

Analysis of results from consultation on the involvement of teachers in the development of confidential assessment materials



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Ofqual/18/6374/3

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Introduction

We have consulted on our proposals to strengthen the safeguards for the involvement of teachers in the development of confidential assessment materials. The consultation ran between 14 March and 25 April 2018.

The consultation questions were available to complete online or download. A copy of the consultation is available at:

<https://www.gov.uk/government/consultations/consultation-teacher-involvement-in-the-development-of-confidential-assessment-materials>

We received 35 responses to the consultation. We are grateful to everyone who participated.

This report is a summary of the views expressed by those who responded to our consultation. We sought views on our proposals to strengthen our regulation of awarding organisations' involvement of teachers in the development of confidential assessment materials.

In September 2017 we announced we would review:

- the risks and benefits of the long-established practice whereby some teachers who write or contribute to exam papers also teach the qualification; and
- the effectiveness of the safeguards used to reduce the risk of a teacher who has this dual role disclosing or otherwise misusing information about confidential assessments.

This consultation presented our policy proposals as a result of that review. We also published a suite of research and analysis that provides context and support to our consultation proposals, which can be found on the same page as the consultation itself.

Who responded?

We received 35 responses to our consultation. 24 responses were from organisations, and the remaining 11 were from individuals. In four cases respondents did not indicate their identity – we have assumed these represented individual's responses. A list of the organisations that responded to the consultation is included in Appendix A: List of organisational consultation respondents.

Three respondents expressed their views without specifically answering the questions asked. These responses were considered but were not included in the total numbers of responses to each question.

Approach to analysis

The consultation was published on our website. Respondents could choose to respond using an online form, by email or by posting their answers to the consultation questions to us. The consultation included 21 questions relating to safeguards involvement of teachers in the development of confidential assessment materials.

This was a public consultation on the views of those who wished to participate. We recognise that the responses are not necessarily representative of the general public or any specific group.

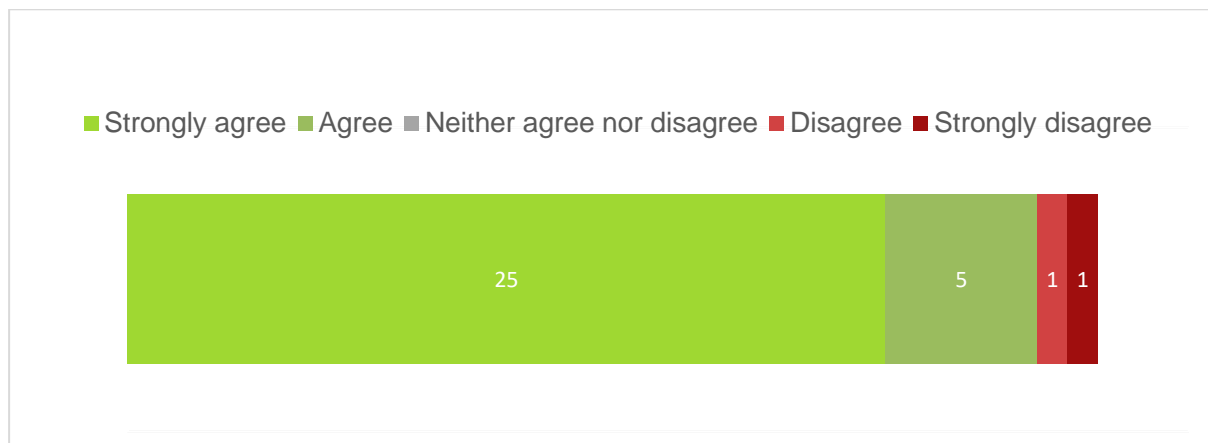
We present the responses to the consultation questions in the order in which they were asked. Respondents could choose to answer all or just some of the questions.

This means the total number responding to each question varies. Additionally, some respondents chose to express their views without specifically answering the questions asked. As noted above, these responses were considered but were not included in the total numbers of responses to each question. We read all responses in full and summarise in this report the range of views that were expressed. While we structure the report by question asked, some comments straddled two or more of the questions. As a result we recognise not all views expressed or the extracts we have included fit neatly under individual questions. We have sometimes edited comments for brevity and to preserve anonymity but have been careful not to change their meaning.

Consultation response outcomes

Question 1: To what extent do you agree or disagree with the following proposal?

We should make it an explicit requirement in our General Condition of Recognition A4 that all awarding organisations must hold up to date records of all conflicts of interest, including conflicts relating to anyone who develops or otherwise sees information about confidential assessment materials.



