

ANALYSIS OF CONSULTATION RESPONSES

# Alternative arrangements for the award of VTQs and other general qualifications in 2021

Approach to awarding qualifications where exams do not take place



Department  
for Education

**ofqual**

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## Summary

The impact of the coronavirus (COVID-19) pandemic has led the Department for Education (the Department) to reach the policy view that it is not viable for external exams to go ahead for some Vocational and Technical Qualifications (VTQs) and other general qualifications.

The Department has consulted on the qualifications which fall in scope of its policy. Ofqual has consulted on how it could implement the Department's proposed policy.

The consultation ran between 15 January 2021 and 29 January 2021 and received 3277 responses, submitted either through an online form or by email. This document provides a summary of the responses received.

## Background

The impact of the coronavirus (COVID-19) pandemic means that, in line with the approach set out for GCSEs, AS and A levels, it is the Department's policy position that external exams for many vocational, technical and other general qualifications should not take place as planned. Some students may also not be able to complete other forms of assessment because of the disruption arising from the pandemic.

Ofqual and the Department published a [consultation document](#) on 15 January. The Department for Education was the author of Part A (scope, policy intent, equalities considerations) and Ofqual was the author of Part B (alternative arrangements, equalities impact assessment, regulatory impact assessment); this division reflects the key roles and responsibilities of the two organisations. The two parts of the consultation were necessarily linked as the policy position reflected for consultation in Part A informs the approach taken in Part B.

In Part A of the consultation, the Department asked for views on which qualifications fall in scope of the Department's policy.

The Department proposed that the qualifications which fall in scope of the proposed policy should be those which received a calculated result in summer 2020 because those qualifications were most similar to GCSE, AS and A levels and were used to support progression to further study or into employment.

For qualifications that require a practical assessment to demonstrate occupational competency or are a licence to practise, the Department's proposed policy position was that assessments should continue to take place wherever possible, subject to public health guidance.

The consultation also explored issues relating to some assessments that have to be delayed where there is no way to deliver the assessment safely, or for practical

assessments where students and other students have not received enough learning to reach occupational competency and so are not ready to take the assessment. In these cases, the proposal was that assessment would need to wait until it could practically be conducted, and the student is ready.

Part B of the consultation set out proposals for how Ofqual could implement the Department's proposed policy as set out in Part A of the consultation. Ofqual consulted on the alternative regulatory arrangements it needs to put in place so that awarding organisations can issue results to students when exams and other assessments do not take place. These alternative regulatory arrangements will help students and other students taking external exams this summer to progress to the next stage of their education.

Under Ofqual's existing regulatory arrangements – the [Extended Extraordinary Regulatory Framework](#) (Extended ERF) which it introduced in October 2020 - awarding organisations have the flexibility to adapt their assessments and qualifications to mitigate against the disruption the pandemic has caused.

Ofqual is now proposing to issue a revised version of the Extended ERF. This would allow awarding organisations to continue to offer adapted assessments for those qualifications in scope, and award qualifications where exams have not taken place and students have not been able to complete all other assessments.

For qualifications that demonstrate occupational competency or act as a licence to practise, Ofqual proposed that these qualifications would be out of scope of the new alternative regulatory arrangements and that the approach and provisions in the Extended ERF continue to remain appropriate. This is necessary to ensure that employers can have confidence in the knowledge, skills and understanding of students achieving these qualifications and are competent to operate in the workplace.

The proposed alternative regulatory arrangements would:

- permit awarding organisations to develop an approach to awarding qualifications in scope of the Department's proposed policy on the basis of incomplete assessment evidence. As part of their approach, awarding organisations should consider their minimum evidential requirement for awarding these qualifications to ensure sufficient validity and reliability. They should also consider where they need additional assessment evidence from teachers and what form this should take. For qualifications most similar to GCSEs, AS and A levels we would expect awarding organisations to use similar approaches to assessment and awarding. These approaches were consulted on in parallel with this consultation.

- expect awarding organisations to be mindful of the burden their approach places on centres and students, and to provide clear and timely advice and guidance
- require awarding organisations to issue certificates (where appropriate) as normal and to not refer on the certificate to a result having been determined under the alternative regulatory arrangements
- require awarding organisations to include private students in their arrangements as far as possible
- permit awarding organisations to take the same approach for qualifications taken in international markets, provided that this does not undermine the validity of the qualifications. We would also expect awarding organisations to consider and address the risks around malpractice and the particular needs of the international market

Ofqual said that following the consultation, it would consult on the detailed conditions, requirements and guidance necessary to put the policy decisions into effect.

## Approach to analysis

The consultation included 33 questions and was published on the Ofqual and Department for Education websites with an online form for responses.

Reflecting the approach to the consultation, this analysis document follows the same format. The Department analysed the responses to the questions contained in Part A and Ofqual analysed the responses to the questions contained in Part B.

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

We present here summaries of the responses to the consultation questions in the order in which they were asked. For each of the questions, we presented our proposals and then asked respondents whether they had any comments on what we had proposed. Respondents did not have to answer all the questions. Some respondents chose to provide general comments instead of responding to the specific proposals. Where percentages are provided, these figures are rounded to the nearest full number and so responses for each question may not always equal one hundred percent. During the analysis, we reviewed every response to each question. In some instances, respondents answered a question with comments that did not relate to that question. Where this is the case, we have reported those

responses against the question to which the response related rather than the question against which it was provided.

In charts that present breakdowns of responses by the groups that respondents belong to, some groups are combined in order to ensure that the privacy of responses is protected.

Groups describing respondent roles were combined as follows:

- academy chains, employers, local authorities, other representative or interest groups, private training providers and other official respondents were combined in a group named 'other organisation'
- apprentices, awarding organisation employees, consultants, examiners, governors, and other personal respondents were combined in a group named 'other individual'
- respondents who selected 'Student - private, home-educated of any age' were joined with those selecting 'Student' in a single category

## Who responded?

We received 3,277 responses to our consultation. 3,273 respondents completed the survey online – these are recorded in the figures shown against each question. We also received four free text responses; these are not included in the quantitative data we provide below but relevant comments have been included against the appropriate questions. We list the organisations who responded to the consultation in Annex A.

In addition to the formal consultation, we also held engagement events with a wide range of stakeholders including awarding organisations, colleges and different sector and professional bodies. The purpose of these events was to support awarding organisations in developing consistent approaches, and to identify and understand potential issues, and how these might be addressed.

The views expressed at these events were not formal consultation responses (although some of those attending may have separately responded to the consultation) and as such are not reported in this analysis document. We have considered the responses to this consultation and the views expressed at consultation events when developing our final policy position.

Table 1: Breakdown of consultation responses

<b>Respondent type</b>	<b>Number</b>
Official responses total	445
School or college	280
Awarding organisation	43
Private training provider	36
Other representative or interest group	36
Academy chain	15
Local authority	13
Employer	12
University or higher education institution	8
Other organisation	2
Personal responses total	2,828
Teacher (responding in a personal capacity)	981
Student	847
Parent or carer	419
SLT (Senior leadership team)	225
Exams officer or manager	156
Other	79
Student - private, home-educated of any age	41
Consultant	28
Examiner	18
Awarding organisation representative	17
Apprentice	9
Governor	8

The vast majority of respondents indicated that they were based in either England, Northern Ireland, Wales or the United Kingdom. We received a small number of responses from EU countries and some from outside of the EU.

Most students, and the students' parents or carers were responding on behalf of, were in year groups 11, 12 and 13. In addition, 18% reported that they had a disability or long-term health problem and 28% percent reported that they usually

receive reasonable adjustments when sitting an assessment. 61% of the students and the students' parents or carers were responding on behalf of reported their ethnic group as white British (see Annex B for further diversity information).

This was a public consultation on the views of those who wished to participate. We were pleased to receive a large number of responses, although we recognise that the responses are not necessarily representative of the general public or any specific group.



# Detailed analysis

## Part A – Policy overview

### *Proposed qualifications in scope for alternative arrangements in 2021*

#### **Question 1**

Are there any other written exams due to take place from April onwards this academic year, that should be in scope and therefore not go ahead?

There were 1937 open responses to question one, and responses to this question were largely related to assessments which the Department proposed are already in scope of the policy proposals.

Responses relating to other general qualifications which share similarities with GCSEs, AS and A levels (general qualifications), such as the International Baccalaureate, Core Maths, and Cambridge Pre-U made up a significant proportion of comments. A majority of these respondents requested that these assessments did not go ahead, with respondents arguing for arrangements which showed parity with general qualifications (i.e. GCSEs and A levels). This is explored further in responses to Question 2.

There was also general agreement with the Vocational and Technical Qualifications (VTQs) in scope of alternative awarding arrangements. There was consensus among respondents that external written exams for these qualifications should not go ahead, with both students and teachers requesting specific VTQs have no exams. The qualifications cited included BTECs, WJEC Applied Generals, Cambridge Technicals and the Extended Project Qualification. Additionally, there were a number of responses which mentioned London Institute of Banking and Finance (LIBF) qualifications and requested that these should no longer go ahead; these responses came in the main from teachers and students.

Some respondents requested the department provided a clearer position on some practical assessments, particularly in Early Years Educator qualifications. Respondents argued that the impact of lost-learning, and the lack of access to technical equipment whilst learning from home needs to be considered.

134 respondents provided a 'yes' response but did not define the qualifications that they believed needed to be in scope of alternative awarding arrangements. These

responses were provided by a range of respondents, including teachers, members of senior leadership teams, and parents and carers. A minority of respondents, including awarding organisations, suggested that the Department should provide more clarity on the specific qualifications referenced in the policy proposals.

A minority of responses requested cancellation of resits. There was specific mention from both students and teachers for the cancellation of resits for; BTECs at Level 2 and 3 and 'on-demand' BTEC exams, City and Guilds Extended Technical Certificate, and LIBF exams. There were also responses referring to VTQ resits more generally, or responses that were not clear what resits they were referring to. Some students also requested that the Department considers arrangements for the cancellation of 'mock' exams or other types of 'mini assessments' providers may be delivering.

There was a significant number of responses lobbying for IGCSEs and International A levels (out of scope qualifications) to also be cancelled. Many of these responses recognised that these qualifications were out of scope as they are not regulated by Ofqual, but requested that they were considered, citing that they should be treated in parity with other general qualifications.

## Question 2

Do you agree that written exams for other general qualifications that are not GCSEs, AS or A levels due to take place from April onwards this academic year, should be subject to alternative arrangements similar to that taken for GCSEs, AS and A levels, as addressed in part B of this consultation?

Figure 1: total responses to question 2

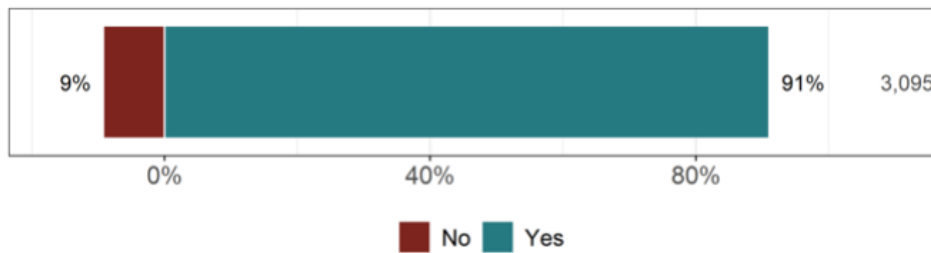


Figure 2: breakdown of responses to question 2 by respondent type (individuals)

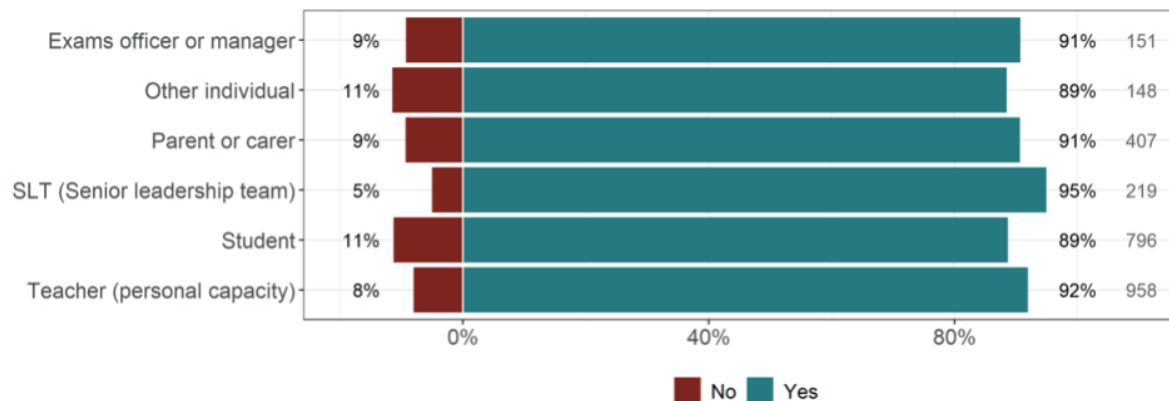
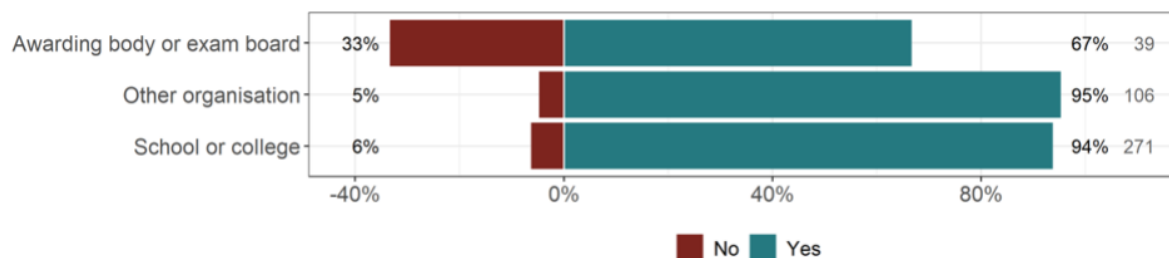


Figure 3: breakdown of responses to question 2 by respondent type (organisations)



There were 3095 responses to this question, of which 2813 (91%) were in agreement with the proposal to have alternative arrangements for other general qualifications similar to those proposed for GCSEs, AS and A levels.

Of those that left comments, strong support was voiced throughout a number of consultation responses for not having examinations for the International

Baccalaureate in particular, mainly because of the amount of learning lost by students is comparable to that lost by their A level peers. There were also several comments from respondents saying that although online or remote learning had been taking place for many candidates, the effectiveness of that learning was not considered to be comparable to that of face-to-face learning.

There was also an emerging theme of requesting parity of treatment of the IB with A levels, because both types of qualification are used for similar progression opportunities. Several respondents (76) expressed specific support for teacher-assessed or centre-assessed grades to be used as the alternative assessment arrangements for other general qualifications.

Respondents who disagreed with this question wanted some exams to be allowed to go ahead, especially in the qualifications where some assessments had already been taken and 'banked' with the relevant awarding organisation. Some commented that where exams could not take place, alternative arrangements should operate, in order for their final grade to be calculated, taking into account work the students had undertaken in appropriately controlled conditions, as being the fairest route for students.

The awarding organisations for the IB and the Pre-U also did not agree that following a similar approach to A levels was appropriate for their qualifications, with both supportive of exams for these qualifications continuing. They both wanted to follow the methodology they had put in place for their November 2020 assessments. In particular, the IB awarding organisation argued that because of the difference in structure of the qualifications, with non-exam assessment or internal assessment being involved in their qualifications, along with the international aspect of their offer, the contingencies they had put in place for their November 2020 series of assessment should be allowed to continue, where adaptations to assessments had been implemented and internal assessments already 'banked' could count towards the final grade awarded, along with teacher assessment to count where other assessments or exams had not been taken.

We note that since responding to the consultation, both IBO and Cambridge International have confirmed that exams for these qualifications will no longer continue.

### Question 3

Do you agree assessments for functional skills qualifications should be permitted to go ahead where they can be delivered in line with public health measures, including remotely, from April onwards, and otherwise be awarded through alternative arrangements set by Ofqual?

Figure 4: total responses to question 3

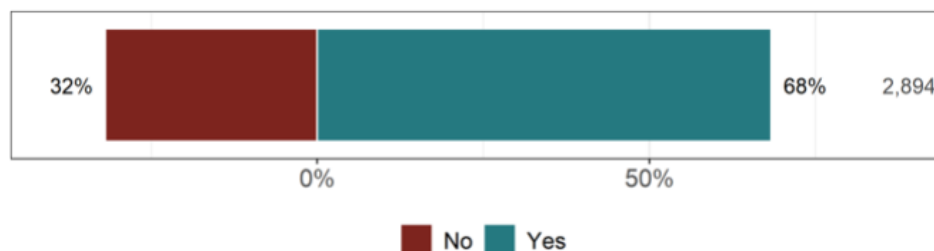


Figure 5: breakdown of responses to question 3 by respondent type (individuals)

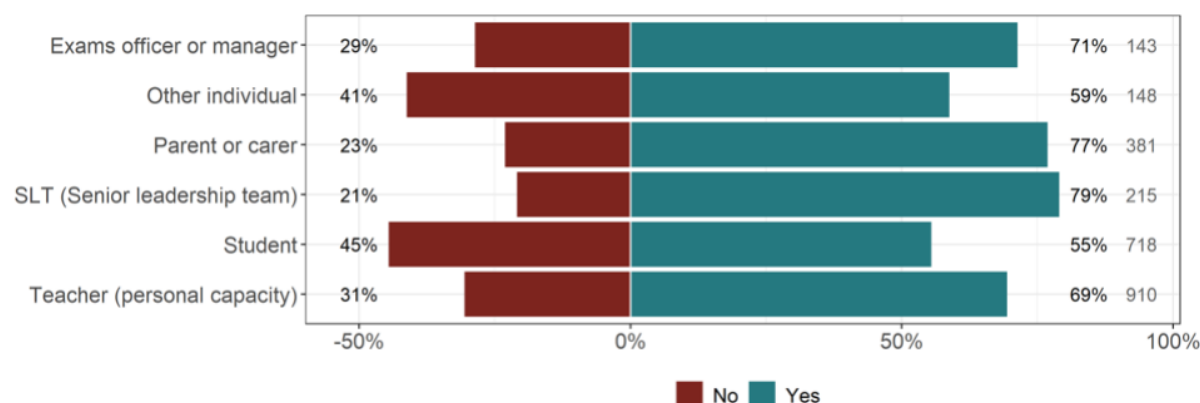
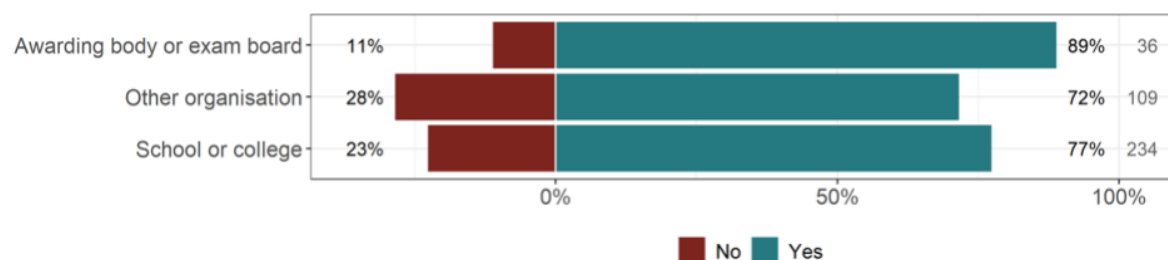


Figure 6: breakdown of responses to question 3 by respondent type (organisations)



The majority of respondents agreed with the proposal and there were 842 comments. There is broad agreement that as functional skills qualifications (FSQs) are smaller, on-demand, qualifications and are provided by a range of delivery providers to a diverse group of students that a flexible approach is required.

Respondents who agreed were clear that assessments should continue where there is minimal risk to student safety and wellbeing. Several students responded that

assessments should still take place online or paper-based where they wish to sit them. Some respondents requested adjustments such as reducing the amount of content examined.

Of those not in favour of the proposal, respondents felt alternative arrangements should apply to all FSQ students at all levels because two types of awarding would lead to disparity in results, approaches and fairness. This was raised particularly in relation to 16-18 year olds, especially where the reformed English and maths qualifications are seen as equivalent to GCSEs. Where alternatives are necessary, it was raised that teachers have in-depth awareness of students' abilities to reliably award through alternative arrangements, and this was done successfully last year.

Where assessments do proceed, respondents raised that students who are vulnerable, shielding, have SEND or English as an additional language should not be disadvantaged. They may have difficulties accessing assessments remotely where support such as scribes and readers are required. Mental health has also been impacted, affecting both performance and willingness to take assessments.

Where respondents agreed that in-person assessments should continue, there were specific comments relating to travelling safely to exam centres, ensuring largescale social-distancing and also discomfort from wearing personal protective equipment that could potentially impact students' performance. Some expressed concerns about asking staff and students to risk their own and their families' health, with suggestion to delay assessment until settings re-open.

Many teachers and students raised the challenges with online teaching and disruption to learning. This is in part because some lack devices and conducive home environments, and due to differential learning styles. The lack of technology was also raised when accessing remote assessments and some highlighted that many adults lack basic digital skills. Other issues related to difficulties with downloading assessment software, the need for multiple devices, and the extra training required for staff and students.

The majority of those who agreed welcomed remote solutions, including most awarding organisations due to heavy investment in remote invigilation which has been delivered successfully. However, it is not yet available through all awarding organisations or scalable to accommodate the volume due to complete by summer. Some respondents asked that capacity for remote assessments should be exhausted across all awarding organisations before opting for alternative arrangements. It was noted an option for alternatives is necessary for ICT FSQs as they are not available remotely.

Many respondents referred to apprentices who have been waiting to take FSQ assessments. They agreed with the proposal, noting it may be possible to implement safe face-to-face assessments in work-based settings or remotely where there are

workplace restrictions. However, not all have IT equipment, and many smaller employers would struggle to fund this. Some respondents raised apprentices do not study within academic years so it would be unviable to submit evidence within specific timeframes.

## T Levels – core component assessment

### Question 4

Do you agree that T Level core component exams should not go ahead this summer and should be taken in the second year, but that students should still have the option to take the employer-set project?

Figure 7: total responses to question 4

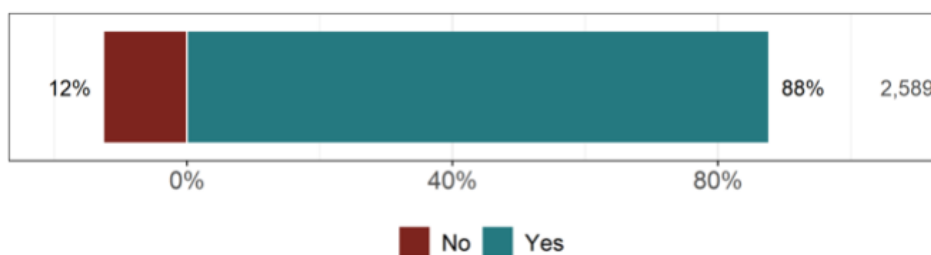


Figure 8: breakdown of responses to question 4 by respondent type (individuals)

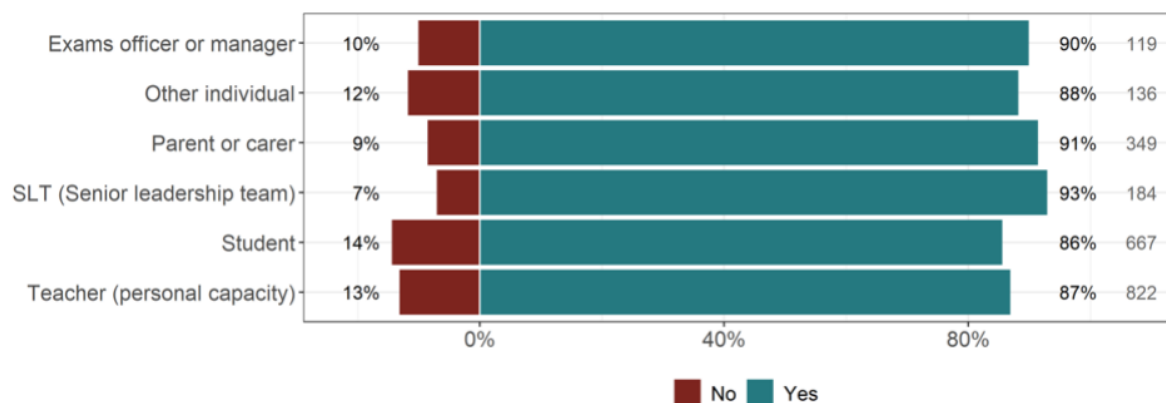
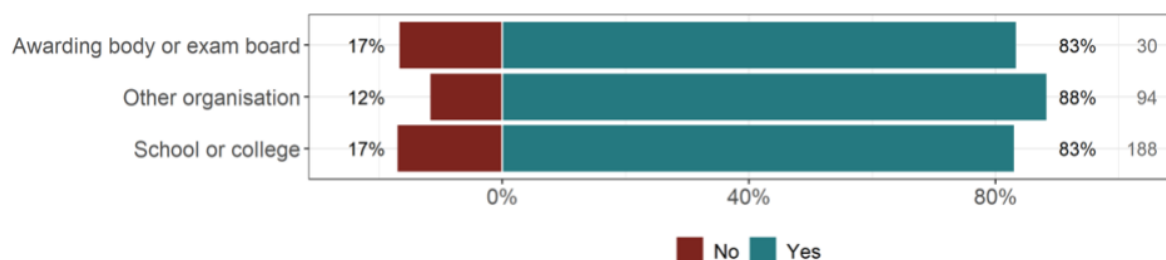


Figure 9: breakdown of responses to question 4 by respondent type (organisations)



88% of respondents agreed with our proposal. Looking at the respondents who provided an open response that addressed question 4, the majority 2266 (88%) agreed with the proposal and 323 (12%) disagreed with the proposal. No response was provided by 684 respondents.

Of the 155 respondents that agreed with the proposal and explained their answer, 30 raised concerns that the proposal would place too much pressure on students in the



second year. Of the 177 respondents who disagreed with the proposal and explained their answer, this was also the most frequently cited reason (raised by 43 respondents).

It is worth noting that most respondents are not directly involved in the delivery or study of T Levels – only 44 providers are responsible for delivering the courses and administering the assessments this year. Of these providers, 34 responded to the consultation and the majority (18 respondents) raised similar concerns about pressure in the second year. They were particularly concerned about the capacity of students to successfully complete the occupational specialisms and Industry Placement in the time available if students also had to complete core examinations in the second year.

Some T Level providers indicated that students have been able to access the core knowledge this year, through blended learning, and would be better off taking the core examinations this summer than the Employer-set project. Thirteen respondents overall suggested that students should be able to take core examinations this year.

However, it was also clear from some T Level provider consultation responses and through separate discussions with these providers during the consultation period, that they may be open to the use of alternative arrangements for deriving core grades this summer.

## Proposed qualifications not in scope of alternative awarding arrangements

### Question 5a

Do you agree that practical exams required for employment and apprenticeships should continue to go ahead throughout the academic year, where they can be delivered in line with public health measures, or otherwise will need to be delayed?

### Question 5b

If you do not agree, which practical, occupational competence exams do you think should not go ahead?

Figure 10 showing the total responses to Question 5a

Figure 10: total responses to question 5a

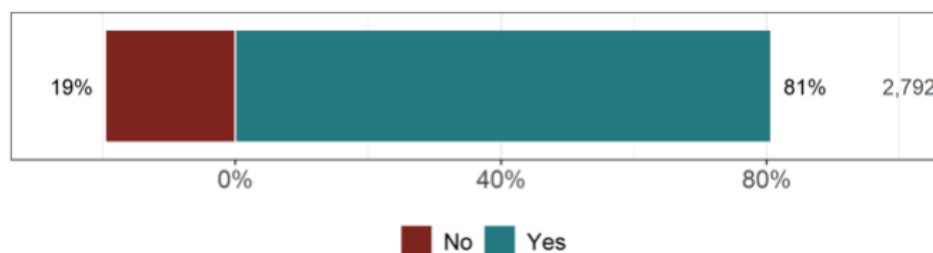


Figure 11: breakdown of responses to question 5a by respondent type (individuals)

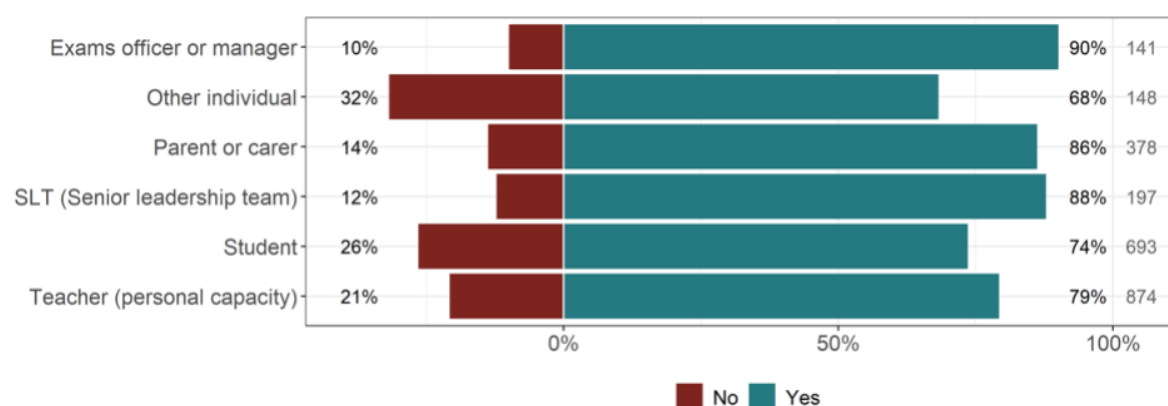
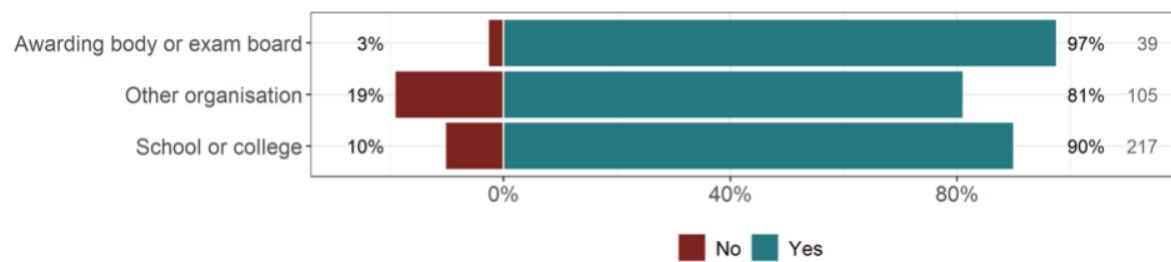


Figure 12: breakdown of responses to question 5a by respondent type (organisations)



The majority of respondents agreed with the proposal that practical exams required for employment should continue, with a small minority disagreeing.

Of those respondents who agreed that exams and assessments should go ahead and left comments, many agreed that they were needed to enable a student to progress to the next stage of their lives. They agreed that it was not possible or safe to award license to practice and qualifications assessing students against professional or occupational standards could not be awarded via alternative means, as it could lead to a lack of confidence in the ability of the qualifications to meet their purpose of training the student to perform in the workplace.

