. In fact, they thought that some of these issues were more easily addressed in CASLO qualifications due to their flexibility and contextualisation as well as providing the potential to incrementally review and update them in a more agile way.

Some AOs noted that the acquisition of certain esoteric skills or attributes such as communication, autonomy, resilience, collaboration, teamwork or problem-solving, as well as application of knowledge, might be happening incidentally due to the contextualised, holistic nature of delivery of their CASLO qualifications. Some AOs saw these as “value-added” aspects of the teaching and learning process rather than part of the construct that was being assessed in their qualifications. Where AOs spoke about challenges of specifying and assessing such content, they again tended to agree that this was not a CASLO-specific issue and that it was easier to teach and assess such constructs in CASLO qualifications.

Several AOs interpreted the potential problem of superficial learning as analogous to the problem of “teaching to the test”, which they saw as a universal assessment washback problem, irrespective of the specific qualification approach. AOs also thought that having a mix of highly motivated as well as less than motivated or engaged students, with the latter more likely to be prone to superficial learning, was inevitable in most qualifications, whether CASLO or not. AOs highlighted that, despite some elements of the CASLO approach increasing student motivation and engagement, a level of intrinsic student agency and engagement with learning and assessment was necessary for them to succeed and that no amount of tutor support or qualification properties can entirely compensate for that. Several AOs also saw a certain amount of assessment burden as unavoidable irrespective of the qualification

approach, and as the price one has to pay for achieving a qualification. Relatedly, the AOs did not think that “poor teaching” was a CASLO-specific problem. Indeed, some AOs believed that the CASLO qualifications make it easier for AOs to detect and mitigate problems related to poor teaching through continuous support and multiple touchpoints with centres.

Contextual factors affecting potential problem relevance in CASLO qualifications

There were several contextual factors related to the qualifications in our sample that appeared to affect some of the problem recognition patterns, and the potential effectiveness of mitigations that the AOs proposed. These contextual factors included qualification purpose, cohort or sector size, qualification level and delivery context.

One tentative pattern involved differences in the extent of recognition of certain potential problems between ‘dual purpose’ and ‘confirm competence’ qualifications. For instance, the potential problems of inappropriate support and lenience and malpractice were somewhat less likely to be recognised amongst AOs offering ‘confirm competence’ qualifications. This might be due to the tighter alignment between the standards of those qualifications and occupational role requirements, often captured via NOS, which were, therefore, more likely to be well-understood and adhered to. The qualification purpose that enabled direct progression to employment perhaps also affected the likelihood of these potential problems arising, with practitioners less likely to be willing to exercise lenience and/or malpractice given safety and other high stakes concerns in the workplace context. However, one AO suggested that there could be an increased risk of malpractice in licence to practise occupational qualifications because of the necessity of achieving these qualifications for progression to employment, which may not be a strong requirement with other qualifications.

The AOs with ‘confirm competence’ qualifications also took the view that the fact that assessment in their context typically happens in real-life situations, and is thus not “designed”, in itself helped to overcome some of the potential issues with poorly conceived assessment tasks or events, and inherently ensured a high degree of validity as well as more holistic assessment. However, the potential problems of local or personal irrelevance and lack of currency were more frequently recognised by the AOs with ‘confirm competence’ qualifications. This might suggest potentially greater challenges in ensuring agreement on qualification content in ‘confirm competence’ qualifications and a more dynamic interaction with workplace practices or specific job roles.

The potential problem of incoherent teaching programmes seemed to be more frequently recognised in ‘dual purpose’ qualifications (as was that of lack of holistic learning). The apparent tendency of the AOs delivering ‘confirm competence’ qualifications to be less concerned with teaching and learning and to recognise this potential problem less frequently might be to some extent unsurprising, given the largely workplace-based delivery of these qualifications. These AOs seemed to adopt the view that, in their qualifications, traditional teaching is less fundamental than situated learning, which builds competence through observation and following of expert practitioners, and repeating work-relevant tasks in a community of practice. In general, there seemed to be more of an implicit reliance in these qualifications on the positive interaction between teacher or assessor occupational expertise and the holistic or contextualised nature of the construct and assessment, and less of an explicit attempt by the AOs to influence teaching approaches actively. These AOs saw their role mostly in providing guidance and enabling assessors to carry out appropriately holistic assessment to avoid creating negative washback into workplace learning, which could affect its implicit coherence. Conversely, the AOs with ‘dual purpose’ qualifications seemed to be more engaged with and more explicitly supportive of the teaching process and more focused on its QA.

For AOs with ‘confirm competence’ qualifications, the occupational standards related to the core content essential to the qualification had to be achieved and were not negotiable, particularly in safety-critical domains. This, in the AOs’ views, made the potential problem of downward pressure on standards in their context largely irrelevant. In contrast, one AO offering a ‘dual purpose’ qualification suggested that, because such qualifications prepare students for either progression to education or entry-level jobs, a more inclusive approach to specifying standards – and greater negotiation between stakeholders about the appropriate standard for different purposes and intended progression – were required. This AO seemed to prioritise ensuring that the qualification was pitched at a standard which was accessible to a wide range of students.

The size of a qualification cohort is another contextual aspect worth mentioning. Several AOs suggested that the relatively small scale of their exemplar qualifications, in terms of having a small cohort or catering for a small sector, helped them to mitigate several potential problems. For instance, qualifications with smaller cohorts potentially benefitted from more extensive QA, thus mitigating the potential problems of inaccurate judgements, lenience and malpractice. Communities of practice were deemed to be more reliable in smaller or long-standing sectors, helping to mitigate the abovementioned problems further. Moreover, AOs with smaller networks of centres appeared more confident in their ability to gain intelligence from centres, where most practitioners knew each other, and operated in a tight, “self-policing”, community of practice.

Lower-level qualifications were considered to be more resilient to risks related to local or personal irrelevance, lack of currency and downward pressure on standards. This was mostly because their content often represented the fundamentals of the domain that were largely non-negotiable and, thus, not subject to personal preferences, and less likely to date quickly. Some AOs with lower-level qualifications believed that the potential problem of hard-to-pin-down content getting missed is less relevant in their context as they thought that content at lower levels was easier to capture in qualification specifications. However, others did not think that qualification level was related to increased difficulty in communicating LOs and thought that this was a subject-specific challenge.

Finally, some AOs noted various limitations that are more likely to arise when CASLO qualifications are delivered in school or college settings rather than in the workplace. They mentioned limitations related to:

- teacher expertise to impart practical skills
- inability to replicate commercial environments
- use of assessment methods mirroring those of academic subjects
- tendency towards unit-based delivery to support timetabling, which might atomise the content and teaching

On the other hand, one AO noted that the more restricted range of evidence typically used for assessment in college-based delivery was helpful in ensuring a higher degree of standardisation.

Tensions in the CASLO approach as indicators of potential problem relevance

Various AO comments provided insights into certain assumptions and tensions within the CASLO approach that might exacerbate certain potential problems. This provides further insight into which of the criticisms from the literature may have the most force and should receive the most attention to ensure the optimal functioning of CASLO qualifications.

Assumed versus actual transparency

The transparency of CASLO specifications, standards and assessment requirements was highly valued by the AOs. It was considered to be a helpful mechanism in promoting student engagement and agency, and in enhancing clarity in what needed to be taught. It also helped with interpreting the meaning of qualification grades, and establishing a clear link with relevant professional standards. However, there was

evidence in our data that actual transparency is not easy to achieve and that it might be, to some extent, assumed rather than ensured in some cases.

This is, perhaps, most clearly illustrated by AO views in relation to the potential problem of inaccurate judgements due to challenges in interpreting the AC. The fact that this was the most widely recognised problem, combined with the extent of resources required by the AOs to ensure consistent interpretation of AC, suggest that transparency of standards is not necessarily a given in the CASLO approach. Consistent interpretation may often require the kind of heavy investment frequently described by the AOs in our interviews.

In relation to the potential problems of lenience and malpractice, some AOs thought that these were relatively easy to detect in assessment evidence during EQA. However, other AOs suggested that, in addition to student work, there is a need for triangulation of evidence from various sources, including scrutinising assessment processes, speaking to staff and students, observing assessment taking place or gaining intelligence from centres. In a similar vein, some AOs suggested that making judgements on the borderline between 2 grades, and being able to argue a position on that, was challenging for both assessors and QA staff, requiring discussion and sometimes negotiation. Holistic approaches to assessment, frequently mentioned as mitigations of various problems, also presented challenges for ensuring sufficient transparency of alignment between the construct and AC. All these challenges highlight the potential limits of qualification specification transparency as sole vehicle for ensuring consistency.

In relation to content specification, based on the extent of recognition of the potential problem of incoherent teaching programmes, it seemed that the AOs recognised the need to provide a degree of support for teachers and/or assessors, rather than assuming that transparency of specifications would in itself ensure coherence in teaching. It was also suggested in relation to several potential problems, including incoherent teaching programmes, that there was a need for reliance on implicit or tacit understanding of content links and other aspects, further suggesting limitations in the extent of specification transparency.

On the other hand, several AOs noted potential negative washback impacts from excessive transparency of assessment requirements and assessment alignment with the syllabus, and some actually attempted to disrupt this alignment to some extent. Simultaneously, too little transparency in holistic assessment was deemed likely to threaten consistency of judgements. This was one of several difficult balances that needed to be achieved to ensure the appropriate functioning of CASLO qualifications.

Flexibility versus prescriptiveness

Another tension that was apparent in AO comments was the balance between flexibility and prescriptiveness. It was relevant to several potential problems discussed. The challenge of finding the balance between ensuring sufficient specificity of the AC to support consistent judgement and allowing sufficient breadth to enable flexibility, personalisation and contextualisation of assessment underlined most of the discussions of the potential problem of inaccurate judgements. This tension was partly reflected in varied views about the extent of detail that should be provided in guidance or through exemplar materials, or whether the latter should be provided at all. In relation to the potential problem of poorly conceived assessment tasks, although AOs generally argued strongly in favour of flexible, contextualised assessments, they also recognised the potential challenge this brings to ensuring an appropriate degree of consistency and comparability between different centres or students within centres. Extensive QA processes were generally seen as necessary to ensure that flexibility and contextualisation do not tip into unreliability of judgements and standards. Within this, certain AOs argued that a degree of inconsistency is inevitable as well as acceptable, given the advantages of contextualisation.

This tension was apparent in relation to certain teaching and learning problems too, for instance that of incoherent teaching programmes. Although a certain degree of flexibility was seen as one of the key benefits of the CASLO approach, AOs also saw value in a degree of prescriptiveness in what needs to be taught and how, to ensure comparable quality of learning experience across centres. The views regarding achieving this balance in their qualifications appeared to partly influence AO positions on how much and what type of content specification and delivery guidance they thought it appropriate to provide to centres, including how to approach sequencing learning and progression through the content.

Discussions about the potential problems of local or personal irrelevance and lack of currency of qualification content highlighted the need to achieve another balance – that between the need to prescribe content and the flexibility to adapt it. This was often influenced by broader qualification purposes and attitudes of qualification users regarding how far that balance should tilt towards narrower occupational roles vs. broader educational goals. Increased personalisation of content was deemed by some AOs likely to lead to excessive narrowing of the content domain and lower transferability of qualifications even though it might be approved of by certain stakeholders. However, a relatively narrow focus on core content was deemed to mitigate certain other potential problems, through the sense of relevance this created in students, or through a reduction in assessment burden. Some AOs thought that their qualifications did not present a barrier to either personalisation or broadening of content, as required, and that centres had the flexibility to adapt content

appropriately. They also believed a qualification awarded at one point in time could not be expected to “futureproof” someone’s career and suggested that this was mitigated by accepting the need to invest resources in life-long learning and CPD.