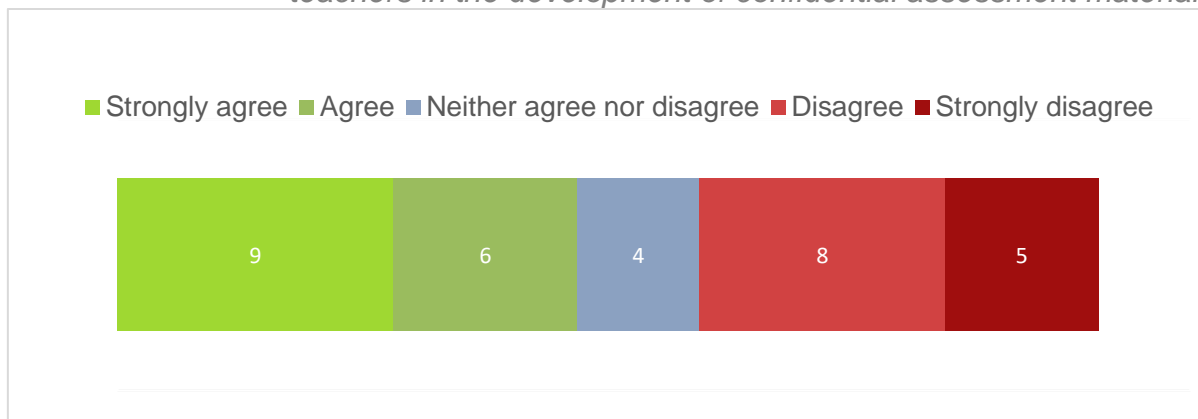
Responses to this question were very positive, with 30 responses either agreeing or strongly agreeing that Ofqual should make it an explicit requirement under Condition A4 that AOs hold up to date records of conflicts of interest, and only two disagreeing or strongly disagreeing.

Those that agreed generally felt that this was a positive additional safeguard. The two respondents who disagreed with the proposal did so on the basis that the existing requirement for awarding organisations to 'identify and monitor all conflicts of interest which relate to it' is sufficient.

Question 2: To what extent do you agree or disagree with the following proposal?

Awarding organisations should be free to decide whether to make public information about the people who are involved in developing their confidential assessment materials.

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Responses were relatively evenly spread in relation to making examiners names public, with two more respondents agreeing than disagreeing. Of those who left comments, examiners were almost all opposed and many responses focused on arguments for not publishing examiner names rather than whether or not awarding organisations should have discretion in this regard.

The risk of pressure on teachers was repeated by many respondents who felt that examiners' names should not be made public. Currently, however, most if not all awarding organisations do not choose to publicise the names of their examiners (other than in some exceptional cases – for example, the name of the Chair of Examiners), and there is no reason to expect that to change if we follow our proposal and continue to leave this decision to the discretion of individual awarding organisations. One awarding organisation reflected on this issue:

While we agree that AOs should have discretion in this matter, we are strongly of the view that routine publication of such information would be highly inadvisable. We are of the view that proposals such as schools publicising which of their teachers act as assessment authors could expose such teachers to inappropriate pressures, hacking attempts etc. and would weaken rather than strengthen the integrity and security of the public examination system. We also hold the view, which we know is universally shared by the teaching associations, that routine publication would act as a strong disincentive to recruitment, thus undermining the wholly proper aim of maintaining teacher involvement in the assessment setting process.

Awarding organisation

Question 3

Question 3 was asked of awarding organisations only, and was in three parts.

3a - Do you already maintain an up to date record of all conflicts of interests?

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Fourteen respondents answered this question. However, two respondents appear to have answered this question in error, as they are not awarding organisations. Of the 12 legitimate responses, 11 said yes and one said no.

3b - If yes, does the record include conflicts of interest that relate to the interests of teachers involved with developing confidential assessment materials?

Of the 11 legitimate responses to this question, 10 said yes and one said no.

3c - Does the record include information about:

- *The qualification(s) the teachers teach?*
- *The schools and/or colleges in which they teach and have taught when they held information about confidential assessment materials?*
- *Any other roles held they hold?*

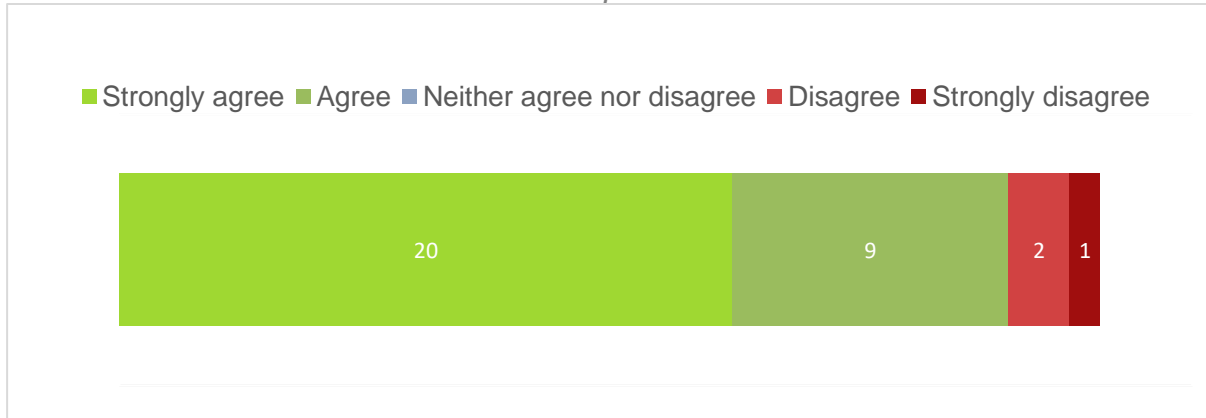
Of the 11 legitimate responses to this question, seven said that they hold records about the qualifications teachers who work for them teach. Nine said that they hold information about the schools or college in which the teachers teach, and the same nine also said they hold information about any other roles the teachers hold.