However, a number of respondents who agreed with the proposal argued that these students require access to specialist equipment and should be prioritised for return to school and college. They also raised logistical concerns, such as ensuring sufficient distancing within workshops, as well as the need for additional funding to ensure students are able to sufficiently catch up before taking their assessments. A campaign response from teachers was identified which raised concerns to this affect, but other non-campaign responses also raised these sentiments.

A number of respondents who agreed that exams and assessments for occupationally competent qualifications should go ahead argued that whilst these qualifications have already been adapted under Ofqual's Extended Extraordinary Regulatory Framework, they may need to make further adaptations and should be permitted to do so. There were also calls for greater consistency between awarding organisations with regards to which qualifications were considered to be occupationally competent and in scope of continuing, with a small number pushing for this group of qualifications to be limited to those qualifications truly considered to be occupationally competent. Comparisons to the arrangements for summer 2020 were made where some exams and assessments for the same subject (Travel and Tourism and Sport was cited) went ahead with one awarding organisation, whilst another cancelled these exams.

A small number of respondents called on awarding organisations to develop their ability to offer remote invigilation. A small number of respondents also suggested that whether exams and assessments for occupational qualifications go ahead should be optional, similar to the position permitted for January exams.

Of those that commented, the majority argued that all exams should be cancelled and respondents argued that practical exams and assessments should be treated in the same way as GCSE and A levels with teacher assessments were possible. The most common reasons cited were concerns regarding the safety of proceeding with exams, that students had lost too much learning to be able to sit exams, with a campaign of responses also arguing that to take a different approach for practical or work-based assessments would be unfair. A small number of respondents raised concerns that continuing with practical exams could further disadvantage a cohort which are already more likely to be from disadvantaged backgrounds.

Whilst not considered to be a qualification which confers occupational competence and so out of scope of this question, IB was the most common singular qualification that respondents said should not go ahead, but this was only raised by a small proportion of respondents. Some respondents argued exams for other specific qualifications, or subject areas should not go ahead including:

- hair and beauty
- health and social care
- applied science
- hospitality and catering
- sports coaching
- graphic design
- performing arts
- music
- business
- engineering
- plastering
- childcare
- information technology
- land based
- construction
- Level 1 technical qualifications as they do not confer occupational competence

There was no clear pattern to the specific qualifications cited, with the subject areas being raised by a small number of respondents. However, the reasons cited including the loss of learning and inability to access the workplace or appropriate

facilities or software, or where social distancing is not possible. However, in citing these qualifications, some respondents had misunderstood the question, and cited subject areas which were not in scope of going ahead.

## **Level 4 and 5 qualifications**

### **Question 6**

What, if any, important differences of approach do you think need to be taken to exams for Ofqual-regulated level 4-5 qualifications?

644 respondents gave a view on Level 4 and 5 qualifications. The range of responses was broad, and it appears that many were putting across a wider view of the best approach to examinations in general, rather than specifically addressing Level 4 and 5.

For those that responded, the most frequent concern cited was about consistency. Respondents varied on whether they wanted to see consistency with A levels and GCSEs, or with other VTQs. Of those who responded, 13% supported taking the same approach as for GCSEs and A levels (i.e. cancellation of exams). The rest favoured a mix of approaches, fitting with the broad nature of the sector - 26% preferred to follow the same approach as for other VTQs, 19% indicated a preference for teacher assessment and/or assessed grades, 30% preferred alternatives to exams such as portfolios, assignments, adapted exams, or lowering grade boundaries. Just 6% stated that they favoured going ahead with exams.

Another common theme was around fairness. Many respondents mentioned that students were not ready or highlighted the limited amount of learning that has been possible against a background of disruption from the pandemic. Others highlighted particular subjects with specific constraints or conditions (such as teaching qualifications), or particular groups with particular needs or difficulties (such as SEND students).

Some respondents also highlighted the need for consistency, at Level 4 and 5, between AO-led qualifications (which are regulated by Ofqual) and HEI-led qualifications (which are not). Only a small number of HEIs responded but most that did were in agreement with our proposal to take a broadly consistent approach with that taken at other levels.

## Question 7

Are there any qualifications in scope of alternative awarding arrangements where a form of teacher assessment is not appropriate?

Figure 13: total responses to question 7

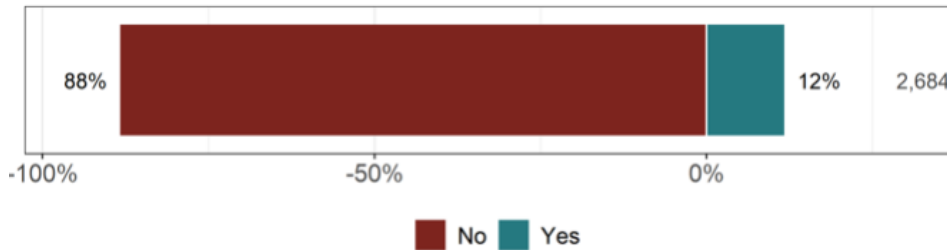


Figure 14: breakdown of responses to question 7 by respondent type (individuals)

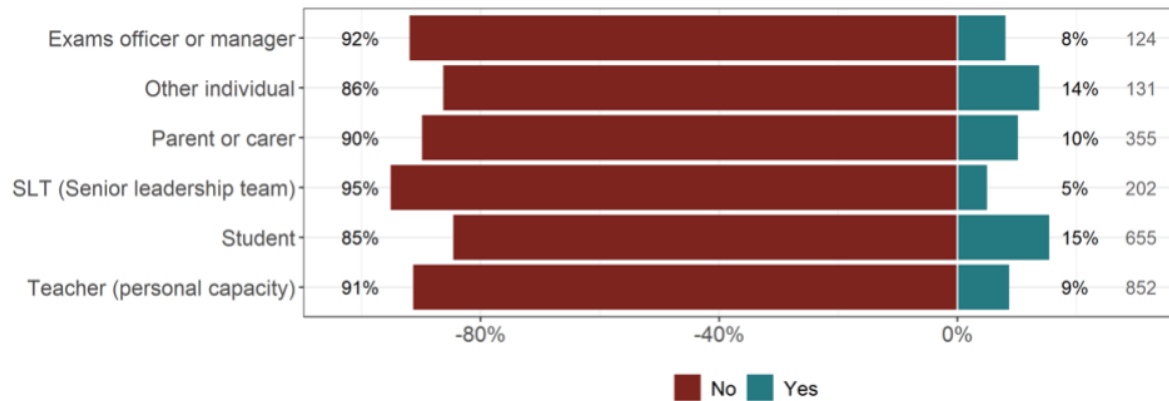
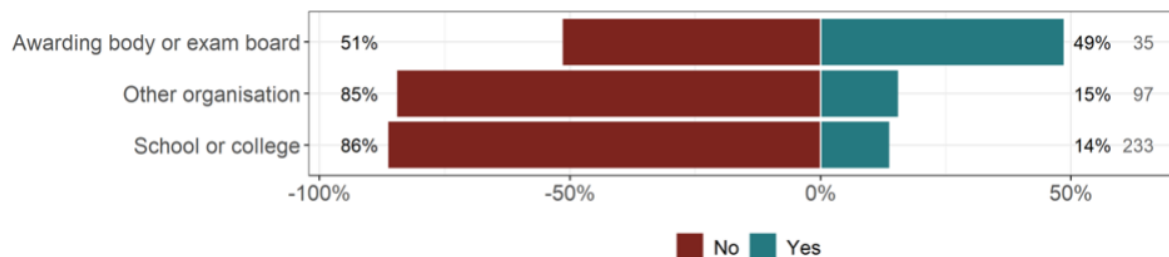


Figure 15: breakdown of responses to question 7 by respondent type (organisations)



88% of respondents thought a form of teacher assessment was appropriate for all qualifications in scope of alternative awarding arrangements.

Respondents felt that teachers know their students best and are therefore best placed to make assessments. Some suggested that in order to ensure teacher assessments were fair, they should still be moderated, with guidance provided for consistency. Responses which voiced support for allowing teacher assessments for all qualifications largely come from students and teachers themselves, with smaller numbers from parents and members of SLT. Comments voicing support for teacher assessments alongside some form of guidance or framework to ensure consistency were mostly raised by teachers and members of SLT.

Whilst considered to be out of scope of alternative awarding arrangements, respondents argued that Technical courses with practical components or those with a licence to practise are not suitable for teacher assessment alone. Examples given included music, performance arts, electrical, plumbing, childcare, hairdressing and animal care. Concerns were raised about potential for teacher bias or favouritism as well as their ability to accurately assess where contact with students has been limited. Some respondents felt there should be a distinction drawn between learning that has taken place at home versus school or college.

A small number of respondents raised concerns that a form of teacher assessment is not appropriate for private students, with one respondent suggesting that these students should be given the opportunity to sit exams remotely. Another respondent suggested that private students should work with a school or another teacher to provide a teacher assessment.

A small number of respondents also argued that teacher assessment was not appropriate for the International Baccalaureate because teacher assessment would not be used in other countries where candidates will be able to sit exams. Other respondents argued that the IB has internal assessment on which the IB could be awarded.

Awarding organisations suggest that where adaptations to assessment arrangements do not devalue the credibility of the qualification or the students' learning, teacher assessment may be appropriate, but that there may need to be some combination of both this and an adapted exam for some courses. They suggest there should still be a role for them in moderating grades rather than relying solely on teacher assessments as they have made contingencies for this scenario.



## Question 8

Do you agree that internal assessment should continue, where relevant, for all students and other learners where possible?

Figure 16: total responses to question 8

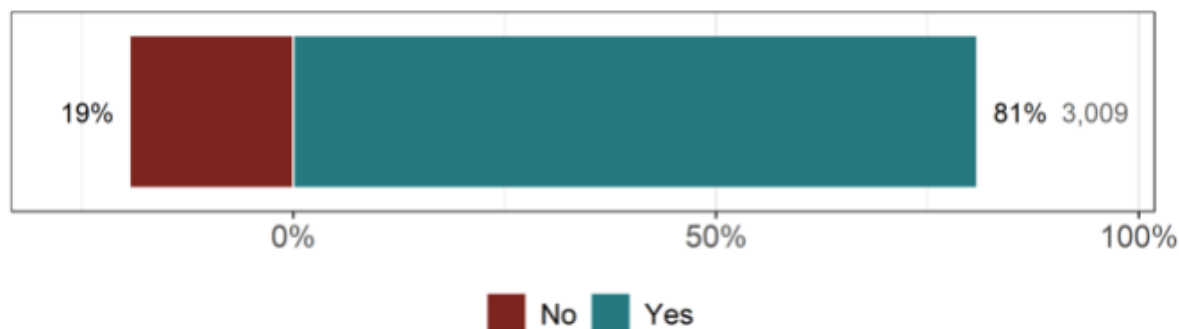


Figure 17: breakdown of responses to question 8 by respondent type (individuals)

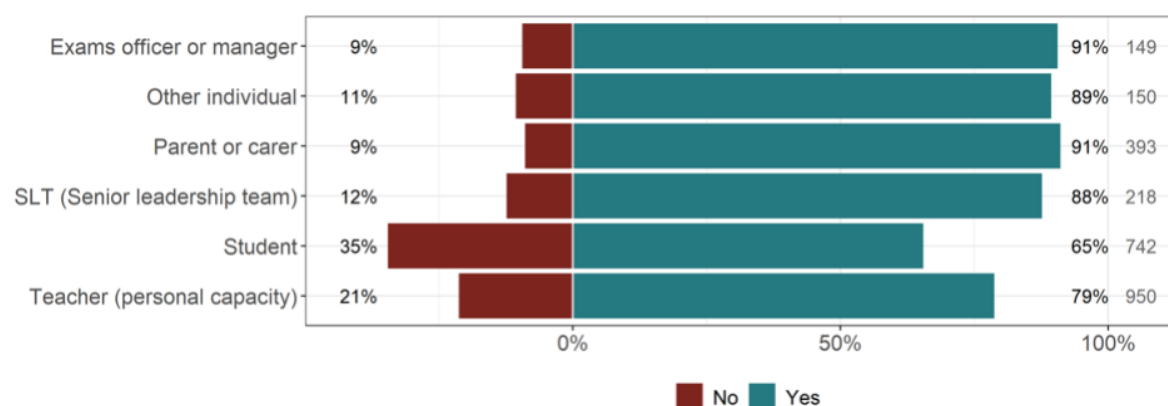
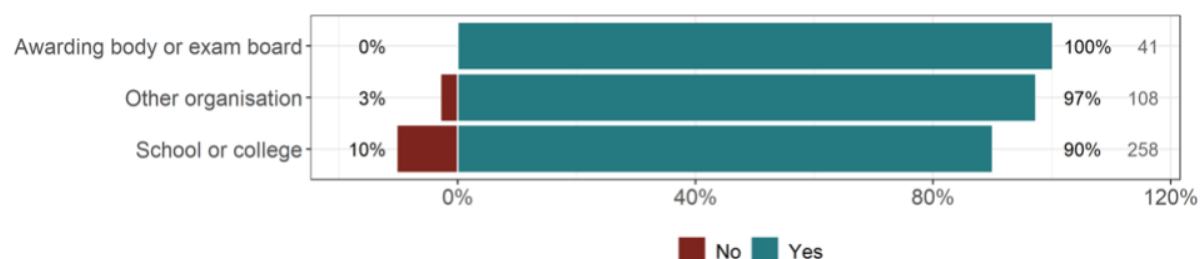


Figure 18: breakdown of responses to question 8 by respondent type (organisations)



The majority of respondents, at 81%, agreed with the proposal that internal assessment should continue where relevant, with 19% disagreeing. However, the respondents that disagreed were over twice as likely to fill in the open comments section than the ones that agreed (69% and 32% respectively). It is important to note that there were different interpretations of what internal assessment meant, particularly as internal assessment can differ between qualifications, and some

respondents were referring to internal assessments as an informal, teacher-led and marked assessment, rather than a type of exam.

Fairness was a major consideration for the majority of those that agreed with the proposals and commented. With fairness in mind, they added several caveats to their agreement, as set out below.

A significant percentage of teachers, senior leadership, and exams officers, as well as a notable percentage of parents and carers, but not students, suggested that individual circumstances should be taken into account, citing digital poverty, an unfavourable home environment, and illness as some of the reasons that needed to be considered.

Teachers were even more likely to suggest that internal assessments should be adapted across the board, with moderated grades, reduced assessment requirements, adapted standards verification process, marking only assessments completed before the third lockdown, and marking incomplete assessments being some of the suggestions made. Another suggestion was to assign everyone a teacher-assessed grade, but, where appropriate, give the students the option to complete internal assessments too, and then keep the higher of the two grades. Some respondents also misunderstood and raised the need for clarity and guidance on the alternative arrangements for the internal assessments.

Exams officers were most likely to suggest that internal assessments continued as a means to inform centre-assessed grades and/or provide evidence for them, a suggestion also popular with parents and carers. The fear that lack of internal assessment would demotivate students was also voiced.

Finally, with safety and accessibility in mind, some thought that internal assessments should only go ahead where appropriate, excluding, amongst others, cases where delivery of practical assessment was impossible either due to lack of access to specialist equipment or PHE restrictions.

As with those in favour of the proposal, a significant number of respondents who disagreed with the proposal cited the lack of fairness as the main reason why. Both teachers and students (which together accounted for the majority of the comments) were equally likely to raise concerns regarding fairness. Inconsistencies amongst different courses (with some courses being disproportionately affected by limited access to specialist equipment and rehearsal spaces, etc), different approach between schools, and the differences between technical courses and GCSEs and A levels were cited.

Disadvantaged students were often mentioned as being particularly at risk of being affected by unfair results. These concerns were mostly cited in the context of digital poverty, but also, with reference to having an unfavourable home environment in which to study. These concerns were cited almost exclusively by teachers, senior

leadership, and exams officers, which might suggest that the students and parents that may have shared these concerns on a personal level did not raise them or had not taken part in the consultation.

A significant loss of teaching time was, also, one of the main concerns, along with the view that remote learning was less effective. Concerns regarding the impact on pupils' mental health were also raised, particularly by students, parents and carers, with the extra stress of having to complete internal assessments and/or exams deemed unnecessary and unwelcome. Teacher-assessed grades were put forward as the solution typically by teachers, students, parents, and senior leadership, but not so by exams officers.

## ***Impacts on VTQ students as compared to students taking GCSEs, AS and A levels***

### **Question 9**

Do you agree with the impacts we have identified and are there any other impacts, including equalities impacts, of the policy set out in Part A that should be considered?

We received a total of 912 general comments from respondents. A high proportion of the responses did not highlight any additional impacts, but highlighted the broad impacts of cancelling exams, rather than raising specific equality impacts or specific impacts of the proposals.

A large majority focused on the need for fairness and consistency across all qualifications e.g., BTECs (or equivalent) should not be treated differently to A levels and GCSEs. Respondents argued it was unfair for some students to sit exams while others did not. Over half of respondents arguing that all qualifications should be treated equally were students, teachers and parents. Where it was suggested teacher assessed grades should be awarded instead, it was the same groups (students, teachers and parents) that highly favoured this approach. It was argued different approaches to different qualifications could cause unnecessary delay for work-based qualifications, disadvantaging these students and it was unfair to require some students to sit exams.

A number of campaigns were identified in relation to qualification equality. One related to functional skills and other work-based learning programmes and how those students could be disadvantaged, in comparison to general qualifications, if assessments went ahead. A similar campaign was received in relation to Pre-U qualifications. A further campaign highlighted that students on practical programmes may be additionally disadvantaged by not being able to access onsite delivery during lockdown, particularly where specialist equipment is required also. It also identified that impacts would vary i.e. that parents' study has been impacted by their childcare commitments, whilst their children are unable to attend school.

Disadvantaged students, SEND students, and BAME students were consistently mentioned. All responses typically related to issues such as unequal access to IT (patchy Wi-Fi, shared laptops and lack of access to online resources), the home environment not being suitable, and that these students often lack the same support at home as they would receive on-site, in order to perform at their best. Examples of issues included: Some parents not being able to work from home (i.e. manual labour jobs) so aren't at home to offer guidance and support as opposed to those parents that can work from home. Students who have not got parents at home who can or

are engaged enough to support them in making sure their work is returned to school or uploaded to online platforms for inclusion in evidencing. Respondents also raised the need to consider SEND students' access arrangements such as being able to have a reader or scribe.

Some respondents expressed views that more thought is needed to be given to those with caring responsibilities, adult students, apprentices, and private or home school students.

A significant proportion of respondents cited mental health as an impact, not just for students but teachers alike. Over two thirds of the responses about mental health came from these groups. Respondents cited that the pressures of coronavirus (COVID-19) have impacted everyone differently and having to undertake exams or assessment would cause additional stress. Many student respondents feel they would not be able to perform at their best in the current climate, this concern was also voiced by teachers. Responses from teachers made the point that they have had to adapt to new teaching methods, engage students and provide feedback remotely, which has led to increase in stress and anxiety.

The impact of lost learning was another key theme, with teachers raising this the most out of all groups, however all respondent groups argued it need to be considered in the arrangements for awarding, and flexibility should be applied. There is concern the impact of lost learning has been underestimated. Respondents made the point that the amount of support and learning received by students has greatly varied across the country and across schools and colleges be it through shielding, self-isolation, or access to online resources. Some respondents identified that some students, especially those disadvantaged, are not able to readily access remote learning, while others do not engage with teaching in this way.

Regarding practical assessments, access to specialist equipment was consistently mentioned as disadvantaging students. Many respondents said that students taking courses such as hair and beauty, music, drama, and art and design, have been unable to use on-site resources which are key to VTQ courses, and therefore would not feel adequately prepared to sit exams or assessments. Respondents said this would put these students at a disadvantage and result in an unfair playing field.

Some respondents said that where practical exams or assessments do take place, the impact of current coronavirus (COVID-19) restrictions and public health requirements must be taken into consideration, particularly for students with disabilities. For example, some cited the impact of mask wearing on deaf students' ability to receive the support they need. Some respondents said that, in areas where infections are higher, there may be concerns regarding attending an assessment in

person, and adjustments for this must be factored in. An exam officer also raised the issue of social distancing and whether more 'assessment sites' will be needed.

## Part B - Approach to awarding VTQs and other general qualifications

### Alternative regulatory arrangements

#### Question 10

To what extent do you agree/disagree that the alternative regulatory arrangements should only apply to the qualifications identified in Part A of this document?

Figure 19: total responses to question 10

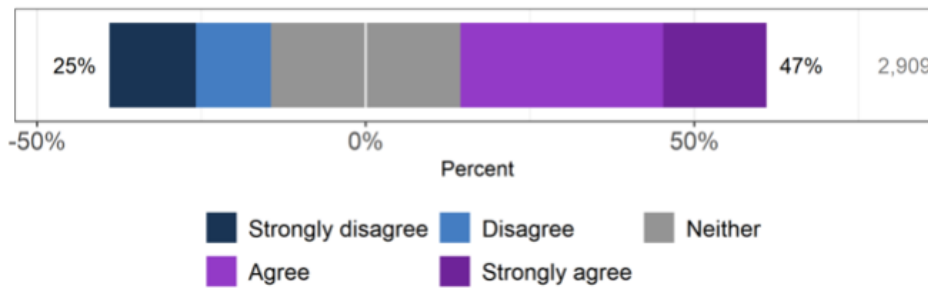


Figure 20: breakdown of responses to question 10 by respondent type (individuals)

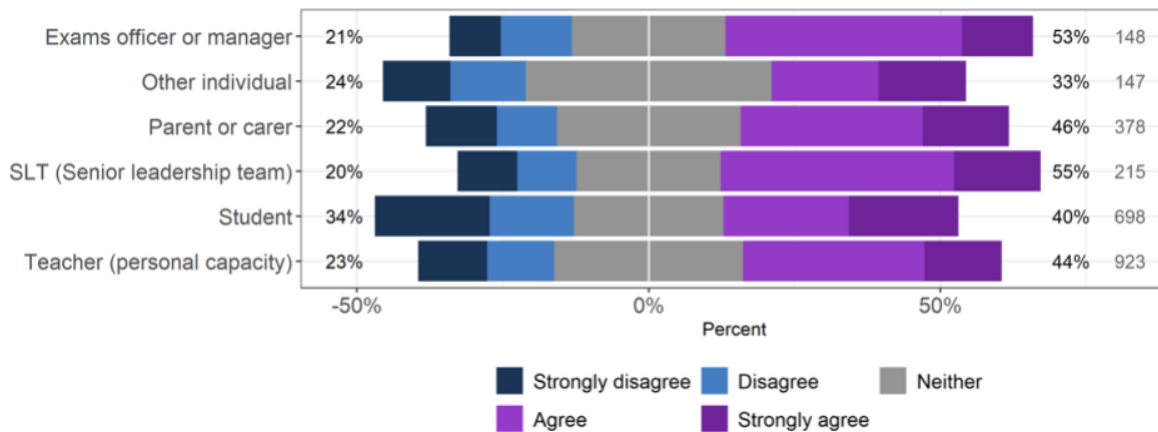
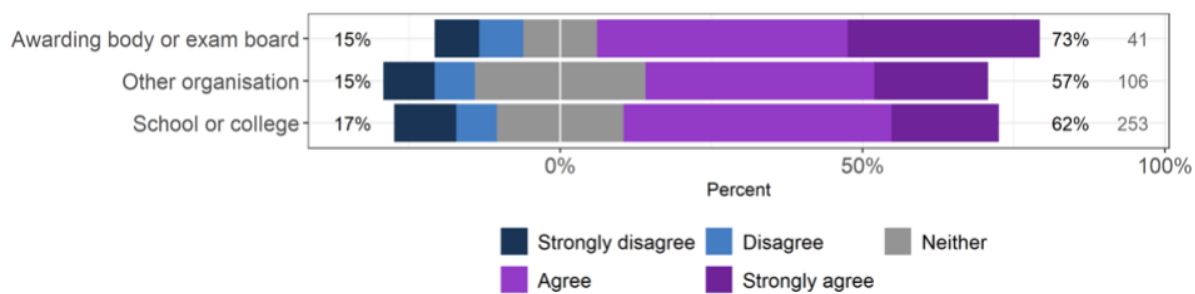


Figure 21: breakdown of responses to question 10 by respondent type (organisations)



A total of 2,909 responses were received to this question and 682 respondents provided comments.

During the consultation analysis we became aware of a number of ‘campaign’ responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. Two separate ‘campaigns’ were identified, one accounting for 26 responses commenting that:

“a large number of qualifications are identified in Part A with seemingly different approaches. The alternative regulatory framework should apply equally to all of those mentioned”

Another campaign accounted for five responses, commenting that the alternative arrangements should apply to Pre-U and IGCSEs so that students that take these qualifications are not disadvantaged compared to their peers.

Of those that responded, 47% of respondents to this question either agreed or strongly agreed with our proposed approach, compared to 24% who disagreed or strongly disagreed. 29% neither agreed nor disagreed. Respondents were generally in favour of the proposal. There were no significant differences between respondent groups.

For each respondent group, the majority agreed or strongly agreed with our proposed approach. Most of the awarding organisations who provided comments to the consultation agreed that the alternative regulatory arrangements should only apply to the qualifications in Part A, only a few either disagreed or neither agreed nor disagreed. We received a mix of responses from teachers, students, parents and carers. It is worth noting that many of the same points were made by these respondents, irrespective of whether they had marked that they had agreed or disagreed with the proposed approach.

Many respondents in support of the proposal discussed the types of qualifications that the alternative arrangements should apply to. This included:



- some respondents across all groups commenting that any knowledge qualifications should be awarded centre or teacher assessed grades whereas competency-based qualifications should be completed
- a few respondents commenting that practical assessment for licence to practise qualifications and qualifications that have health and safety implications should go ahead with agreed adaptation and delayed as necessary as centre or teacher assessed grades are not appropriate for these qualifications
- mixed responses around functional skills qualifications, with some respondents suggesting that assessment should go ahead for these qualifications as centre or teacher assessed grades are not appropriate and others that expressed concerns around functional skills exams going ahead
- some awarding organisations and other representative or interest groups commenting that performing arts graded examinations should fall out of scope. One awarding organisation commented that they have now put in place remote assessments providing full flexibility and enabling students to take the examinations when ready
- a centre commenting that smaller competency-based qualifications that do not have exams should be considered in Part A so as not to disadvantage opportunities for progression to work or university

Other comments from those in support of the proposal included:

- a small number of respondents commenting that centres and awarding organisations should be given the flexibility to offer exam-based results or calculated results
- several awarding organisations commenting that the Extended ERF should remain in place as it is flexible and meets many requirements
- a high proportion commented that the qualifications in Part A were similar to GCSEs, AS and A levels and therefore to promote fairness and equality, the same principle should apply
- awarding organisations, centres and teachers requested more clarity and information to be provided in a timely manner around which qualifications are in scope

Respondents who disagreed with the proposal suggested that the alternative arrangements should apply to additional or all qualifications. This included:

- many respondents commenting that the same approach should apply to all qualifications as the pandemic has affected everyone and highlighted the need for fairness and equality across students and qualifications so that

students are not disadvantaged from any future education or employment because of the qualifications they are taking

- a few respondents felt that more qualifications should be included within Part A, such as entry level qualifications and functional skills, so that students are not disadvantaged because they take different qualifications
- a few respondents commenting that licence to practice examinations should be included and adapted so that students are not held back, especially when they have already completed their practical work
- a few awarding organisations commenting that the proposed arrangements are not flexible enough and that the awarding organisations should be allowed to apply these arrangements to all qualifications where they are deemed necessary

Many of the respondents also suggested the approach for GCSEs, AS and A levels should be used. Reasons included:

- most of the respondents felt that the qualifications in Part A are more aligned to GCSEs, AS and A levels rather than vocational qualifications and therefore the same approach should be implemented
- one respondent commented that practical skills are not only assessed in VTQs, but also in some GCSE and A level qualifications, therefore if the skills were not to be assessed in GCSEs, AS and A levels, the same should apply for VTQs

A few respondents commented that exams should go ahead, perhaps alongside the alternative arrangements and some respondents commented that students should have the option to sit exams.

In addition, an awarding organisation suggested that it would be more appropriate to consider management of ongoing examinations through Special Consideration and highlighted the fact that there is currently no substantive reassurance there will be comparability of approaches.

Most respondents said that BTECs should be included under the alternative regulatory arrangements. However, one teacher commented that students taking BTECs which assess practical skills could be disadvantaged as there would not be written work upon which to base teacher calculated grades. A few parents and students raised concerns that students taking BTECs exams may be disadvantaged by being required to take assessments compared to their peers who decided not to take the exams and requested for more clarity.

Respondents who neither agreed nor disagreed made the following additional comments:

- most commented that clarity is needed regarding which qualifications are in scope
- a respondent from an awarding organisation commented that it would be necessary to review the qualifications that were in scope in 2020 in light of the changing circumstances
- a centre commented that there should not be an external summer examination for BTECs and that internal data should be used to generate a centre assessed grade for examined modules.

Some of those who neither agreed nor disagreed commented that they were not in a position to comment further as they were not familiar with all the qualifications.

A high proportion of respondents did not specifically reply to the question but called for teacher or centre assessed grades to be used, or for specific qualifications to be included in Part A. We received several comments which did not specifically address the question but highlighted the following concerns:

- exams should be cancelled for all qualifications as it is unfair that some students sit exams whereas others will receive centre or teacher assessed grades
- some expressed concerns around students' mental health as well as learning loss affecting which may have a negative effect both on work they are requested to carry out at home or on exam results
- some respondents expressed concerns around the fact that some practical work cannot be completed at home due to lack of technology or equipment
- some wanted further consideration to be given to BTECs, ESOL Skills for Life, functional skills, and entry level qualifications
- some expressed concerns around postponing ESOL Skills for Life and functional skills exams and the impact on the students
- one respondent from an awarding organisation commented that qualifications that were introduced and regulated after the awarding arrangements for 2019/2020 should be considered
- an awarding organisation expressed concerns around the needs for a clear plan and funding to support students taking qualifications with practical assessments. These may need further adaptation to account for learning loss as well as burden on teachers and centres. They also expressed concerns around the impact on the pandemic on apprenticeships

Additionally, we received a number of comments which focused on International Baccalaureate (IB) diplomas and programmes, saying that they should be included

under the arrangements or that IB exams should be cancelled. A few respondents commented that IB should have been included in the consultation for general qualifications. Whether these responses were part of campaign responses or not is unclear.

We also received a few comments that are related to qualifications that are not regulated by Ofqual requesting for these qualifications to be considered for alternative arrangements, such as IGCSEs.

## Learners in scope of the alternative regulatory arrangements

### Question 11

To what extent, do you agree/disagree that the alternative regulatory arrangements should apply to all learners expecting to sit exams or assessments in the academic year 2020/2021 for the qualifications identified as in scope in Part A of this consultation?