Cost-effectiveness

Another tension that was prominent in AO comments concerned how to establish cost-effectiveness, or value for money, in relation to the resources needed to ensure optimal functioning of their qualifications, partly due to their scale, but partly also due to other challenges, especially the degree of flexibility that they allowed. For instance, resource challenges appeared to permeate and to some extent shape the way that the mitigations were put in place for the potential problem of inaccurate judgements, be it in relation to QA, standardisation, qualification design and review, and so on. Resource issues were also mentioned in relation to investing in and supporting communities of practice, particularly where other bodies, such as sector skills councils, no longer provided support of this nature. With reference to lenience and malpractice, most AOs implied that a certain amount of unreliability would inevitably remain in the system despite best efforts to eradicate it. This was due to limited resources to moderate every single student result, as well as the complex nature of the judgements being made by everyone involved, including assessors, IQAs and EQAs.

The challenge of establishing cost-effectiveness also pertained to other actors in the qualification ecosystem, such as centres, according to some AO comments. For instance, resource limitations within centres might affect the extent of flexibility that their students experience, including the number of available resits, how tailored the assignments might be to specific student contexts or interests, or how many optional units they might be able to deliver to allow personalisation.

Overall, there appeared to be an implicit recognition that the CASLO approach inevitably required significant investment and resource to operate effectively, and to ensure reliable assessment alongside sufficient teaching and learning flexibility, but also that the benefits of the approach justified this investment. What was less clear from the views expressed in our interviews was where the optimal balance between investment and resource, as well as prescriptiveness and flexibility, should lie and how far a defensible balance could be achieved across all contexts and qualification types.

Lack of clarity over roles and responsibilities between AOs and centres

How AOs positioned themselves in relation to other actors in the broader educational ecosystem also needed to be balanced.

Some of the decisions about the amount and nature of support that the AOs provided to centres in relation to assessment appeared to depend not just on the amount of resources or investment available but also on the appetite of centres for receiving support and guidance (that might be perceived by centres as restrictive, given their individual delivery contexts). Some AOs also saw value in centre ownership of assessment and encouraged centre and assessor development in this respect. And some AOs thought that creativity in assessment approaches might be stifled if centres relied too much on exemplars and detailed AO guidance.

Most AOs thought that providing a degree of guidance was ultimately beneficial to reduce pressure on centre staff when making potentially difficult assessment decisions. The integrated approach to QA and support appeared to aim to get the centres to the point where they could operate with little support from the AO. Nevertheless, some AOs suggested that centres sometimes had a preference for off-the-shelf assessment materials to support them, potentially because they did not have the time, resource or expertise to develop appropriate materials themselves.

Some AOs explained that nowadays, due to changes in policy and funding arrangements in centres, AOs had less direct influence on centres with respect to tutor or assessor CPD requirements or the length of industry experience. AOs could monitor these but could not enforce specific requirements on centres to adhere to. Although tutor or assessor occupational expertise might be seen as squarely in the domain of centre responsibility, it was noted that a lack of expertise might threaten their ability to interpret and apply the AC appropriately, for which AOs are ultimately responsible.

Interestingly, there were some inconsistent views about certain areas of AO responsibility which seemed to be clearly in the domain of assessment. While some AOs described their EQA process as involving checks of assessor judgement accuracy and consistency, others questioned how far the EQA checks should focus on judgement accuracy, rather than focusing upon broader assessment and IQA processes. One AO questioned whether it was EQA's role to "second-assess", suggesting that, partly due to resource-intensive nature of this process, EQA's role was more to check that all processes in the centre were in place to support correct assessment decisions rather than the checking the decisions as such. Ofqual regulations indicate clearly that EQA processes must include checks of judgement accuracy, yet the balance between focusing on judgemental accuracy versus

broader assessment and IQA processes is challenging to operationalise, as we considered in some detail in Newton & Lockyer (2022).

The domain of responsibility of the AOs in relation to potential teaching and learning problems was even less clear-cut. Overall, most AOs seemed to recognise the need to provide a degree of support for teachers, even though the AOs appeared to have a great deal of confidence in and reliance on their occupational or professional expertise. This might suggest inherent tensions in the relationships between AOs and centres depending on centre attitude towards receiving explicit teaching guidance and their perception of the AO as a “credible authority” in this domain or not.

There was a suggestion by some AOs that the extent to which teachers seemed to want explicit guidance on schemes of work and/or pedagogy from AOs fluctuates over time. And some AOs argued strongly that only those who are occupationally competent, and who do not need additional resources such as schemes of work and textbooks, should be allowed to teach vocational qualifications. For the most part, the provision of support and guidance related to schemes of work or pedagogy was tentative, with these aspects deemed ultimately to be the prerogative of centres. Despite the perception that their role in providing pedagogy-related support was limited, AOs that provided it seemed to believe that such support did not present barriers to flexible delivery (unlike specific schemes of work).

Some AO comments suggested a clear belief that there was a best approach to delivering their qualifications. For some AOs, this seemed to include an expectation that centres would teach content that was broader than the specified learning outcomes, although none of the AOs appeared to have strong requirements from centres in that respect. Similarly, in relation to the potential problem of lack of holistic learning, despite providing support for centres, as well as conducting some monitoring of holistic approaches, AOs again pointed out that their impact on how qualifications were delivered in centres was limited. There seemed to be a broad agreement that attempts to raise the level of prescriptiveness might jeopardise the flexibility that is highly valued in CASLO qualifications. Overall, there did not appear to be much in the way of agreement concerning the optimal amount of responsibility in relation to providing support for teaching and learning.

Perverse incentives

There were several potential problems which were said to be exacerbated by the influence of certain perverse incentives on centre or student behaviour. These mostly involved funding and accountability pressures, achievement rates, and time pressure while striving to conform to the rules of specifications. It was also suggested that potential biases could arise from familiarity with students, therefore affecting tutor or assessor decisions or actions, as could EQA overfamiliarity with

centres. Some AOs included potential factors that accommodated these risks within their risk-based sampling models, helping to ensure that centres deemed susceptible to these issues got extra monitoring.

Potential problems of lenience and malpractice were often discussed against the backdrop of potential perverse incentives, which were deemed likely to influence centre behaviour and complicate the task of quality assuring qualification results. Private training providers as well as schools and colleges faced pressures from performance-related pay and achievement rates too. It was also mentioned that certain roles that are normally fundamental for QA in the CASLO approach, such as IQAs, are potentially under a lot of pressure from their institutions to ensure appropriate achievement rates. Typically, the absence of time constraints on learning was discussed in terms of its potential to remove incentives for centres to pass students before they reached the required standard, thereby mitigating the risks of lenience and malpractice. However, some AOs noted that employer requirements or funding arrangements can still impose time constraints even if the qualification could (in theory) be delivered to less constrained time scales.

Interestingly, atomistic judgements and lack of holistic learning were also thought to be potentially exacerbated by some of the abovementioned pressures. Some comments suggested that the pressure to ensure that students pass, under achievement rate or funding pressures and pressure of the mastery model, might incentivise teachers to deliver or assess the qualification more atomistically (for fear of missing certain aspects in a more complex, holistic, approach).

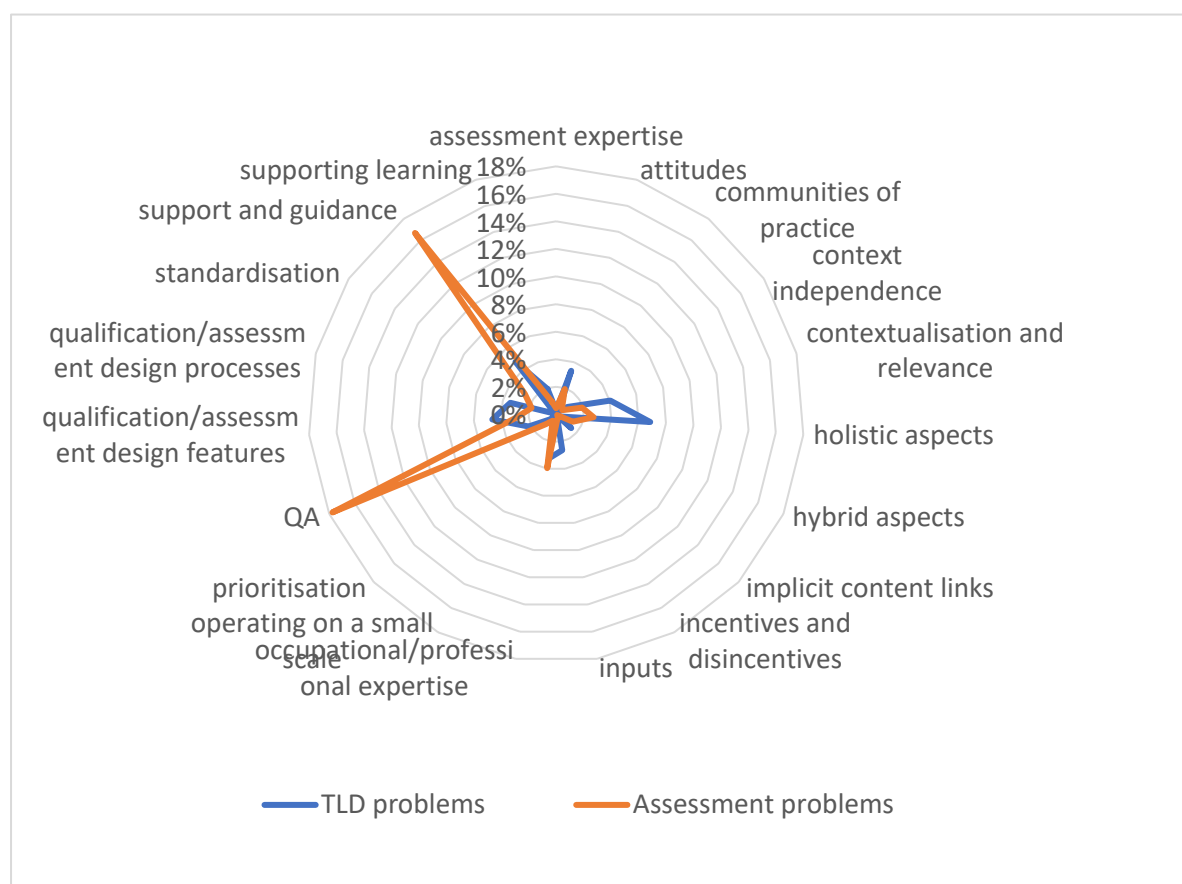
Key mitigations and protective factors

In the following sections, we briefly summarise and discuss the nature and applicability of the various mitigation types we identified in the data across individual problems.²¹ These mitigations and factors help to foster the conditions under which the quality and value of CALO qualifications may be ensured. We also point out certain tensions where particular mechanisms might represent mitigations for the risks associated with one problem while simultaneously creating challenges in the context of another problem. These tensions also reflect the complex interactions of different mechanisms that might ensure the quality and value of CASLO qualifications, with several mechanisms usually required to work in concert to achieve this.