Overall, responses to the various parts of Question 3 indicate that awarding organisations are highly likely to already have a conflict of interest register in place, and will record in it information about teachers who are involved in the development of confidential assessment materials. The degree to which those conflict of interest registers hold detailed information about the nature of the conflict, however, is not as extensive. In particular the level of specificity at qualification level appears less well developed – it is not clear why this is the case.

Question 4: To what extent do you agree or disagree with the following proposal?

We should make explicit in our Condition G4.1 that awarding organisations need to manage the risks of teachers disclosing information about confidential assessment materials.

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Respondents were generally strongly in favour of our proposal that we should make explicit in Condition G4 that AOs need to manage the risks of teachers disclosing confidential assessment information. Three respondents disagreed.

Similarly to Question 2, those that disagreed did so on the basis that the current condition is already sufficient and it is unhelpful to go into this level of detail, which should more properly belong in guidance.

This proposal adds little to the existing requirement. The regulatory requirement is already clear and unqualified.

Awarding organisation

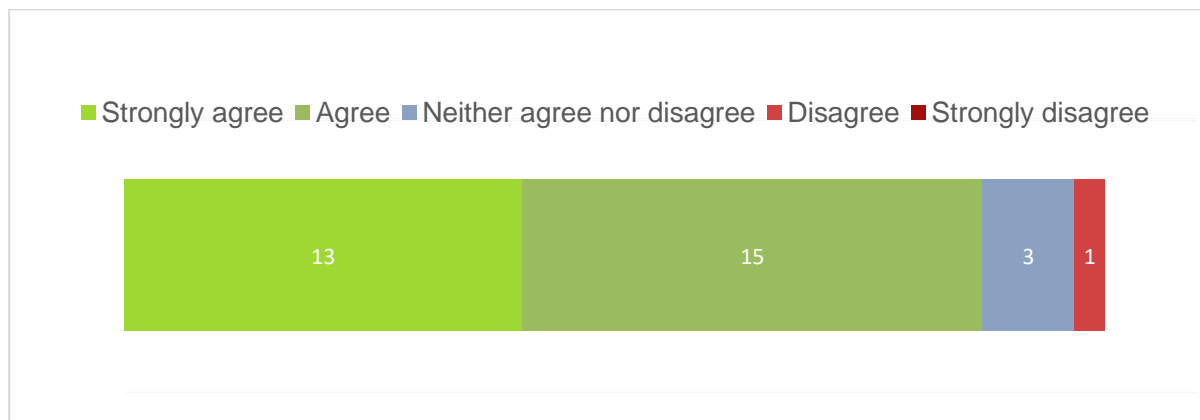
Those that agreed with the proposal felt that making it explicit reduces ambiguity and reinforces the expectation that awarding organisations will manage this risk.

Although the expectation is implied in the current wording, it is right that this is made explicit to ensure there is no ambiguity in the requirements on awarding organisations regarding their responsibility to proactively manage the potential risks to the confidentiality of assessment materials when they involve teachers in their development.

Head teachers association

Question 5: To what extent do you agree or disagree with the following proposal?

The safeguards an awarding organisation uses to protect the confidentiality of its assessment materials need to be tailored to its particular qualifications, having had regard to the statutory guidance.



Only one of the 32 responses to this question disagreed with our proposal that awarding organisations should tailor the safeguards it uses to its particular qualifications.

The disagreeing response was from an organisation which represents centres, and described a concern that a range of different safeguards from different exam boards could place further pressure on teaching staff and exam teams.

Some responses agreed with our proposal in principle but offered some caveats, for example by suggesting that there should be a 'national minimum requirement' or, in the case of one awarding organisation, questioning the nature of statutory guidance:

Regardless of Ofqual's legislation and documentation, the status of statutory guidance is unclear. Too often regulators use guidance as rules as any other name. It is clear this is a risk that Ofqual faces ... If Ofqual wishes to use guidance as its tool it should:

- be more explicitly clear how and when it would use guidance, what controls it will put in place on its staff in using guidance during audits, monitoring or in making judgements on compliance, and
- being [sic] explicit when it would not hold awarding organisations to account against guidance.