Figure 22: total responses to question 11

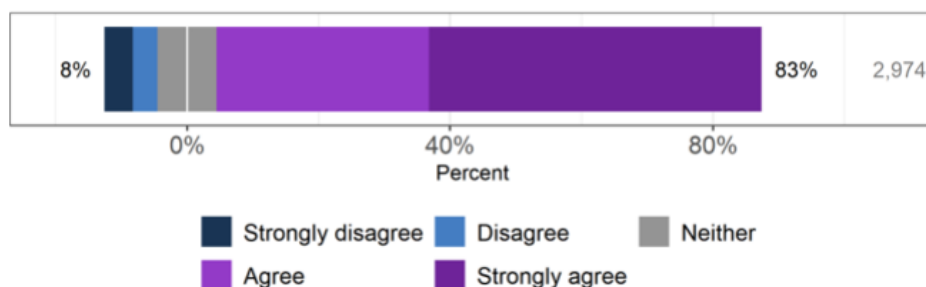


Figure 23: breakdown of responses to question 11 by respondent type (individuals)

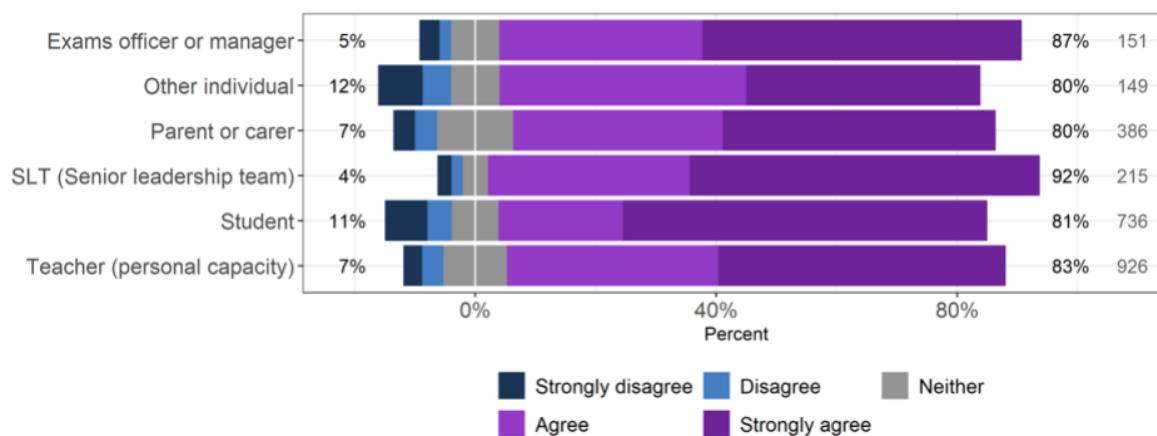
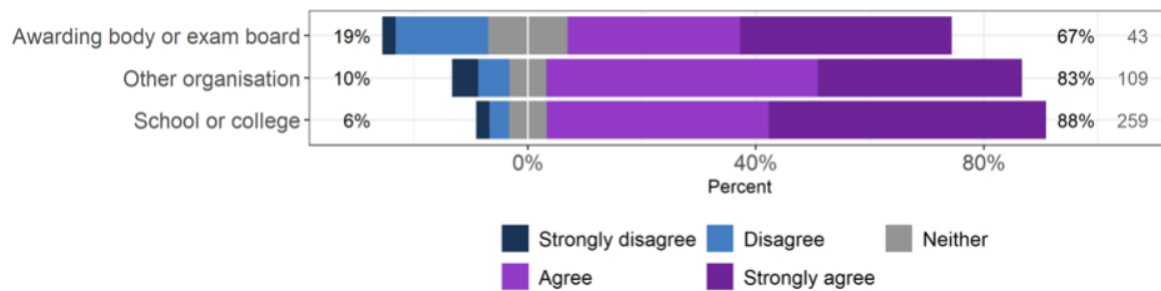


Figure 24: breakdown of responses to question 11 by respondent type (organisations)



A total of 2,974 responses were received to this question and 519 respondents provided comments.

During the consultation analysis we became aware of a number of ‘campaign’ responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One large campaign accounted for 26 responses and agreed with the proposal but:

“subject to the alternative regulatory framework being applied equally to all qualifications mentioned in Part A with no alternative arrangements from some”.

Another campaign accounted for seven responses who commented that the proposal should include learners who are not certificating this year but who were due to complete elements of their courses. Another campaign across several employers accounted for ten responses and requested that that alternative regulatory arrangements should apply until further notice, and not only to students due to sit examinations in the academic year 2020/21. The employers commented that the ongoing issues with national and local lockdowns are impacting apprentices and therefore they need to ensure they have continued to meet the needs of their apprentices who follow a roll on, roll off programme to have access to assessments as appropriate.

Of those that responded, 83% of respondents either agreed or strongly agreed with our proposed approach, compared to 8% who disagreed or strongly disagreed. 9% neither agreed nor disagreed.

Respondents were generally in favour of the proposal. There were no significant differences between respondent groups and for each respondent group, the majority agreed or strongly agreed with our proposed approach. We received many responses that did not address the question and it is worth noting that many of the same points were made by respondents, irrespective of whether they had marked that they had agreed or disagreed with the proposed approach.

Many of the respondents who provided comments requested more clarity on the qualifications which qualifications would be in scope of the alternative arrangements and asked for further clarity on what the arrangements would be.

Some awarding organisations commented that it would be counterproductive, and likely to be perceived as highly unfair, and challenging to operationalise any limit to arrangements only for those certificating in 2020/21, discounting other students.

Comments from respondents in support of the proposal included:

- an awarding organisation commenting that all students that are affected by the cancellation of exams should be identified and in scope, but that qualifications should only be awarded to those who have demonstrated they meet the minimum evidence requirements set by the awarding organisation
- an employer commenting that the alternative arrangements should apply until further notice, not just for 2020/2021, due to the impact of national and local lockdown impacting the apprentices
- an awarding organisation commenting that they will apply the same approach to all schools in the UK but not necessarily outside the UK.

Most of the respondents who disagreed did not specifically address the question. Instead, many commented on the qualifications in scope of the arrangements and the alternative arrangements being proposed. For instance:

- several respondents commented that all qualifications should be assessed by teachers and that the alternative arrangements should not be in the form of awarding organisation assessments, 'mini-exams' or 'short-exams' as this would cause unprecedented levels of stress
- respondents also commented on the IB, with a few respondents taking the view that the exams should be cancelled, whilst others commented that exams should be able to go ahead so that UK students were not disadvantaged compared to students from other countries who would be sitting exams
- an awarding organisation commented that they felt the adaptation approaches in the Extended ERF accompanied by the General Conditions of Recognition were sufficient and felt that the direction towards exam cancellations and new further alternative arrangements seemed "unnecessary and excessive"
- several awarding organisations commented that on-demand exams should continue and that stopping exams that are still viable to take place would be counterproductive. It was suggested that alternative arrangements, such as teacher assessment grades, should only be allowed where exams are not

able to be sat in line with public health guidelines, and even with permissible adaptations in place, that this should be a last resort.

However, several centres commented that they could not agree with the proposal unless there was reassurance that in respect of additional funding to support the implementation of the approach, including increasing digital access and access to specialist equipment.

Respondents who neither agreed nor disagreed made the following comments:

- the majority of respondents, across all groups, commented that there needed to be parity for all students who had intended to complete qualifications by examinations or assessments this year, whether GCSEs, AS and A levels or VTQs. One teacher, for example, expressed concerns around the short assessments that could give an unfair advantage to students on academic subjects to those on VTQs. The short assessments do not align with having vocational subjects continuing to work through lockdown remotely on coursework and other internal assessments that could play a much bigger role in informing their final grade
- one association of employers commented that functional skills qualifications should be moved to alternative arrangements involving primarily teacher assessed grades and expressed concerns around remote assessments (and remote invigilation) not being fully tested, scaled or widely available. Moreover, they pointed out that functional skills qualifications for maths and English have been awarded through teacher assessed grades and that this should be available to students acquiring functional skills qualifications through apprenticeships

We also received several comments which did not specifically address the question, but which raised concerns about year 10 and year 12 students who have been affected by the pandemic but who would not be expecting to complete their qualifications this summer. Other respondents made the following comments:

- few respondents commented that assessment and grading should take into account if students have been severely adversely affected by coronavirus (COVID-19) such as several periods of self-isolation or serious tech issues during lockdown
- several respondents expressed concerns about the impact of learning loss and the difficulties in completing training. One awarding organisation commented on the differences between summer 2020 and the current situation, pointing out that in 2019/20 the lockdown mainly impacted the final term, by which time most teaching had been undertaken, whereas in 2020/21 the national lockdowns have impacted the first two terms where the majority of teaching normally takes place



- an individual response from a member of the senior leadership team at a centre commented that internal assessment cannot continue for practical subjects if the awarding organisation is unable to make sufficient adjustments to their specification to enable students to work from home to achieve all components of some specifications

## Consistency with GCSEs, AS and A levels

### Question 12

Should other general qualifications such as Pre-U, AEA, Core maths and the International Baccalaureate be included under the measures proposed for GCSEs, AS and A levels or under the alternative arrangements for awarding VTQs we propose to put in place?

Figure 25: total responses to question 12

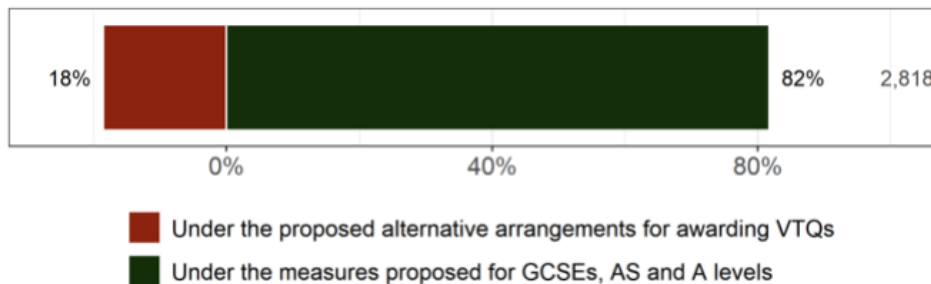


Figure 26: breakdown of responses to question 12 by respondent type (individuals)

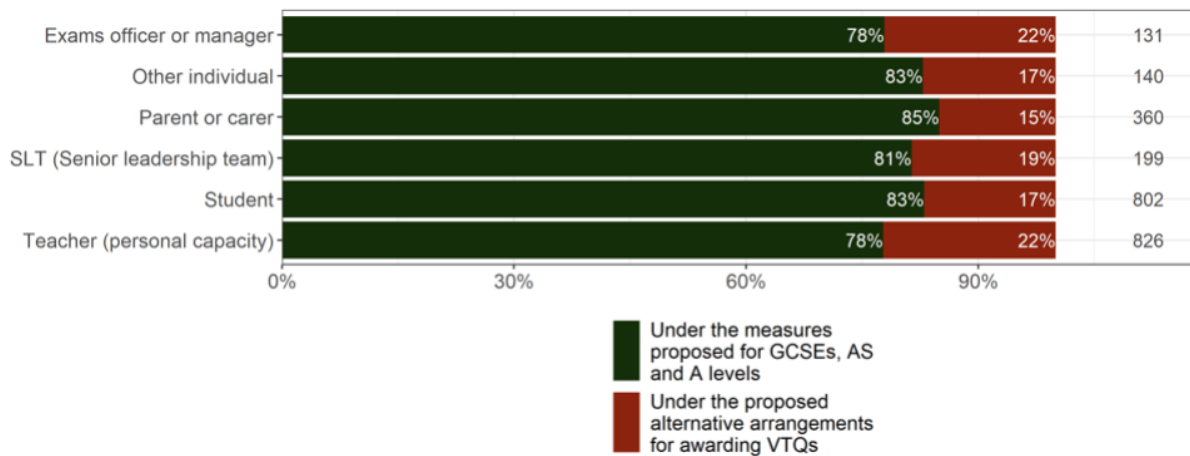
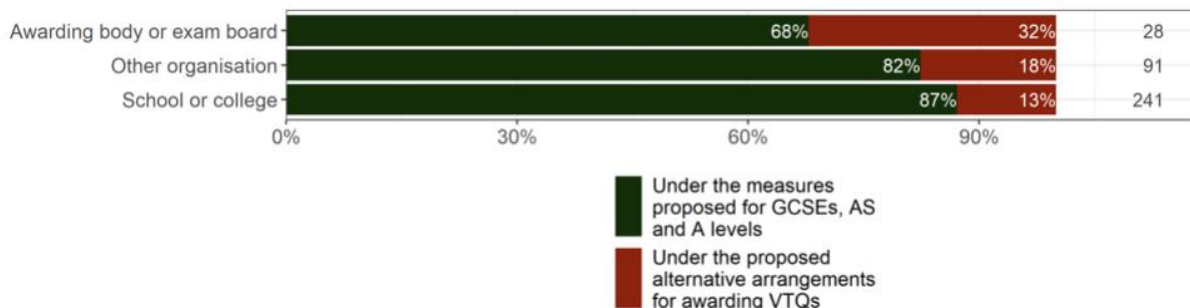


Figure 27: breakdown of responses to question 12 by respondent type (organisations)



A total of 2,818 responses were received to this question and 509 respondents provided comments.

During the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One was identified with at least 11 responses that highlighted the need for all tested qualifications to be regulated under the same regime. Another campaign accounted for seven responses and highlighted the importance for qualifications to be assessed and quality assured using a similar approach so that this does not disadvantage students.

Of those that responded, 82% felt that other general qualifications should be included under the measures proposed for GCSEs, AS and A levels, compared to 18% who felt that other general qualifications should be included under the alternative arrangements for VTQs. The majority of the awarding organisations responded that other general qualifications should be included under the measures proposed for GCSEs, AS and A levels, although some disagreed and 3 awarding organisations expressed no preference because they did not offer those qualifications. Irrespective of their responses, a few commented that knowledge-based qualifications should be aligned with GCSEs, AS and A levels whereas qualifications assessing practical skills should be aligned with VTQs.

Those who responded that other general qualifications should be included under the measures proposed for GCSEs, AS and A levels made the following comments:

- the majority commented that other general qualifications are similar in form and content to GCSEs, AS and A level and therefore should be included under the same arrangements for GCSEs, AS and A levels
- many commented that all students have been impacted by the pandemic and to ensure a fair and equal approach, the same approach across all qualifications should be in place which would be easier for students, parents, carers, teachers and centres to understand
- many commented that the qualifications are taken alongside or instead of GCSEs, AS and A levels and are important for progression to university therefore grades should be awarded using the same approach

Those who responded that other general qualifications such as Pre-U, AEA, Core maths and the IB should be included under the alternative arrangements for awarding VTQs commented that non-standard forms of assessments would work best for other general qualifications. An awarding organisation commented that Pre-U should be included under the alternative arrangements for awarding VTQs due to the differences in assessment approaches between Pre-U and A levels.

We received several responses which did not specifically address the question but commented on the need for fairness and consistency across all the qualifications, including international qualifications and said that all exams should be cancelled. Respondents also expressed concern about the negative impact that coronavirus (COVID-19) has had on both the education and the mental health of students and that expecting some students to sit exams (or some exams) but not others, would be unfair. Some were concerned that coronavirus (COVID-19) still represents a threat to the public and therefore exams should not be sat. Several respondents also called for the use of teacher assessed grades and did not want 'mini-exams' or an algorithm to be used. Some respondents expressed concerns that short papers may overburden teachers and schools who have already collected the evidence to make their professional decision. Other responses which did not specifically address the question wanted clarity for those who sat exams in January (particularly modular exams such as BTECs) and one respondent was concerned that an awarding organisation is still considering having candidates sit Pre-U exams.

Additionally, we received a number of comments which focused on IB diplomas and programmes, saying that they should be included under the alternative arrangements for GCSEs, AS and A levels or that IB exams should be cancelled. A few respondents commented that IB should be assessed based on coursework

A few respondents called for other qualifications that are not regulated by Ofqual to be included in scope, such as IGCSEs and Access to Higher Education qualifications.

## *January exams*

### **Question 13**

For learners expecting to sit assessments in January, are there any particular factors that would need to be taken into account in the development of the alternative regulatory arrangements to seek to ensure fairness?

A total of 1469 responses were received to this question.

A large number of comments received for this question considered the form that the alternative arrangements for these students should take. The majority of comments suggested these students should be awarded results based on centre or teacher assessed grades, or some form of internal assessment. Some comments suggested that the exams should simply be delayed and take place later in the year. However, a large number of comments considered the burden that may be added onto students and centres should they be required to prepare for these exams at a later date, when in most cases students will have moved onto new units.

The majority of comments focused on the importance of fairness and parity between students who were able to sit the January exams and those who were not. It was a clear theme that no student should be disadvantaged on the basis of either sitting or not sitting the exams in January. A few respondents commented that the January exams should be completely disregarded, enabling complete equity between students.

There were some responses that suggested there should be parity in the arrangements for all qualifications. However, during the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to this question. These were analysed no differently from other responses, although it has been highlighted that they may have influenced this theme of consistency across qualifications.

Many respondents also commented on the impact of coronavirus (COVID-19) on students who were expecting to sit assessments in January and factors which should be taken into account to ensure fairness. These included:

- student and staff illness and absence, centre closures and the fact that many staff and students have been required to self-isolate
- the major disruption to learning and varied levels of learning loss that students have experienced

- the challenges of remote learning and lack of access to IT or specialist equipment
- the amount of stress and pressure that students have experienced and how this has affected their mental health and wellbeing

A large number of respondents commented on how these factors would have affected students' ability to prepare for the January exams as well as their performance on the day. This included:

- learning loss and lack of face-to-face teaching time in preparation for exams
- pressure and stress of taking an exam during a global pandemic and national lockdown
- illness of these students, or their family members, and possible bereavements
- concerns for safety and wellbeing while sitting the exam and when travelling to centre by public transport
- conditions of the exam hall. Some respondents commented that ventilation of exams hall had led to uncomfortably cold temperatures during the exam
- uncertainty due to unclear and last-minute announcements
- lack of exam experience as this may have been many students' first attempt at sitting a formal or external exam because of the lockdown last summer
- the assumption there would be an opportunity to resit. One school or college commented that some students use January exams as a chance to practice and depend on their ability to resit in the summer

Many respondents commented on the alternative arrangements that should be put in place for students, who were able to sit their assessments in January, to take account of these circumstances. Suggestions included:

- students who were able to sit the January exams should have their efforts acknowledged, and in some way rewarded
- adjustments should be made to the outcome of January exams, such as lowering the grade boundaries or more lenient marking, perhaps with consideration to what content had been covered
- students should have the opportunity to resit these exams at a later date
- those who were able to sit the January exams should be offered the opportunity to 'resit' in the sense that they should have the option to obtain a grade through the same alternative arrangements in the same way as those who were not able to sit the exam, and take whichever grade is higher

- the alternative arrangements take the form of centre or teacher assessed grades, and students and centres should have the opportunity to choose whether their January exam result is considered as part of this or not

A number of respondents commented on the importance of parity for students whenever they take their assessments, recognising the variable impact of the pandemic.

An awarding organisation suggested that students may experience different levels of fairness depending on the month in which they sit their assessment. With significant differences in circumstances for those sitting assessments at the end of 2020, in January, between February and March and those taking place April onwards.

A university or higher education institution commented that unlike GCSEs, AS and A levels, that have one final exam, many VTQ qualifications require completion of various modules taking place throughout the year. The impact of the pandemic will have differed across time, creating variability across modules which will need to be accounted for so as not to disadvantage VTQ students in comparison to those completing general qualifications.

Some respondents commented that consideration should be made to the stage of the course students are at, suggesting it is important that the alternative arrangements apply to certificating and non-certificating students so as not to impact their learning or progression.

A few respondents highlighted the particular issues facing practical subjects and practical exams and the need to address them in the alternative arrangements. For example, an awarding organisation commented that due to the significant disruption to learning, centres may have insufficient evidence of students' practical abilities which could pose risks if students are certificated without the ability to demonstrate these skills. Therefore, these students may not have the opportunity to be certificated in the current academic year which must be considered so that these students are able to progress as intended.

A number of respondents commented on the guidance and decision making surrounding the January assessments and alternative arrangements. These comments included:

- a number of respondents expressed concern around the short notice decision to cancel exams, which caused uncertainty and confusion for students and centres. Especially for those with exams taking place in the days following announcements
- several respondents commented that there was a lack of clarity in these announcements and the guidance that followed, which further added to the uncertainty and confusion experienced by students and centres

- some respondents felt that by giving centres discretion as to whether they could hold exams or not, additional pressure and difficult decision making was placed upon them. Some respondents felt this was an unnecessary burden on students and centres
- there were also a number of respondents who commented that the January exams should not have taken place
- many respondents suggested the decisions for alternative arrangements must be made and communicated as soon as possible to allow for any preparation and so as not to delay student progression



## **Assessment by exam**

### **Question 14**

Do you have any comments on how exams could be defined for qualifications in scope of the alternative regulatory arrangements?

A total of 1004 responses were received to this question.

The majority of responses did not specifically address the question, with most of the respondents commenting instead that exams should not take place and should be replaced with an alternative, such as centre or teacher assessed grades, or internal assessment.

Where respondents did address the question, many defined exams as those which are externally set and externally marked. Although some respondents suggested that a definition of exams should include exams that are marked internally.

Respondents also suggested other features which could be used to define exams, such as:

- assessments that are moderated externally by an awarding organisation
- assessments that are sat under controlled or exam conditions with some form of invigilation
- closed book exams, or those that are completed independently without additional aid
- consisting of set tasks or questions
- written exam format
- required to be completed in a set amount of time
- taking place in specific window and setting by all candidates
- testing competency, ability or knowledge that is gained through the content covered in the course
- a summative assessment that takes place at the end of the course, contributing to the final grade
- those featured in league tables and performance tables
- those that fit JCQ regulations
- practical and performance assessments
- assessments requiring specific equipment or a specific venue

When considering a definition of an exam in the context of the alternative arrangements, many respondents suggested that this should be in line with the definition of exams used for GCSE, AS and A level assessments. A number of comments suggested that there must be consistency across all qualifications and types of assessments.

Some respondents suggested that definitions should be considered in terms of qualification types. An awarding organisation gave the example of Applied General qualifications and Tech Levels, which was echoed by several other respondents as an approach to definition.

Some respondents felt that it should be up to the awarding organisations to recognise what constitutes an exam and a number of respondents suggested that all assessments and exams of any type, or any exam or assessment affected by coronavirus (COVID-19) should be considered in scope of the alternative arrangements.

Some respondents said that on-demand and remote exams could, and should, go ahead where possible and would therefore be out of scope, whilst others said that they should be in scope. Several respondents commented that students taking on-demand exams have faced the same amount of disruption to learning as their peers and should not be disadvantaged because of this.

In terms of the viability of remote assessment, a number of respondents commented that by having these exams take place, this may introduce a lack of fairness on the basis of access to adequate resources and IT equipment.

A school or college commented that while on-demand and online tests can be viable, they require the same planning, preparation and organisation as written tests, which may place undue pressure on institutions. Some respondents suggested that there should be an element of choice for students and centres, so that those who are able to, can sit on-demand and on-line exams, but those who are not can have alternative arrangements. Although, one school or college suggested that this may introduce further disparity.

In terms of paper-based written exams, many respondents commented that these would not be viable. Although, several awarding organisations commented that paper-based examinations in some circumstances, where qualifications are niche with only a small number of students enrolled and public health guidelines can be adhered to, could still be able to go ahead safely.

A number of respondents suggested however exams are defined, it is essential that definitions are clear, especially for students and parents. Several respondents suggested it would be helpful to provide clear examples of exams that are considered viable and those which are not, assuming these examples do not prevent safe and viable assessments from going ahead.

## Internal assessment

### Question 15

To what extent do you agree/disagree with our proposal to permit awarding organisations to make awards when not all internal assessments have been completed in qualifications in scope of the new regulatory arrangements?

Figure 28: total responses to question 15

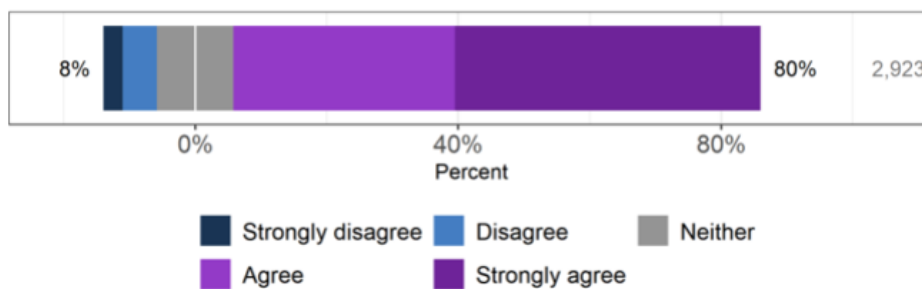


Figure 29: breakdown of responses to question 15 by respondent type (individuals)

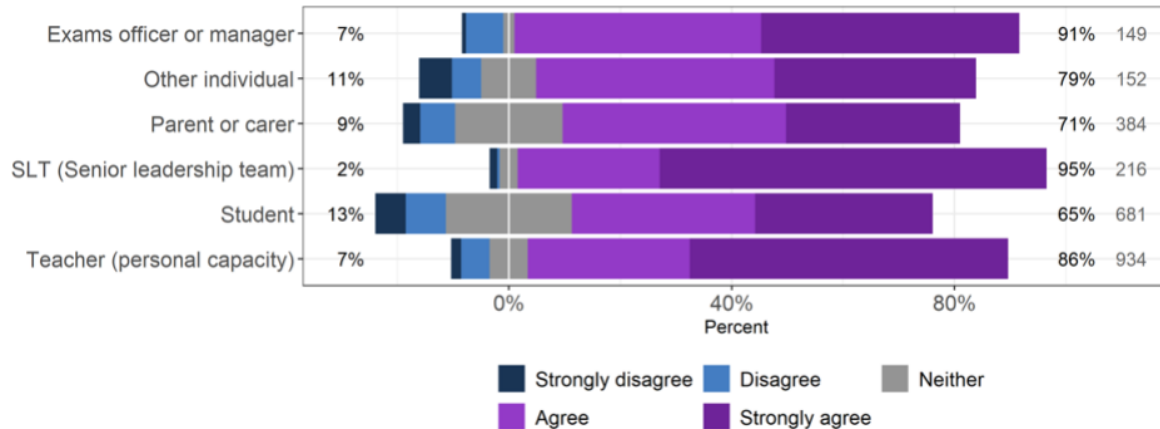
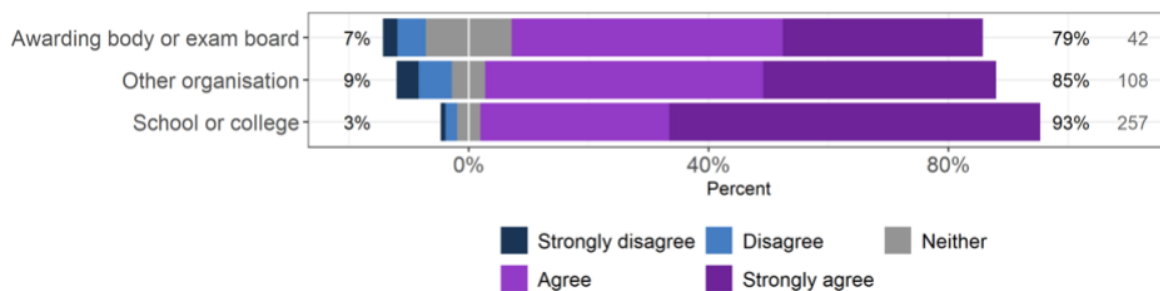


Figure 30: breakdown of responses to question 15 by respondent type (organisations)



A total 2923 responses were received to the question.

Of those that responded 81% either agreed or strongly agreed with our proposed approaches to permit awarding organisations to make awards when not all internal assessments have been completed in qualifications in scope of the new regulatory arrangements, compared to 8% who disagreed or strongly disagreed. 12% neither agreed nor disagreed.

A total of 725 respondents provided further comments.

Of those respondents that agreed or strongly agreed with the proposals, comments focused on this being the fairest approach as it is not possible to complete all internal assessments. Some suggestions were for centre or teacher assessed grades.

In addition, representative bodies who agreed with the proposals stated that students had been impacted in different ways by coronavirus (COVID-19) and internal assessments was one of these.

Awarding organisations and awarding organisation employees that agreed or strongly agreed with the proposals also stated that:

- without the arrangements there was no parity between GCSE, AS and A level and VTQ students
- students should be encouraged to complete internal assessment, where possible
- the approach provides awarding organisations with the flexibility required for the differing purposes and assessment strategies of their qualifications
- students should not be penalised for not being able to complete all internal assessment
- clarification is needed on whether awarding organisations would be expected to moderate or verify internal assessments or whether quality assurance processes would need to be introduced to moderate the teacher judgements

Respondents commented that awarding organisations should provide centres with guidance on the minimum evidential requirements expected which should take into account partial completion of internal assessments. Centres should also be able to mark partially completed assessment and use them to make teacher judgements.

Respondents also stated that there needed to be supporting or sufficient evidence to make a fair assessment as well as the need for clear guidance on minimum evidence requirements, minimum completion and how the process would work. For example:

- sufficient evidence is required to make a fair and honest assessment of the student and their capabilities
- sufficient evidence is required to ensure there is a level playing field for all students and stop centre malpractice

- a minimum percentage of content should be covered
- a minimum number of assessments should be required for qualifications to be awarded and centres should have evidence to support the reason for any missed assessments
- clear guidance is needed on the reasons awarding organisations will award a qualification where internal assessment has not been completed
- the approach taken by awarding organisations needs to be consistent

There were some respondents who reported there should already be enough internal assessment evidence, particularly for those students coming to the end of their studies to give an award. However, more respondents said that it was not possible for all internal assessments to take place. Comments included:

- all content should be taught but not all internal assessments need to be completed in order to avoid disadvantaging students
- with so much interruption in teaching and learning, it would be unrealistic to assume that all internal assessment should be completed as they would in a normal academic year
- where it is impossible to complete a unit assessment in the required manner (e.g. under a controlled assessment) then there is no option but to award without that unit
- many centres have been impacted in different ways by the pandemic and as a result of the disruption, many have been delaying practical assessments
- the amount of incomplete assessment needs to be proportional to the course and the impacts of the pandemic, but it is reasonable to mitigate against impacts which are outside of a student's control

Respondents highlighted that the amount of learning and the completion of units across qualifications would vary significantly and questioned how to ensure fairness across students. For example, would this be a reduction in the content of units or the number of units and what would the approach be for mandatory units.

Respondents also highlighted the need for fairness for students, who needed to be able to progress even though, through no fault of their own, they would not be able to complete all internal assessment. The following points were made:

- some students may be unable to access the necessary resources to complete assessments
- awarding organisations have taken different approaches to streamlining assessment in their qualifications and this inconsistency introduces unfairness for students
- students in poorer areas and those who have been affected by the lock down more would be disproportionately disadvantaged

- the disparity in resources and level of provision made by centres means this approach is necessary

A few respondents suggested that where it may not be possible to complete assessments, with the appropriate funding, the year could be repeated, if a student wanted to. This was also supported by a representative body who said that there may be some students on one-year qualifications who will have had such a disrupted year due to self-isolation, lock down, bereavement, that they will need to be funded to repeat the year or part of the year as appropriate.

A few respondents commented that the approach to awarding needed to align with that of GCSEs, AS and A levels or take the same approach as last year.