²¹ Appendix 4 contains tables with crosstabs showing the number of references to different mitigation types across individual problems.

Profile of mitigations across problem groups

Our earlier description of the mitigations that AOs discussed in response to various problems showed that there was a great deal of overlap, both within and across the different problem groups. This is further depicted in Figure 7 below, which shows the mitigation types referenced for assessment problems, and for teaching, learning and delivery problems, as a proportion of the total number of mitigations mentioned across all these problems.²² The larger proportion of assessment problem mitigations also reflects the overall larger number of mitigations mentioned for these problems.



²² To calculate these proportions, we first split the references to mitigation types for assessment problems and for teaching, learning and delivery problems, and calculated the number of references to each mitigation type for each group or problems. Then, for each group of problems, we calculated the proportion of references to each mitigation type from the total number of references across both groups of problems. Thus, for instance, across all assessment problems, references to support and guidance represented 17% of all the mitigations mentioned, while occupational/professional expertise represented 4%. Across all teaching, learning and delivery problems, references to support and guidance represented 5% of all mitigations mentioned, while occupational/professional expertise represented 3%.

Figure 7 Mitigation types referenced for assessment and teaching, learning and delivery problems (TLD) as a proportion of the total number of mitigations across all problems

It can be seen from this chart that certain problems – including QA, support and guidance, occupational or professional expertise, qualification or assessment design features, holistic aspects, attitudes, contextualisation and relevance and qualification or assessment design processes – were seen as helpful across both groups of problems, though they were not used to the same extent in both groups. For instance, holistic aspects and attitudes seemed proportionally more relevant in the context of teaching, learning and delivery problems, while QA was more frequently referenced in the context of assessment problems.

The differences in mitigation frequency across different groups of problems is depicted more clearly in Figure 8 below. It shows the proportion of references to each of the mitigation types across assessment problems (blue bars), teaching and learning problems (orange bars) and delivery problems (green bars), as a percentage of the total number of references to a specific mitigation type. For instance, out of all the references to holistic aspects (across all the problems), 29% were mentioned in relation to assessment problems, 66% in relation to teaching and learning problems, and 4% in relation to delivery problems.

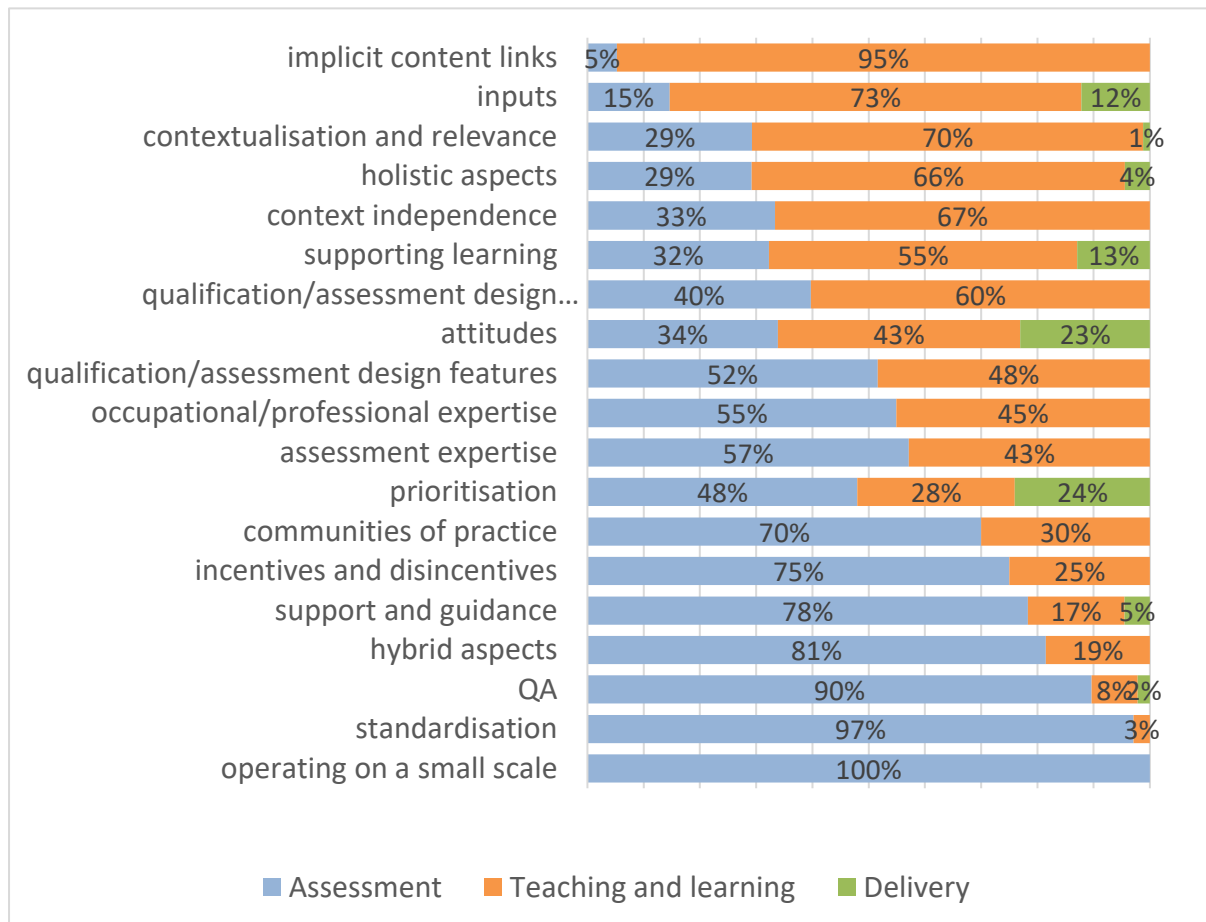


Figure 8 Differences in mitigation relevance to different groups of problems

Perhaps unsurprisingly, the figure also shows almost exclusive use of implicit content links and inputs as mitigations for teaching and learning problems, and almost exclusive use of standardisation, QA and references to operating on a small scale (in terms of small cohort size or sector size) in relation to assessment problems. Beyond these instances, there is a significant overlap in the use of most mitigation types with different types of problems. This probably testifies to the complex interaction that exists within CASLO qualifications between teaching, learning, delivery and assessment. Furthermore, all groups of problems also appear to require some mitigations that are relatively exact, such as certain design features, as well as those more esoteric, such as attitudes, expertise of practitioners and appropriate prioritisation of resources.

In the following sections, we discuss the key mitigation types and protective factors mentioned by the AOs across different potential problems that they pertain to.

Support, guidance and quality assurance

AOs often described their QA as a dual process involving both monitoring and support in relation to interpreting standards and other aspects of qualification delivery. In our analysis, we coded as QA those aspects that related more explicitly to monitoring rather than to support and guidance, although it was not always straightforward to distinguish between them.

Support and guidance for centres and, to some extent, for AO staff including qualification writers and EQAs, was one of the most frequently mentioned mitigation types, featuring across all problems, in various different guises and with different foci. Support and guidance featured more prominently than QA in relation to atomistic assessor judgements, as well as for the majority of the teaching, learning and delivery problems.

As part of support and guidance, AOs provided advice from EQAs as “critical friends”, guidance documents, exemplar materials, training sessions, assessment checking service, glossaries, and video tutorials. Depending on the problem, support and guidance focused on a wide range of aspects, including:

- clarification of standards
- approaches to task design
- holistic assessment and how to effectively map this to the AC and LOs
- holistic teaching and learning
- IQA and standardisation processes
- planning of assessment
- appropriate scaffolding of assessment and appropriate feedback

- nature and sufficiency of assessment evidence
- aspects of pedagogy and exemplar schemes of work

Support and guidance were largely seen as a continuous process, involving multiple touchpoints with centres throughout the delivery cycle. In relation to certain potential assessment problems, notably task design, and several teaching, learning and delivery problems, the importance of pre-emptive support, early in delivery, was seen as key. This was because of the restricted options to QA (and rectify identified gaps in learning) towards the end of the delivery process.

The AOs occasionally expressed some uncertainty about the optimal amount of support and guidance to provide. There were differing views about the amount and nature of exemplar materials that should be provided as well as about the extent of detailed guidance related to assessor judgements or teaching programmes. This was discussed earlier as an instance of lack of clarity and tension in relation to the domains and nature of AO responsibility and impact. Some AOs noted that some assessors or centres do not request or require detailed guidance, training or exemplars, or felt that they did not have time or sufficient resource to engage with them. This somewhat contrasts with the positive picture painted by some of our respondents about positive attitudes of practitioners towards receiving guidance and feedback and acting on it to improve their practices.

In addition to support and guidance, all AOs in our sample described complex and multi-faceted QA processes and strategies that, in their view, significantly mitigated the potential risks in relation to most assessment problems, but also to certain teaching, learning and delivery ones. Most AOs emphasised the importance of establishing from the start, through the centre approval process, that centres have appropriate occupational and assessment expertise to deliver the qualification, as well as appropriate processes in place to play their part in quality assuring their delivery and assessment through IQA. EQA monitoring was discussed as an important check and deterrent against inaccurate judgements, poor IQA and assessment practices, ineffective standardisation, as well as lenience and malpractice.

In relation to poorly conceived assessment tasks, AOs emphasised the importance of IQA to ensure that these are developed appropriately ahead of administration. Some AOs mentioned more explicit attempts to sample and monitor assessments at different stages of the development and delivery cycle. They also scrutinised centre assessment development processes, including related IQA activities, to help prevent assessment being based on poorly conceived tasks or events.

Various punitive measures on the back of EQA could be implemented, as well as monitoring of results patterns, to guard against lenience and malpractice.

Triangulation of evidence from different sources in addition to student work was also mentioned in relation to these problems, including looking at the assessment

management process, speaking to staff and students, observing assessment taking place or gaining intelligence from centres.

AOs explained that EQA could only be implemented through risk-based sampling, with the chance of residual incorrect assessment decisions or inappropriate assessment tasks slipping through the net. One possibility in such cases was to require further assessment opportunities for students, or implement other interventions, if issues were detected in final moderation. However, the AO actions in such cases typically involved assigning those centres a higher risk rating and, therefore, providing additional support and additional monitoring in the next academic year.

In relation to certain potential problems, for instance, atomistic judgement, it seemed that some EQA processes, such as observation of assessors in action, risked influencing assessor performance, inducing assessors to approach assessment more atomistically than they normally would. It also raises questions about the potential effectiveness of real time monitoring as a diagnostic tool for atomistic judgement. Perhaps for that reason, explicit EQA monitoring seemed to be less referenced in relation to that potential problem, as well as in relation to inappropriate support, with AOs mostly discussing various aspects of support and guidance as mitigations.

Some AOs also recognised the potential for EQAs to become biased in favour of the centres that they might have worked with for a long time, mitigating this by implementing a hierarchy of EQAs, with more senior and more junior ones monitoring each other. Some rotated EQAs across centres, so that no EQA would monitor a centre for more than 3 to 4 years.

Holistic aspects

While introducing holistic aspects as mitigations was discussed for a few assessment problems, this tended to be mentioned as particularly helpful in relation to teaching, learning and delivery problems. Some of the key mitigations that we coded under holistic aspects involved holistic or project-based approach to assessment and/or delivery, use of synoptic units, and use of sufficiently broad AC or LOs to enable contextualisation.