Awarding organisation

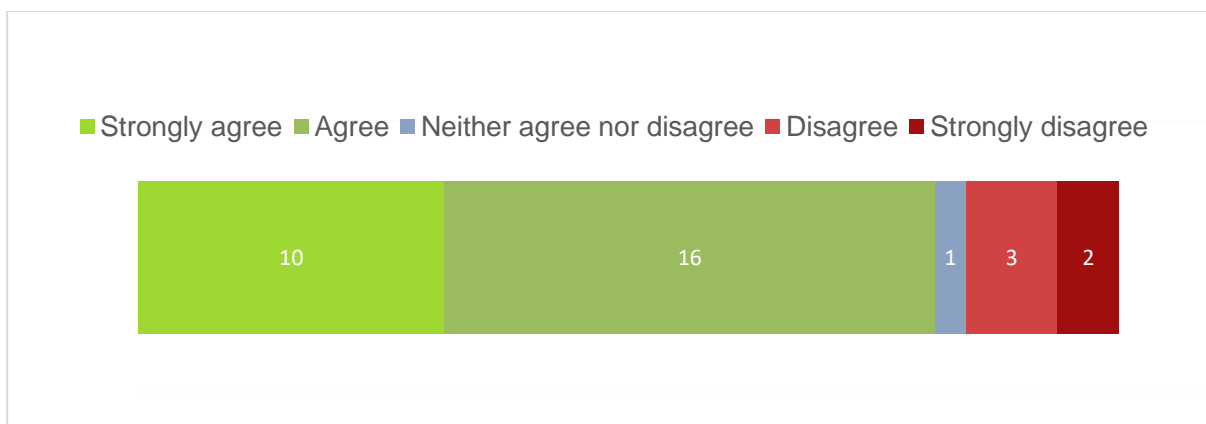
Similarly, one response which did not answer our specific questions but accepted that there could be no one size fits all approach said:

In order that such arrangements are transparent and fully understood we believe that Ofqual should publish detailed statutory guidance that covers the full range of qualifications and all types of assessment.

Head teachers association

Question 6: To what extent do you agree or disagree with the following proposal?

We should publish expanded statutory guidance that makes clear the safeguards we would expect an awarding organisation to apply to different types of qualifications



Most (26) respondents who answered the question agreed with the proposal that we should publish expanded statutory guidance in relation to the different safeguards that we would expect to see applied to different types of qualifications. Only five respondents disagreed or strongly disagreed.

Some respondents seemed to interpret the use of the term ‘types’ as implying that we would specify what it would expect for certain descriptions of qualifications (such as GCSE), rather than in the more general sense of qualifications sharing certain characteristics, which is what we intended.

Those that disagreed with the proposal did so on the basis that guidance of this type would be too prescriptive and would remove any flexibility for awarding organisations to tailor their approach by shoehorning qualifications into different types with respect to which certain approaches should be followed.

Assessment materials differ widely in nature, so protection should be appropriate for the different assessments offered by different awarding bodies. The awarding bodies are best placed to decide upon the nature of safeguarding required.

Lead examiner

Three awarding organisations described their concerns about prescriptive guidance, which one said awarding organisations “essentially take as an extension of the Conditions”.

The ongoing tendency to develop more and more guidance is inconsistent with Ofqual’s statutory duties to (1) have regard to the desirability of facilitating innovation (s.129 ASCLA) and (2) not to impose or maintain unnecessary burdens (s.170 ASCLA). It is also inconsistent with the Principles of Better Regulation.

Awarding organisation

Question 7: Do you have any comments on the examples of safeguards we propose an awarding organisation should consider using during assessment production to reduce the risk of inappropriate disclosure of confidential information?

Twenty four respondents made comments about the examples of safeguards we proposed. Some of these comments were broad, while other addressed each of our examples in detail.

Sixteen responses to this question referred to our proposal that teachers who contribute to confidential assessment materials should not know if or when those materials will be used. There was broad agreement in principle that this is an attractive safeguard, but there were various concerns raised about its practicality for different subjects and qualifications. Qualifications in GCSE science subjects were highlighted in three separate responses as being hard to develop in line with this principle as the use of a question bank does not allow for the fine tuning of a whole paper. Having a bank of whole papers which may or may not be selected in any given series was regarded in one of these responses as “unrealistic and unaffordable”.

Several responses focused on the disadvantages of excluding teachers from assessment development, discouraging their involvement or making it more difficult in practical terms (such as barriers to moving between schools). These are all problems we acknowledged in the consultation and contributed to our decisions not to prohibit the involvement of active teachers in the development of confidential assessment materials.

Question 8: Are there any other safeguards that we have not suggested that awarding organisations could use? If yes, please describe them and the circumstances in which they might be used.

Nine respondents answered this question, but only seven supplied suggestions for other safeguards which we had not included in our proposals.

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Some of these suggestions lie outside of Ofqual’s remit – for example “The high stakes accountability regime in schools could be scrapped, so that teachers no longer have the sorts of incentives to commit malpractice in high stakes assessments that currently exist.”