Of those respondents that either disagreed or strongly disagreed with the proposal:

- students and parents suggested centre or teacher assessment grades, a few commented on fairness, and others stated that there should be enough internal assessment to award a grade, or that internal assessments should be completed
- some schools and teachers supported the use of centre or teacher assessed grades, highlighted the need for fairness and stated that there should be sufficient internal assessment. Others said there was a need for consistency, to use the same approach as last year and/or the same as GCSEs. Whilst some stated they felt external assessment should take place in some form
- awarding organisations raised concerns around public confidence and integrity of qualifications, particularly for those with safety critical aspects and competence or licence to practice qualifications. For example:
  - inconsistencies in the rigour of approaches and the minimum evidential requirements of awarding organisations could call into question the validity and robustness of the qualifications system
  - for competency and licence to practise qualifications, without the completion of all internal assessment, there is no way to ensure that students have the necessary knowledge, skills and abilities
  - validity and reliability of awarding qualifications is of paramount importance, and all mandatory internal assessment must be completed. This is particularly true of those qualifications which carry a licence to practice or are competency based
- one awarding organisation also stated that issuing results to students where not all internal assessment has been completed is incompatible with ensuring that validity and reliability of the award of the qualifications is not undermined. Therefore, they stated that there needs to be clear guidance on the expectations in these scenarios, and the steps that should be taken, or the possible alternative assessment methods that should be used.

- a comment received from an employer stated that whilst adaptations needed to be made to qualifications, they needed to know that job applicants had fully achieved their qualifications

## A principles-based approach

### Question 16

Do you have any comments on what should be the guiding principles for awarding organisations for the award of qualifications where exams do not take place and/or where learners cannot complete all internal assessments?

A total of 1786 comments were received to this question.

In general, there was support for the principles listed in the consultation although several respondents reported that they felt the guiding principles should be the same as those used for the Extraordinary Regulatory Framework rather than those used in Extended ERF as was proposed in the consultation.

Several awarding organisations also reflected that the Extended ERF principles were suitable and should apply to all qualifications taken in 2021 regardless of whether the qualifications are in scope of the alternative arrangements. One awarding organisation highlighted that by not doing so, it would raise concerns of fairness between students.

Some respondents commented to say that they agreed with the suggestion in the consultation that an additional principle regarding issuing as many results to students as possible should be included. This included a school or college suggesting the principle should be expanded to include reference to the results being issued within the expected time frames to allow students to continue to progress.

Some respondents (mostly awarding organisations) reflected that it would be helpful for the principles to be in a hierarchy. Comments included that:

- there are tensions between the principles and without a hierarchy it is not clear where compromises should be made
- without a hierarchy, there is a potential conflict between Principle 3 (sufficiently maintaining validity and reliability of a qualification) and the proposed principle (seeking to issue as many results to students as possible). A representative organisation also suggested Principle 3 (maintaining the validity and reliability of the qualifications) should be prioritised over the proposed principle regarding issuing as many results to students as possible
- fairness is important and so Principle 2 (ensuring adaptations do not serve to advantage or disadvantage students) should be prioritised



Awarding organisations also agreed there were challenges with meeting Principle 2 (ensuring adaptations do not serve to advantage or disadvantage students against their peers taking general qualifications).

There were also several responses relating to Principle 3 (maintaining the validity and reliability of the qualifications):

- several respondents reported that the word 'sufficiently' was subjective and might require further guidance or clarity
- one awarding organisation felt that the wording should be changed to 'An awarding organisation must seek to ensure that, where it makes any adaptations to its qualifications in accordance with the Extended ERF, *as far as possible* the validity and reliability of those qualifications is sufficiently maintained'
- an employer highlighted the importance of the principle stating that they needed to be confident that the qualifications are valid and that they can rely on it to determine a student's ability

A range of views across respondents were also expressed around Principle 4 (seeking to maintain standards with previous years), this included:

- a teacher stating that awarding organisations must be confident that students' knowledge and practical skills are at the same standard as those who have taken the qualification in other years
- several awarding organisations commenting that because there were calculated results in 2020, the results data for 2020 is not consistent with previous years. This inconsistency makes it challenging for awarding organisations to determine the standard the results in 2021 should be consistent with
- a teacher stating that if no form of externally assessed component is used to generate a grade, it would be impossible to maintain standards
- an awarding organisation highlighting that the maintenance of standards is not referenced in the consultation for GCSEs, AS and A levels and that the alternative approaches are likely to lead to different outcomes in comparison to previous years. Therefore, to ensure parity between the different types of qualifications the awarding organisation suggested Principle 4 should not be included as it is currently written
- a representative organisation suggesting that whilst it is vital that the standards of qualifications are maintained by awarding organisations, they should also take account of the context students have completed their

learning and look to either support students to complete their qualifications or reflect the disruption in the grade boundaries

The majority of the respondents also suggested other principles or issues which they felt should be included in the guiding principles.

Many of the centres, teachers, students and parents or carers responding to the question reflecting that the guiding principles should include fairness and equity across different types of students, qualifications and situations. Comments received included:

- the guiding principle should be that no students are disadvantaged by the circumstances they find themselves in
- there should be fairness and equity between students, qualifications, regions and centres
- students should not be disadvantaged by the fact that they are sitting qualifications in the middle of a pandemic and also against their peers taking general qualifications
- students should not be advantaged over those who were able to complete the exams and internal assessments
- students should not be disadvantaged because of lack of access to IT equipment, illness or lack of teaching

Many respondents also reported that there should be consistency in approach across awarding organisations, centres and qualifications. For example, a further education college said that whilst awarding organisations are best placed to determine their approaches, there must be a consistent approach across similar qualifications. Several respondents also commented to say that the principles should be consistent with those for GCSEs, AS and A levels.

Many of the centres, teachers, students and parents or carers responding to the question also felt that the principles should include the importance of trust in teachers and lecturers. For example, one teacher responding in a personal capacity said that the guiding principle should be one of trust in the lecturer's judgement and another added that teachers know their students the best and how their students are performing.

In addition, a large number of respondents also said that the guiding principle should be that some form of teacher assessment should be used as part or all of a student's grade where exams are not able to take place. One teacher responding in a personal capacity said the principles should allow teachers to use their best judgement to award a fair grade for their students based on the work or skills they have covered. The teacher also highlighted that the work and skills covered will be different for

every school or college because the qualifications can be delivered in a number of ways and at different times throughout the year. Many of these responses also suggested the evidence which should be used by teachers when making a judgement, this included:

- coursework and internal assessment
- homework and classwork throughout the year
- predicted grades
- attendance and engagement in class

In contrast to this, several respondents felt that some or all exams should continue or that the award of the qualification should be postponed until it is possible for students to take them. A teacher responding in a personal capacity suggested that the fairest way was to have some form of externally assessed component, selected by the student and marked by external examiners.

Many respondents also reflected that the guiding principles should include enabling students to progress onto further study or employment. For example, an awarding organisation said that the approach must be implemented as consistently and fairly as possible with the objective of facilitating student progression.

Several respondents mentioned that the guiding principles should include the importance of additional provision for students who would not be able to complete some or all of their qualifications this summer, for example:

- a school, college or teacher representative organisation highlighted that where there is insufficient evidence for a grade to be awarded as a result of the disruption this year, there needs to be funded provision for the student to retake all or part of the year.
- a comprehensive academy highlighted the importance of fairness for students taking practical subjects where the internal practical assessments are not able to continue but are integral parts of the qualifications

A number of other comments received (mostly from teachers and students) also suggested the guiding principles should consider the stress and anxiety students are experiencing. For example, a student stated that awarding organisations should consider the stress and anxiety that the pandemic is causing and how this is impacting on the quality of students' work.

Other respondents reflected that a guiding principle should be that awarding organisations reduce the content students need to complete in order to gain their qualification.

## Question 17

Do you have any comments on how Principle 2<sup>1</sup> might apply for in scope qualifications in light of the new approach to assessment proposed for GCSEs, AS and A levels?

A total of 787 responses were received to this question.

The vast majority of respondents agreed with Principle 2 and asked that there should be parity across qualification types. It was felt that students taking VTQs should be treated the same as those taking GCSEs, AS and A levels with no advantage or disadvantage to students taking either group of qualifications.

The awarding organisations that provided responses to this question largely raised concerns about how this principle could work in practice. It was felt that the diversity of VTQs meant that in many cases, they were not comparable with GCSEs, AS and A levels and efforts to align the two would not be feasible. Many of this group requested further guidance from Ofqual and the Department as to how approaches between VTQs and GCSEs, AS and A levels could be developed as to not advantage or disadvantage either group of students. Some awarding organisations raised concerns that many organisations may not offer GCSEs, AS and A levels and therefore will not have access to the resources to make an effective comparison between their assessments and GCSEs, AS and A levels.

A number of respondents agreed with the principle and provided further comments. Many of this group felt that although parity between qualifications would be desirable, it might not be relevant or achievable for all qualification types. Many requested that qualifications should be considered on an individual basis, rather than a general approach to all qualifications being implemented. Additional comments received from this group included:

- as the VTQ landscape is diverse and not all qualifications are directly comparable to GCSEs, AS and A levels, it was suggested that the principle should be refocused so that awarding organisations should ensure that the adaptations do not serve to advantage or disadvantage students that take similar or directly comparable qualifications
- progression is the most important element to consider in any decision taken, with many students looking to secure employment or progress to further study. Those taking VTQs will be in similar positions to those taking GCSEs,

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<sup>1</sup> Principle 2 – An awarding organisation must seek to ensure, as far as possible, that the adaptations which it makes to a qualification do not serve to advantage or disadvantage students taking that qualification against their peers taking general qualifications not covered by the Extended ERF

AS and A levels; there should be no disadvantage to student's progression in the approaches taken

Many respondents asked that a standardised approach be set across exam boards, so that similar procedures are used by all awarding organisations. They asked that if Principle 2 is enacted then the approaches used by awarding organisations' need to be comparable and standardised. Many felt that this would be vital to ensure there is a consistency of approach in centres and reduce the disadvantage or advantage to students taking different qualifications.

There were comments received to this question that referenced the BTEC suite of qualifications. A number of these related to the January series of exams and that in some cases exams were taken when GCSEs, AS and A levels did not have any assessments scheduled, which this group of respondents felt disadvantaged BTEC students. Other comments related to BTEC qualifications included:

- there was some criticism of the calculated grades achieved by students last year - one teacher commented to say that the first release of BTEC result data showed no correlation at all to any banked units by the students in their cohorts
- a number of respondents felt that teachers would have more evidence from BTEC students on which to base a calculated grade. BTEC qualifications contain a larger number of internal assessments compared to GCSEs, AS and A levels where the assessment is largely taken at the end of the course of study - because of this increased volume of evidence, this group of respondents felt that teachers delivering BTECs would be better placed than others to accurately predict a student's attainment
- if there is an expectation of a portfolio of evidence for assessment objectives in GCSEs, AS and A levels, a similar expectation should be included for the examined element of BTEC qualifications

There were comments asking that the approach used for qualifications the previous year should be applied again, to ensure consistency and reduce confusion for centres and students.

A number of respondents requested that any adaptations should be in line with the assessment methods already in place for affected qualifications. Concerns were raised from this group that students will have been preparing for one type of assessment method and to change this could have a detrimental effect on a student's preparation. The introduction of an unfamiliar assessment method could be problematic for students.

There were comments received from numerous respondents asking that there should be a minimum level of evidence set for students to have completed before a qualification is awarded.

One teacher asked that there is a standardised UK-wide approach linked to the approaches being used in Scotland, Northern Ireland and Wales. They felt that this would result in less confusion for centres and help to reduce any disadvantage to students taking qualifications available across the UK.

We received a large number of comments that did not specifically address the question but asked that exams do not go ahead in any subjects or qualifications, to be replaced by centre assessed grades or the use of previously predicted grades. This group often commented to ask that all assessments in all qualification types should be cancelled due to the lack of teaching time available this academic year.

## Question 18:

Do you have any comments on whether Principle 4<sup>2</sup> is still appropriate for in scope qualifications, awarded where exams do not take place and/or all internal assessments cannot be completed?

A total of 811 responses were received to this question.

The majority of respondents supported Principle 4 and felt it was still appropriate.

Reasons given for this view included:

- centres will have quality assurance processes in place, combined with the processes that exist already in awarding organisations - both of these can be extended to suit individual qualifications and ensure standards are maintained
- it was felt that even though there will be a change of methodology in the awarding processes, this principle will still hold as the alternative measures used will still ensure the maintenance of standards
- some respondents felt assured that standards can be maintained using external verification
- there were suggestions from some respondents that centres with significant improvements in results or high proportions of top grades could be prioritised in sampling
- some respondents agreed that Principle 4 was essential for the confidence in the qualifications awarded this year - they felt that for 2021's qualifications to have any validity in employers' eyes, then it should be clear that grades achieved this year broadly equate to previous years

However, a large number of comments received here point to the potential difficulty in maintaining standards with previous years. Many of this group pointed to the lack of consistency and reliability between the approaches taken in different years and between qualifications. Many also commented to say that the lack of data from summer 2020 following the affected academic year would make standard setting difficult. Without having prior attainment or the previous cohorts achieved grades, this group of respondents felt that it would be difficult to achieve any acceptable level of accuracy. Also:

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<sup>2</sup> Principle 4 – An awarding organisation must seek to maintain standards, as far as possible, within the same qualification in line with previous years, and across similar qualifications made available by the awarding organisation and by other awarding organisations

- it was felt that it would be unfair on students if standards are maintained against cohorts that were not affected by the coronavirus (COVID-19) pandemic
- there were concerns raised by a group of respondents about how this principle would work in practice - they requested clarity as to the scope of the principle and further detail for the term 'as far as possible' so that expectations can be set

There were a number of comments highlighting the impact of coronavirus (COVID-19) on students learning which may lead to Principle 4 being problematic. This group of respondents felt that there would be differences across cohorts, centres and between individuals in regard to how much learning has taken place and how much evidence can be gathered to inform grading. They felt that changes to content, assessment requirements and guided learning hours would make Principle 4 difficult to comply with. The amount of teaching time that has been lost was cited by many as the main challenge to maintaining standards to previous years. It was noted that in some cases students will have had two years of study affected and it would be difficult to benchmark these students against those that have had a full two years of study.

A number of respondents' comments related to the IB suite of qualifications. In many cases, this group felt that the coursework and projects completed by students could form a reliable form of evidence.

There were responses asking that there was some 'future proofing' built into the system for grading this year, so that those students assessed in 2022 would not be adversely affected. They asked that any approach should cover multiple years, so that planning for next year can commence as soon as possible.

Some respondents noted the interplay between Principles 2 and 4. They requested that the two principles should align where possible and that care should be taken that further guidance does not result in the two principles contradicting each other. They felt that the principles did not operate in isolation and needed to be considered together.

The awarding organisations that provided responses to this question largely raised concerns about how standards could be maintained between years and between qualification types. Further clarification was requested on key points of the principle and especially the wording 'as far as possible' which was considered by many to be open ended and potentially open to differing interpretations by awarding organisations. For some of the awarding organisations, mitigating the impact of the pandemic on teaching, learning or assessment (as covered in Principle 1) was seen as more important than maintaining standards.



Many awarding organisations commented to say that the disruption to learning this year would have a serious impact on student attainment. They questioned whether it was appropriate to maintain standards with previous years when there would be very little evidence in many cases to inform decision making. They cited the varying impact of coronavirus (COVID-19) on teaching and learning over the past two academic years as one reason that Principle 4 may be difficult to enact. They also raised concerns about how standards could be maintained over the wide range of qualifications covered by the Extended ERF in the vocational sector.

Comments were received from awarding organisations and teachers, about the validity of qualifications that are issued to students who have not completed exams or practical assessments. They asked that any alternative arrangement should consider how to mitigate potential gaps in knowledge, skills and understanding of students.

A large number of the awarding organisations that responded also raised concerns about the burden that would result from Principle 4 in its current form, with the gathering of evidence and the approach to missing evidence highlighted as potentially resource intensive activities. The documentation and record keeping process outlined in the consultation document (point 85) was felt to be a sensible approach but was considered labour intensive and awarding organisations raised concerns about the resourcing of this process.

## ***Arrangements for awarding qualifications where exams do not take place and/or learners cannot complete all internal assessments***

### **Question 19:**

Do you have any comments on our proposed approach to arrangements for awarding in scope qualifications where exams do not take place and/or learners are unable to complete all internal assessments?

A total of 1140 responses were received to this question.

A broad range of comments were received, which may be an indication that not all respondents fully understood the question raised.

Some respondents either stated they did not have anything more to add or that they agreed with the proposals and felt they were fair and sensible. More than half of the respondents, mainly students and teachers, commented that they felt using centre or teacher assessed grades would be appropriate.

Some respondents, mainly students, commented that all exams should be cancelled. In contrast to this, a few respondents suggested that alternative form of exams (often described as 'mini-exams'), or exams themselves could take place later in the year, or that students should be able to delay their exams, perhaps to the autumn.

There were a few comments from schools that suggested students should be able to repeat the year (with additional funding).

Both students and teachers commented on the importance of treating students fairly so that they were not being disadvantaged. Students and teachers also commented on the need to use the same approach as GCSEs, AS and A levels, or using the same approach as last year. Comments were also received saying that Pre-U should follow the same approach as AS and A levels.

Responses from a few representative bodies agreed with the approach to awarding but also stated that there needs to be funding to support students to retake disrupted learning where there is insufficient evidence to enable students to achieve their qualifications.

Some respondents, including those from awarding organisations, mentioned the need for the process of collecting evidence from centres to be manageable and to consider the additional workload placed on teachers.

Comments were also received regarding consistency between awarding organisations. Schools and teachers would like to see more consistency whereas a

few awarding organisations stated that they had some reservations as to how this could be implemented. For example, an awarding organisation highlighted that it is important awarding organisations are empowered to gather the evidence necessary to make an award. They added that whilst consistency is desirable as a principle trying to achieve this is problematic.

Teachers stated that awarding organisations should provide guidance as to the minimum evidence requirements. This included what could be used as evidence, and that any additional requests for evidence were made promptly. For example, a teacher stated that it was important that awarding organisations clearly set out the minimum requirements for internal assessments in plenty of time. They added that the amount of evidence required should be proportional to the qualification size.

A response from a school suggested that providing clear guidance on minimum evidential requirements could help with consistency across centres.

Some awarding organisations agreed with the proposed approach and welcomed its flexibility. Comments included:

- there must be flexibility for awarding organisations to specify the minimum evidence requirements - the arrangements should have parity with those put in place for GCSEs, AS and A levels but must also be flexible enough to accommodate the unitised nature of the VTQs
- awarding organisations are well placed to decide on the minimum evidence requirements for their qualifications and welcome the guidance on developing our approach to this – however, the proposed guidance needs to align with the already agreed adaptations under the Extended ERF
- the process proposed in the consultation could become more burdensome for centres and awarding organisations than the actual assessments
- in many cases it is not beneficial for VTQs to be treated in the same way as GCSEs, AS and A levels - equality of outcome does not have to mean equality of operation
- the approach provides sufficient flexibility to award students that have completed planned assessments, whilst at the same time facilitating arrangements for students unable to complete all their internal assessments but have other evidence to support their abilities
- a principle-based mechanism could help to ensure consistency across awarding organisations and subject disciplines

Awarding organisations either disagreeing with the proposals or expressing concerns to the proposals stated:

- the proposed guidance to support awarding organisations seems contradictory to the already agreed adaptations of reduced internal assessment (mandatory and optional) under the provisions of the Extended ERF
- by allowing awarding organisations to decide whether it is necessary to require students to generate evidence for all the knowledge, skills and understanding or just a sample means that VTQs are being treated differently than GCSEs, AS and A levels
- in many VTQs, awarding organisations may already have sufficient internal assessment evidence on which to base a grade, without requiring additional teacher assessment to be completed
- the guidance for Performance Table Qualifications provided by the Department must also recognise and align with the principles being put in place
- further clarity on the proposals is necessary
- the approach would not work for functional skills qualifications. If robust evidence can be provided for a centre or teacher assessed grade in functional skills qualifications then there is no reason an assessment cannot take place, and if it can't then a centre or teacher assessed grade should not be awarded
- external quality assurance is vital to assure the validity of the qualifications. Further guidance from Ofqual on the minimum evidential requirements is important to ensure consistency of rigour across awarding organisations
- the proposed process for awarding organisations is not possible because every student is in a different situation and will have a unique set of evidence, so the decisions on what is required to 'fill the gaps' will need to be taken on a student-by-student basis. Instead, the proposed process should be completed by teachers and centres, with supporting guidance from awarding organisations (as is proposed for GCSEs, AS and A levels).
- when making holistic judgements on the grade students are awarded, teachers should be allowed to use their knowledge of the situation a student is in and decide whether on balance to give students the 'benefit of the doubt'. The possible evidence teachers could use when making a judgement should be the same across VTQs and GCSEs, AS and A levels

## ***Learner eligibility***

### **Question 20:**

Do you have any comments on the arrangements that should be put in place to authenticate the eligibility of candidates or claims for the award of in scope qualifications?

A total of 1006 responses were received to this question.

We received many responses that did not specifically address the question but highlighted their support for centre or teacher assessed grades. There were also a few comments to cancel exams, and conversely a few saying they wanted exams or 'mini exams' to take place.

Some respondents appear to have misunderstood the question and felt the question was asking about authenticating the work produced by the students. These respondents gave examples of the additional evidence that should be used to support the student grades such as more coursework, the use of previous assessments, videoing students, timed and paper-based tests, and the use of remote learning.

There were also responses from awarding organisations, representative bodies, schools, and teachers that commented as 'agree' or 'agree with the proposals' etc. without providing any further information.

For the few respondents that added comments, these suggested using the same approach as last year and the need for consistency. Representative bodies for schools and colleges also commented on the need for clear messaging and consistency across awarding organisations for equivalent qualifications at the same level and that a permissive approach can cause confusion.

There were many responses from schools and teachers saying that awarding organisations need to determine what evidence is needed to authenticate eligibility and that this needs to be manageable and should be based on the successful approaches used last summer.

There was support for the use of Head of Centre declarations, using historical data on the centre, or data that the centre already held on students. Many comments also suggested supplementing this with moderation. There were a few comments suggesting student declarations. These responses were mainly from teachers and school, as well as awarding organisations.

Some respondents, again mainly from schools and teachers, suggested using the same approach as last year and/or the same as for GCSEs, some saying that the

process of authenticating students is still fit for purpose' that the approach used for functional skills was very successful and enabled students to move on. Some also stated that the approach for Pre-U should closely follow that for A levels and GCSEs.

## Guidance to teachers and learners

### Question 21:

Do you have any comments on the guidance that should be put in place to support teachers and learners to implement the new arrangements?

A total of 1293 responses were received to this question.

Most respondents agreed that the guidance should be both clear and prompt, with awarding organisations keen to have the information required to create guidance for centres and centres keen to receive the information they needed in good time, to enable them to collate the evidence required and conduct any teacher assessments appropriately.

Most respondents agreed that, where possible, the guidance should be consistent across qualifications, including across GCSEs, AS and A levels and other VTQs to reduce confusion and teacher burden. Some respondents suggested guidance should be targeted at particular qualifications, to ensure guidance was relevant and reduce ambiguity. Many centres and teachers also suggested they would welcome additional training and support alongside the written guidance.

Many respondents pointed out the guidance would not only be needed by teachers, but also by other centre staff, such as exams officers and headteachers, and, crucially, guidance should also be provided for students, parents and carers.

Many respondents commented on the need for clarity in the guidance, noting that content should be unambiguous and language should be accessible to all teachers, as well as to students and parents, unless separate guidance was issued for these groups. In addition, several respondents commented that information should be presented clearly and accessibly using flow charts, infographics, etc. rather than relying only on dense blocks of text, and in a variety of formats.

There were mixed views on whether the guidance should be consistent across awarding organisations to prevent confusion and reduce burden or whether it should be qualification specific to avoid ambiguity and ensure that the guidance was relevant to their purposes and clear.

An awarding organisation also highlighted importance of clear messaging from Ofqual about differences between GCSE, AS and A level and VTQ approaches as centres often deliver both and assume the approaches will be the same, leading to confusion and potentially the following of incorrect processes. It added that the dominant narrative on 'summer exams' risked causing centre and student uncertainty.

Many respondents commented on the need for timeliness and most centres requested that information be received promptly, with sufficient time to ensure it could be fully understood and applied evenly across all provision and avoid a negative effect on the progression of some students.

Several awarding organisations noted that the timeliness of their guidance for centres was dependent on decisions by Ofqual and the Department and highlighted that prompt communication of expectations from Ofqual were essential to avoid the provision of guidance that was timely but based on incomplete knowledge, in response to urgent centre queries. Awarding organisations also highlighted that policy decisions for VTQs should be issued at the same time as GCSEs, AS and A levels to give the wider sector reassurance that all students are being considered in an equitable way. Centres also noted they would need the guidance by March at the latest to be able to implement it in time.

There were many comments on suggested content for the guidance:

- in contrast to this, others suggested that detailed subject and qualification-specific guidance should be provided to enable teachers to plan the remainder of their teaching and learning in 2021 and to plan for assessment and a few suggested that content should include the relevant industry requirements and skills alongside seasonality
- to enable consistency, one awarding organisation recommended the guidance should cover sufficiency of evidence, coverage of subject content, potential weighting of evidence and what to do where the evidence shows erratic or inconsistent performance
- several respondents also suggested the guidance should include details on the maintenance of records by centres (not only records of evidence used, but also of any decision-making to reach a final grade) and the handling of any internal reviews; this would be necessary to ensure that any post-results appeals could be properly considered by the awarding organisations. In addition, suggestions included that any guidance to record keeping should be realistic and allow it to be streamlined to address the fact that many people are working from home and without access to their usual resources
- some respondents suggested that provision of information on previous grades could help guide centres when making decisions on grades; an awarding organisation suggested that the historical accuracy of a school's predicted grades could support those schools in making more accurate predictions where teacher assessed grades were used, while a centre suggested subject-by-subject information on 2020 results could also help them make decisions
- centre recommendations included that adjustments to practical subjects and assessments take into account the ability of providers to complete these within government guidance, where workshops and salons were operating at a reduced capacity to maintain social distancing; there was a risk that some courses would struggle to complete within the timeframes currently laid out



- some respondents noted that guidance should be included on how to minimise the risk of unconscious bias in teacher assessments, the use of remote invigilation and Special Consideration
- a few respondents noted that while the consultation refers to guidance for teachers, guidance was also going to be required for exams officers and heads of centres, so the guidance should be aimed at centres rather than teachers; also that guidance for students, as provided last year, and for parents/carers or employers, would also be very helpful

There were many comments on communications relating to the guidance, with several awarding organisations requesting co-ordination of messages between awarding organisations, the regulator and the Department. This included consistent ways to display key information on awarding organisation websites and an awarding organisation suggesting that sector forum involvement would be helpful to ensure consistency, where exemplar materials could be agreed.

Many centres and awarding organisations also commented on communications between awarding organisations and centres. This included requests that the information is presented in different formats e.g. infographics, slides of key messages written in accessible language, online events, social media and dedicated webpages.

In contrast, other centres and respondents such as exams officers noted that a range of sources of information could lead to inconsistent messages being received by centres and requested all updates to be sent via email.

Many centres and teachers noted the additional teacher burden in conducting assessments this summer so requested training in addition to the written guidance. Teachers in particular wanted training on how to undertake assessment, with an awarding organisation commenting that the guidance should define the minimum level of training teachers should require, and an exams officer noting that training needed to be provided immediately, to enable guidance to be implemented.

Some centres noted that they should be able to appeal aspects of the guidance which were unreasonable or contrary to what was laid out in the consultation outcomes, either to the awarding organisations themselves, or to Ofqual

We also received several responses and comments which did not specifically address the question but commented on other issues such as the need for teacher assessment.

## Special Consideration

### Question 22:

To what extent do you agree/disagree with our proposed approach to Special Consideration?

Figure 31: total responses to question 22

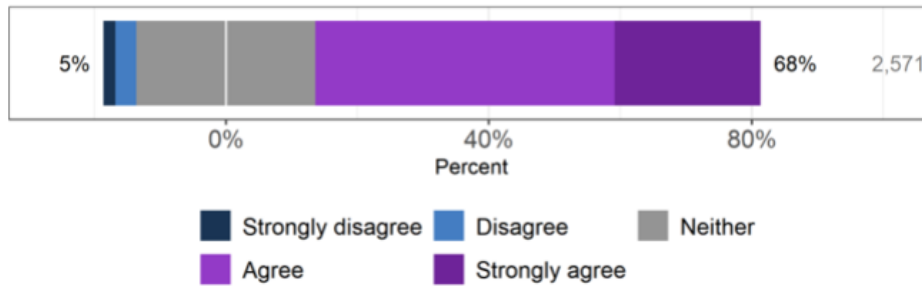


Figure 32: breakdown of responses to question 22 by respondent type (individuals)

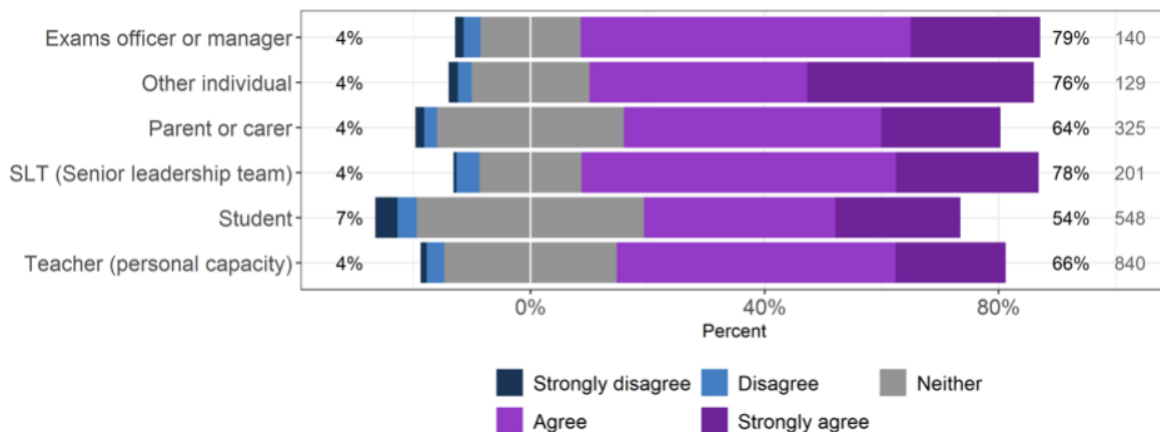
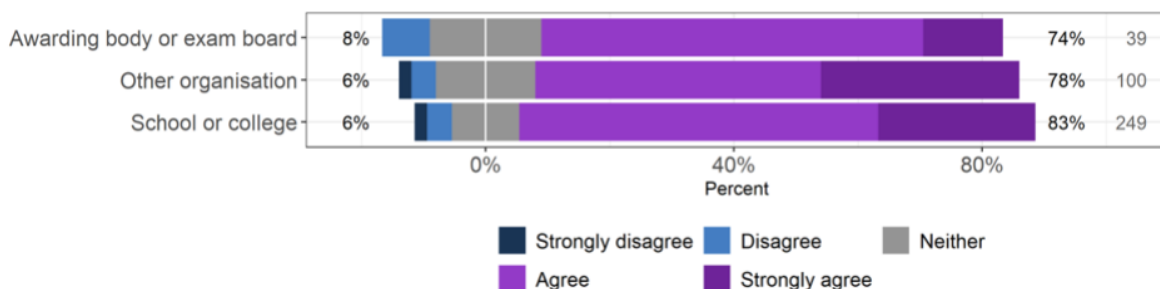


Figure 33: breakdown of responses to question 22 by respondent type (organisations)



A total of 2571 responses were received to this question and 380 respondents provided comments.