Broad AC or LOs were deemed essential for designing sufficiently flexible qualifications. This was also thought to promote the use of professional judgement by assessors, which was likely to be holistic rather than atomistic against broad criteria. In addition, holistic consideration of a wider pool of evidence potentially required by broader AC or LOs would be more likely to lead to more confident and accurate decisions and thus mitigate the risks of both arbitrary and inaccurate judgements.

AOs also gave examples of different ways in which synopticity might be ensured in their qualifications, helping to mitigate the potential risks of inauthentic assessment based on deficient atomistic judgements and lack of holistic learning. Most AOs characterised holistic approaches to delivery and assessment in the context of contextualised or real-life tasks as ensuring implicit synopticity of assessment and teaching and learning situations (across LOs or even units). This was often mentioned in qualifications delivered in the workplace, where such holistic assessment was deemed to require integration of learning as a matter of course to complete workplace tasks. Use of integrated workplace tasks and making the best use of naturally occurring events to accumulate assessment evidence was believed by some AOs to prevent negative washback into the natural coherence of teaching and learning in workplace settings. Additionally, it was deemed to optimise the assessment process, therefore, minimising potential undue assessment burden. Other AOs also explicitly included synoptic units in their qualifications to promote holistic assessment and enable application of integrated performance across the entire content domain of their qualifications, additionally helping to mitigate the potential problem of incoherent teaching.

Finally, AOs thought that holistic delivery in realistic situations ensured a more organic learning of the more esoteric skills and attributes in CASLO qualifications than in some other qualification types. Thus, holistic delivery in the CASLO approach was viewed as mitigating the risks of the hard-to-pin-down content getting missed by students even if such aspects were not explicitly outlined in qualification specifications nor directly assessed or assessable. Some AOs believed holistic delivery to provide natural opportunities for students to revisit and consolidate learning in the context of holistic practical tasks or situations, mitigating some of the risks associated with superficial learning. A few AOs saw holistic delivery as a hallmark of good teaching practice although some pointed out that highly integrated teaching across units might be too challenging for students in lower-level qualifications.

Despite various benefits, holistic aspects were recognised to raise challenges for ensuring sufficient judgement consistency, transparency and effective assessment design. It also appeared that, despite the intention of qualification designers for judgements against individual AC to “add up” to an overall judgement about the coherence and effectiveness of an integrated performance, this was not easy to ensure in practice, nor to reflect in the specifications of the AC or LOs.

Contextualisation, relevance and context-independence

Contextualisation and relevance of delivery and assessment were seen as highly protective against the risks posed by many of the potential problems discussed. For instance, contextualisation of AC was seen as one of key mitigations of the risks associated with inaccurate assessor judgements, while real-life or otherwise contextualised task setting was commonly seen as inherently protective against atomistic judgements. Judgements situated in context should be more holistic, as assessors have to take into account how the activities that happen during those tasks fit together, how students meet different requirements of the tasks, how they justify their decisions, and so on. Contextualised delivery was also considered to provide implicit coherence to the teaching and learning process, guarding against incoherent teaching.

In relation to task design, real-life, contextualised, task setting was considered to inherently ensure a high degree of validity, providing authenticity through the holistic assessment process. Many AOs discussed both the need for and the advantages of contextualisation to make assessment more effective in eliciting appropriate evidence, and to make it more supportive of students through a sense of relevance that such tasks are likely to engender. Contextualised assessment and delivery that were perceived as personally relevant to students were also deemed to guard against a superficial approach to learning with the sole aim of meeting the AC, especially where skills needed to be applied to (and frequently revisited during) day-to-day work practice. A sense of relevance from contextualised delivery and assessment was also deemed protective against perceiving assessment as burdensome as well as against demotivation or disengagement.

Some AOs noted that one of the sources of inappropriate support can be overly scaffolded assessment tasks. They suggested that task contextualisation helped to mitigate this risk because tasks anchored in a specific context lend themselves less to scaffolding and to formulaic responses. This was especially the case where assessment happens in real time and is part of a larger contextualised process (for instance, a theatre production rehearsal). These tasks or events were also less likely to lend themselves to repeated assessment with the sole aim of allowing students to eventually achieve a pass or a higher grade. In some qualifications, where assessment is carried out in a real-life setting, such as delivering a service for a client, the assessors would not provide feedback or guidance as this would be antithetical to normal workplace practices. This, then, also mitigated the risk of inappropriate feedback being given in the context of summative assessment situations.

Most AOs thought that their qualifications achieved appropriate specificity and personalisation through contextualisation, thus mitigating the potential problem of local or personal irrelevance. Where there was a need or attempt to assess some of the more esoteric aspects, it was thought that they could be more easily elicited and evidenced through assessment in contextualised situations.

While contextualisation was seen as helpful in relation to many teaching, learning and delivery problems, certain context-independent aspects were flagged as supportive of consistency in AC interpretation, and supportive of task design in terms of comparability. These were said to include certain types of skills, such as core technical or process skills, which involved following industry best practice protocols (often captured via NOS) or where standards were based on principles rather than specifics. These context-independent aspects were also seen as essential and non-negotiable to some qualifications, irrespective of personal or local preferences, and largely deemed to retain longer-term currency. This implied that potential problems such as local and personal irrelevance, lack of currency and downward pressure on standards did not apply to those, often fundamental, aspects of qualification content.

Occupational or professional expertise, assessment expertise and communities of practice

Alongside other mitigations, most AOs also emphasised the need for the practitioners involved in development, delivery and assessment of CASLO qualifications to have relevant occupational/professional expertise (including assessor or QA expertise and regular CPD) and to be members of a community of practice. These were suggested as key mitigations in relation to inaccurate judgements, as well as many other potential problems such as those related to content specification. Relevant occupational expertise should allow assessors to see the bigger picture and the significance of certain aspects of performance to meeting the AC rather than assessing in a mechanistic tick-box fashion, mitigating the risks of atomistic assessor judgements.

Some AOs also specifically emphasised assessment expertise as a potential mitigation of risks associated with inaccurate and atomistic judgement problems, as well as poorly conceived assessment tasks or events, but also suggested that this type of expertise was difficult to develop. This is unsurprising, given the complexity of expertise required by assessors, including needing to be flexible and able to tailor assessment to individual student needs, and able to plan and adapt assessment to sometimes challenging and dynamic workplace contexts. Less experienced assessors were deemed to be more likely to judge inaccurately or atomistically, being more dependent on AC specifications. Some concerns were also raised about

the effectiveness of assessor or QA qualifications, and how far they capture or reflect what assessors and IQAs or EQAs are meant to be doing in practice.

It was also suggested that communities of practice in this domain might be helpful, as well as longer-term familiarity with a single qualification or its previous incarnations. Communities of practice were deemed to be more reliable in smaller or long-standing sectors, and some AOs emphasised that it takes time and engagement with centres to engender these in relation to specific qualifications. While most AOs saw their normal support and guidance practices, alongside EQA, as helping to establish communities of practice, not all AOs actively promoted these through other means. It was also flagged that reliance on implicit understanding of standards within communities of practice needed to be balanced with sufficient adherence to AC as a strong sense of “sector expertise” might lead assessors to think that they have internalised the standard and result in impressionistic judging.

Occupational expertise and presumed ability to see implicit links in CASLO specifications were deemed as non-negotiable to enable effective and holistic teaching, mitigating the risks of incoherent teaching programmes and lack of holistic learning. Communities of practice in relation to pedagogy around long-standing qualifications also had the potential to bridge the gap between what was laid out in the qualification specification and how best to deliver it to students.

Qualification and assessment design processes

Qualification and assessment design processes were referenced relatively frequently across a subset of both assessment problems and teaching, learning and delivery problems. These typically involved multiple rounds of development and review by expert and stakeholder panels before the qualification is launched, sometimes involving centres or students, too.

The need for precision and clarity in writing the AC – to ensure that there is a good chance of them being interpreted accurately – was often emphasised, mitigating potential problems of inaccurate judgement, poorly conceived tasks or events, and, to some extent, lenience and malpractice. This helped to make common interpretation of AC more likely, supporting effective QA, too.

Effective qualification design processes, which made heavy use of stakeholder input by including employers, teachers or students in development or review panels or consultations, as well as periodic qualification reviews, mitigated risks around local or personal irrelevance, lack of currency and hard-to-pin-down content getting missed in specifications. AOs spoke about ensuring sufficiently robust qualification design processes and involving stakeholder feedback so that appropriate standards can be set in their qualifications. This helped to guard against downward pressure on standards. There was little detail in our data regarding how specifically the AOs went

about setting appropriate standards, but some AOs made references to notions of the “scope” or the “range” of a level and their understanding of typical students undertaking qualifications at a particular level.

Qualification and assessment design features

A number of specific qualification and assessment design features were mentioned as mitigations across most problems. These included command verbs, use of grading criteria or descriptors, different aggregation models including mastery model and multiple hurdles, the nature of constructs, and hybrid aspects such as use of external, mark-based, assessment.

Many AOs relied on command verbs, and, sometimes, grade descriptors, to help disambiguate the AC and thus mitigate the potential problem of inaccurate judgements. However, because most AOs resorted to somewhat underspecified, broader AC to allow for contextualisation, this meant that occupational expertise and a degree of assessor professional judgement were often deemed necessary in order to make contextualised, holistic judgements, as well as to design appropriate assessment tasks.

Command verbs were also seen as helpful in capturing different aspects of the content, mitigating the potential problem of hard-to-pin-down content getting missed. They also helped to denote the appropriate qualification level as a mitigation in relation to downward pressure on standards, and to provide some pointers about the nature of the assessment tasks. However, AOs were also aware that there were challenges in using command verbs consistently to differentiate between levels, and that the same command verbs could be used in a range of different tasks, targeting different AC. Nevertheless, some AOs mentioned the relative transparency of the AC as going a long way towards ensuring that the tasks targeting them were appropriate.

One AO suggested that the use of grade descriptors that apply across the relevant AC, rather than at individual AC level, helped to mitigate the potential problem of atomistic judgements. To mitigate the potential problem of incoherent teaching programmes, as well as a lack of holistic learning, another AO used grading criteria as descriptors to capture the alignment between assessment requirements and the content of teaching. The grading criteria were said to imply and “pull together” the range of content and skills that needed to be taught. This blurred the mapping between individual AC and the syllabus, which was provided separately from the qualification specification. Blurring this alignment between the AC and the syllabus was also thought to mitigate the potential problem of superficial learning.

There were several references to the mitigating effect of the mastery model, and multiple hurdles in assessment, across different problems. For instance, the mastery

model was mentioned as helpful in motivating centres to design appropriate tasks, and to take their role in this seriously, given the stakes imposed by the mastery requirement if students failed to meet certain AC due to task inadequacy. The requirements of the mastery approach and its multiple hurdles were deemed to provide greater assurance overall about whether the appropriate standard was reached. The strong mastery model rather than some form of compensation, and continuous rather than terminal internal assessment, were thought to be more helpful in this respect. These aspects were deemed to mitigate the risks of lenience and malpractice, particularly in relation to the pass or fail threshold, but also the risks of downward pressure on standards and superficial learning. In some qualifications where skills have to be evidenced on multiple occasions over time to cover the range, this was said to further mitigate the potential problem of superficial learning.