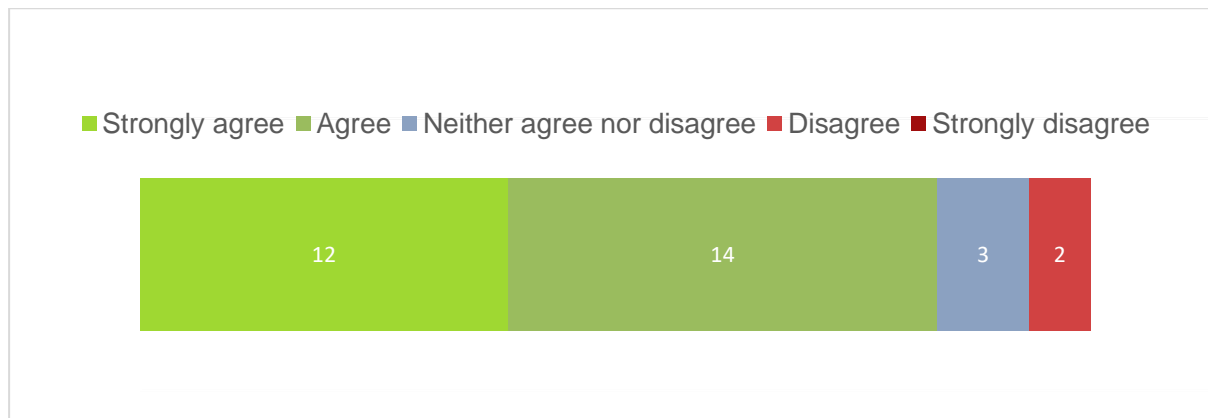
Others proposed minor refinements or alternatives to some of our proposals, Examples included:

- an option to restrict a teacher to only setting part of an examination paper;
- discouraging those writing assessment materials from private tutoring; and
- requiring teachers involved in the development of confidential assessment materials to declare any links they have to publishers.

One awarding organisation which has exams which are taken in different timezones gave the example of a safeguard they already use whereby a teacher authors a paper for students in a different timezone than the one their students would sit.

Question 9: To what extent do you agree or disagree with the following proposal?

The types of measures we set out would support teachers who had seen information about confidential assessment materials to meet their obligations in respect of those materials?



Only two respondents disagreed with our proposal that the types of safeguards we included in our consultation would support teachers to meet their obligations for confidentiality.

Question 10: Are there any other types of support an awarding organisation might provide to a teacher to reduce the risk they will misuse information about confidential assessment materials?

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Ten respondents suggested other types of support which may reduce the risk a teacher will misuse confidential information about assessment materials. These ranged from some which are outside of Ofqual's remit – for example “pay them more” – to others which are more aspirational – “we also believe there is more that can be done in building a supportive community of practice for teachers who act as assessment authors”.

One repeated feature of these responses, mentioned in seven of them, was the role of the centre in supporting teachers.

All teachers involved in developing question papers or other confidential materials are required to inform their school or college that they are working for an awarding body in this capacity.

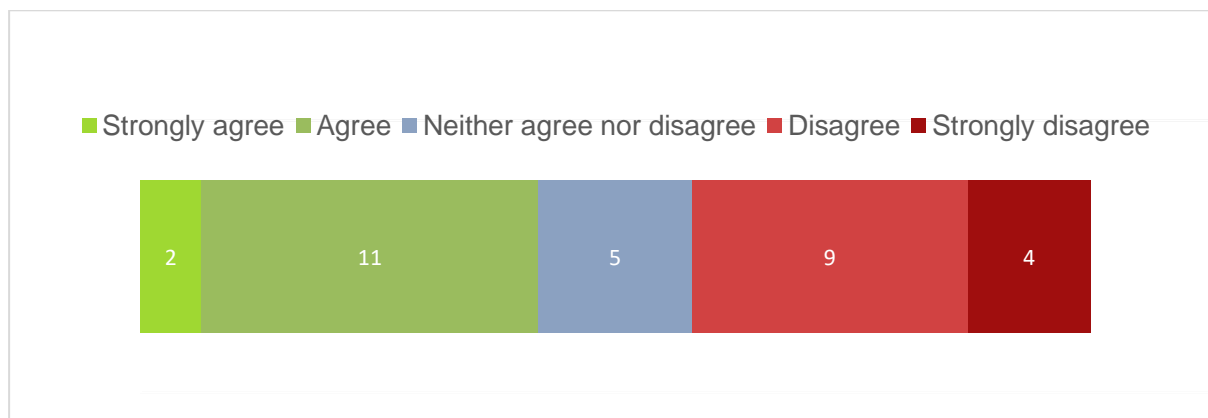
All schools should be provided with clear guidance on how to identify conflicts of interest in their setting and how to support staff to manage the potential risk of malpractice.