68% of respondents to the question either agreed or strongly agreed with our proposed approach to Special Consideration compared to 5% who disagreed or strongly disagreed. 27% neither agreed nor disagreed.

Respondents were generally in favour of the proposal, although many respondents across all categories were unclear what was meant by Special Consideration. There were no clear differences between different respondent groups in how they responded to the question, with many of the same points made by respondents irrespective of whether they had marked that they had agreed or disagreed with the proposed approach. We received several comments to this question which did not specifically address the question but highlighted concerns around appeals or teacher assessment.

Respondents in support of the proposal made a range of comments.

Many agreed that the requirement to use adaptation initially, where possible, where students have missed teaching and learning as a consequence of public health guidance, was sensible.

A high proportion of respondents of all types expressed the need for clear guidance to enable Special Consideration to be applied reliably. They suggested the guidance should contain clarification on the minimum evidential threshold, on the types of grounds for and on the process for applying for Special Consideration, how it could be applied to different types of assessment, including practical and internal assessments, and timescales. Respondents noted that the application of Special Consideration could be complex as the amount that any individual student had been affected by the pandemic could vary hugely.

Several respondents queried whether application of Special Consideration should be uniform across similar types of qualifications or sectors and suggested there should be consistency of approach across awarding organisations offering similar qualifications. For example, a respondent commented that parents, teachers and students should receive a consistent message from awarding organisations and suggested this be coordinated by Ofqual or the Department for Education to ensure consistency.

Many respondents commented on the evidence requirements for Special Consideration. Many queried how requirements for Special Consideration should be evidenced and several agreed there should be a need for detailed investigation of evidence before Special Consideration can be given. Suitable evidence suggested included attendance data for students who have been absent from school for significant periods of time, due to self-isolation. Conversely, centre views suggested that additional evidence should not need to be produced by students or submitted by teachers, and several respondents noted the difficulties involved in providing evidence during the pandemic, particularly for mental health issues, for which there are long waiting lists.

In addition, a headteachers' representative body noted that there appeared to be an apparent inconsistency of approach between GCSEs, AS and A levels and VTQs. Where for the latter the awarding organisations were about the amount of

assessment evidence a student must have completed before a qualification can be awarded, but this was not the approach for GCSEs, AS and A levels.

It was clear that there was a variety of interpretations of where Special Consideration might be appropriate. This included:

- a large number of respondents querying what might be acceptable, for example, if local health tiers or infection rates would be considered
- many respondents gave examples of or analysed the different types of situations where Special Consideration might be necessary, to include students who have been ill, suffered loss, have been required to self-isolate, have had caring responsibilities, being a Key Worker (for adults studying part-time) etc. beyond the normal requirements of lockdown, and which had impacted their learning; a teacher queried if teacher illness would also be a valid reason for Special Consideration
- a number of respondents, particularly students and parents, noted that mental health issues, caused or aggravated by coronavirus (COVID-19) or by lockdown, were prevalent among students and should merit Special Consideration
- a number of respondents commented that Special Consideration should be available for students without access to a suitable device or internet access or who had otherwise been affected disproportionately due to disadvantaged backgrounds
- some respondents noted the need for awarding organisations to be aware of equalities implications for students, particularly those with SEND, whose learning and assessment had been affected by lack of access to their usual support, mode of learning or reasonable adjustments
- a few respondents commented that students should not be disadvantaged compared to GCSE, AS and A level students, for example BTEC students who took the exams in January in very difficult circumstances
- an awarding organisation suggested there were two types of situations where Special Consideration might apply: a) where there is learning loss due to the pandemic, and b) where there is no learning loss but students cannot take original or adapted assessments due to pandemic disruption
- it was also suggested the guidance should specify clearly which kinds of issue or situation would **not** be accepted for Special Consideration
- several respondents commented that Special Consideration was intended for use regarding unplanned disruption and unforeseen circumstances, for temporary issues occurring on or around the day of the exam or assessment, but that the impact of the pandemic was not now unforeseen so should not merit Special Consideration so should be addressed by other means
- a special school noted that it was not in the interests of their students to gain a grade higher than their current ability and special consideration should not

be used to inflate this; a college commented that a qualification would be undermined if students could be awarded the qualification with very limited knowledge, and suggested that deferral and extra year of funding should be made available where too much learning has been missed

- several respondents noted however that students should not be penalised for circumstances beyond their control

Differing views were provided on who should be entitled to Special Consideration with many respondents making the point that all students should be entitled to Special Consideration, given that everyone had been affected by lockdown, i.e. the entire cohort. Conversely, others recognised that adaptation should be used as an initial mitigation, with Special Consideration only available to a few in exceptional situations, so its use should be minimal.

Respondents also commented on the resource implications for schools and awarding organisation given the volumes of students who might be entitled.

Respondents who disagreed with the proposal made the following additional comments.

- that Special Consideration should not be required, as this consideration should be incorporated into teacher assessments - a few also commented that Special Consideration should not be allowed for practical assessments where there is no substitute for demonstrating the skill
- others also mentioned that where minimum acceptable standards existed, it would be unfair to allow some students exemption from this because all students had been affected by lockdown

As above, many respondents wanted further clarity and consistency on what would be allowed under Special Consideration. Queries raised included:

- how Special Consideration could be applied reliably and fairly as it would be difficult for teachers to identify which students deserved it when everyone had been affected and it would be overly complicated to decide and manage
- whether a student should be subject to both special consideration and adaptations for the same qualification
- whether Special Consideration could be awarded in more than one component of a qualification

Concerns were also raised over how Special Consideration could be applied:

- some schools, colleges and teachers expressed concerns that Special Consideration could be abused, with parents or students submitting spurious claims
- it was suggested this could reward centres which had been less careful and taken fewer precautions, so whose students were therefore more affected by coronavirus (COVID-19)

- a school commented that Special Consideration would still need to be in place for those situations in which special consideration is normally applied i.e. illness, bereavement etc., and adaptation would not be the most appropriate avenue for these students.
- some respondents expressed concerns that disadvantaged students or students with SEND would not be treated fairly; an equalities organisation queried if disabled students who had been unable to fully access an assessment would be included, while an HE institution suggested that guidance should be provided to awarding organisations on making fair, inclusive and consistent decisions

Some respondents were concerned that using adaptation before offering Special Consideration was an unrealistic option at the current time, given the difficulties with online assessment, and did not allow for the large number of students with poor access to the internet, lack of devices or suitable space at home to sit the assessments. In addition, a concern was expressed over the suggestion that alternative dates for assessments should be an initial option, before offering Special Consideration, as this would add pressure to the student unnecessarily due to something out of their control, and impact on their study of other units.

Respondents who neither agreed nor disagreed with the proposal made comments about clarity with some respondents unclear about how Special Consideration could be applied in practice and others stating that the consultation included insufficient information for them to judge.

## Appeals

### Question 23:

To what extent do you agree/disagree that we should supplement General Condition I1 with additional guidance around appeals for qualifications in scope?

Figure 34: total responses to question 23

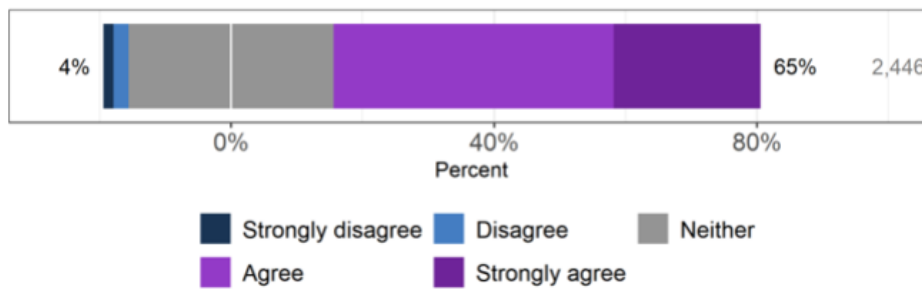


Figure 35: breakdown of responses to question 23 by respondent type (individuals)

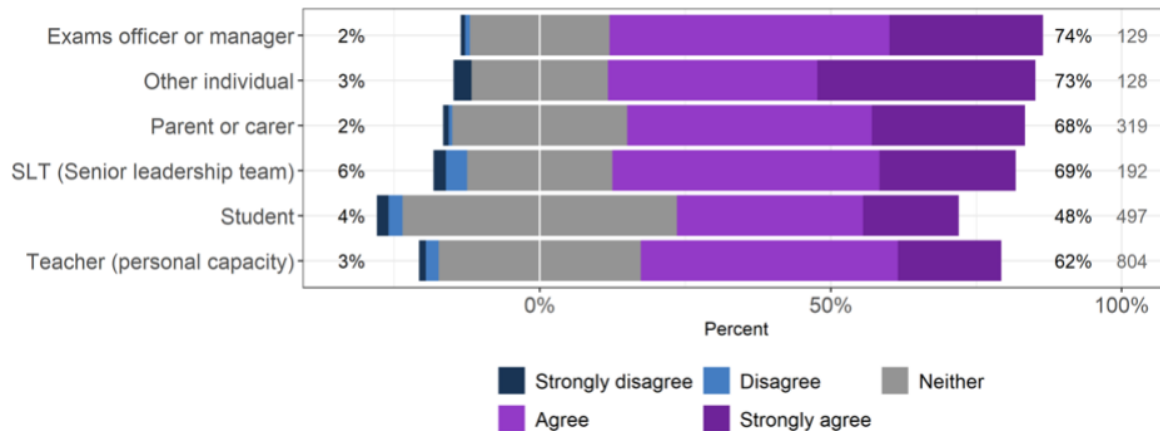
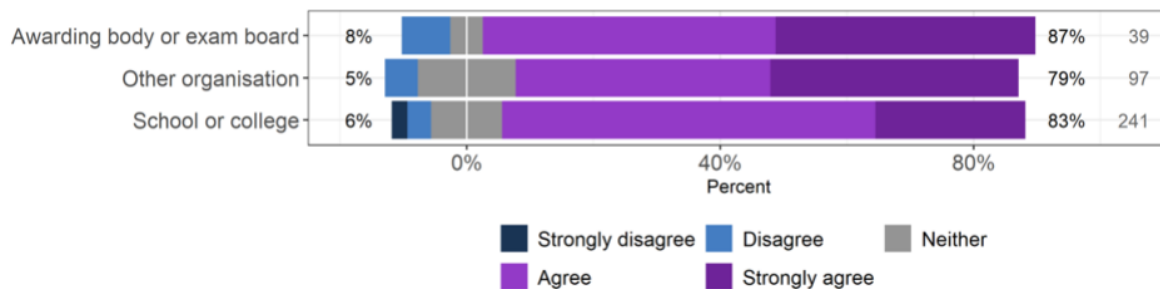


Figure 36: breakdown of responses to question 23 by respondent type (organisations)



A total of 2451 responses were received to this question and 310 respondents provided comments.

65% of respondents to the question either agreed or strongly agreed with our proposed approach to appeals compared to 4% who disagreed or strongly disagreed. 31% neither agreed nor disagreed.

The majority of respondents of all types agreed that additional guidance on appeals should be provided as proposed. Some respondents thought appeals should be conducted as in 2020, while others felt that appeals processes last year had been too complex and misunderstood by some students and parents. Most responses discussed what the guidance should contain.

There were some differences in views between different respondent types. Awarding organisations tended to have different views to schools, colleges and private training providers and their staff about whether students should appeal directly to the awarding organisation or the centre.

Many awarding organisations opposed students being allowed to appeal directly to awarding organisations, and preferred that initial appeals be made to centres, as awarding organisations did not have the capacity or direct relationships with students.

Conversely, schools, colleges and private training providers and representative bodies and their staff tended to prefer appeals being made directly to awarding organisations, because of the extra burden dealing with appeals would impose on centres and staff, because of the pressure from parents or students that teachers might face. Centres were concerned that where they had agreed and signed off grades as fair and accurate, they would not be best placed to manage appeals against these grades, because awarding organisations had signed off centres' internal quality assurance process and awarded the grades, they should be responsible for appeals. Concerns were raised that a centre-managed appeals process would risk damaging the relationship between centres and parents.

However, some schools, colleges and private training providers thought appeals should be made to the provider first who would investigate and refer to the awarding organisation.

Some students and parents said students should be able to appeal directly to awarding organisations, as centres would not be likely to overturn the judgements of their teachers and there were concerns that the teacher's judgement might be subjective rather than objective, and biased in cases where the student-teacher relationship had broken down

Official responses tended to differ from personal responses on the grounds that should be allowed for appeal:

- most centres and awarding organisations agreed that appeals should only be available on limited grounds, where there was evidence of clerical or administrative errors, or malpractice, but that it should not be possible to appeal teacher assessed grades, as no-one else would have better knowledge of the student's performance



- conversely, some comments from individual respondents, particularly from students and parents, suggested appeals should be available for students who had not received the grades they were hoping for, or needed, or were expecting to get, so they should be able to appeal the teacher assessed grade itself
- respondents' views on whether and how teacher bias could be appealed were mixed

Respondents in support of the proposal also made the following comments.

Most respondents agreed that clarity of guidance was a high priority. There was overwhelming agreement from all types of respondents that any guidance should be clear, explicit, straightforward and accessible so that awarding organisations and centres understood their responsibilities and end users, i.e. students, parents and carers, understood how to appeal, and to avoid a high number of appeals. A teachers' representative body also pointed out that clarity of guidance was particularly important to ensure disadvantaged and mature students who are less likely to appeal understand the process. In addition, many respondents stated that clear guidance should improve consistency.

Several respondents commented that clarity was particularly needed on the roles of each organisation in the appeals process and whether centres were required to consider appeals prior to appeals being escalated to awarding organisations.

A few respondents suggested the guidance should mention equality issues given that students with protected characteristics, for example, SEND, were likely to be disproportionately affected

A number of respondents agreed that speed and clarity of timelines was important, both in finalising the guidance and in processing the appeals. For example, an awarding organisation commented that the timely launch of any guidance on appeals was essential to allow awarding organisations to communicate clearly with centres and students about appeals in sufficient time.

The interdependencies between the timeline for appeals and the admissions process to higher education was also highlighted. For example, a university representative body was concerned that the potential decoupling of the timing of the issuing of qualification results and the release of HE confirmation decisions, with initial results being released earlier and HE decisions coming only after appeals, would risk leading to a rise in the number of appeals, as students seek to meet their offer conditions for selective universities and also risk leaving students with poor mental health to deal with initial results when schools would not be available to offer support. So, the respondent recommended appeals take place after results have been issued but with an earlier results day, of 6 July, and a final deadline for meeting

offer conditions of 5 September, to allow sufficient time for all appeals to be completed.

In addition, a university representative body was concerned that suggestions that universities and colleges would be free to either confirm students' results at the point they are initially received or after appeals have been completed, could provide an inconsistent experience for students and prove hard for teachers or students to navigate.

Many respondents, particularly centres and teachers, agreed that where possible, appeals processes should be uniform across all qualifications, aligning with GCSEs, AS and A levels where appropriate. Respondents felt that a uniform approach would be easier both to manage and to explain to students, parents and carers. Respondents also stated that this would ensure that all students were not unfairly advantaged or disadvantaged compared to their peers.

There were mixed views across respondent types about how to approach appeals over 'unfairness' or teacher bias, with many being in favour of this being included as grounds for appeal, but with others feeling investigation of this should sit outside the appeals process. For example, an awarding organisation commented that in 2020 there had been different regulatory policy on the approach to managing bias and discrimination cases, which had been outside of the appeals route for GCSEs, AS and A levels, but permitted within the appeals route for VTQs (albeit with an understanding that AOs could implement one approach, which could be used regardless of the qualification type). They recommended a single approach for these cases, in which students apply to the awarding organisation (via their centre) where they have reason to believe that the process for determining grades has not been applied fairly. These cases could be reviewed within the appeals framework. Any cases where an unfair approach was identified would be referred for malpractice investigation.

Some respondents discussed the possible appeals process, agreeing that the process should be as simple and straightforward as possible. This included:

- any adjustments to grades being made by a human working for the awarding organisation rather than a computer
- evidence to be provided electronically to avoid unnecessary travel and external visits into the school to reduce the risks of transmission of coronavirus (COVID-19)
- differing views on whether awarding organisations should charge for appeals

Many respondents were concerned about the potential burden of appeals cases, with some awarding organisations and other respondents raising concern about the number of appeals that might be received this year and their capacity of awarding organisations to process these in a short timescale.

Many centres and teachers also expressed concern over the pressure teachers and centres could be under from parents and students, particularly wealthier or more advantaged ones, to provide the grades they felt the students wanted or needed and felt that it was important therefore that appeals were dealt with externally, by awarding organisations

Many respondents (particularly schools, colleges and teachers) pointed out the importance of having a clear approach and guidance on how grades would be reached this year, particularly for teacher assessed grades, including clear guidance on how to conduct internal quality assurance; they argued that the clearer these were, the fewer appeals would be needed, so ensuring approaches to assessment were clear should be the priority in reducing the burden of conducting appeals.

Respondents who disagreed with the proposal also made the following comments.

A minority of respondents said that additional guidance on appeals was unnecessary, because appeals should not be available. In most cases this was because they felt teacher assessed grades that had already been moderated had already been checked so should not be subject to further appeal, or that there was no-one who would be able to make a better judgement than the original teacher. However other respondents also mentioned the pressure teachers would be put under and a couple of school staff suggested it would be preferable to have autumn resits than appeals, as schools would not be able to manage appeals.

A few respondents, including an awarding organisation, said that there was no need for additional guidance as the existing conditions were sufficient.

A few respondents said that there was insufficient information on how assessment would take place generally in summer 2021 to allow them to comment on appeals and many raised questions about the proposed approach. Questions included:

- how would the process work for qualifications which are not graded
- whether complex appeals could be resolved by September, even if results were released in July
- what should the arrangements be for late submissions
- whether awarding organisations could use their 'results claimed in error' process so that centre errors could be corrected more quickly

In addition, a representative body commented that the example cited in paragraph 104, says that 'awarding organisations have discretion to include additional grounds should they wish to do so, such as allowing appeals to be accepted directly from students', would lead to inconsistency of approach to appeals across awarding organisations, whereas students should be entitled to similar rights of appeal irrespective of which awarding organisation their centre uses for its qualifications.

A centre also suggested that appeals to centres should be chargeable to prevent speculative appeals and cover costs as is usually the case with appeals to awarding organisations.

## Certificates

### Question 24:

To what extent do you agree/disagree with our approach to certification for qualifications in scope?

Figure 37: total responses to question 24

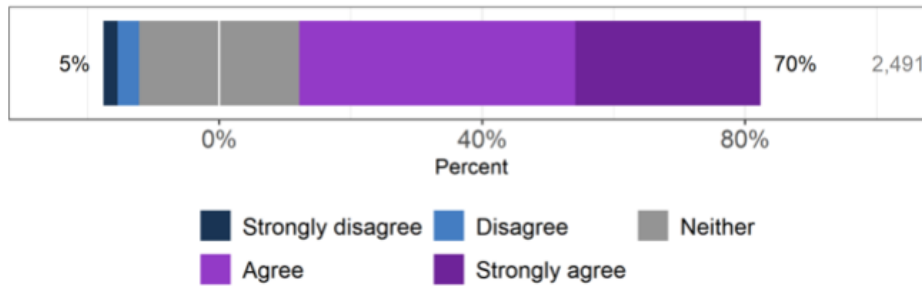


Figure 38: breakdown of responses to question 24 by respondent type (individuals)

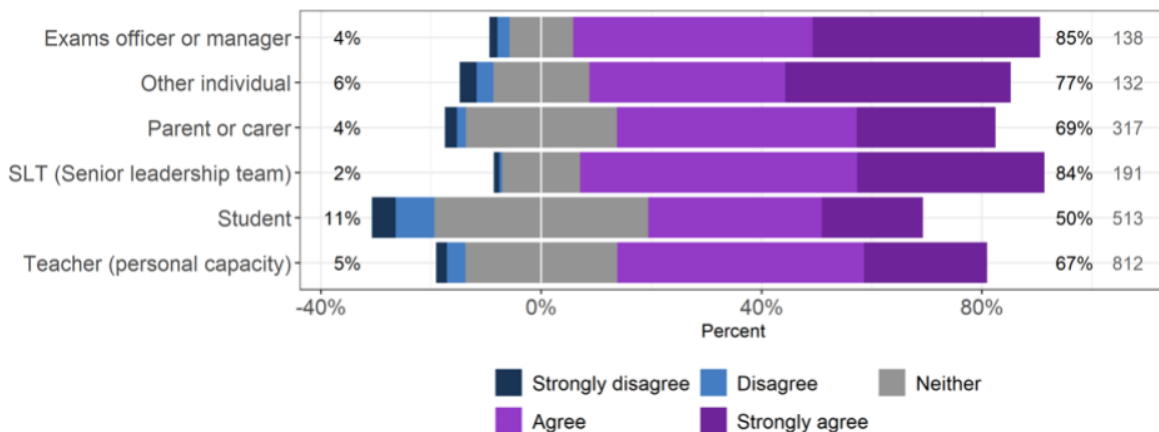
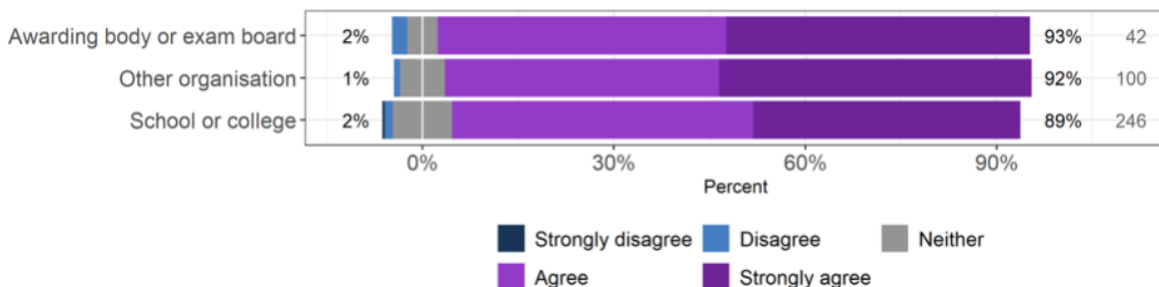


Figure 39: breakdown of responses to question 24 by respondent type (organisations)



A total of 3273 responses were received to the question.

During the consultation analysis we became aware of several 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. Two separate 'campaigns' were identified. One accounting for four responses and one accounting for ten responses. 70% of those who responded to the question either agreed or strongly agreed with our proposed approach to certification for qualifications in scope, compared to 5% who disagreed or strongly disagreed. 24% neither agreed nor disagreed.

A total of 221 respondents provided comments.

Respondents both in support of the proposal and those that were neither for nor against the proposal, recommended that results this year should not be identified as any different to any other years. Comments included:

- certificates should not accidentally include identifiers or fields which would disadvantage students
- certification which indicated how grades had been awarded would not be helpful to students and may indicate to some that the work was not fully achieved

Responses from awarding organisations were in support of the proposal and agreed that students should not be disadvantaged. One awarding organisation advised that they often provide a unit summary of achievement with certificates and asked for guidance on what should be included to ensure consistency between awarding organisations.

Respondents also highlighted the need for students to not be disadvantaged from any future education or employment opportunities due to the year that they were certificated.

A number of comments from schools asked for guidance on how to support students where there was insufficient evidence to certificate. Comments included:

- further education providers need to understand what students may not have completed to support these students in catching up
- certificates need to imply in some way that the student may need further support because they had not completed the course but that this needs to be worded so that it does not affect the students

Additional comments made by respondents in support of the proposed approach include:

- a respondent recommending that certificates should not be issued before EQA processes are complete to avoid certificates having to be withdrawn

- a local authority commenting that the process and qualifications need to inspire confidence and avoid any possible labelling. They stressed that qualifications awarded this year should have the same value as previous and future years. They suggested that this can be achieved by grades being awarded by awarding organisations and not teachers. In addition, they felt that grades needed to be fair and avoid further inflation which may undermine value and confidence in the awards and that awarding organisations and Ofqual should be accountable for the award of qualifications

Of those respondents who disagreed with the proposal, one commented that certificates should note how the grade had been awarded.

The majority of respondents who either disagreed or strongly disagreed or were neither for nor against the proposal did not specifically reply to the question. These respondents called for teacher or centre assessed grades to be used. However, one awarding organisation that disagreed with the proposed approach commented that some qualification certificates include reference to outcomes at unit level. They recommended that these should not be included on certificates for 2021.

## Private candidates and learners

### Question 25:

To what extent do you agree/disagree with our proposed approach for private candidates and learners?

Figure 40: total responses to question 25

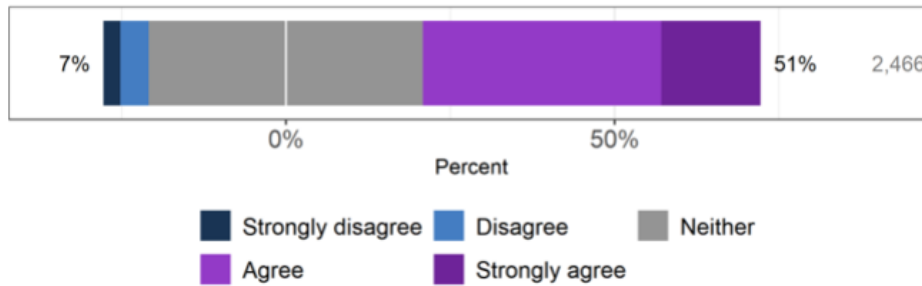


Figure 41: breakdown of responses to question 25 by respondent type (individuals)

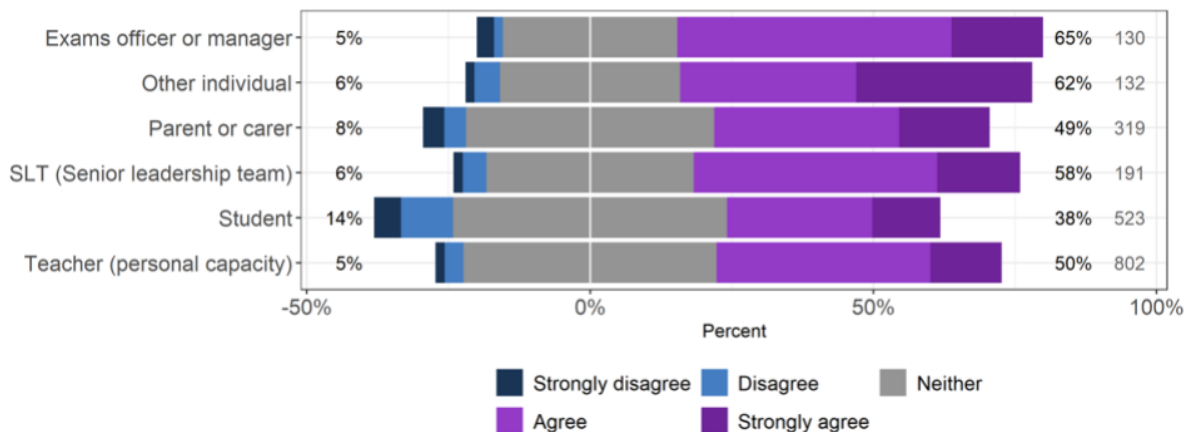
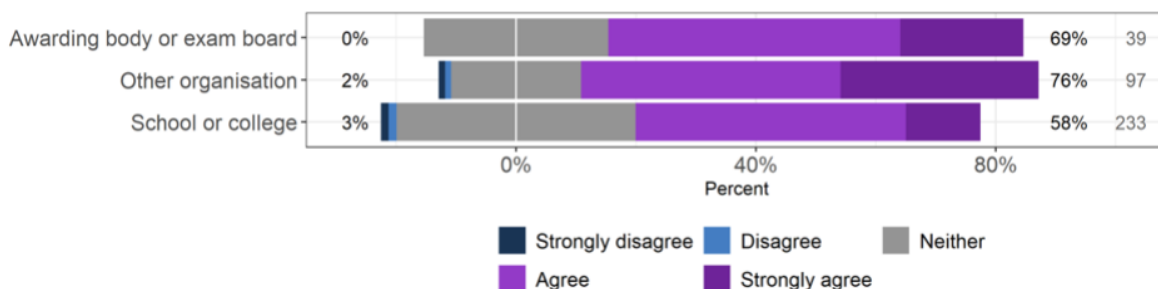


Figure 42: breakdown of responses to question 25 by respondent type (organisations)



A total of 3273 responses were received to the question.



During the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One separate 'campaign' was identified accounting for fourteen responses.

51% of those who responded to the question either agreed or strongly agreed with our proposed approaches for private candidates and learners, compared to 7% who disagreed or strongly disagreed. 42% percent neither agreed nor disagreed.

A total of 301 respondents provided comments. There were no significant differences between respondent groups. For each respondent group, there was a marginal majority that agreed or strongly agreed with our proposed approach, followed closely by the respondent groups neither for nor against the approach.

Both respondents in support of the proposal and those that were neither for nor against the proposal highlighted the need for private candidate and learners to be treated equally and assessed similarly to other candidates. There were several comments which questioned how a grade would be calculated. There were also a few comments that called for exams and assessments to be held for private candidates and learners to enable them to receive a grade.

Awarding organisations agreed with the proposal. With one awarding organisation commenting that it should be aligned with the approach taken for GCSEs, AS and A levels. Another commented that it would be difficult to certificate private candidates and learners who have not had formative assessments marked.

The majority of responses, from a range of respondent groups, call for private candidates and learners to be treated the same as other students. One respondent said that the approach cannot prejudice individual students through no fault of their own.

Further comments included:

- responses from a teacher, an exams officer and a member of a senior leadership team highlighting the difficulty in authenticating work completed by private candidates and learners and called for an independent party to complete the assessment
- responses from teachers, private tutors, schools and exams officers calling for awarding organisations to provide clear guidance on how to calculate grades submitted from these students
- responses from a member of a senior leadership team and an exams officer suggesting that it may be necessary for some private candidates and learners who have not been studying with a centre to take an assessment to enable the centre to award a grade

- a comment from a school stating that there should not be a dual grading system and called for a consistent approach
- responses from a school and a member of a senior leadership team agreeing with the proposed approach but commenting on the challenge this year due to lack of evidence and called for more guidance
- one respondent commenting that centres cannot be responsible for assessing private candidates and learners where they study alternative qualifications as staff may not be in a position to make knowledgeable judgements on the work produced
- another respondent commenting that teachers should not be expected to assess this work
- a response from an awarding organisation also agreeing that private candidates and learners should be awarded a qualification but again highlighting that the level of support that these students have received may be very different to other students. They recommended that all awarding organisations adopt a consistent approach that is overseen by Ofqual. They stated that if the quality assurance is undertaken correctly by awarding organisations then their awards will be valid

Respondents who disagreed with the proposal also highlighted the need for private candidates and learners to be treated equally and assessed similarly to other candidates. Respondents also commented on the challenges that teachers face when assessing private candidates and learners work and questioned how grades would be calculated. A few responses from teachers and other respondent groups recommended that private candidates and learners sit an exam or additional assessment.