The mastery model was largely believed to contribute to student engagement rather than to cause demotivation with learning. Nevertheless, one AO implemented “summative grading” that derives the overall qualification grade only from the final unit that is taken towards the end of the course. This mitigation was intended to address possible disengagement among students who may have received lower grades in units taken early in their programme, potentially preventing access to higher overall qualification grades. Some AOs introduced certain elements of other aggregation models, such as “charity” aggregation, to prevent the overall qualification standard from being too harsh. Finally, some AOs suggested that a degree of contextual compensation, or compensation across AC, is in some instances legitimate, even though there has been a tendency for AOs to operate mastery at the AC level as well as the LO level. This AC-level compensation was thought to be beneficial in mitigating the risks of atomistic judgements.

Several AOs implied that assessment should focus as much on the overall performance, and to how the discrete activities that correspond to individual AC are integrated within it, as on the discrete activities in isolation. In some qualifications, a mechanism employed to ensure that the integrated character of the task is captured in assessment involves a strong task-level mastery requirement across all the relevant AC. That is, while the AC might correspond to individual activities, they are to be jointly met each time in the context of a broader procedure, arguably amounting to overall successful and integrated performance. This appeared to mitigate the risk of AC being individually met without reference to the broader procedure, as well as the risk of atomistic judgement being used in such cases. This way of operationalising the assessment of integrated performance may not be applicable in all contexts.

Several AOs also discussed the mitigating effects of the nature of the constructs in their exemplar qualifications. For instance, where a qualification involved constructs such as the creative process, AOs flagged that assessors can only reach a judgement about the student grade having seen the whole process. Therefore, the

nature of the construct seems to mitigate the potential problems arising from atomistic judgement made solely against individual AC.

There were suggestions that skills-related constructs, particularly basic technical skills, are more straightforward to assess reliably and validly than constructs such as knowledge. This implied that the potential problem of poorly conceived assessment tasks or events might be less of an issue for CASLO qualifications that largely deal with skills-related constructs. A relatively narrow focus on core content was deemed to mitigate potential problems such as superficial learning, demotivation or disengagement and undue assessment burden, through the sense of relevance this created in students, or through a reduction in the amount of assessment required.

Some AOs delivering certain 'confirm competence' qualifications (for instance, fenestration or construction) seemed to suggest that the nature of the construct of these qualifications meant that there were "no borderline performances" at the pass grade boundary. In these qualifications, the threshold between knowing and not knowing how to do something, or whether someone addressed or did not address pass criteria, was thought to be clear, and thus unlikely to serve as a smokescreen for lenience or malpractice. This implied that it would be relatively straightforward to detect these potential problems, at least at the pass grade boundary.

Several qualification or assessment design features were mentioned as mitigating the risk of superficial learning, including pass standards that are in themselves not minimal, alongside demanding content that requires a high level of engagement and perseverance to achieve the qualification. Progression to a higher level in a qualification where grading was not available was deemed to be motivating to students, further mitigating some of the risks of demotivation or disengagement.

Some AOs also implemented certain design features in their qualifications which promoted holistic approaches to teaching, learning and assessment. These included aspects such as consistent ("plan-do-review") unit structure that was repeated across different units despite their different context and focus. This aimed to instil a transferrable reflective approach in students towards their creative practice.

Hybrid aspects

There were several qualification design features that we classed as 'hybrid' in our analysis. One of these features was use of externally set and/or marked assessment as a mitigation for the risks related to poorly conceived assessment tasks or events. The 2 AOs in our sample that did have some externally set and marked assessments or components alongside the CASLO ones justified this by stakeholder or accountability demands. One of them argued that external assessments were perceived by stakeholders to be more reliable in providing assurance about some essential aspects of competence, such as health and safety.

Use of external assessment was also seen by one AO as improving the perception of the status and parity of their CASLO qualifications with academic qualifications, which typically use external assessment. This was thought to contribute to student engagement through a sense of completing a valued qualification. There were also perceived benefits for students who would gain experience and confidence from taking part in external assessment, deemed essential if they were to progress to higher education. However, this AO advocated thinking more widely about different ways in which external assessment could be designed, and going beyond solely paper and pen tests, to retain a sufficient degree of construct validity.

Several potential challenges of creating hybrid CASLO qualifications with externally assessed components were discussed. These involved a challenge of balancing the 2 approaches within the qualification and ensuring that the grade profile across internal and external assessments is not skewed by potentially poorer performance of students on external assessments. It was also suggested that different students might interact in different ways with different assessment methods, with some finding the task-based internal assessments more challenging.

Some comments also highlighted potential issues that might arise from unclear interaction between mixing internal and external assessment in qualifications that do not allow for qualification-level compensation, and where each individual component has to be passed to achieve the overall qualification. This could lead to unwelcome washback into teaching, with undue focus on some (typically externally assessed) components where there might be a perception that they would be more difficult to pass, even though the content in those components was not intended to be seen as more important than the content in internally assessed units. Some manageability issues for both centres and AOs in combining internal and external assessment in one qualification were also mentioned. One interviewee saw the challenges of hybridisation as a higher-level balancing act of considering what assessment methodology might be appropriate for certain sectors and what would be meaningful for each sector and for qualification users.

Overall, despite an awareness of the potential risks of centres devising poorly conceived assessment tasks or events, few AOs in our sample had external assessment in qualifications as a potential mitigation of those risks. Internal assessment and direct grading were seen to facilitate transparency and student engagement as well as contextualisation, all highly valued features of the CASLO approach.

While not using external assessment by examination, some AOs explained that in their qualifications, typically delivered in the workplace, assessment was often carried out by external (visiting) assessors, rather than by the students' own supervisors or other colleagues. In such cases, summative assessment was not continuous, helping to mitigate the potential problem of inappropriate support.

External assessors were also mentioned as mitigating the risks of lenience and malpractice. On the other hand, continuous internal assessment was seen by some AOs as more protective against malpractice than terminal internal assessment.

Terminal assessment, more generally, was more often than not seen as inferior in the context of the CASLO approach, and some AOs found it hard to see how it could be integrated in qualifications where the accumulation of large amounts of evidence over time, due to the mastery model, was seen as essential. Nevertheless, terminal assessment was indeed used in some qualifications in our sample, though it tended to involve large-scale projects or tasks rather than relatively brief written examinations.

Several other features that might be seen as hybridisations were proposed as mitigations of certain potential problems. For instance, one AO in our sample effectively tried to “quantify” some of the complexity involved in judging practical performances in their qualification. They described a hybrid approach to rewarding contextually justifiable partial performance via assigning a mark tariff to AC in some of their assessments and allowing for partial credit. They also used mark tariff without partial credit to, in effect, assign higher weighting to the AC that required full demonstration and where contextual factors should not play a role.

Several AOs discussed mitigations such as limited opportunities for resit or resubmission of evidence as ways to potentially increase the distinction between formative and summative assessment and reduce the opportunity for students passing based on inappropriate support. In some cases, the tighter resubmission rules were put in place to increase parity with academic qualifications because of perceptions that constant resubmission brings into question the level of demand of CASLO qualifications. However, to the extent that introducing additional constraints on learning time might present incentives for lenience and malpractice, even if they mitigate the potential problem of inappropriate support, there may be a need for additional mitigations for these risks in qualifications with such restrictions.

Supporting learning

There were several CASLO qualification design features that we grouped under the mitigation type called supporting learning. This is because all these features promoted flexibility in qualification delivery and assessment, which was deemed by many AOs as fundamental for helping to enhance student engagement with learning, creating opportunities for learning and improving qualification achievement.

These features included no time constraints on learning, multiple assessment and resit opportunities, unit-level achievement or credit, possibilities to extend the course time, special consideration policies, and use of calculated grades for missed units. They were often discussed in terms of their potential to remove incentives for centres

to pass students before they reached the required standard. By doing so, these features mitigated the risks arising in relation to the potential problems of lenience and malpractice, downward pressure on standards and demotivation or disengagement. In relation to demotivation in particular, mitigations such as unit-level certification were deemed to provide a “safety net” for students and to reduce the likelihood of disengagement due to a sense of failure of an entire qualification.

Several other mitigations, for instance, teaching broader content and investing in life-long learning by employers were deemed to reduce the risks of local or personal irrelevance and lack of currency. Expectations from centres to teach broader skills were also deemed by AOs to help bridge the potential gaps in qualification specifications in relation to more esoteric content that was considered valuable though not essential, and which might otherwise be missed. Undue assessment burden and demotivation or disengagement were also considered to be mitigated by engaged tutors, and continuous tutor support, sufficient guidance and feedback for students. These enabled students to take some ownership of the assessment process, which was additionally helped by the transparency of qualification specifications. Some AOs also saw the value of a teachers’ ability to track individual student progress and to motivate students with tailored approaches and individual support as further mitigating the risks of demotivation or disengagement. In relation to undue assessment burden, flexible delivery which is student-focused and bespoke, helps centres to make potential time savings by focusing less on areas where students might have prior expertise. For some, this included flexibility in the type of evidence that might be collected, which reduced the burden on centres and students.

As already mentioned, some supportive aspects such as unlimited resits were limited in some qualifications to combat other problems such as inappropriate support. In such qualifications, the AOs believed that there was an onus on centres to evaluate the effectiveness or impact of their teaching and whether students might be summatively assessed too early in some cases.

Inputs

Different aspects of inputs to teaching and learning were largely discussed as mitigations for teaching, learning and delivery problems, although a small number were discussed in relation to certain assessment problems. AOs mostly discussed inputs in relation to the potential problem of incoherent teaching programmes. These included 3 broad types, namely, lists of content or syllabi, schemes of work and pedagogy.

The AOs did not always explicitly differentiate between the types of inputs in terms of their potential advantages and disadvantages. Indeed, some AOs only discussed one of these types, expressing sometimes negative views towards it and implying

that the same might hold across any type of input. However, collectively, the AOs appeared to have distinct views about the different input types in terms of how useful or feasible they perceived them to be in the context of their qualifications, and how frequently they used them to mitigate the potential problem of incoherent teaching. Overall, based on what the AOs said about their practices in relation to the potential problem of incoherent teaching programmes, the LO-based specifications did not appear to be inherently incompatible with inputs such as syllabi or pedagogy guidance, contrary to some suggestions in the literature.

Most AOs provided some form of mandatory or indicative content lists, and some support in relation to pedagogy, mostly revolving around holistic approaches to delivery and, sometimes, advice in relation to approaches to revision or progression through the curriculum. The AOs seemed broadly in favour of supporting teaching and learning in this way, as long as the content was specified at a sufficiently high level to allow contextualisation. Some recognised the need for a certain level of prescriptiveness in content to support comparability of student experience and the use of their qualification results by stakeholders, especially where this was for HE selection purposes.