All teachers taking on a role in developing confidential materials should be provided with mandatory training on managing conflicts of interest and be fully aware of possible sanctions by awarding bodies and their school or college.

Head teacher association

Question 11: To what extent do you agree or disagree with the following proposal?

Measures such as we propose would enable an awarding organisation to detect the inappropriate use of information about confidential assessment materials by a teacher?



This was one of two questions in this consultation which provoked a very mixed response (the other was Question 2). Thirteen people either agreed or strongly agreed, and the same number either disagreed or strongly disagreed.

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In general, respondents had mixed views on our proposals. For example, the monitoring of social media was widely supported, but our proposals for the sampling of teaching materials and the use of statistical monitoring were not. It is not clear how these viewpoints affected respondents' answers to the question itself.

It is likely that some of the disagreement reflects the fact that techniques such as statistical monitoring do not provide evidence of malpractice by themselves. We identified this in a paper we published alongside this consultation:

Although they can provide some kind of likelihood-based conclusion about possible cheating for those who are interested in the performance of the test and use of the results, it is impossible for them to prove that cheating or test collusion has actually happened.

He, Meadows and Black, "Statistical techniques for studying anomaly in test results: a review of literature"¹

Comments made in response to other questions also indicate that respondents to the consultation have doubts over the practicality of our suggestion that awarding organisations might "where appropriate, sample the teaching plans, teaching materials and formative assessments used by teachers who had prior knowledge of assessments". Respondents indicate this could be burdensome and in many cases would not be possible anyway, as these materials are not always available. One response which did not answer our specific questions said

We do not agree with the proposal to sample lesson plans and formative assessments of teachers as routine deterrent practice. We would only be supportive of this as part of an investigation into suspected malpractice and only if the information were available, as teachers are not required to produce detailed individual lesson plans.

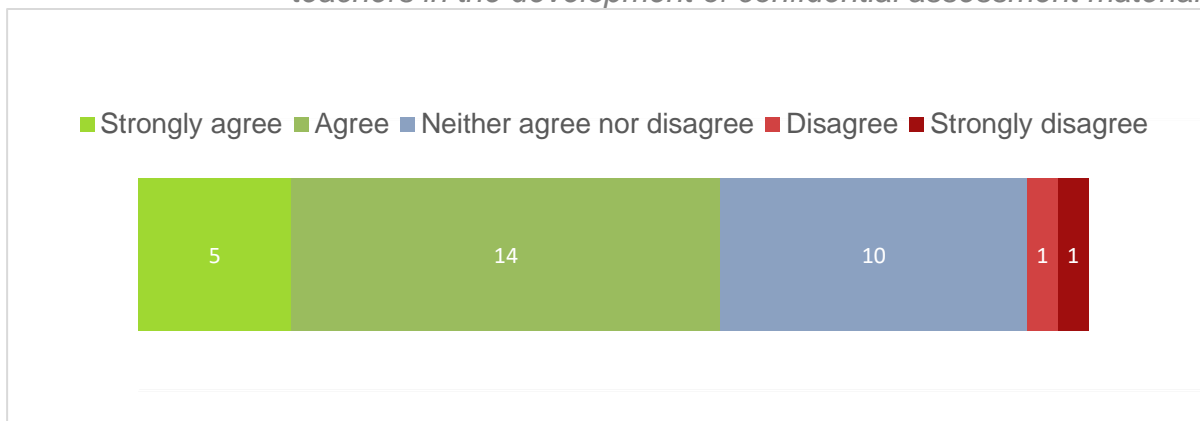
Head teachers' association

Question 12: To what extent do you agree or disagree with the following proposal?

A teacher who had information about confidential assessment materials would be deterred from misusing information if they knew the awarding organisation would take measures such as we propose to detect wrong-doing?

¹ <https://www.gov.uk/government/consultations/consultation-teacher-involvement-in-the-development-of-confidential-assessment-materials>

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This question elicited the largest number of responses saying “neither agree or disagree”, perhaps indicating that respondents who were not teachers were unwilling to make assumptions about how teachers might react to the safeguards we proposed.

Of those that did commit to agreeing or disagreeing, the vast majority agreed that our proposed safeguards would deter teachers from misusing information.

Prevention is the best approach to ensure a robust system and achieve public confidence and we believe that teachers should be made aware of the steps awarding bodies might take if they suspect malpractice. In order to support teachers with this, awarding bodies should strengthen their communication around potential sanctions in cases of malpractice and develop their monitoring procedures.

Head teachers’ association

Two responses, one from a teaching union and one from an awarding organisation, disagreed as they stated that the proposed measures would simply deter teachers from becoming involved in assessment development.

Question 13: Are there other steps an awarding organisation could take to detect or deter a teacher from inappropriately using information about confidential assessment materials that we should include in our statutory guidance?

Nine respondents commented regarding other steps awarding organisations could take to detect or deter malpractice of this type. Of these, one was a call for practising teachers not to set exam questions, and two simply confirmed that they had no suggestions.