Further comments included:

- most students recommending that all candidates should be treated the same. One private student however called for private candidates and learners to be given the option to sit an external exam
- many teachers commenting on the challenges to monitor and assess private candidates and learners who they have little to no contact with. A couple of responses recommended independent scrutiny or grading for private candidates and learners being managed by awarding bodies rather than teachers or centres
- one teacher commenting that they would be unable to provide any assessment data and so an exam or assessment will enable them to provide a grade for some but not all qualifications in scope

- another teacher commenting that an externally assessed component which was marked by external examiners would be the fairest way to secure equity across the cohort

Respondents who were neither for nor against the proposal also highlighted the need for private candidates and learners to be treated equally and assessed similarly to other candidates. Respondents also commented on the challenges on assessing and calculating a grade for private candidates and learners. The majority of respondents however advised that they felt unable to comment as this question was not applicable to them.

## Qualifications also taken internationally

### Question 26:

To what extent do you agree/disagree with our approach to awarding for qualifications in scope which are also taken internationally?

Figure 43: total responses to question 26

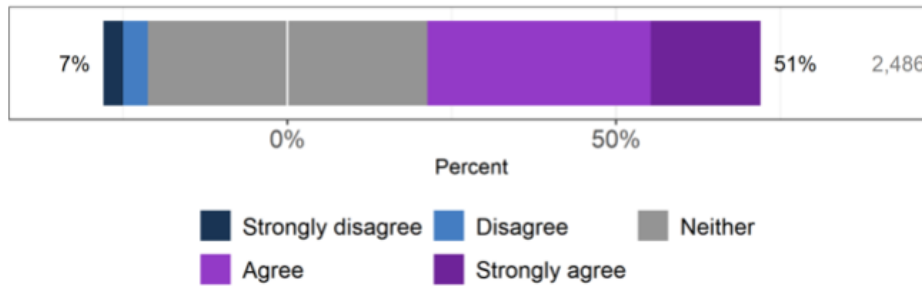


Figure 44: breakdown of responses to question 26 by respondent type (individuals)

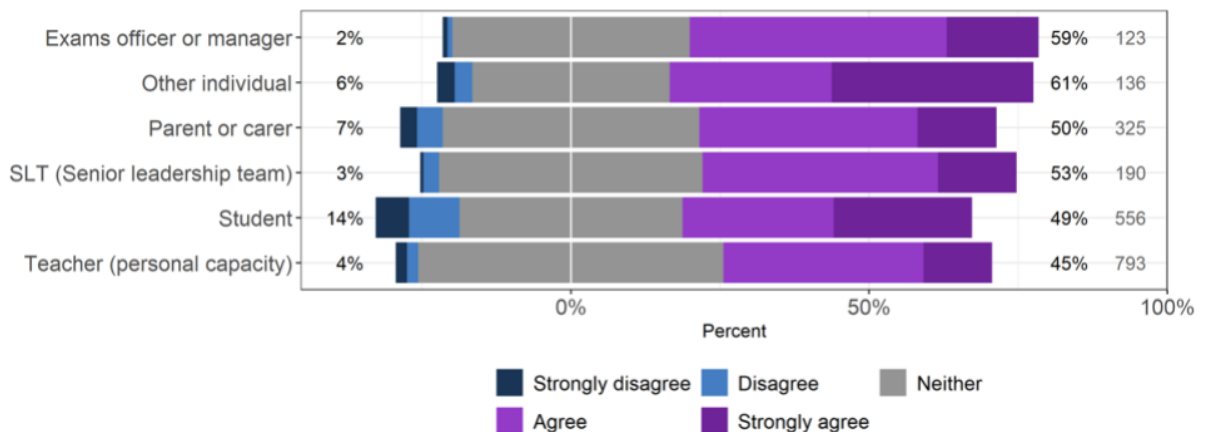
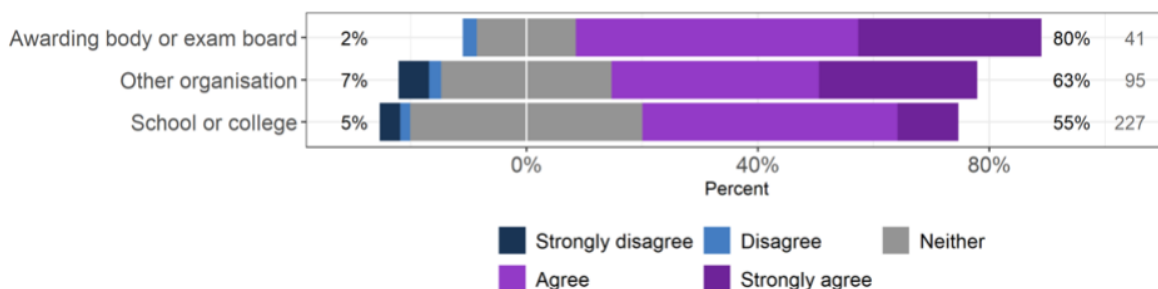


Figure 45: breakdown of responses to question 26 by respondent type (organisation)



A total of 3273 responses were received to the question.

During the consultation analysis we became aware of a number of ‘campaign’ responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme.

Two separate ‘campaigns’ were identified, both accounting for four responses each. 51% of those who responded to the question either agreed or strongly agreed with our proposed approaches to awarding qualifications in scope which are also taken internationally compared to 7% who disagreed or strongly disagreed. 43% neither agreed nor disagreed.

A total of 227 respondents provided comments. There were no significant differences between respondent groups. For each respondent group, there was a marginal majority that agreed or strongly agreed with the proposed approach followed closely by the respondent groups neither for nor against the approach. For awarding organisations however, 81% agreed or strongly agreed with the proposed approach.

The majority of respondents in support of the proposal commented on the need for consistency when awarding qualifications in scope which are also taken internationally. Respondents commented that international students should not be disadvantaged.

Respondents strongly agreeing with the proposal highlighted the flexibility offered by the ERF and Extended ERF and felt that this was the best course of action for international students.

Further comments included:

- several students calling for the IB exam due to take place in May 2021 to be cancelled
- several students and teachers suggesting that qualifications in scope which are also taken internationally should follow the same approach as GCSEs, AS and A-Levels
- an examiner commenting that each country has been impacted by coronavirus (COVID-19) in different ways. For those that have been impacted in a similar way, they should be able to access the same mitigation
- one awarding organisation suggesting that to ensure validity and comparability, an identical approach should be taken with qualifications in scope that are also taken internationally. They highlighted that the extent in which coronavirus (COVID-19) has impacted individual centre and students in the UK varies considerably and the same can be said for international centres and students

- another awarding organisation commenting that the ERF and Extended ERF allowed for flexibility in delivering assessments

The majority of respondents who disagreed with the proposal also commented on the need for consistency when awarding qualifications in scope which are also taken internationally.

Respondents disagreeing or strongly disagreeing with the proposal also highlighted the impact coronavirus (COVID-19) has had on different countries and as such, applying one approach will not be appropriate. Respondents recommended complying with the different national government's requirements. For example, one awarding organisation explained that it works internationally and must satisfy a variety of national government requirements to maintain the validity of the qualifications. In some countries, the awarding organisation's qualifications are used as a gateway to employment and the government will not accept teacher or centre assessed grades. As such, the awarding organisation stated it would comply with national government requirements and delay exams to later in the year.

Respondents who were neither for nor against the proposal also commented on the need for consistency when awarding qualifications in scope which are also taken internationally. Many respondents called for exams to be cancelled globally. With one member of a senior leadership team commenting that it would not be a level playing field if exams are not cancelled for all students.

Other respondents, including one teacher, commented that qualifications in scope which are also taken internationally need to conform to the processes used by each individual country.

One awarding organisation that neither agreed nor disagreed with the proposed approach highlighted that the government's announcement to cancel exams has created concern with schools internationally. The awarding organisation explained that schools in many other countries have contacted them concerned that their students who have taken written exams in late 2020 or due to take exams in forthcoming examination series will be at a serious disadvantage to students in England. The awarding organisation added that schools and students internationally perceive students in England as having an easier route to easier grades and this is causing particular concern in relation to access to higher education where many international students want to study in the UK.

A number of respondents who were neither for nor against the proposal advised that they felt unable to comment as this question was not applicable to them.

Whilst this question specifically concerned VTQs in scope which are also taken internationally, several respondents commented on IGCSEs.

## Regulatory oversight and record keeping

### Question 27:

To what extent do you agree/disagree with our approach to regulatory oversight and record keeping?

Figure 46: total responses to question 27

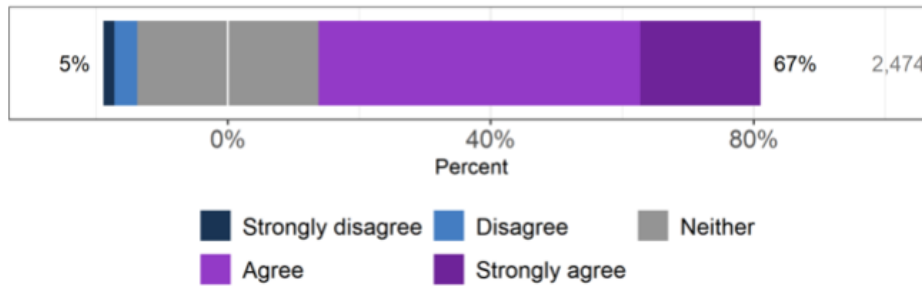


Figure 47: breakdown of responses to question 27 by respondent type (individuals)

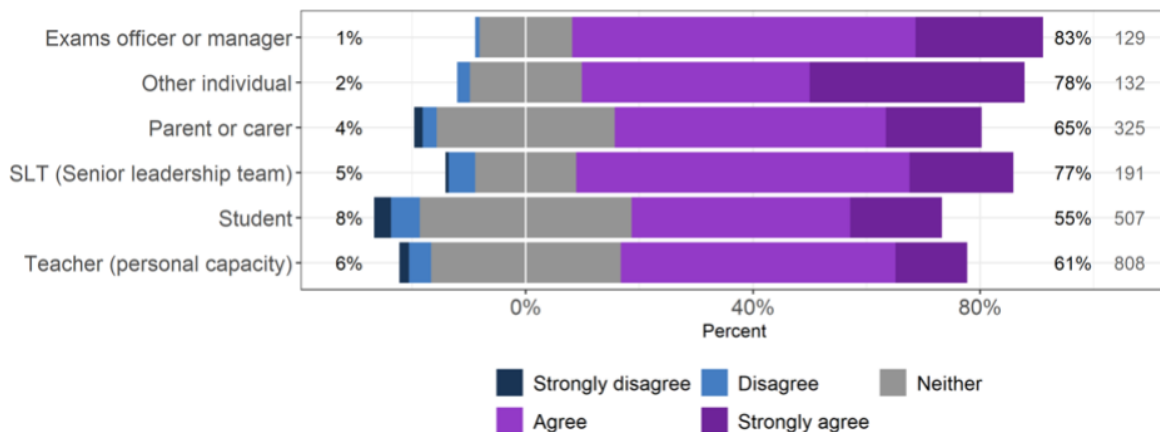
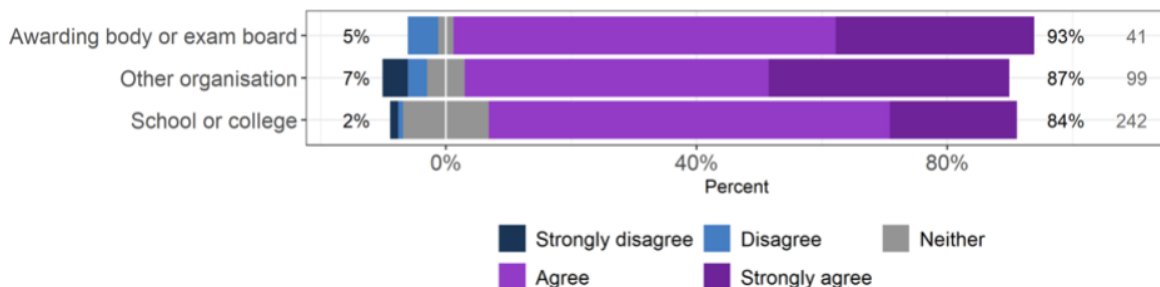


Figure 48: breakdown of responses to question 27 by respondent type (organisations)



A total of 2474 responses were received to the question.

67% of those who responded to the question either agreed or strongly agreed with our approach to regulatory oversight and record keeping, compared to 5% who disagreed or strongly disagreed. 28% neither agreed nor disagreed.

The vast majority of respondents welcomed our approach to regulatory oversight and record keeping. The main reasons given for this were:

- many believed that Ofqual's oversight of the awarding organisations' processes would ensure consistency and fairness between qualifications
- there were comments that the approach to regulation would help to reduce the instances of malpractice in the system
- it was felt by a large number of respondents that this approach provides clarity for students and teachers that due process is being followed
- Ofqual can ensure there is more specific guidance on all aspects of the process available to stakeholders

A number of respondents felt that the regulatory arrangements are now established and are important part of the awarding process. It was felt that the regulatory approach provides additional confidence in the system, promoting consistency between qualifications and awarding organisations.

There were a number of comments received that agreed with the proposal, but requested additional steps be added to the regulatory arrangements to make them as robust as possible. Comments received from this group included:

- feedback should be sought from centres on the systems in place, so that improvements can be made where possible
- the requirements of the process should be communicated to all stakeholders as soon as possible. Early sight of guidance documents and expected levels of evidence was requested
- some felt that the regulatory oversight should be extended to cover centres, which would help to minimise malpractice

Significant numbers of the respondents who agreed with the approach to regulatory oversight and recordkeeping provided further comments on the potential burden that may result. Teachers commented to request that workloads for themselves and centre staff were considered in any regulatory process. Some awarding organisations provided comments relating to the burden that regulatory action could place on them at a time of resource intensive activity.

A significant number of respondents neither agreed nor disagreed with our proposed approach to regulatory oversight and record keeping. The majority of respondents that neither agreed nor disagreed with the proposal left no further comments. Those



that commented asked for more information on the processes involved before they could make a decision on the appropriateness of the proposal.

A minority of respondents disagreed or strongly disagreed with our approach to regulatory oversight and record keeping. This group of respondents largely cited concerns over the burden that additional regulatory requirements could place on those involved in the awarding process. Many felt that regulation should be set at a minimum, to make the whole process as unburdened and easy as possible for all those involved.

Across respondent types we received a number of specific points relating to record keeping. Most respondents in this group agreed with the approach and stressed the importance of accurate record keeping.

Awarding organisations largely supported the proposed approach that awarding organisations should maintain a record of their decision making, with some making specific comments on the process. For a large number of the awarding organisations, keeping the process in line with the previous year was seen as a positive. However, some awarding organisations commented further to ask that there should be refinements made to some of the processes between them and Ofqual, asking that burden should be reduced wherever possible and documentation kept to a minimum.

We received a number of comments regarding record keeping from teachers and centre staff. The comments asked that there is consistency in approach and documentation between awarding organisations, with many giving examples of the varying documents and processes that were used by awarding organisations last year. They felt that the differing approaches used across awarding organisations and qualifications was not helpful previously and increased the burden on centres.

## Equality impact

### Question 28

Are there other potential positive or negative equality impacts that we have not explored?

Figure 49: total responses to question 28

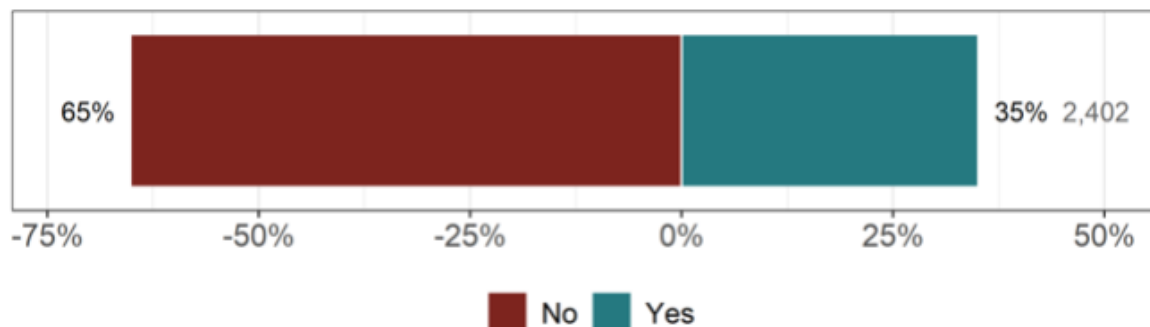


Figure 50: breakdown of responses to question 28 by respondent type (individuals)

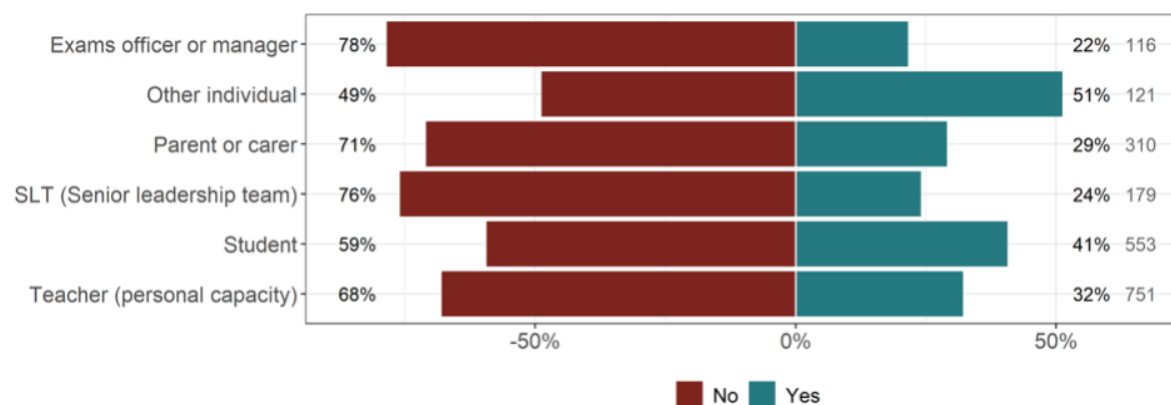
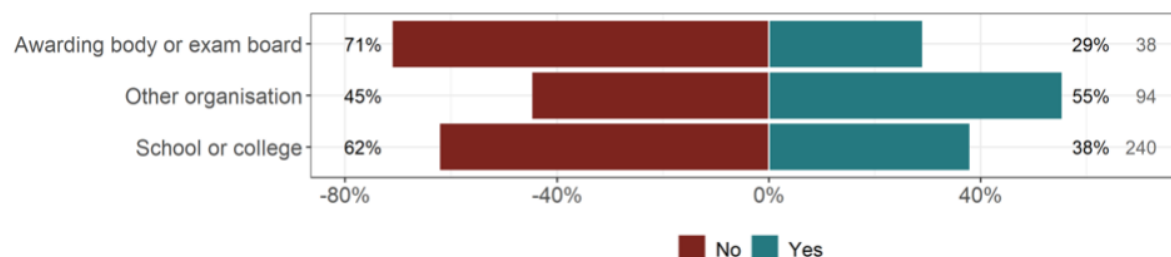


Figure 51: breakdown of responses to question 28 by respondent type (organisations)



926 respondents provided additional comments in response to this question. The majority of these responses (80%) were personal responses. Of these personal responses, 46% were from teachers, exam officers or senior leadership team members, 31% were from students (including private home-educated students), and 14% were from parents or carers. The other personal responses came from

apprentices, awarding organisation employees, examiners, consultants and governors.

The remaining responses were on behalf of organisations. Of these organisational responses, 54% were from schools or colleges, 13% from private training providers, 10% from representative or interest groups and 9% from awarding organisations. The remainder of the organisational responses were from academy chains, employers, local authorities, universities and higher education institutions.

Comments to this question covered equalities considerations from across all of our proposals. Some of the responses supported issues we had identified as part of the equalities impact assessment in our consultation, others highlighted additional issues that they did not feel had been considered in our assessment. We set out in this section the key themes that were identified. In the main, most themes were raised by a range of respondent types, however where a theme appeared to be raised more often by a particular respondent type we have set that out below.

### *Differing impacts on particular groups of students*

A large number of respondents commented on the difficulty of assessing the impact, as different groups of students will have been affected in different ways, and individual students within a particular group will have been affected differently too. There was a strong view that most students will have been affected and will be disadvantaged in some way – some due to the pandemic generally, some as a result of sharing a particular protected characteristic (e.g. disabled students) which may have increased the disadvantage faced by other students; and some due to other equalities issues which don't necessarily directly relate to a protected characteristic (e.g. mental health).

For those students who responded felt they were disadvantaged on equalities grounds; this disadvantage was generally considered to be on top of the general level of disadvantage faced by all students. So, while taking an assessment remotely may negatively impact all students, some disabled students, for example, would be disadvantaged to an even greater extent, perhaps because their disability made it more difficult for them to access remote assessments, or reasonable adjustments which they would normally use.

Respondents were of the strong view that even for students with circumstances that may appear the same, for example, taking the same qualification at the same centre, the individual impact of the pandemic on each individual student may be different. Respondents commented in particular that in addition to the impact being different, it would be further complicated by the fact it would not be possible to quantify such differences.

The following concerns were raised in particular about the unequal impact of the pandemic on different students:

- different students may have been affected by coronavirus (COVID-19) in different ways, either directly or indirectly. This could be, for example, as a result of their personal circumstances requiring them to shield, due to having contracted coronavirus (COVID-19), having to self-isolate having come into contact with someone, or having friends or family members who have been affected in some way
- teachers in particular were concerned that students' grades may be affected by where they live or study. A number of respondents felt that the disproportionate effect of coronavirus (COVID-19) could mean that students in poorer areas could be more disadvantaged compared to those in more affluent areas. A number of respondents, in particular teachers and students referred to the risk of there being a 'postcode lottery' with results depending on where students lived
- a number of respondents said that lockdowns have affected different areas in different ways, and within different areas, affected different centres in different ways. This has meant that some students have had their learning more disrupted than others depending on where they live and the restrictions that have been place
- individual students' personal circumstances will have impacted on how they are affected by any disruption. Some students highlighted additional responsibilities they had at home, for example caring responsibilities, either for older or younger relatives, which could disrupt their learning
- different students will have missed different amounts of teaching and learning, or completed different units for the same qualification, so it would be difficult to determine the extent to which one student has been affected compared to another, making it difficult to apply the same adjustment for all students
- different areas of the country have been impacted in different ways, and to different extents, so students in some areas may struggle more due to the impact and the different levels of support that have been available
- the support available from awarding organisations, or the adapted assessments available may have differed, meaning some students may be disadvantaged over others on the basis of the level of support they have received, even if taking similar qualifications or types of qualification
- differences between students who did, and did not take exams in January, where these were not cancelled, and centres were able to decide whether to

proceed. Some students may have been advantaged or disadvantaged, depending on whether they took these assessments

- students have missed learning at different points on their courses, particularly those on two-year courses who will have been affected this year and last year at various points

Respondents including centres and teachers commented on the need to ensure that any arrangements take account of the impact on students in years 10 and 12 who are not due to take assessments this year, but for whom performance in assessments next year may be affected by the disruption. They commented that they should not be expected to catch-up or resit internal units and external exams missed, as this may create an unfair burden on them in the next academic year.

Due to the different ways in which students may have been affected, respondents commented that special consideration should be available to all students, including those who sat assessments in January, to ensure that no student is disadvantaged.

It was also noted by centres that a number of those who were disadvantaged do not necessarily share protected characteristics, for example, disadvantaged students, and those students who have suffered most regional or institutional disruption

### *Mental health*

A significant concern for respondents, particularly students, was the impact of the disruption on students' mental health. While students were the main respondent group to raise this, a lot of teachers, parents and carers also commented on this.

While mental health is not a protected characteristic, it was raised both as something that could affect all students, and that would also potentially be more of an issue for students with certain disabilities. Respondents commented that students on the autistic spectrum, for example, may find adapting to new ways of taking assessments, or disruption to established routines, more difficult to cope with than other students, and this may lead to anxiety being a particular issue. Some of the particular issues relating to mental health that were raised included:

- the impact of the pandemic itself on students
- the additional anxiety caused by uncertainty about the arrangements that would be in place for qualifications
- a lack of communication about the exact arrangements that would replace cancelled assessments which could add to students' anxiety
- the potential impact of 'mini-exams' to inform teachers judgements. Students were concerned about the suggestion of these overall, and additionally about the impact on mental health if they were required to complete these in what they perceived to be unsafe conditions

- students who may have developed mental health conditions as a result of the pandemic
- the lack of support available for students who are suffering with their mental health, as a result of schools, colleges and other places of support being closed
- that students will be affected in terms of their mental health both in their ability to take any assessments, and their preparedness for any assessments they do take

Teachers, parents and carers highlighted particular concerns about the mental health impact on students with conditions such as anxiety disorders and autistic spectrum disorders (ASD). They said the issues set out above would particularly affect these students.

A small number of respondents also suggested that the conditions in which students are having to work at home may also contribute to these concerns, as many students do not have the right conditions or equipment at home to access teaching and learning or assessments. Even where students can access assessments, the conditions under which they are taking them may not enable students to perform to the best of their ability.

### *Access to equipment and resources*

Across students, parents, carers, teachers, senior leaders and centres, along with a number of other types of respondent (including local authorities and governors), stated that a particular concern was the impact on students of having no, or differing access, to resources, such as IT equipment, software or other resources (for example musical instruments or specialist catering equipment) needed for learning and assessment. A number of respondents who referred to this referred to 'digital poverty' where some students do not have access to equipment at all, or have access to equipment within their household, but it is shared between family members, so do not have full access to it.

Respondents commented that any minimum evidential requirements would need to take account of the extent to which students may or may not have had access to the necessary equipment or resources. A lack of, or unequal access to, IT, equipment and other resources was one of the main concerns raised in response to the consultation.

There were concerns raised about the types of devices being used, where they were available. Students accessing remote learning or assessment on a phone, or a device that cannot download content, as opposed to those using laptops, could be at a disadvantage if their device does not support the same functionality.

A representative group raised concerns that students taking music or music technology courses could be disadvantaged as these often require access to specialist software, instruments, or equipment that are not available remotely. It may also be difficult for such students to access lessons remotely and there were likely to be significant differences between different students or groups of students. A small number of teachers also made specific references to equipment needed for particular types of assessment. For example, in music qualifications, students may not have access at home to musical instruments which they need to practice and to carry out assessments. Similarly, for catering qualifications, students may not have access at home to kitchen equipment or ingredients to enable them to prepare for, or take, an assessment.

Some students and parents commented that it was not simply a matter of having access to equipment, but also having space and a suitable environment in which to use it. So, in addition to those students that did not have access to equipment or resources, students who had access, but nowhere to use it could also be disadvantaged.

Respondents commented that one impact of this is that a lack of access to such resources is likely to have impacted on learning that students have been able to access and the work they have been able to produce during their course. This will impact on how well prepared they are for any assessment that does go ahead, either in original or adapted form. It will also affect the quality of any internal assessment that has been completed during the course, or whether students have been able to produce such work at all since centres closed, which may negatively affect them if this work is used to inform a teacher judgement, where an assessment does not go ahead.

The other main impact in this area related to students being able to access the assessments themselves. Some students would not be able to access an assessment that was adapted to be delivered remotely, so may be negatively impacted as a result. This could be caused by socio-economic factors which mean students don't have access to the necessary equipment. Even where a student lives in a household that does have access to a laptop for example, if they live with other people who also need the same equipment, they may not be able to access it as often, or at the times, when it is needed. Access to equipment could also impact disabled students who may not be able to access the reasonable adjustments they need to take an assessment remotely.

A concern that was raised by some respondents was that issues relating to access to equipment were not just about whether a student has access to equipment now, but also whether they have had access during previous lockdowns over the duration of their courses. While students may now have been provided with a laptop for example, which would enable them to complete work and access an assessment

now, this would not effectively mitigate the disadvantage faced earlier on in their course, where they have not been able to participate fully in teaching and learning. Respondents thought it was important therefore that any approach considered the impact of a lack of access to equipment across the whole course, not just the impact during the current restrictions.

### *Nature of assessment and assessment setting*

There were a number of comments about the different impacts on different types of assessments. Respondents were particularly concerned about practical assessments and about assessments that are delivered outside of a school or college environment, such as work-based students.

While not all of these were directly related to a particular protected characteristic, a number of respondents noted that VTQs in general, were often taken by students who are from more disadvantaged backgrounds, or who have special educational needs or disabilities (SEND). They commented that if qualifications that are more likely to be taken by these students are affected by the proposals, then any disadvantage is likely to be experienced to a greater extent by these students, when compared with students who typically take general qualifications, or other types of VTQ.

Teachers in particular commented that performing arts students, could be negatively impacted, particularly where group work was part of the assessment, which is often the case. Some students may have missed group work themselves or could have been unable to complete it due to other students in the group being unable to complete it, for example as a result of having to self-isolate. Similar comments were made in relation to qualifications in which some form of fieldwork would normally take place as part of the assessment, which students may also have been unable to complete. Students may also be disadvantaged in their assessments by the lack of practise time they have had over the duration of their course due to lockdowns.

A small number of students commented on the proposal that where licence to practice assessments could not be completed, these would have to be delayed rather than receive a teacher assessed grade. They were concerned this could disadvantage these students, who may not be able to progress if they did not receive an assessment result. They felt that many students would have produced sufficient evidence of their competence on their courses, with which teachers could make a judgement as to whether they were competent. They suggested that where possible, teachers should be allowed to provide a testimony rather than the student needing to wait to take a delayed assessment. In contrast, some centres commented that students on licence to practice courses may have been less able to have developed the necessary skills, due to the amount of missed learning, and would require additional funding to ensure students were confident in their specialist areas. For



competency-based qualifications, a representative group commented that there needs to be a contingency plan in place for if assessments are not able to take place within a reasonable timeframe.

A small number of teachers commented on the difficulty in teaching and assessing some internally assessed units remotely. In particular, units that required procedures to be carried out with particular materials, may not be possible to deliver, therefore students taking these units may be disadvantaged.

A small number of respondents commented that childcare qualifications require a large number of hours to demonstrate competency. Since many settings have refused to have students in, students taking these qualifications would be unlikely to have been able to meet the requirements to obtain their licence to practice, so could be disadvantaged.

Respondents commented that for many practical courses, students will not have had enough time to develop the practical skills needed to undertake their assessments. Regardless of what adaptations are permitted, if students have not had time to develop their skills, they are unlikely to be able to demonstrate the necessary level of competence.

Some teachers commented that students who were required to complete work placements as part of their qualifications could be disadvantaged if workplaces are closed and they were unable to complete these placements. Some schools and colleges commented that students on practical programmes may not have been able to access sites or equipment during lockdowns, so could be disadvantaged. Schools, colleges and training providers in particular were concerned about the impact on students taking qualifications and assessments in work-based learning environments. These students may have missed different amounts of teaching and learning, as closures may not be the same as in schools. Some workplaces have not been able to accept work placements for students, in particular childcare, health and beauty and hospitality. Students taking assessments in these environments are particularly likely to have been disadvantaged compared to students taking assessments and qualifications in other environments.

Additionally, respondents were concerned that students taking qualifications outside of schools and colleges are more likely to be adult students and may be balancing other responsibilities such as work or caring responsibilities. They may find it difficult to take any type of assessment other than a remote assessment this year.

Some centres commented that it would be important to consider the bias that internal assessment could have on overall grades. Depending on the structure of the qualification, internal assessment could have a greater or lesser weighting, therefore the impact of any bias in internal assessment and therefore the overall qualification result could vary by qualification.