None of the AOs in our sample provided prescriptive schemes of work, though some did offer exemplars of these, or EQA support in developing such schemes. The need for contextualisation and tailoring of delivery was perhaps the main reason why the AOs were less in favour of providing centres with prescriptive schemes of work even where they recognised the potential problem of incoherent teaching. They argued that centre autonomy and ability to deliver qualifications in the way that worked for their context and students was paramount in these qualifications. This was perhaps more strongly expressed by the AOs that delivered the 'confirm competence' qualifications, who thought that the professional expertise of assessors was what was required instead of prescribed schemes of work. The AOs that delivered primarily college-based qualifications, especially those that are more explicitly time-bound, seemed to be more conscious of potential resource or expertise limitations in centres. They seemed more overtly supportive in terms of providing guidance about delivery approaches to centres, though these were never compulsory. Whether some 'confirm competence' qualifications could reap some benefits from greater emphasis on more explicit pedagogy may be worth exploring further.

Inputs such as screening assessments to ensure the appropriateness of students for their chosen courses – alongside (perhaps obviously) sufficient teaching – were deemed as important mitigations of downward pressure on standards. Assessment and delivery planning, as well as EQA support with planning, were seen by several AOs as important mitigations reducing the risk of undue assessment burden for both students and tutors and helpful in relation to the potential problem of inappropriate support. These aspects were also considered to mitigate the risks of lenience and

malpractice by ensuring sufficient time to collect evidence, and then to assess and QA it.

Implicit content links

The notion of implicit links across qualification content featured quite prominently in relation to several teaching and learning problems, in particular those of incoherent teaching programmes and lack of holistic learning. In relation to incoherent teaching programmes, several AOs suggested that implicit content links, or the implied best order to teach units or content within units, emanates from the nature of the domain of their qualifications, such as the creative process, and should be apparent to occupationally expert practitioners.

Other implicit aspects mentioned were those of a natural or implicit progression in the complexity of some of the tasks or skills, believed to be familiar to teachers, which also helped to ensure teaching coherence. Some AOs also discussed the benefits and drawbacks of implicit alignment between teaching and assessment, where the assessed curriculum provides insights into the taught curriculum helping to ensure coherent teaching. However, they noted that this might also lead to the content that is taught being overly driven by what is assessed, potentially limiting the breadth of the curriculum.

One AO suggested that where units could be completed in any order, this might exacerbate the potential problems of superficial and holistic learning as it becomes more difficult to utilise certain links between units to revisit and embed knowledge and skills. Several AOs implicitly agreed with this view, arguing that their exemplar qualifications benefited from “organic”, implicit links between units, which fed into each other. One AO suggested that it was necessary, where possible, for qualifications to be designed to allow “units to integrate”, enhancing the implicit links between them. The same AO suggested that repeating similar criteria across units can help achieve this aim, particularly in larger qualifications with many related components.

In relation to the potential problem of hard-to-pin-down content getting missed, several AOs suggested that some of the more complex or esoteric outcomes were implicit in qualification levels even if not stated in the qualification specification. For instance, level 3 would imply a higher degree of expectation regarding a construct such as autonomy than level 2. More generally, according to some AOs, the fact that this content was implicit did not mean it was missing, as such content would be acquired in the course of teaching and learning due to the contextualised, holistic nature of delivery, as a value-added benefit of teaching and learning in CASLO qualifications.

Attitudes and disincentives

In relation to potential problems of lenience and malpractice, it was interesting to observe the extent to which AOs referenced positive attitudes of different practitioners and stakeholders (tutors, assessors and employers). Their integrity, professional standards, high expectations from students and sense of pride or vocational passion were suggested as perhaps equally important as QA processes. This included the need for a degree of trust between these actors and the AOs. Relatedly, some AOs noted that despite perceptions that employers who deliver qualifications to their own staff (“employer centres”) might be incentivised to pass students that did not meet the standard, this was unlikely to be the case. This was attributed to the positive attitudes of employers towards employee upskilling and delivering qualifications “for the right reasons”, genuinely wanting to improve their employees’ skills. There was a sense in AO comments that these kinds of attitudes and QA processes had to go hand in hand to enable successful delivery of CASLO qualifications, and that positive attitudes to some extent compensated for limited resources on the QA side.

When discussing the potential problem of poorly conceived assessment tasks or events, some AOs pointed out that assessors often had positive attitudes towards creating engaging and high-quality assessment tasks, and towards their own professional development in assessment design. This was because assessors felt professionally invested in sharing their expertise and skills, both as practising professionals with their students and as assessment practitioners with other assessors. These kinds of attitudes were also said to help reduce the sense of undue assessment burden as assessors take pride in both their assessor role and in seeing the achievement of their students rather than seeing assessment as burden.

Proactive attitudes of centres about doing “meaningful assessment” and teaching broader enriching content, irrespective of whether these were explicit in qualification specifications, were deemed helpful in mitigating some of the risks linked to the potential problem of hard-to-pin-down content getting missed. Some risks around downward pressure on standards were mitigated by AO integrity and an awareness of the requirements for student progression, which would not allow these organisations to deliberately dumb down standards.

Student engagement, vocational passion, and a sense of choice and agency were considered to play a helpful role in mitigating the risks related to superficial learning. AOs offering creative practice qualifications added that their subject-matter created a “natural barrier” against superficial learning. This was because delivering poor creative pieces, even where these might meet the minimum standards of the qualification, would be an unpleasant experience for the students. Some AOs offering qualifications that support progression to HE suggested that students tended

to know what grades they would need to achieve to progress to specific higher education courses and, therefore, would not be willing to “settle with just scraping through”. It was suggested that this attitude enabled students to challenge low quality teaching where teachers may just be aiming to get them to achieve minimal standards to pass rather than to achieve higher grades.

Student agency and choice in pursuing the qualifications that they were interested in further reduced the sense of undue assessment burden and demotivation. Both students and tutors were believed by the AOs to accept assessment as integral to their experience, and necessary for the qualification to achieve its broader purposes despite assessment being fairly extensive, reducing perceptions of assessment burden.

Some AOs mentioned the notion of managing stakeholder expectations, as well as expectations of students in some cases, as a way of mitigating certain risks. For instance, qualifications where there was an emphasis on relatively narrow, core skills – to ensure that students mastered them in the allotted time while guarding against disengagement and dropout – limited the time devoted to other, more peripheral though potentially useful, skills. Therefore, employer expectations about how much additional training students might need to receive on the job in relation to such skills had to be managed. Simultaneously, student expectations had to be managed to accept that such core skills, even if not stimulating in terms of creativity, needed to be sufficiently mastered. Making students realise that only well-embedded core skills can be later personalised or built on creatively in higher-level qualifications, mitigated the risks of personal irrelevance of content and demotivation or disengagement.

Similarly, in one ‘dual purpose’ qualification, the AO emphasised the need to manage the expectations of qualification users about the standards that students were likely to achieve. As these qualifications prepare students for entry-level positions, further learning should be expected.

Prioritisation

AOs made reference to different aspects of prioritisation given resource limitations in several areas. For instance, QA processes as a mitigation of inaccurate judgements were based on risk-based sampling, and, therefore, focused more extensively on higher-risk areas. There were references to prioritisation in relation to other mitigations of this potential problem, for instance providing only limited student work exemplars to centres, as this was not possible for every unit or every AC. The AOs had to prioritise areas which were either perceived to be core, higher-stakes, or known to be more prone to inaccurate judgements. Similar approaches to prioritisation were mentioned in relation to providing task exemplars to mitigate the potential problem of poorly conceived assessment tasks or events and in relation to standardisation. For example, some AOs focused cross-centre standardisation on

graded qualifications rather than those that only required pass or fail decisions, because of the perception that grading consistently was more challenging for assessors. Similarly, in relation to monitoring potential lenience, some AOs suggested prioritising higher-grade assessment decisions over those at the pass threshold during moderation activities.

There were also some references to prioritisation in the context of the potential problem of undue assessment burden. This problem was considered to be partly mitigated by ensuring that centres streamline and optimise the assessment evidence that they collect and provide to AOs. In relation to superficial learning, some AOs emphasised that the content in their qualifications is streamlined and prioritises core skills, which in turn helped mitigate this potential problem by ensuring student engagement through content relevance. Relatedly, in relation to demotivation, where there were time constraints on learning, core skills were prioritised to allow enough time for them to be mastered.

These mitigations for the latter 2 problems might raise some questions about whether in CASLO qualifications with a broader educational purpose and content – which might not appear to the students as immediately relevant – the potential problems of superficial learning or demotivation might be exacerbated, especially under pressure of time-constrained courses. Furthermore, where content had to be slimmed down to the exclusion of potentially important, though not core, skills and knowledge, this might raise questions about how far a balance between specificity and breadth of content can be successfully struck under significant time constraints.

Conclusion

The AOs described complex constellations of mitigations and protective factors that are embedded in CASLO qualifications to ensure their quality and value. We observed instances of creative solutions to specific problems, some variability in the profile and plausibility of specific mitigations, some tensions between certain mitigations, and some differences in perceived seriousness of individual problems. The latter appeared to depend, at least in part, on different contexts and qualification uses, as well as on the perceived extent of responsibility of AOs in the educational ecosystem beyond solely assessment and certification.

While recognising many of the potential risks associated with the CASLO approach, and the resources required for its implementation, AOs were confident in the validity and value of their qualifications. They often invoked stakeholder approval and recognition for their CASLO qualifications, challenging the suggestion in the academic literature that the CASLO approach might be inherently sub-optimal.

We have qualifications with external assessment in them. It's a very different learning experience for students. I think, ultimately, our strong feeling is that CASLO qualifications, or our model of CASLO qualifications, work really well for our students. If someone introduced us to another model that we found to work better, we would explore that as well, but for us, at the moment, with our ethos and the learning experience that we're trying to offer students in relation to vocational experience, this model works really well. [...] creative arts learning and education is a community of its own, [...] and they tell us that our qualifications serve their needs. So that's really what informs us. [...]. And obviously it's difficult, but we do it and we believe we do it well. Creative_L3

[...] I should say we have recognition by 5 or 6 different professional bodies for the qualifications, so they think that we have done it in a way that represents their needs. Construction_L5

[...] I think it would be a sad day if we ever lost it [the CASLO approach] because I do think there are individuals out there that [have] been let down by the traditional system of education, so having a different approach to enable them to get the recognition for the work that they do, and also a route into other work that they want to do, I think we do need an alternative [...]. End of life care_L2

CASLO qualifications can be absolutely fine. Yeah, they've got weaknesses [...] but, equally, if they're delivered by good teachers who know what they're doing, with a good IQA and good support from the EQA, you can be pretty confident the learner's going to get a good experience and get through it. Adult care_L3

It is, perhaps, of note that the most recognised potential assessment problem involved inaccurate judgements, while the most recognised teaching and learning problem involved incoherent teaching programmes. Both of these problems relate to the defining properties of the CASLO approach and the ability of the transparency mechanism to support the functioning of CASLO qualifications by ensuring that teaching, learning and assessment domains (or curriculum, pedagogy and assessment) align appropriately and are interpreted consistently.

According to what many AOs told us, LO- and AC-based specifications on their own are unlikely to ensure the transparency of this alignment entirely, and need further elaboration through syllabi, support and guidance, and other means. In one sense, this might be seen as an acknowledgement of the force of certain key criticisms in relation to current CASLO qualifications. Yet, in another sense, it can be seen as a reminder that the CASLO approach is adaptable, to achieve optimal functioning. For instance, it was clear from various AO comments and practices that the CASLO approach is not incompatible with or antithetical to specifying quite detailed syllabi and providing support and guidance to teaching and learning in addition to LOs.