The remaining six responses covered a variety of areas. One called for ‘random school inspections’ which we had effectively already proposed in the form of checks

of teachers' teaching materials. Another suggested that "some form of fine might be more of a deterrent".

The response of one head teachers' association expressed concerns about our proposal that if appropriate, we would expect an awarding organisation to notify the National College for Teaching and Leadership (which has now been replaced by the Teaching Regulation Agency). They believe that instances of malpractice where a referral to TRA would be deemed an appropriate sanction would be rare, and they contend that since the teacher involved would "have two separate contracts of employment – one for examining and one for their teaching post – it would seem more appropriate for the school employer to make any referral to NCTL following discussion with the awarding organisation, as this sanction relates to their teaching post."

Question 14: Are all the factors we have identified for awarding organisations to consider when deciding which safeguards to use appropriate?

Five respondents did not feel that all the factors we identified were appropriate. In their comments, one reiterated potential problems with some subjects if awarding organisations were required to use an "item banking" approach. Another called for teachers to be prohibited from writing confidential assessment materials.

One response from an awarding organisation said "The factors that Ofqual has identified are negative factors and do not include the positive factors why awarding organisations would use teachers." It appears to suggest that there might be factors which would encourage an awarding organisation to use teachers in the development of their assessment materials. We agree with this view, and described the advantages of using teachers in our consultation when we ruled out prohibiting teachers from contributing to confidential assessment materials.

Another exam board warned of the "potential for a disproportionate package of safeguards" which might adversely effect the recruitment of teachers.

Other respondents answered 'yes' to the question, but nonetheless made comments. Some of these were simply to express support for our proposals, but others used the opportunity to reiterate concerns about some of our proposals, for example our suggestion regarding statistical monitoring.

Question 15: Are there other factors which might affect which safeguards are appropriate for a qualification which we have not identified?

Nine respondents suggested they had other factors in mind. Some comments, however, only supported the suggestions we had made.

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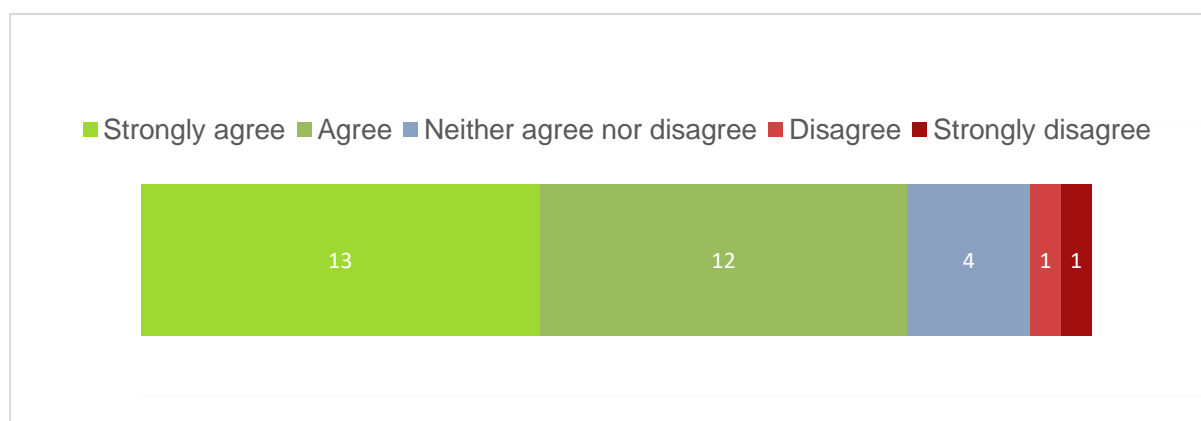
There were some comments which did make concrete suggestions for other factors which awarding organisations should consider. These mostly pertained to the details of the type of assessment used in a given qualification. These included:

- The assessment model, with the example given that for some “standards-based assessment through evidence portfolio, observation, discussion, etc, there are no risks around confidentiality”.
- The sampling regime, with the example given that where “the same areas of the curriculum are assessed in the same proportions in each assessment version” the risk is lower than where the content sampling varies and is unknown.
- The delivery model, with the example given that some on-demand assessments mean that no one knows exactly what questions will be given to any particular candidate, as the assessment is automatically generated when required.
- The exam medium, with the example given that it might be easier to make changes to assessments taken on screen than to ones which are printed.

Another two comments identified a centre’s track record of malpractice as being another factor which awarding organisations should consider in terms of their efforts to detect malpractice.

Question 16: To what extent do you agree or disagree with the following proposal?

Including examples in our statutory guidance would be useful for awarding organisations to understand the factors they need to take into consideration and the range of safeguards which would be appropriate.



Only two respondents disagreed with our proposal to include examples in our guidance. Neither gave any reason for their disagreement.

Questions 17-19 were asked of awarding organisations only.