A representative group commented that students could be disadvantaged if they took an adapted assessment, when the original method of assessment has since become possible to deliver. Some respondents also commented that students sometimes choose their assessment based on the type of assessment, for example because they prefer to take exams, practical assessments or projects. If the assessment method is changed, then such students could be disadvantaged if they are required to take a different form of assessment to that which they had expected.

It was also noted that for some VTQs, where they are broken down into units, then each unit could be considerably different to the others. It may be difficult therefore to predict how a student would perform for a qualification overall, based on a small number of units taken, which could be very different to those not yet taken.

Depending on which units had been taken and which were still to be taken, students could be more, or less, disadvantaged. Additionally, many centres enter students for examined units first, giving them chance to resit, and recognising that the first attempt may be improved on in the second attempt. Basing a result on this first attempt if it has taken place, could disadvantage students who would normally have an opportunity to improve their result, and may have taken the first assessment knowing this to be the case, which may have affected their performance compared with if they knew this was their only chance at the exam.

A number of respondents, including teachers and private training providers, as well as students, parents and colleges were concerned that on-demand tests were being treated differently to exams that are taken at fixed points. Many provided identical or very similar responses setting out that it was unfair on those students who may have to sit assessments in conditions that students taking other qualifications are not required to. They felt that all students, including those outside of the traditional school or college system should be treated the same. The response set out:

“Learners outside the school and college system are usually unrestricted by the academic year and under normal circumstances would have access to assessment and testing on demand. It is not currently safe for this to go ahead in many cases, similarly to those in the school/college system. Your approach appears to be expecting learners outside the constraints of the academic year to sit tests. This is unviable and leads to inequity due to choice of learning pathway. The greatest impact is on those who are in digital poverty”

Others, who made similar points commented that many settings for work-based students no longer allow training providers in, which prevents tests taking place. This disadvantages students taking assessments in these settings. Work-based students may be further disadvantaged if work settings took longer to return and restart training and assessments after lockdown ends.

For some qualifications, respondents highlighted a 'seasonality' factor, in that certain assessments, such as agriculture, can only be taken at certain times of the year. It is possible that the window for taking these assessments may have passed by the time centres reopen, and that students will not be able to take them until the same time the following year. In such circumstances, students should be able to be awarded grades, in order to enable them to progress.

### *Private students*

We received a small number of comments about the impact of the proposals on private students. These were mainly from private students themselves, or from their parents or carers.

Respondents said that it is important that if exams are cancelled, they have the same access to a teacher assessed grade as those who take assessments with a centre. This may be more difficult as they may not have access to a teacher who is able to assess their work. A small number of these respondents commented that many private students are repeating their assessment from a previous year, or they may be disabled or BAME students. If private students were less likely to be able to receive a result under the proposals, then these groups of students are likely to be disadvantaged as a result of sharing these characteristics.

Additionally, with reference to private training providers, it was noted that most home schooled and adult students' complete courses via distance learning with private providers and this needs to be addressed properly.

### *Teacher assessments*

A number of respondents were concerned about the potential disadvantages on some students if teacher judgements are used to inform results. The extent of these impacts, and the specific groups affected depended on the evidence that was used to inform grades. Responses to this question came in particular from students, their parents and carers and teachers. Particular concerns were raised.

Teachers, in the main, were concerned that:

- due to the differential impacts of lost learning, it would not be possible to assess students in a way which reflects their capabilities fairly
- students who were given a grade informed by teacher judgements could be disadvantaged when compared with students who had taken an exam
- there was a potential for students to be disadvantaged where NEA was used to inform a teacher's judgement. Different centres take different approaches to when their students complete NEA, and students could be advantaged or disadvantaged based on decisions taken by their centre about how to deliver the qualification

- previous centre performance should not be taken into account as part of any process, as this has the potential to disadvantage students
- it may be difficult to authenticate any internally assessed work that was completed remotely, to be sure it was produced by the student in question
- the risk of students having insufficient evidence on which to base a teacher grade due to the amount of missed learning, so therefore being disadvantaged
- the risk of students who had completed all units required for certification receiving a lower grade than a student who had been awarded a teacher assessed grade who may not have all the supporting evidence

Students, in the main, were concerned about:

- the impact of 'mini-exams' if they were used to inform teacher grades. They felt that these would create additional stress and anxiety for students. They also queried why, if exams are cancelled, a 'mini-exam' would be allowed to go ahead
- how the results from any mock assessments would be used. As not all students will have taken mock assessments, and different centres use them in different ways. They were concerned that students in different centres could be unfairly advantaged or disadvantaged, based on the approach taken by their centre
- the potential for teacher assessed grades to be biased, including on the basis of students' protected characteristics

Views from centres included concern that some schools may punish students for not engaging with online learning. A small number of respondents also commented that every centre will have its own approach to ensuring disadvantaged students are not negatively affected, so it would be important to have clear guidelines to support centres on this. They said it would be important any process for determining teacher grades was considered and followed a process, as opposed to being a last-minute judgement. There was a suggestion that centres may be able to work together to assess each other's students to support with this and that checking for bias should form a part of any checks that take place.

Some respondents were concerned about the potential for students to be disadvantaged by the timelines. If deadlines are brought forward, centres may not have sufficient time to gather evidence or to complete the necessary quality assurance.

Some respondents, including a university were concerned that in VTQs, teachers are often less familiar with their students than classroom-based GCSEs, AS and A levels, therefore, may be less well placed to determine a grade for their students.

### *Special educational needs and disabilities (SEND) and reasonable adjustments*

A number of respondents commented that students with special educational needs or disabilities could be negatively impacted. Teachers, students and their parents or carers made similar comments in this area. These included:

- that students with disabilities may already struggle with their workload, and are now having to undertake online learning, which they may struggle with even more
- that some SEND students struggle in particular to access remote teaching, learning and assessment, so may be further disadvantaged by assessments taking place in this way compared with other students
- disabled students may often have one to one, or other support in their normal learning, but are unlikely to have had access to this this year, either for teaching and learning, or assessments
- some SEND students also have parents who have SEND, so may not have the level of support at home that other students may have
- students who would normally have extra time in an exam as a result of a disability were concerned they could be disadvantaged if this was not taken into account when they are completing any NEA or other 'mini-exams'. Students were concerned that it is less easy to determine an appropriate amount of additional time for an adapted or remote assessment, than for an exam taken in a centre
- some students use reasonable adjustments such as human scribes or readers which are difficult to put in place under current public health restrictions
- some SEND students may not yet have had an assessment for reasonable adjustments, therefore they may not have access to the necessary reasonable adjustments when working from home
- some SEND students may have 'banked' a poor performance at their first attempt but intended to make a second attempt at an assessment. Requiring them to rely on the 'banked' attempt could disadvantage these students

- the risk that some adapted assessments may not be accessible to some groups of students, including deaf students, in particular because they are a relatively small group of students compared with those with other needs
- the risk that assessments for, and applications for reasonable adjustments may not be possible within the published deadlines due to centres being closed

It was also suggested that awarding organisations should be required to collect data about any potential disadvantage faced by students, and the severity of the disadvantage could be measured.

Staff at a specialist centre made a number of comments relating to students who are on the autistic spectrum. Such students may find it more difficult to adapt to change, and often cannot just take an assessment 'cold' but will need time to settle back into teaching and learning. For these students, it will not be a case of simply asking them to complete an extra or adapted assessment.

It was also highlighted that many students with SEND take entry level qualifications, and it would be important to ensure that these are considered in any approach. For these students, they commented that teachers are best placed to know what students know and can do. They were also concerned that results must be realistic – they do not want students to receive an unrealistically high result that does not reflect what students actually know and can do, as they may struggle if they have progressed to college on this basis. For such students, it may be difficult to present evidence of what they know and can do as the evidence may not exist in the form of formal or informal paper-based assessments. They suggested a certificate of participation could be awarded where a student has not been able to demonstrate their ability due to the disruption and any disadvantage they have suffered as a result of their disability.

It was also noted that some SEND students take longer to learn the assessment process, therefore earlier assessments may not fully reflect how they would have performed in later assessments as they become more familiar with the process. Basing a result on assessments taken early in a course could disadvantage these students. It was suggested that a later submission deadline for such students could help centre ensure sufficient evidence is available.

Other comments included students in pupil referral schools are vulnerable and may already have missed large amounts of teaching prior to the coronavirus (COVID-19) disruption. It was felt these students could be disadvantaged, and that the potential for any further external tests may put them under additional unnecessary stress.

Representative group comments included that students could be disadvantaged if it was not made explicit to awarding organisations the need to ensure equal and fair access to assessment. It was commented that the position set out in the consultation

that awarding organisations should not be prevented from making an adapted assessment available even if it could not be made available to all students, was only tenable if alternative, accessible arrangements are in place to provide students who have not been able to complete internal assessments with another means to achieve the qualification.

### *Socio-economic*

Respondents were concerned that students could be disadvantaged as a result of socio-economic factors. Some of the points raised here were general, without specifying the exact impact, for example stating that working-class students may be more disadvantaged. Others set out more specific disadvantages, which are included below:

- socio-economic factors could mean that some students are more disadvantaged in terms of being able to access equipment needed to access remote learning or assessments
- students in poorer areas have been more affected by the pandemic therefore are at risk of being disadvantaged compared to other students
- students who were from more disadvantaged backgrounds were more likely to be taking VTQs, therefore would be more likely to be negatively affected
- students who are economically deprived are more likely to do VTQs than others, and yet they are having to continue to do exams, when other students are not. This is a further widening of the gap and disadvantaging of these students
- socio-economic factors could impact the grades given by their teachers as a result of bias, as teachers may label particular students, which may impact the grade they give
- the impact of home circumstances, including socio-economic factors, could have a greater impact on some students more than others, leading to a widening of the attainment gap
- some students may have lost jobs either due to being made redundant, or employers going out of business. Such students would need alternative arrangements to be put in place to enable them to continue with their assessments
- many BAME students live in deprived areas and may be negatively affected as a result of factors such as access to resources and equipment, study space at home, lack of access to centres, of coronavirus (COVID-19) having a greater impact in the areas where they live, or having additional caring responsibilities at home

A small number of parents and carers commented that the process needs to be fair to all students. They commented that private schools need to be sampled and reviewed just as much as state schools do. They were concerned that independent and state educated students will have had different educational experiences, opportunities and support, which need to be considered to ensure fairness between these students.

Representative group comments included that students with protected characteristics are over-represented in the rates of absence, which means that such students are likely to be disadvantaged and that students on free school meals were also more likely to be absent than other students. It may be more difficult to award grades for students with high absence rates than for other students.

### *Race*

A small number of respondents made comments relating to the potential for BAME students to be disadvantaged. These comments included that:

- black candidates are often encouraged to take certain qualifications such as BTECs. These students could be disadvantaged as there is less certainty over the arrangements for these qualifications than others
- BAME students are not covered explicitly enough, but did not provide further information about the specific disadvantages they faced
- students with ethnic backgrounds were really struggling as they are poorer and were not engaging
- black, SEND and looked after students could be disadvantaged as they would not have the opportunity to 'pull it out of the bag' in an exam. They said this could delay their progression to the next level of their education
- BAME students have on average missed more live learning than other groups, and that measures to address school closures should take this into account specifically

A representative group pointed to research which shows that BAME students have been disproportionately affected by coronavirus (COVID-19). Students from a BAME background were more likely to be coping with illness, fear for their relatives or grief for lost ones therefore, it is likely that the education and wellbeing of students from the BAME community will have been disproportionately disrupted by the coronavirus pandemic.

### *Carers*

A small number of respondents commented that students with caring responsibilities may be disadvantaged, as they may have found it more difficult to access remote teaching and learning, or remote and adapted assessments. Respondents also



commented that caring responsibilities may prevent students from being able to attend rescheduled exams.

### *coronavirus (COVID-19)*

Some respondents commented that students who have been required to shield may be disadvantaged. While the reasons for shielding vary, some students will have been required to as a result of their disability.

A small number of respondents commented on the impact on students who had lost family members as a result of the pandemic, which will potentially have affected the amount of teaching they had completed and also their performance in any assessments they have completed or may be required to complete.

Some respondents commented on the effects of coronavirus (COVID-19) in terms of students feeling safe and being able to perform in the way expected when they take their assessments, due to these concerns.

### *Other qualifications*

Some respondents commented on the impacts that could be felt on students taking particular qualifications.

- a large number of respondents commented on the need to ensure there was consistency across all qualifications. It would be important that expectations around taking assessments were similar, and also in relation to the type of evidence needed for each qualification or assessment
- a number of respondents, including teachers and centres commented that students taking functional skills could be disadvantaged compared with those taking GCSEs, AS and A levels. They commented that such students may already have missed more teaching and learning than those taking GCSEs, AS and A levels, and the proposals could further disadvantage them
- respondents commented that many students from disadvantaged backgrounds take VTQs rather than GCSEs, AS or A levels, so if the arrangements are not consistent between these qualifications, students taking VTQs could be further disadvantaged
- private schools would be discriminated against due to IGCSEs not being cancelled, as these are taken by a number of private schools. Forcing these students to take external exams when other exams have been cancelled would disadvantage students taking these exams, despite also having had their teaching interrupted
- a number of students in particular commented that it is important that BTEC students are treated the same as A level students, so as not to disadvantage them. Students commented that BTEC students complete work over the

duration of their course, and it is important that such work is taken into account. Many respondents felt that BTEC exams should also be cancelled. Teachers commented on the different nature of the cohorts who take BTECs and felt that students taking these qualifications would have been impacted to a greater extent, in terms of their ability to study, than students who take other qualifications

- a small number of teachers commented on qualifications that are also taken internationally and felt that these should also be cancelled where exams in England are being cancelled. A number of centres and parents commented that students in England could be disadvantaged if a different decision on whether exams can go ahead is taken in England compared to other countries where the same exams are taken. Respondents commenting on exams taken internationally were also concerned that students in England may have missed more learning than students taking the same exams in other countries, but competing for the same progression opportunities
- it would be unfair if pre-U exams continued as students may be competing against those doing different qualifications for whom exams have been cancelled
- awarding organisation views relating to pre-U included research from schools focussing on the fact that many had coped well with remote learning but recognising concerns about the potential burden of alternative arrangements on schools. Concerns were noted from schools, that students taking exams could be disadvantaged in comparison to students who may receive higher grades through teacher judgements
- while not covered by our proposals, some respondents commented on the need for apprentices to be treated in the same way as students taking other qualifications.
- some teachers commented that ESOL students are often from poorer backgrounds and are being further disadvantaged if exams take place and they are required to travel to sit their assessments

Views from teachers also included the need for consistency across qualifications regulated by different UK regulators. They highlighted that some of their students take GCSEs regulated by Qualifications Wales, whereas other students take an equivalent VTQ regulated by Ofqual. They commented that students faced very different assessment arrangements depending on which qualification they were taking.

Some centres commented that the exclusion of end point assessments from the proposals could disadvantage students who are taking apprenticeships.

### *International Baccalaureate*

A large number of respondents submitted comments relating to International Baccalaureate (IB) exams. Many of these respondents submitted identical or very similar responses.

Students who commented were concerned about the approach being taken for IB qualifications and were concerned they would be disadvantaged if a different approach was taken for the IB than for GCSEs, AS and A levels, which are often taken as alternatives to one another.

Respondents commented that the approach for IB assessments should be the same as that taken for GCSEs, AS and A levels and that exams for these qualifications should not go ahead. They felt that if IB assessments went ahead while assessments for other qualifications did not, then IB students could be disadvantaged. Some respondents commented that if these exams went ahead, then a student who was unable to take the assessment, for example, due to having coronavirus (COVID-19), would potentially be disadvantaged if they missed their assessments, since it had gone ahead, whereas students taking other assessments that were cancelled would not be similarly disadvantaged.

Some respondents commented on differences between students taking IB qualifications in England compared with those taken elsewhere in the world. They commented that students could be disadvantaged if students in the UK had grades awarded on a different basis to those taking the IB internationally. Respondents also commented on the differential impacts of the amount of lost learning between students in the UK, and those in other countries, depending how long schools have been closed for in each country.

An awarding organisation commented on a number of impacts that may be caused if the IB were to follow the same model as is being proposed for general qualifications. It commented on the successful delivery of IB exams in countries where this has been permitted and on feedback from centres suggesting many would be in a position to administer exams. The awarding organisation commented on the potential impacts that could arise if IB were required to be subject to the arrangements for general qualifications, as opposed to the requirements for VTQs.

### *Other*

A number of other issues were raised by small numbers of respondents, or by individual respondents. These included:

- the potential for students who were due to resit from last year being disadvantaged

- an awarding organisation who is based overseas commented that the proposals should not apply to international students, although did not identify any specific equalities considerations
- students commented that if exams were to go ahead, the conditions required to take them safely, such as having windows and doors open, could affect student performance in the exam
- students seeking to progress to university may be disadvantaged as there could be significant numbers who had deferred entry from last year, meaning competition for places may be higher.
- concerns were raised by teachers that the arrangements made by different awarding organisations differ, with some making more adaptations available than others. For students taking qualifications with awarding organisations who have not made adaptations available, students often have to travel to centres, which would have a detrimental effect on their performance in the current circumstances. They said these students are often from ethnic minorities, affected by existing health conditions, living in financial difficulty and crowded or poor housing
- students could be disadvantaged if decisions are not made and communicated quickly, in particular those due to take assessments in January and February
- the disadvantage for international students taking qualifications at a UK centre. Respondents said that these individuals are less likely to have been able to complete external assessments (due to restrictions on international travel and closed borders) and/or internal assessments (due to access resources, especially in practical subjects). They may also have found remote learning more challenging, due to access to resources and time differences
- students who take an assessment in a different language to that which they speak at home could be disadvantaged if they have been unable to practice their assessment language at home
- students may have missed time when centres are open due to pregnancy and then returned to centres when they are unable to open due to lockdown, so have not been able to catch up on learning
- some students, such as those taking qualifications in the criminal justice system, may be less likely to receive a result as some of the evidence in which to base a teacher assessment may not be available.
- children in care, who may be more likely to move schools frequently may also be less able to receive a result as there may not be sufficient evidence held by their schools on which to base a result

- if there was not a fair and consistent appeals process, then students may be disadvantaged if they are unable to challenge any disadvantage they feel they have suffered

## Question 29

Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

1029 respondents provided additional comments in response to this question. The majority of these responses (79%) were personal responses. Of the personal responses, 54% were from teachers, exam officers or senior leadership team members, 24% were from students and 13% from parents or carers. The other personal responses came from apprentices, awarding organisation employees, examiners, consultants and governors.

The remaining responses were on behalf of organisations. Of these organisational responses, 58% were from schools or colleges, 13% were private training providers, 13% were awarding organisations, and 10% were representative or interest groups. The other organisational responses were from academy chains, employers, local authorities, universities and higher education institutions.

Comments to this question covered equalities considerations from across all of our proposals. Some of the responses supported issues we had identified as part of the equalities impact assessment in our consultation, others highlighted additional issues that they did not feel had been considered in our assessment. Some respondents set out ways in which they thought impacts could be mitigated, although a large number simply repeated concerns raised, but did not propose mitigation approaches. We set out in this section the key themes that were identified. In the main, most themes were raised by a range of respondent types, however where a theme appeared to be raised more often by a particular respondent type(s) we have set that out below.

### *Cancel exams*

A large number of respondents, in particular students, parents and carers suggested that cancelling exams would help to mitigate the potential disadvantage faced by students. Some made comments relating to specific qualifications, for example that BTECs or IB assessments should not go ahead if exams in other qualifications were being cancelled. Respondents felt that it was only fair for the same approach to be taken across all qualifications, and that VTQs should be treated the same as GCSEs, AS and A levels in terms of their exams being cancelled.

Teachers who commented said that it would be important to treat all qualifications the same. They said that all exams and other external assessments, including practical assessments should be cancelled, and that teacher assessed grades should be used instead.

Some respondents did comment on the possibility of using other assessments to help inform teacher judgement. They suggested exam-like questions could be set as

homework and be timed, which could help inform teacher judgements. Others suggested that while they supported exams being cancelled, if they were to go ahead, there should be a maximum number of papers per qualification, with a maximum duration, and that topic lists should be provided setting out what the assessment would cover.

### *Proceed with exams*

A small number of respondents said that they thought the best way to mitigate any potential negative equalities impacts would be to allow assessments to go ahead. The majority of respondents who supported exams continuing in some form were teachers.

Some of these respondents supported exams going ahead in their existing form, and some suggested they could go ahead in a shortened form with fewer compulsory questions. Some respondents said there would need to be an externally marked assessment to ensure standardisation across centres. While this could be supported by some internally assessed work, they commented the externally marked assessment should be the main contributor to the result.

Some students said that allowing exams to go ahead would help protect students against potential disadvantages as it would mean they could receive a result based on this, rather than teachers being involved, which they said had the potential to disadvantage some students.

Some respondents commented that even if written exams did not go ahead, it may be necessary for some practical assessment to continue to make sure that students aren't disadvantaged.

Some respondents commented on ways in which exams could go ahead, albeit not necessarily for all students:

- exams should be available for those students who wish to take them
- where exams did proceed, these should be online only
- BAME students often perform better in exams, so they should be allowed to sit exams

Some respondents commented that awarding organisation set tasks should also be used, either alongside, or instead of, teacher assessed grades.

An awarding organisation commented on the need for flexibility of assessment and the use of both on-demand and remote assessment. They commented that this was the fairest way to ensure students receive results which reflect their knowledge, skills and understanding.

### *Internal and non-exam assessments*

There were mixed views about whether internal non-exam assessments should continue. Some respondents felt that it would be appropriate for assessment of all types to be suspended during lockdown, particularly as not all students would be able to complete internal assessments remotely.

Other respondents thought it was important that internal assessment is considered. Some thought that only internal assessment completed pre-lockdown should be used, whereas others felt that students should be allowed to continue with internal assessment to ensure centres have sufficient evidence on which to determine student grades.

Respondents said that internal assessment evidence produced remotely by students should be accepted if the centre had controls in place to ensure that it was the work of the student. They also said that partially completed work should be taken into account where necessary, if completed work was not available.

Some respondents commented that basing results on practical assessments would be a fairer approach than making students sit exams.

### *Use of teacher assessments*

A large number of respondents felt that allowing teacher assessed grades would help prevent any potential disadvantage for students. A large number of teachers commented that teachers know their students best and would be most likely to be aware of students' individual circumstances, so should be trusted to make judgements about the grades students would have achieved. These were proposals made in the main by teachers, but also by a number of students.

Respondents commented that as different students may have been affected differently, teachers would need to take account of the individual impact on different students when determining grades. Training provider views included the importance of there being clear minimum evidential requirements for teacher assessed grades. A number of respondents commented that teachers should be able to take account of the impact on individual students of their particular circumstances, when determining their grades.

Some respondents who supported teacher assessed grades commented that these should also be supported by internally assessed work, or shortened versions of assessments to help ensure that teacher judgements were fair to students.

Respondents commented that it would be important to consider a wide range of evidence and for centres to seek views from multiple staff when determining a grade.

Respondents commented that they thought teacher assessed grades would be preferable to requiring students to sit 'mini-exams'.



Some students commented that it would be preferable for teachers to discuss grades with students. They said that if this happened early on, then a student would know what more they needed to do to maintain or improve their grade, so would be motivated to continue with their study.

Some respondents commented that it could be important that where teacher assessments were being used, clear guidance would be needed setting out how any teacher assessment should be completed to avoid the potential for bias. They commented that there would need to be checks to ensure that approaches were fair, and data should be published to prove that moderation has occurred and show what inequalities have been identified and managed prior to results being issued. This suggestion was made by students, parents, and by teachers and members of senior leadership teams. Some respondents commented that it was important that awarding organisations retained scrutiny of judgements made by centres and should be closely involved in decision making. Centres commented that awarding organisations would need to provide clear guidance for teachers about how grades should be determined. They commented that it could be more difficult for teachers to determine grades this summer, as students have missed more teaching than last year, so teachers may be less familiar with individual students.

Respondents commented that it would be important that teacher assessed grades were able to take account of particular groups of students and how individual students had been affected and take steps to ensure they weren't unfairly disadvantaged. They commented that it needs to be accepted that different groups have been affected to differing extents, and this needs to be taken into consideration. A teacher commented that results and grades need to be looked at on a centre-by-centre basis and not region by region.

Respondents also commented that:

- teacher judgements should reflect the performance of the student and the amount of work they had done. They said that students should not be able to achieve the qualification if they had not done enough work, teachers should be allowed to provide a teacher assessed grade that can be used for students who are due to complete courses next year
- teacher judgements should be permitted even where a student had already made an attempt at an exam
- since some students may be less able to produce work at home, only work produced in centres should be allowed to inform teacher assessed grades

Respondents commented that it would be important for a wide range of evidence to be considered as part of any teacher grades to ensure they were fair for students and that not all students would necessarily have to be assessed on the same evidence. Allowing a range of evidence would help ensure no students were

disadvantaged. Centres commented that verbal evidence should be considered if other evidence is not available. Respondents also commented that any teacher grade should not be solely down to one individual teacher.

Respondents commented that extending the timescale for centres to submit grades would allow additional time to carry out the necessary moderation and quality assurance processes.

### *Private students*

Views from parent or carers suggested that for private students, if there was insufficient evidence on which to base a teacher assessed grade, private students could be given the opportunity to complete skills tests. They also commented on the potential disadvantages faced by private students commented that they could be given special consideration.

Students commented that private students that had not completed any work which could be used to predict their grades needed to be considered. They also commented that it is important that arrangements take account of private students this year. They said they were more disadvantaged compared to other students last year, so it was important they were not disadvantaged again, otherwise they faced having lost two years.

Teachers commented on the need for private students taking VTQs to be treated in the same way as GCSE and A level students.

### *Licence to practice*

In relation to licence to practice qualifications and the potential disadvantage students taking these qualifications could face, respondents made the following suggestions for how this could be mitigated:

- performance could be verified by a supervisor's report which confirms the student is able to work safely
- students should not be disadvantaged where an assessment cannot take place and that expert witness testimony should be able to be used in its place

### *Provide access to equipment*

Respondents who had been concerned about students being disadvantaged by being unable to access equipment needed to access remote teaching and learning or assessment made suggestions for such equipment to be provided to students (for example access to IT equipment, specialist equipment, software or broadband). A large number of respondents made similar suggestions across students, parents and carers, teachers, centres, senior leaders within centres and representative groups. While many acknowledged that access to equipment was better than during previous

lockdowns, they did not feel provision of equipment now would sufficiently mitigate the impact of the disadvantage these students have already faced.

Centres noted that where students did not have access to equipment, they should be allowed to continue to go into centres, provided it was safe for them to do so.

A representative group commented that it would be important to ensure that assessments do not inadvertently disadvantage students with limited access to these, through for example, using timed assessments or streaming video where slow internet connection may interfere with a student's ability to engage with an assessment.

### *Specific adjustments and use of special consideration*

The application of special consideration was raised by a large number of respondents. These included students, parents, carers, teachers and centres. They commented that special consideration would be needed to take account of the impact of disruption and any disadvantage faced by individual students. Some respondents commented that these applications could be supported by statements explaining how students have been affected, for example by SENCO staff.

There were a number of scenarios referred to where special consideration might be applicable, including to make up for lost teaching and learning, disruption caused by lack of access to remote teaching and learning or necessary equipment, mental health impacts, caring responsibilities, and the effects of coronavirus (COVID-19) on students or their friends or families.

Some respondents, in particular teachers, made specific recommendations for other actions that could be taken to ensure that students were not disadvantaged. These included:

- to apply deprivation index data to schools, combined with data on the extent to which students' education has been disrupted
- to uplift grades linked to deprivation area and to carry out analysis into links between deprivation and ethnicity to uplift grades accordingly
- to potentially take a view on prior level 2 attainment
- not to look at the scores of previous cohorts, as each cohort should be treated differently. In contrast, some respondents said that previous centre performance should be taken into account to keep attainment in line with historical achievement, while allowing for some improvement
- scrutiny of teacher assessment judgements by Heads of Department, with some light touch sampling from awarding organisations

- the need for intensive oversight over the grades awarded to those who are in groups who have been known to be victims of racism in education
- that grading systems should be discussed completely openly and clarified totally for all prior to the giving of grades
- to potentially lower grade boundaries
- awarding of additional marks
- to pay special attention to every student from a minority group to ensure they are not disadvantaged
- to allow for positively discrimination where students might otherwise be negatively affected through no fault of their own
- that units which have been completed should be given a higher weighting than teacher assessed grades when determining results
- to allow students to be assessed on discrete topics, so students are not disadvantaged due to having missed some topics but not others
- to remove practical elements or optional units from assessments
- to allow the impact on students' mental health to be taken into account when determining grades

### *SEND and reasonable adjustments*

Some respondents, including teachers and members of senior leadership teams, made comments relating to how the potential disadvantage faced by students with special educational needs and disabilities could be mitigated. These suggestions included:

- that schools would need to consider, for those students who normally have reasonable adjustments, how these could be translated into remote learning. They suggested approaches such as allowing specific one to one time remotely for students with disabilities, to help ensure they have the support and adjustments they require to access teaching and assessments
- that specific care and attention should be taken for students with conditions such as dyslexia who have missed out on much of their normal support
- students felt that some of the potential disadvantage on students with autism and other disabilities could be mitigated by announcing changes as soon as possible, to help remove additional stress on these students
- allowing additional time for students taking assessments remotely, including those who might not normally require additional time when an exam was being taken under normal circumstances

- teachers commented that existing dates for the approval of reasonable adjustments could be extended
- students enrolling on courses in September had had insufficient time to demonstrate their normal way of working to inform applications for reasonable adjustments. Exam officer respondents said they may have difficulty processing the large number of applications and would like to apply for the same reasonable adjustments awarded to students in year 11 without the need to assess them this year
- consideration should be given to those with behavioural or learning difficulties so that their relationship with their teachers does not influence their result, positively or negatively
- some of the normal requirements relating to reasonable adjustments could be relaxed to make it easier for students to access the reasonable adjustments they require
- a greater weighting should be given to those assessments that were completed with reasonable adjustments fully in place than those that may not have
- centres would need to be proactive in flagging potential negative impacts in advance, so that awarding organisations could take account of them
- the need for adapted assessments to be simplified where possible to reflect the fact that many SEND students will not have access to the support they would usually have to access exams

A representative group commented that Ofqual should provide guidance for awarding organisations on examples of reasonable adjustments they should be prepared to make for students, to help ensure consistency across awarding organisations. They commented that centres may need specific support if the reasonable adjustments students required to take adapted assessments are different to those they are used to. They commented that it would be important students could appeal their results if they thought they had been disadvantaged as a result of their SEND.

Awarding organisation views included the need to balance the need to provide reasonable adjustments, such as remote invigilation, with preventing malpractice and that in some cases, preventing malpractice may make a reasonable adjustment less possible, or providing a remote reasonable adjustment may increase the risk of malpractice.

A representative group commented it would be important for centres to seek advice from specialists who work with deaf students, to ensure assessments are fully accessible. They commented that centres should be required to record the input they

have received from specialists and record where reasonable adjustments have been made for each assessment. Students should be permitted to appeal a result if they suspect assessments were not fully accessible to them or that specialist advice has not been sought by a centre.

### *Deferring assessments and allowing resits*

A number of respondents made comments that related to either deferring assessments, allowing resits, or extending the academic year, or allowing students to retake the year.