The insights provided by our respondents seem to suggest that high quality CASLO qualifications should strive for an appropriate balance between ensuring educational value, reliability, validity, and manageability, bearing in mind the specific purposes these qualifications are intended to serve. Furthermore, given the extent of interdependence between teaching, learning and assessment in CASLO qualifications, it would stand to reason that ensuring a high level of alignment between the actors in these different areas would also help to ensure optimal functioning of these qualifications. Effective regulation of CASLO qualifications is likely to require a nuanced understanding of the abovementioned tensions, balances and domains of responsibility in different contexts. The current study has hopefully moved that understanding forward.

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Appendix 1: Exemplar qualifications

Table 4 Exemplar qualifications

Abbreviation	Title	Qual No.	Level	Primary purpose	Total Creds	GLH	TQT	Grading Type	Total certs until end of 2023	Certs for 2023 (Q1-Q3)	Operational start date
Adult care_L3	NOCN Level 3 Diploma in Adult Care (England)	610/0088/7	3	Confirm competence	58	372	580	Pass/Fail	95	5	01/05/22
Business_L3	Pearson BTEC Level 3 National Extended Certificate in Business	601/7159/5	3	Dual purpose	-	360	480	Graded	60,450	11,410	01/06/16
Chef_L2	iCQ Level 2 diploma in Professional Chef (England)	603/4270/5	2	Confirm competence	85	574	850	Pass/Fail	25	25	01/07/19

Responding to Criticisms of the CASLO Approach (Report B)

Construction_L1	ICM Level 1 Certificate in Construction Skills	Non-regulated	1	Dual purpose	16	160	160	Pass/Fail	-	-	
Construction_L5	Pearson BTEC Level 5 Higher National Diploma in Construction Management for England	603/7859/1	5	Dual purpose	240	960	2400	Graded	-	-	01/09/23
Creative_L2	RLS Level 2 Certificate in Creative and Performing Arts (Specialism: Performing & Creating, Performing	601/8614/8	2	Dual purpose	-	120	200	Graded	125	15	01/09/16

	g Arts Business & Productio n) (non- performa nce tables)											
Creative_L3	UAL Level 3 Diploma in Creative Practice: Art, Design & Communi cation	603/5 302/8	3	Dual purpose	72	540	720	Graded	16,19 3	6,032	01/09/20	
End of life care_L2	IAO Level 2 Certificat e in Principles of End of Life Care	601/6 185/1	2	Confirm competence	16	135	160	Pass/Fail	70	0	01/06/15	
Fenestration_ L2	GQA Level 2 NVQ Diploma in Fenestrat ion	500/7 825/2	2	Confirm competence	37	232	370	Pass/Fail	7,625	85	01/01/10	

Responding to Criticisms of the CASLO Approach (Report B)

	Installation											
First aid_L3	ITC Level 3 award in Outdoor First Aid	601/7 616/7	3	Confirm competence	2	16	20	Pass/Fail	16,725	2,315	01/10/15	
Hairdressing_L2	VTCT Level 2 Diploma in Women's Hairdressing	500/8 976/6	2	Confirm competence	52	448	520	Pass/Fail	10,720	1,060	01/08/10	
Housing_L5	CIH Level 5 Diploma in Housing	601/8 133/3	5	Confirm competence	32	128	320	Pass/Fail	600	45	01/12/15	
Skin peel_L4	GA Level 4 Award in Chemical Skin Peeling	610/0 703/1	4	Confirm competence	12	60	120	Pass/Fail	10	0	21/03/22	
Teaching support_L2	NCFE CACHE Level 2 Certificate in Supporting	603/2 476/4	2	Confirm competence	32	225	321	Pass/Fail	17,520	3,340	01/01/18	

	Teaching And Learning										
Procurement_	CIPS	603/3	4	Confirm	60	250	600	Pass/Fail	4,590	935	31/01/19
L4	Level 4 Diploma in Procurement and Supply	924/X		competence							

Appendix 2: Interview schedule

Exemplar qualification – rationale

First of all, we'd like to discuss your views about the CASLO approach in the context of your Exemplar qualification, so we're keen to understand:

- why you've adopted the approach for this qualification, including
- why you think the approach works particularly well in this context, or
- why it might work better than a more classical approach

And, just as a reminder, by the 'CASLO approach' we mean:

- defining qualification content and standards in terms of detailed LOs and AC
- requiring students to achieve all specified LOs to pass the qualification (mastery)

- 1) Why do you think the CASLO approach is particularly well-suited to your own Exemplar qualification?
 - a) Is it particularly suitable given its **purpose, cohort, context, or progression** routes? In what ways?
 - b) Is it particularly **valued** by stakeholders? Which stakeholders? Why?
 - c) Does it work particularly well in terms of ensuring **effective learning**? How? How do you know?
 - d) Does it work particularly well in terms of ensuring **high-quality assessment**? How? How do you know?
 - e) Have you **adapted** the CASLO approach at all for your Exemplar qualification – maybe tweaked it, or hybridised it?
 - i) How? Why? What effect do you think this has had?
 - f) Have you built any **extra controls** into the CASLO approach for your Exemplar qualification?
 - i) How? Why? What effect do you think this has had?
- 2) How important do you think the mastery approach is to your Exemplar qualification (that's the idea of requiring students to achieve all of the LOs)?
 - a) Why? What are the consequences of adopting a mastery approach?
 - b) Is the mastery approach applied strictly, or do assessors get to make any allowances, or is compensation used at all?

- 3) Is entry to this qualification open to anyone, or do students have to satisfy formal or informal entry criteria? Is any prior knowledge or competence assumed?
 - a) How do centres determine whether students are ready for the qualification, in terms of prior learning?
- We're going to move on, now, to the main body of the interview and discuss some potential problems for CASLO qualifications from the literature, which we've grouped into 3 categories:
 - Assessment challenges
 - Learning and teaching challenges
 - Delivery challenges

Assessment challenges

The literature identifies various problems that involve assessors applying CASLO standards inaccurately or incorrectly:

- sometimes their judgements are too harsh or too lenient, but unintentionally so
- other times their judgements might be intentionally too lenient

We'll explore each of these cases separately.

Section A: Inaccurate judgements

- 1) The literature identifies problems related to assessors making inaccurate judgements, meaning that some students pass when they shouldn't, and some students don't pass when they should.

According to the literature, that happens because assessment criteria are very hard to write precisely – and they're very hard to interpret precisely – which is a big problem for the CASLO approach because assessors need to make heavy use of these written criteria when judging student performances.

Clarity and Range

- 1) We've brought along an example of learning outcomes and assessment criteria for your Exemplar qualification.

Some critics say that written statements alone – like these – are too imprecise to communicate the threshold between passing and not passing (that is, between satisfactorily achieving or not achieving).

 - a) How do you make sure that your qualification standards are communicated with sufficient precision?
 - i) Do you rely purely on written assessment criteria?

- ii) What steps do you take to ensure that your assessment criteria are communicated as clearly as possible (cf. our example) – including to, for example, new centres?
 - b) [For qualifications with grades] Do you face any particular problems when trying to define thresholds between different grades?
 - i) Do you rely purely on written grading criteria?
 - ii) What steps do you take to ensure that your grading criteria are communicated as clearly as possible (cf. our example)?
 - iii) When you use command verbs (from Bloom’s Taxonomy) to illustrate different levels of performance, how can you be sure that all assessors will interpret and apply them in the same way?
 - c) Do you use any additional guidance to elaborate your assessment criteria (or grading criteria) for example, exemplars, guidance on sufficiency of evidence?
- 2) Some critics say that assessment criteria need to be supplemented by range statements, to indicate the range of contexts across which students need to demonstrate competence (for each LO or for each AC).
- a) Do you use range statements (or anything similar) for your Exemplar qualification?
 - i) how strictly are they supposed to apply (mandatory or illustrative)?

Assessor judgements

- 1) Some critics say that there is more to having met a learning outcome than having satisfied a list of assessment criteria, but that this gets missed when assessors are reduced to ticking-off criteria lists, criterion by criterion.
 - a) Do you recognise this as a potential criticism of your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of arbitrary judgements that are constrained by criteria lists?
 - ii) [if NO then] why doesn’t this criticism seem to be relevant?
 - b) To what extent are assessors expected to apply assessment criteria holistically rather than atomistically?
 - i) might assessors introduce an element of compensation at this level, not necessarily requiring all AC to have been ticked off?
 - ii) what support do you provide to help assessors to make any holistic judgements as consistently as possible?

Assessor standardisation

- 1) Some critics say that assessor standardisation tends not to be very effective for CASLO qualifications because
 - it happens too infrequently, or
 - it focuses more on procedures than standards, or
 - it's just hard to develop effective guidance and exemplars
 - a) Do you recognise ineffective standardisation as a potential criticism of your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of ineffective standardisation? Do you have any specific requirements of centres? Is there any external standardisation (facilitated or organised by AO)?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 2) Some critics argue that standards ultimately reside in the shared understanding of a community of practice (rather than in written criteria). So, it's important for an assessor to be an active member of a sector-based community of practice in order to be able to apply standards consistently.
 - a) Would you agree with that position?
 - i) [if YES then] have you put anything in place to facilitate communities of practice relevant to your Exemplar qualification?
 - ii) [if NO then] why don't you agree with the position?

Assessment tasks or events

- 1) Some critics say that having detailed assessment criteria to judge the quality of student performances makes it look like the assessment process is extremely straightforward. However, because assessors often fail to appreciate just how hard it can be to elicit the right kind of assessment evidence in the first place, CASLO qualifications are very vulnerable to being based on poorly conceived assessment events or poorly designed assessment tasks (that don't elicit the right kind of evidence).
 - a) Do you recognise poorly designed assessments as a potential criticism of your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of poorly designed assessments?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
 - b) If you devolve significant responsibility for designing assessment tasks or events to centres, then
 - i) how do you ensure that those tasks or events always elicit high quality evidence?

- ii) how do you ensure that those tasks or events are sufficiently comparable in terms of the demands that they make of students?

Section B: Lenience and malpractice

- 1) Some critics say that the imprecision of assessment criteria can act as a sort of smokescreen for assessors, allowing them to be intentionally lenient for students who haven't quite reached the qualification standards (we'll call this giving undue benefit of the doubt).

This can be exacerbated towards the end of sessional courses, for students who are just about to leave, but who still haven't quite achieved all of their LOs.

- a) Do you recognise assessors giving undue benefit of the doubt as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of this happening?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 2) Some critics say that the line between formative and summative assessment gets blurred when using the CASLO approach, and this can lead to students being given too much support and then being assessed at a higher level than they have independently achieved.
 - a) Do you recognise inappropriate support as a potential threat to your Exemplar qualification? How would you detect it?
 - i) [if YES then] what steps do you take to reduce the risk of this happening?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 3) Occasionally, assessors try to pass students who are a long way from meeting the qualification standards (we'll call this malpractice). They can get away with this – according to some critics – because it's extremely hard to detect and correct inaccurate assessor judgements under the CASLO approach.
 - b) Do you recognise this kind of malpractice as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of this happening? How would you detect it?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?

Learning and teaching challenges

The literature identifies a variety of problems that allegedly arise from the way in which CASLO qualifications are specified. They either criticise:

- what students end up learning, or

- how well students end up learning, or
- whether students end up learning what they need to learn.

We'll address each of these criticisms separately.