Question 17: To help us assess the burden awarding organisations might experience in responding to our proposals, please indicate for how many of your qualifications:

- **you involve teachers who teach a qualification in developing confidential assessment materials for that qualification and**
- **for how many of these qualifications you do NOT already use safeguards of the type described above at the assessment materials development stage and**
- **how many of these qualifications you consider to be high stakes and/or particularly vulnerable to malpractice.**

We did not receive enough responses to this question to build a fully accurate picture of the effect our proposals might have if they were rolled out and applied to all awarding organisations. We received responses from fewer than 10 awarding organisations, so we have not been able to extrapolate to the wider awarding organisation community. We currently have 150 recognised awarding organisations on our Register.

Eight respondents gave us figures regarding the number of their qualifications which use teachers to develop confidential assessment materials. The number of qualifications ranged between two and 1750.

All of the awarding organisations who made relevant comments indicated they already took safeguards of some form at the assessment materials development stage, although they were not clear precisely which safeguards they used.

Question 18: Please provide us with an indication of any additional costs you estimate you will incur if we amend the Conditions as we propose and please tell us how you have arrived at this estimate.

Question 19: Please provide us with an indication of any additional costs you estimate you will incur if we expand our statutory guidance as proposed and please tell us how you arrived at this estimate.

Respondents did not differentiate consistently between these two questions.

Two exam boards confirmed they already maintained a register of third parties' conflicts of interest, so no incremental burden would be imposed. The other two exam boards indicated costs from this proposal of £96k and £50-100k per annum. A large awarding organisation indicated a cost of £20k per annum. This would suggest an average incremental burden of £50k per annum for the large awarding organisations and exam boards would not be unreasonable. For the remaining,

smaller awarding organisations the impact would be significantly less, since the numbers employed will be lower, however none provided specific figures in their responses.

In terms of the other safeguards we proposed, the responses focused on the cost of producing additional assessments in the implementation period, with ongoing costs then largely unchanged. One exam board indicated they were already compliant with the proposals, so no incremental burden would be incurred. One exam board estimated a one-off cost of £2m and another suggested a £1.0-1.2m cost. One large awarding organisation indicated a one-off cost of £130k for their affected qualifications. This would suggest exam boards would incur one-off costs of, on average, £1m, while other awarding organisations will incur additional costs of up to £130k each, depending on the number of qualifications where conflicts could arise.

Question 20: Are there any steps we could take to reduce the regulatory impact of our proposals while making sure awarding organisations are taking all reasonable steps to protect the confidentiality of their assessment materials that have been developed or otherwise seen by teachers?

Six respondents commented in response to this question. The following suggestions were offered as ways for us to reduce the regulatory impact of our proposals:

- allow a sufficient lead time for compliance
- do not mandate a timetable for the introduction of paper/item banks
- improve clarity by, for example, better defining ‘teacher’ with respect to the proposals.
- recognise that system changes need to be implemented in phased and managed ways in order to safeguard against risks to the wider examining process.

Question 20: Are there any costs or benefits associated with our proposals which we have not identified?

Six respondents commented, and four made relevant points about other costs:

- One respondent said “sampling teaching plans, teaching materials and formative assessments is ‘unnecessarily draconian’ and ineffective as a teacher committing malpractice is unlikely to create a record of it.”
- Another expressed concerns that awarding organisations might pass on any increased costs to schools.

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- A subject body raised concerns around the effect on small specialist subjects in terms of increased centre costs around compliance.
- A fourth respondent warned of problems with recruiting specialist examiners in small subjects.

Question 21: We have not identified any ways in which our proposals could have an impact on persons who share a protected characteristic. Are there any potential impacts (positive or negative) we have not identified?

Two respondents commented in response to this question. One noted that teachers in independent schools tend to be under more pressure from parents, and the other expressed a concern that our proposals might deter teachers from wanting to be involved in developing assessment materials.

Question 22: Please provide any further comments on the impacts of the proposals on persons who share a protected characteristic.

Only one respondent made any further comments:

I write papers and would never dream of sharing the detail as it is not professional. You should not make my job harder or more onerous due to the actions of a few dodgy characters. Some measures may deter people from wanting to carry out this type of work which is vital. I think it is vital that teachers who work with young people are involved in writing the exams that these young people take.

Anonymous

Appendix A: List of organisational consultation respondents.

We asked respondents to tell us the capacity in which they were responding.

We have listed below those organisations that submitted a response to our consultation. We have not included a list of those responding in a personal capacity, however all responses were considered during the analysis.

AQA

Art History in Schools

ASCL

Association for Art History

Association of Accounting Technicians (AAT)

Association of Colleges

Cambridge English

CILEx

City & Guilds

FAB

HMC

International Baccalaureate Organization

International Dance Teachers Association

ISC

NAHT

NASUWT

National Education Union

National Foundation for Educational Research

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NCFE

NCTJ Training

OCR

Pearson

PIABC Limited

WJEC

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