Section C: What students learn...

- 1) Because CASLO qualifications are extremely explicit about the learning outcomes that need to be acquired, this has led some critics to claim that they are too inflexible to respond to:
 - local economic needs, or
 - the bespoke needs of small employers, or
 - students with particular interests or aspirations, including demands made by higher level courses
 - a) Do you recognise local or personal irrelevance as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to facilitate local or personal relevance for your Exemplar qualification?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 2) Some critics have said that the level of detail in CASLO specifications inevitably ties them to existing work functions, or to contemporary concerns, which limits their currency and means they provide poor preparation for future demands.
 - a) Do you recognise a lack of currency as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of it arising?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 3) Some critics have said that learning outcomes that are essential to a qualification – but that are very hard to put into writing – get left out of CASLO specifications, which means that students miss out on essential learning (for example, outcomes like 'independence' or 'autonomy' or 'problem solving' or 'professional judgement').
 - a) Does your Exemplar qualification include learning outcomes that are very hard to put into writing?
 - i) [if YES then] how have you dealt with this challenge?
 - ii) [if NO then] are you confident that students are not missing out on essential learning, given the difficulty of writing complex LOs?
 - b) Are LOs harder to write and pin down for higher level qualifications (L4 and above)?
 - i) Are there any challenges in achieve appropriate differentiation between qualification levels via LOs?

Section D: How well students learn...

- 1) Because awarding organisations have to specify standards that can be achieved by all students, critics say that this puts a downward pressure on standards, meaning that no single learning outcome can be pitched at a level that is beyond the reach of the lowest attaining student (within the targeted cohort, that is).
 - a) Do you recognise this downward pressure as a potential threat to your Exemplar qualification?
 - i) [if YES then] have you been able to tackle, or mitigate, it? (How would you spot this?)
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
- 2) Critics say that because CASLO qualifications pay so much attention to learning outcomes – which can downplay the importance of an underpinning syllabus – many teachers fail to compensate for this and they fail to deliver coherent teaching programmes.
 - a) Do you recognise the lack of a detailed syllabus – or the lack of guidance on how to teach the qualification – as a potential threat to your Exemplar qualification?
 - i) [if YES then] have you been able to tackle, or mitigate, it? (How would you spot this?)
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
 - b) Do you design your unit specifications to capture anything important about **progression in learning**, or how learning is **best sequenced**?
- 3) Because CASLO qualifications represent learning outcomes one by one – and without representing how those learning outcomes relate to each other – some critics say that students fail to learn holistically. This means that their learning is neither systematic, nor integrated, nor co-ordinated, which leaves them unable to apply their learning effectively.
 - a) Do you recognise the failure to learn holistically as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of students failing to learn holistically? (How would you spot this?)
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
 - b) Do you believe that your Exemplar qualification does manage to specify learning outcomes holistically? How?
 - i) Are there some units in your Exemplar qualification that are more difficult to specify holistically? Which ones? Why might this be the case?

- c) Is your Exemplar qualification designed to assess learning outcomes holistically, or synoptically? How?
 - i) Does unitisation provide a barrier to this?
- 4) Because CASLO qualifications specify learning outcomes one by one – and because they focus attention on detailed lists of criteria that need to be met for each learning outcome – critics say that this disposes students towards superficial learning.

This might involve demonstrating the minimum possible performance on each criterion for each learning outcome – then moving on to the next learning outcome – and not revisiting learning outcomes that have already been achieved and therefore not consolidating their learning.

 - a) Do you recognise superficial learning as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of students learning superficially?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
 - b) Are there particular steps that an AO, or centre, can take to facilitate robust learning?

Section E: Whether students learn...

- 1) Critics note that there is often a heavy burden associated with completing and documenting assessments, which can be demotivating. The requirement to achieve each and every learning outcome can also be demotivating – particularly when a student begins to fall behind – and this can result in disengagement and non-completion.
 - a) Do you recognise demotivation and disengagement as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of it happening?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?
 - b) Are there particular steps that an AO, or a centre, can take to help engage students?

Delivery challenges

Section F: Burden

- 1) We've already touched on this criticism to some extent. It's basically the criticism that the mastery requirement forces students and teachers to spend so much

time being assessed – and so much time documenting their assessments – that it ends up being a hugely burdensome process.

- a) Do you recognise this as a potential threat to your Exemplar qualification?
 - i) [if YES then] what steps do you take to reduce the risk of undue assessment burden?
 - ii) [if NO then] why doesn't this criticism seem to be relevant?

Final observations

- a) Now that we've reached the end of the interview, are there any final observations that you'd like to make, to help us to understand the difference between a 'stronger' CASLO qualification and a 'weaker' one?
- b) Is there anything else at all that you'd like to say
 - i) about your Exemplar CASLO qualification?
 - ii) about the CASLO approach more generally?
 - iii) or about how you've found the interview?

Appendix 3: Recognition status of potential problems by qualification²³

Table 5 Recognition status of potential problems by qualification – assessment problems

Problem	Atomistic assessor judgements	Inaccurate judgements	Inappropriate support	Ineffective standardisation	Lenience	Malpractice	Poorly conceived assessment tasks/events
Adult care_L3	Yes	Yes	Not entirely	Yes	Yes	Not entirely	Yes
Business_L3	Yes	Yes	Yes	Not entirely	Yes	Yes	Yes
Chef_L2	Yes	Not entirely	N/A	Yes	No	Yes	Yes
Construction_L1	Not entirely	Yes	Yes	Yes	Yes	Yes	Yes
Construction_L5	Not entirely	Yes	Yes	Not entirely	Yes	Yes	Yes
Creative_L2	Not entirely	Yes	Yes	Yes	Yes	Yes	Yes
Creative_L3	Not entirely	Yes	Yes	Yes	Yes	No	Yes

²³ Recall that our interview questions were framed in terms of ‘potential’ problems rather than ‘actual’ problems. Therefore, by saying that AOs ‘recognise’ a problem, that means that they recognise it as (at least) a potential problem (though some might also recognise it as an actual one). See explanation in the Analysis section about the use of the categories presented in the tables in this appendix.

End of life care_L2	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Fenestration_L2	Not entirely	Yes	Yes	Yes	Not entirely	Yes	No
First aid_L3	No	Yes	Yes	Yes	Not entirely	Not entirely	Not entirely
Hairdressing_L2	Not entirely	Yes	Yes	Not entirely	Yes	Yes	Yes
Housing_L5	No	Not entirely	Yes	No	No	Yes	Yes
Skin peel_L4	No	Yes	No	Yes	Not entirely	Yes	Not entirely
Teaching support_L2	Yes	Yes	Yes	Yes	Yes	Yes	Yes

Table 6 Recognition status of potential problems by qualification – teaching, learning and delivery problems

Problem	Content hard to pin down gets missed	Demotivation/ disengagement	Downward pressure on standards	Incoherent teaching	Lack of currency	Lack of holistic learning	Local or personal irrelevance	Superficial learning	Undue ass. burden
Adult care_L3	Not entirely	Yes	No	Yes	No	Yes	Yes	Not entirely	Yes

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Business_L3	Not entirely	Not entirely	Yes	Yes	No	Yes	No	Not entirely	Not entirely
Chef_L2	Yes	Not entirely	No	Not entirely	Yes	Not entirely	Yes	Not entirely	Not entirely
Construction_L1	No	Not entirely	No	Yes	Not entirely	Yes	Yes	Not entirely	Yes
Construction_L5	Not entirely	Yes	N/A	Yes	No	Not entirely	Not entirely	Yes	No
Creative_L2	Not entirely	Not entirely	No	Not entirely	No	Yes	No	Not entirely	Not entirely
Creative_L3	Not entirely	Not entirely	Yes	Yes	No	No	No	No	Yes
End of life care_L2	Yes	Yes	Not entirely	Yes	Yes	Not entirely	Not entirely	Yes	Not entirely
Fenestration_L2	No	Not entirely	No	Not entirely	Not entirely	No	Not entirely	Not entirely	No
First aid_L3	No	N/A	No	No	No	Not entirely	No	Not entirely	No
Hairdressing_L2	Yes	Not entirely	Not entirely	Yes	Not entirely	No	Not entirely	Not entirely	Yes
Housing_L5	Yes	No	No	No	No	No	No	Not entirely	Not entirely

Skin peel_L4	No	No	No	No	No	No	No	No	Not entirely
Teaching support_L2	Not entirely	Yes	Not entirely	Not entirely	Not entirely	Not entirely	No	Not entirely	Yes

Appendix 4: Mitigation type by potential problem

Table 7 Number of references to different mitigation types by potential problem – assessment problems

Mitigation type	Atomistic assessor judgement	Inaccurate judgement	Inappropriate support	Ineffective standardisation	Lenience	Malpractice	Poorly conceived assessment tasks	Total
QA	11	34	15	30	44	37	28	199
support and guidance	10	53	21	42	12	7	34	179
occupational /professional expertise	14	15	0	5	1	0	10	45
qualification /assessment design features	9	15	1	0	4	1	2	32
holistic aspects	21	8	1	0	0	0	1	31
standardisation	1	7	0	20	1	1	0	30
attitudes	0	0	0	0	15	7	0	22
contextualisation and relevance	4	5	3	0	2	1	6	21
Qualification /assessment design processes	0	13	0	0	1	1	3	18
hybrid aspects	1	3	3	0	5	1	0	13

prioritisation	0	0	1	8	1	0	2	12
supporting learning	0	0	0	0	9	2	0	11
communities of practice	0	3	0	2	0	0	3	8
context independence	0	3	0	2	1	0	0	6
operating on a small scale	0	2	0	1	1	2	0	6
assessment expertise	1	2	0	0	0	0	2	5
inputs	0	1	1	0	1	0	2	5
incentives and disincentives	0	0	0	0	1	2	0	3
implicit content links	1	0	0	0	0	0	0	1

Table 8 Number of references to different mitigation types by potential problem – teaching and learning problems

Mitigation type	Content hard to pin down gets missed	Demotivation /disengagement	Downward pressure on standards	Incoherent teaching programmes	Lack of currency	Lack of holistic learning	Local or personal irrelevance	Superficial learning	Undue assmnt burden	Total
holistic aspects	3	2	0	10	8	33	7	11	4	78

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support and guidance	4	2	1	25	1	7	0	3	12	55
qualification /assessment design features	10	7	11	2	4	4	9	5	1	53
contextualisation and relevance	1	3	0	5	3	10	13	10	1	46
qualification/assessment design processes	17	0	4	0	12	0	6	0	0	39
attitudes	1	4	9	0	1	1	0	8	14	38
occupational /professional expertise	5	0	0	16	4	8	1	3	0	37
inputs	3	3	4	14	0	0	0	1	5	30
QA	0	2	2	9	2	5	0	0	5	25
supporting learning	0	11	6	0	0	0	1	0	4	22
implicit content links	0	0	0	10	0	6	0	1	0	17
context independence	0	0	2	1	3	0	5	0	0	11
prioritisation	0	1	0	0	0	0	0	0	5	6
hybrid aspects	0	2	1	1	0	1	0	0	0	5

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assessment expertise	2	0	0	0	0	0	1	0	0	3
communities of practice	0	0	0	2	0	0	1	0	0	3
incentives and disincentives	0	1	0	0	0	0	0	0	0	1



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