Some respondents, in particular teachers felt that for some practical assessments, the best way to minimise any potential disadvantage would be to defer them until later in the year.

A number of respondents commented that for students for whom special consideration was not able to mitigate any disadvantage, then it may be necessary to take or repeat assessments at a later date. Some also commented on the possibility of extending the academic year to allow students to catch up on missed learning and to complete assessments.

Private training provider views included that free resits should be made available at a later date for students who wish to retake their assessment for any reason.

### *Alternative approaches*

A small number of respondents commented that alternative assessment methods should be considered, for example, online, or open book exams. Some respondents, including schools and colleges commented that there should be additional assessment opportunities available so that students can take assessments when they are ready, and receive the support they need.

Respondents said that for some students, it would be important to allow exams to continue remotely, or to allow internal assessment evidence to continue to be produced, as some students may have had their learning disrupted, including due to a lack of access to necessary equipment and resources, and may therefore not have enough evidence in order for a teacher to determine a grade.

Teachers commented that adaptations may also be needed for next year's exams, and that these should be allowed to be carried over.

Centres commented on the need to allow greater autonomy, to take account of different qualifications, their uses, and the students who take them. They also commented that some qualifications need to be taken in a logical sequence to allow students to build skills, which has not been possible with remote delivery.

## *Appeals*

A small number of respondents commented that it would be important for there to be a fair and robust appeals process in place for students to appeal if they thought they had been unfairly disadvantaged.

Parents and carers commented that there should be clear guidance on appeals procedures. They also commented that unconscious bias, or any inconsistency in allowances for equality impacts should be dealt with in the appeals process.

Teachers commenting on the appeals process said that as part of an appeals process, schools should be asked for evidence but unless there is obvious malpractice, grades should stand.

## *Consistency*

A small number of respondents from centres commented that one way to mitigate any potential disadvantage would be to ensure the arrangements are consistent across qualifications, so as not to discriminate against weaker students who may take particular qualifications.

Training providers and centres commented that it would be important students were treated the same across the board, regardless of which awarding organisation they are using.

Respondents made comments about a number of specific qualifications, including functional skills, BTECs, Pre-U and ESOL, saying that these should be treated in the same way as GCSEs, AS and A levels and that any arrangements should ensure that these students have the same opportunity to progress.

## *Other*

A number of other suggestions were made by small numbers of respondents, or by individual respondents. These included:

- the need to communicate the final arrangements quickly, so that students and centres were aware of them as soon as is possible. They said these needed to be, and be applied, consistently
- some students commented that teachers should be able to take account of the effects of stress on students when determining a grade
- a small number of respondents, including exam officers commented that it would be important to implement a fair approach from the outset. They said that vocational students were negatively impacted last year by delayed results due to reverting to centre assessed grades late in the process
- delaying start dates for the academic year should be considered

- a small number of respondents, including parents and carers felt that a lack of learning could not be fixed through the approach to determining results and that it may be necessary to complete additional work during the summer, or some students may need to complete the year
- some respondents commented that additional funding should be provided to ensure that any student who is disadvantaged has the support they need to take their assessments
- some parents commented on the importance of ensuring that students should be provided with as much live, online learning as possible to keep them motivated to complete coursework
- to ensure that communications take account of the language used, recognising that English may not be the first language for many from deprived backgrounds
- to allow additional exams in September, or to put in place entry exams for colleges
- the need for there to be a variety of assessment options was raised, so that centres and students could choose the option that is most effective for them
- that dates for Entry Level assessments should be pushed back to allow the maximum possible amount of teaching to take place

A representative group commented that it would be helpful to take a longer-term view of the impact on students. They noted that some colleges are extending their summer terms to provide students with the opportunity to catch up on lost learning, particularly in relation to practical assessments.

A representative group commented on the need to set out how the impact of these disadvantages will be monitored, accounted for and negated. They set out that it would be important to be clear about the limitations of any approach that is ultimately implemented and to provide guidance and support to help mitigate these advantages as far as is possible, even if they can't be fully mitigated. They also commented that it would be important for there to be flexibility in the approaches taken, to help ensure students aren't disadvantaged as far as is possible.



## Regulatory impact

### Question 30

Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are not identified in this consultation?

Figure 52: total responses to question 30

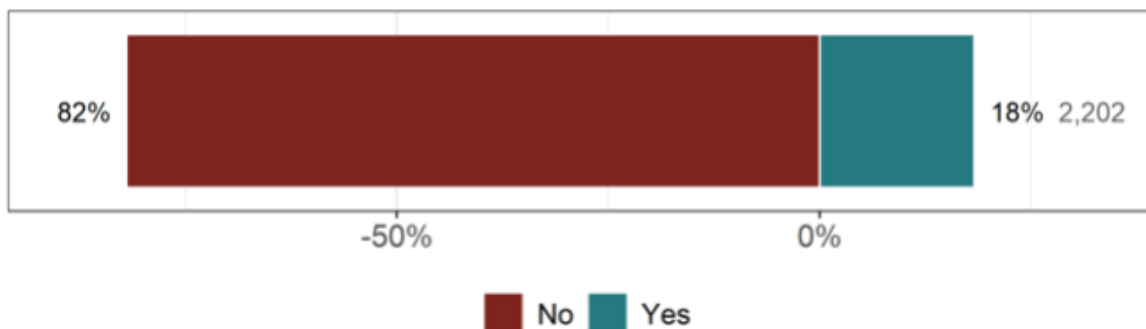


Figure 53: breakdown of responses to question 30 by respondent type (individuals)

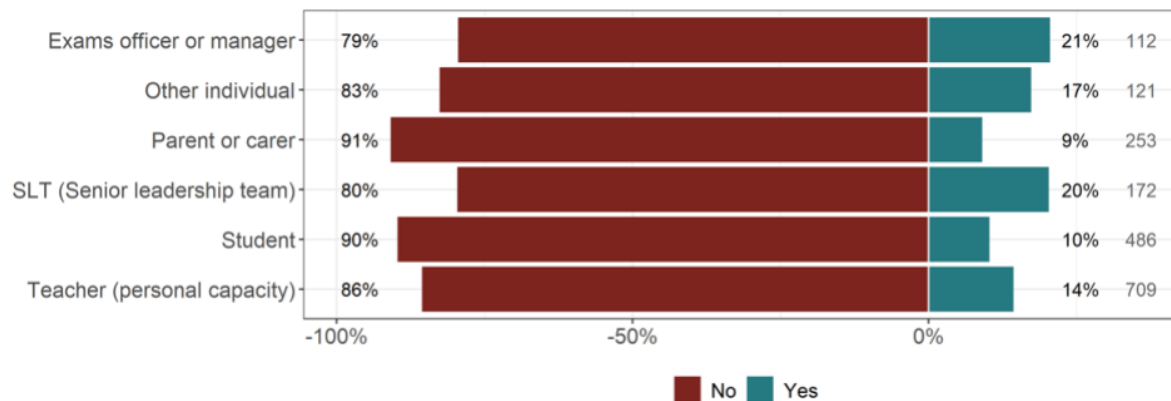
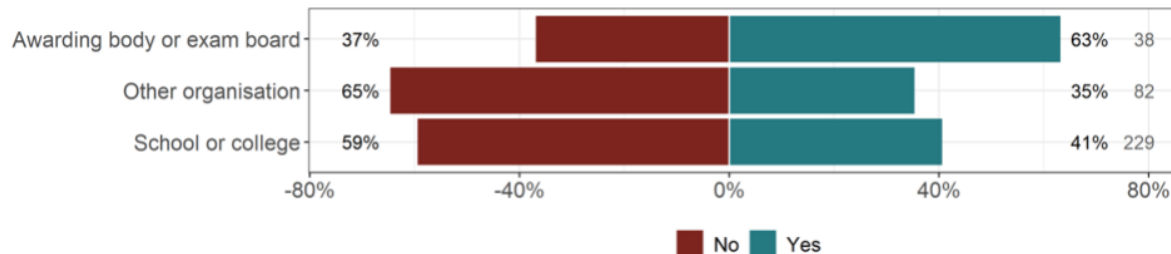


Figure 54: breakdown of responses to question 30 by respondent type (organisations)



During the consultation analysis we became aware of a number of ‘campaign’ responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One large ‘campaign’ was

identified with at least 14 responses that commented, '... Timings of submission of evidence for example needs to take into consideration both GQs and VTQs. Notification of results also has to take into consideration both VTQ and GQ providers. Any changes to published timetables need to be notified as soon as possible.' There were other, smaller campaign responses but the replies were not in relation to the question asked.

436 respondents provided additional comments in response to this question. Responses to this question were from across a range of respondent types. The majority of responses are broken down as follows. 26% of responses were from teachers, 24% from centres, 9% from students, 8% from SLT members, 6% from parents or carers, 6% from exams officers and 6% were awarding organisations.

Comments to this question covered regulatory impacts from across all of our proposals. Some of the respondents commented on issues we had identified as part of the regulatory impact assessment in our consultation, others highlighted additional issues that they did not feel had been considered in our assessment. We set out in this section the key themes that were identified. In the main, most themes were raised by a range of respondent types, however where a theme appeared to be raised more often by a particular respondent type we have set that out below.

### *Provision of equipment and admin costs*

A number of respondents commented that for remote or adapted assessments, there would be a burden on centres and students of having to provide equipment to enable students to access the assessments. Some centres would be able to provide these for students, whereas for others, students themselves may have to provide the required equipment.

A small number of respondents also commented on the cost of the provision of materials other than IT equipment including for any unexpected internal assessment which had not yet been planned for. Some teachers commented that some students would need musical instruments to be provided to allow them to practice and complete assessments, which they said would be expensive for centres to provide.

A number of awarding organisations commented that additional resources will be required to implement and manage new arrangements, to manage additional quality assurance processes and that there will be an expected increase in complaints and appeals further adding to resource costs.

### *Cost of teachers, examiners and markers*

A large number of respondents made comments that related to the potential cost, both financially and in terms of workload, for teachers, examiners and other assessors. These comments were made in particular by teachers, centres and some awarding organisations.

Respondents identified a range of additional costs, mainly relating to teachers having to take on additional work in order to determine grades. These included:

- if teachers were to mark 'mini-exams' then they should be paid for performing the role that would normally be done by an examiner, as this is additional to their normal workload
- the impact on teacher workload of having to mark additional assessments, or having to collate evidence in order to determine grades
- the cost of time and overtime for teachers working to determine grades and collate evidence, particularly where these would normally be externally marked, so this was an additional workload for teachers
- the cost of photocopying papers if additional 'mini-exams' are set
- the cost of teachers performing processes such as standardisation within centres
- the cost of training teachers in new processes
- the cost of time in additional quality assurance
- students taking certain qualifications would require additional time. For example, some VTQ assessments would take longer to be conducted remotely, so there would be an additional cost in making this time available

Centres and SLT members commented that there would be costs and increases in workload due to having to deal with appeals.

Some respondents, who were exam officers, felt that the potential for results to be issued earlier than usual would place a burden on exam officers, and would mean that timelines for teachers and centres to turn around the required processes would be unrealistic.

A small number of respondents said that there would be potential cost savings as a result of exams being cancelled and the proposed approach. These included:

- savings in the cost of moderation of coursework
- allowing teachers to make assessment judgements would mean there would be no additional costs of administering assessments
- savings in paper, administration and examiner costs
- online assessments would be more environmentally friendly when compared to paper exams

### *Exam fees*

Respondents commented on the potential cost to centres who have paid exam entry fees for assessments that are no longer going ahead.

- teachers, centres and SLT members queried whether centres would receive refunds of entry fees for exams that do not go ahead as centres would be undertaking much of the related work for determining grades
- private students commented that centres may take advantage of the situation and increase the price of exams for these students due to the additional work for centres, when the cost should actually be reduced as awarding organisations are not delivering examinations

### *Travel*

Some students commented on the potential impact on travel costs for students, although did not specify how travel costs would be impacted.

### *SEND*

Respondents commented that SEND students may face greater additional burden, as the cost of providing equipment and support which they may require to access an assessment may be higher than for students that are simply taking an assessment online with no reasonable adjustments.

### *Consistency*

A small number of respondents from centres commented that the burden may depend on the consistency of approach across awarding organisations. Clear communication and consistent approaches would help minimise any burden.

Centres commented that clear and consistent communications from awarding organisations, covering all qualifications would help reduce burden. They commented that last year, they spent a lot of time on the phone to awarding organisations clarifying requirements, which caused additional burden for centres.

A number of centres commented that timings and workloads also need to take into consideration for GCSEs, AS and A levels as some centres provide both VTQ and GCSEs, AS and A levels.

### *Resits*

A small number of respondents commented that the cost of resits for students who were unhappy with their results could be increased.

## Question 31

Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are specific to teachers not identified in our consultation?

During the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One large 'campaign' was identified with at least 12 responses that commented, 'Any changes to planned approaches to assessment cause additional work for teachers, exam staff, managers and most importantly students.'

500 respondents provided additional comments in response to this question. Responses to this question were from across a range of respondent types. The majority of responses are broken down as follows. 38% of responses were from teachers, 22% from centres, 11% from SLT members, 6% from parents or carers, 5% from students, 4% from exams officers and 3% were awarding organisations.

Comments to this question covered regulatory impacts from across all of our proposals. Some of the responses comments on issues we had identified as part of the regulatory impact assessment in our consultation, others highlighted additional issues that they did not feel had been considered in our assessment. We set out in this section the key themes that were identified. In the main, most themes were raised by a range of respondent types, however where a theme appeared to be raised more often by a particular respondent type(s) we have set that out below.

### *Teacher workload*

Respondents identified a number of factors that would impact on teacher workload. These responses were raised in particular by teachers, centres and SLT members, but were also referred to by awarding organisations, students and by parents and carers. The particular issues raised included:

- the biggest concern was about there simply not being enough time for teachers to carry out the necessary work in order to determine centre judgements. This includes the time needed to identify evidence, request additional evidence, to mark any internal assessments or other assessments, as well as following processes to determine a teacher grade, on top of delivering teaching, often remotely.
- teachers are already spending time trying to ensure students catch up on missed teaching and learning and the process of determining grades will be additional to this

- requiring teachers to undertake this additional work would have a knock-on effect on their teaching and learning, which was already being delivered in difficult circumstances, with the majority of it taking place remotely
- the fact that if teachers were required to mark assessments, particularly if awarding organisation-set 'mini-exams' were used, teachers who marked these would effectively be doing the job of an examiner, which is a role that awarding organisations normally recruit and pay people to perform. Teachers were concerned that they would effectively be taking on this additional task for free
- the additional burden of having to secure additional evidence from students, again in difficult circumstances where teachers and students are often working remotely
- teachers who also work as markers or moderators in other years are being financially disadvantaged, as they are potentially still carrying out marking on behalf of awarding organisations, but will not be being paid for it, as they are being required to do it as part of their role as a teacher, rather than their additional paid role as an examiner. Teachers suggested they should be paid by exam boards for performing these functions on their behalf
- the impact on teachers who may have caught coronavirus (COVID-19) as a result of their work in schools, who may be having to deliver an increased workload, while recovering from illness
- the additional time required to administer assessments, for example printing, photocopying etc for any assessments that do need to be taken.
- personal costs to teachers, such as childcare costs where they are required to be in centres or carrying out additional activities to determine grades
- the additional cost in terms of time of collating additional evidence, and where necessary and if implemented, of administering 'mini-exams'
- teachers commented that the additional work would be completed in many cases on top of delivering a normal timetable, which they felt is a significant difference between teachers of VTQs and teachers of GCSEs, AS and A levels
- the cost of time to implement quality assurance and checking processes, including data entry, cross referencing and checking within centres.

Teachers commented that some part-time staff who would normally be involved in marking for awarding organisations are normally employed until June, so would not be available for marking until then. This means that existing teachers are having to

take on this additional work due to the timing of when the processes for determining centre grades are likely to take place.

Teachers and centres were concerned about the additional pressures that could be placed on them by parents in relation to the results they are determining.

Teachers and centres commented that some would still be delivering a full timetable of lessons remotely on top of this additional workload. They suggested a cut off for when evidence could be produced, so there was then sufficient time to carry out the necessary activities to determine grades.

Some awarding organisations and centres believe that in addition to the extra workload placed on teachers and the extra training requirement there will be an increase in demand on resources due to an expected increase in appeals.

### *Teacher mental health*

A number of respondents were concerned about the effects on their mental health and well-being of having to deliver assessments under the proposals. Teachers, centres and parents felt that teachers would feel under pressure to collate the necessary evidence and to ensure their students received good results.

Some teachers were concerned about conflicting messages, if on the one hand public health guidelines were to stay at home, but for some qualifications, the expectation was that assessments could go ahead. Teachers said that the impact of these conflicting messages needs to be considered as part of any guidance that is issued.

Teachers highlighted the impact that the additional work they were required to undertake would have on them personally. It would impact on their mental health and well-being, as they are trying to look after themselves, their students, and their own families. The workload would impact on this and on their work-life balance.

### *Equipment*

A large number of teachers were concerned about the costs of the equipment they would need to implement the procedures. Not all teachers had equipment provided by their centres which would enable them to perform these processes from home. Some of the comments made included:

- they have had to pay personally for new equipment to allow them to deliver from home.
- the cost of or the wear and tear on their personal devices if teachers are required to carry out additional processes from home
- the cost of internet upgrades to enable teachers to work from home effectively

- not all teachers will have access to the equipment and resources at home which they will need to carry out some of these processes and determine grades effectively

Teachers also commented on the additional costs of utilities due to working from home.

### *Need for certainty*

Teachers and centres commented that it would be important for there to be certainty about the arrangements as soon as is possible, in a well communicated manner, to ensure that they are able to plan and deliver any arrangements as required.

Some SLT members commented that enough time needs to be allowed for the centres to complete any new processes effectively and that any new procedures need to be communicated as early as possible.

### *Other*

Some teachers commented that the impact on teachers may depend on the subjects they were teaching. Some qualifications with practical assessments may be more difficult to transfer to online provision and teachers delivering these qualifications are likely to already have a significantly higher workload than teachers delivering other qualifications that lend themselves better to remote teaching and learning. They commented that the impact on teachers teaching different types of qualifications with different types of assessments would need to be considered. In some cases, teaching and assessing would not be possible to adapt for remote teaching.



## Question 32

What additional costs do you expect you will incur through implementing our proposals? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

During the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One large 'campaign' was identified with at least 35 responses that commented, 'Costs of teacher assessment are similar to those for invigilation in the environment in which we operate; there will be additional costs for quality assurance.'

765 respondents provided additional comments in response to this question. Responses to this question were from across a range of respondent types. The majority of responses are broken down as follows. 25% of responses were from teachers, 21% from centres, 9% from students, 9% from SLT members, 7% from parents or carers and 7% from exams officers. Awarding organisations made up 5% of responses. Another campaign accounting for 15 responses mentioned costs of student catch-up, especially for students who have experienced two years of disruption.

The majority of respondents who provided comments to this question commented that there were likely to be additional costs. A far smaller number of respondents identified potential savings. The majority of those who responded identified broad categories of costs, without providing detail about exactly what these costs would be.

Of those who identified additional costs caused by the proposals, the costs identified were:

- the need for financial support to sustain remote learning
- loss of income for examiners and markers if exams are cancelled
- staff costs for working overtime to support the arrangements and the cost of providing cover for those involved in the arrangements
- the cost in time for teachers to determine centre or teacher assessed grades
- the cost of any additional time and training that may be required to implement the new arrangements
- the cost of the time needed to implement the assessment arrangements, and the cost to alternative activities from which time and resources may need to be diverted

- additional costs for centres who will need to run continuous testing in order to facilitate teacher assessed grades
- costs for centres of providing additional equipment to facilitate remote learning and assessment, for example providing laptops or other equipment
- the cost for centres of standardisation and the possible cost of the invigilation of any additional assessments that are taken
- postage costs of providing materials to students who do not have access to materials electronically
- the cost of quality assurance arrangements which centres will need to put in place
- costs for students of needing to provide their own equipment for taking assessments remotely, for example art equipment
- costs for individual students who may pay privately for additional tuition while schools are closed, or who may choose to purchase additional revision materials
- the potential cost for students who receive a teacher assessment grade, but who then also decide to resit the assessment next year
- the cost of the time taken to deal with appeals
- as it is unlikely as many students will be able to complete assessments at the same time under public health guidelines, the potential cost of having to run multiple assessment sessions to accommodate all students. One individual estimated additional costs could be in the region of £2,000 per cohort
- an SLT member estimated an additional cost of £30 per student for exam invigilation. If remote assessment was not used, then there was an estimated cost of £50 per student to chase up, collate and mark student work
- having already paid for school meals, they were now required to provide food at home while lessons are taking place remotely.
- some teachers also identified additional costs incurred through working at home, for example spending on utilities
- costs of additional teaching in future years for students who want to resit assessments, or just to ensure that students are prepared for future assessments
- additional costs if exam entry fees were not refunded by awarding organisations for exams that don't take place

- one local authority estimated additional costs of £7,200 for remote invigilated exams to £9,000 for in house assessments involving additional teacher moderation
- some centres estimated an additional £12,000 to £24,000 in teacher and leader time in running assessments and appeals
- one centre commented that it is difficult to accurately place a value on this without knowing what exactly it will entail but estimated £50,000 to £75,000
- one centre estimated if further test-based assessments are introduced the costs would be £75,000 for additional marking and assessment. For competency-based qualifications, licence to practice etc. the cost would be in the region of £250,000
- one higher education institutions estimated additional costs of £25,000

Some large centres commented that it was not just the individual costs of the proposals, but the combined costs of delivering multiple assessments with different arrangements. Some large centres who deliver both VTQs and GCSEs, AS and A levels may be delivering remote assessments, delayed assessments, 'mini-exams' and normal online exams as well as teacher assessed grades. Delivering all of these under different arrangements at the same time would incur additional costs.

Some awarding organisations commented that there will be an increase in costs for new technology solutions and IT developments alongside new support services to support centres.

Centres commented that supporting students to catch-up would be their greatest cost as for some students this will account for most of their 16-18 phase.

Some SLT members commented that they have an expectation of an increase in appeals and that this could create costs in the form of legal fees.

One awarding organisation estimated an additional cost of £45,000 due to the additional resources required to deliver training and additional quality assurance.

Some individuals identified costs that did not relate to our proposals, but to the general requirement for centres to be closed. They identified things such as the increased cost of utilities and printing materials at home while students are studying at home.

Of those who identified savings, the main savings identified were:

- savings for centres on the costs of exam entries
- savings on facility hire for the running of exams

- savings on the costs of running exams, in particular the additional cost that would be likely to be incurred from running exams in ways they met with current public health guidelines
- savings for exam boards on the cost of markers and examiners
- a number of centres identified savings in invigilation costs
- savings on the cost of printing exam papers
- savings on travel costs that could have been incurred by students travelling to centres to sit exams

A large number of respondents, in particular teachers, centres, and SLT members commented that costs would essentially be transferred from one part of the system to another. They said that the cost of marking would be saved by awarding organisations, who would not need to recruit and pay for markers, but would be passed on to centres, who's teachers would have to take on the additional task of marking internal assessments, without any additional pay. Savings on invigilation would be balanced out by additional costs for teacher assessment and quality assurance arrangements.

Teachers and centres who responded commented that exam entry fees should be reduced to reflect the fact that a number of activities normally carried out by awarding organisations will now be being carried out in centres.

Some training providers estimated that the costs would be neutral, with savings in one area balancing additional costs elsewhere. Some felt the cost of teacher assessment would be similar to the savings made in invigilation arrangements.

Some awarding organisations commented that this investment has been a necessary as part of building resilience both in response to the pandemic and for longer term flexibility in offering graded examinations qualifications and has introduced cost savings internationally.

One individual, who was a member of a senior leadership team provided an estimate that the centre would save approximately £800 on exam invigilation costs, and additional costs of about £500 for exam officer and school admin hours to oversee the process.

Some awarding organisations commented that whilst there will be costs it is difficult to project and put a monetary value on them until the consultation is over.

Parents and carers on the whole did not have a response however some did question the cost of exam fees and whether there would be any savings around these.

## Question 33

Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

During the consultation analysis we became aware of a number of 'campaign' responses which gave identical or very similar answers to several questions. These were analysed no differently from other responses, although it has been highlighted where they may have influenced a central theme. One large 'campaign' was identified with at least 12 responses that commented:

"Comms to key stakeholders (schools and colleges, ITPs, students, parents, carers, employers and HEIs) need to be clear, concise and consistent. Approaches to adaptations and admin need to be consistent across awarding organisations. Qualifications need to be viewed within the wider landscape of lost learning and the potential to compound disadvantage unless this is addressed."

453 respondents provided additional comments in response to this question. Responses to this question were from across a range of respondent types. The majority of responses are broken down as follows. 29% of responses were from teachers, 21% from centres, 13% from students, 7% from parents or carers, 7% from SLT members and 6% from awarding organisations.

In the main, most suggestions were raised by a range of respondent types, however where a theme appeared to be raised more often by a particular respondent type(s) we have set that out below.

A large number said that the burden could be reduced by cancelling exams and awarding teacher grades. Respondents said that there should be consistency across all qualifications. These comments were made both by students and by teachers in the main.

Respondents commented that providing clear requirements and guidance and providing this as soon as is possible would help to prevent the burden on teachers and centres. In particular, teachers wanted clarity as soon as possible about what evidence would be needed to inform teacher judgements. Respondents commented that it was important that any arrangements are applied consistently.

Having become used to the approach taken in VTQs last year, some respondents commented that the same approach should continue as centres are now familiar with it. They felt changing the approach now could bring an additional and unnecessary level of complication.

A small number of respondents felt that allowing exams to go ahead would help reduce the burden on teachers and centres. Some also commented that allowing

some external marking by awarding organisations would help reduce the burden on centres. Some respondents felt that this should be a choice for students, about whether they wanted to receive a teacher assessed grade, or to sit their exams when this is possible. Respondents also suggested the idea of digital 'mini-exams' being used in place of teacher judgements.

A small number of respondents commented that using evidence that has already been gathered would help reduce the burden on centres. Teachers felt that reducing the evidential requirements would help to ensure any additional burden was manageable. Teachers highlighted that many centres deliver both VTQs and GCSEs, AS and A levels, so it would be important to consider that teachers could be following different processes for different qualifications.

Respondents commented on the need for there to be clear appeals arrangements in place, and that steps should be taken to remove any potential bias against particular students or groups of students before results are published. Respondents felt that there could be a significant number of appeals, so having a clear process would help reduce the burden. A teacher commented that students should be allowed to submit requests for special consideration.

The need for any process to be open and transparent was raised, and it was suggested that results should be discussed with parents and students before they are submitted.

A small number of respondents commented that treating VTQs in the same way as GCSEs, AS and A levels could help reduce the burden on centres.

Centres highlighted the need for there to be forward planning for the 2021/22 academic year to identify early what changes may be needed for teaching and learning and assessments. Teachers also highlighted the need for any proposals to remain in place, and not to make last minute changes once decisions have been taken.

Some respondents commented that having strict deadlines with clear and concise communications regarding any decision making would be helpful in managing workloads. They commented that teachers need to be given the time to implement any arrangements. These comments were made by centres and teachers in the main.

Some centres commented that they wanted their teacher assessment judgements moderated by awarding organisations, so that they could be sure they had been accepted and would not be adjusted downwards as a result of other centres having over-estimated their grades. Awarding organisation moderation of centre results was raised by a number of centres and teachers.

Some centres requested that deadlines were extended, to allow more time for determining teacher assessed grades, and to allow students more time back in centres.

A large number of respondents repeated comments made in previous questions, in particular commenting that cancelling exams and relying instead on teacher assessed grades would help to reduce the burden on centres. This approach was supported by teachers and by students.

Exams officer views included that it would be important for there to be a long enough window between completion of grading and results issue for centres who work with multiple awarding organisations to process and submit their results.

A small number of centres commented that it would be important that the same arrangements should be in place across all parts of the UK.

Some awarding organisations commented that narrowing the scope will reduce the burden on them.

Some awarding organisations commented asked for further consideration as to how many requests for data are sent in over the next few months with little notice or tight time scales as these can be consuming of their resources.

Some respondents commented that awarding organisations should run the appeals process.

## Annex A: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation. These are the organisations that submitted a non-confidential response:

ABMA Education Academy	Aspire Sussex	Bexhill College
Academy for Contemporary Circus & Physical Theatre	Associated Board of the Royal Schools of Music	Bexley Grammar School
ACCA	Association of Colleges	BHS Qualifications
Activate Learning	Association of Employment and Learning Providers (AELP)	Bishop Burton College
Active IQ	Aylesford School	Bishop Heber High School
Ada, the National College for Digital Skills	B&FC	BMET
Adult Education in Gloucestershire, Gloucestershire County Council	Babington	Brent Start
AIM Qualifications	Baker Dearing Educational Trust	Brentwood School
Alec Reed Academy.co.uk	Barnsley MBC	Bridgend College
Alexandra Park School	Barrow Sixth form/Furness College	Bright Horizons
All Saints Academy	Barton Peveril College	British Ballet Organisation
ALLERTON GRANGE SCHOOL	BATOD - British Association of Teachers of the Deaf	British Association of Construction Heads
Alleyne's Academy	Baxter College	British School in the Netherlands
AQA	BCS	Brockenhurst College
ASCL	Bedford College Group	Brune Park Community school
Aspirations Academies Trust	Berkshire College of Agriculture	Burnley College
		Bury College
		Calderdale College
		Camborne Science and International Academy



Cambridge Assessment International Education	Connect2Care	Essex County Council
Cambridge Regional College	Construction Industry Training Board	Estyn
Cape Cabin Alternative Education Provision	Convent of Jesus and Mary	FAB
Cardiff and Vale College	Conyers School	Fearnhill School
Cardinal Newman	Corfe Hills School	Felsted School
Castle Rushen High School	Council for Dance Drama and Musical Theatre	Fettes College
Caterham high school	CPCAB	Fitzalan High School
Cefn Saeson Comp	Cranford Community College	Food Teachers Centre Community
Chartered Institute of Educational Assessors	Craven College	FUEL
Chartered Institute of Legal Executives	Cumbria County Council	Furze Platt Senior School
Cheltenham Ladies College	De Aston School	Garth Hill College
Cheltenham Ladies' College	Denefield School	Gateway Qualifications
Cheshire College South & West	DH Associates Ltd	Gateway Sixth Form College
Chiswick School	DistanceLearningCentre.com	George Abbot School
City & Guilds	DN Colleges Group	GFM
City of London School	Doncaster Adult Family & Community Learning	Gloucestershire College
City of Stoke-on-Trent 6th form college	EAL	Godalming College
Coleraine College	Early Years Alliance	Gordonstoun
College of Agriculture, Food and Rural Enterprise (CAFRE) - NI	Eastleigh College	Graded Qualifications Alliance (GQAL)
	Education Policy Institute	Great Baddow High School
	English Speaking Board (International) Ltd	Greater Manchester Colleges' Group
	Enterkey Training	Hackney Education
		Hackney LEA
		Haileybury
		Haileybury Turnford

Hampton School	HSDC College, Hampshire	League Football Education
Harlow College		
Hartpury College	Hungerhill School	Leeds College of Building
Hatch End High School	IB Schools and Colleges Association (IBSCA)	Libra 3E Limited
Havant & South Downs College	IBO	Lifetime Training Group
Haybrook College Trust	Ifield	Long Road Sixth Form College
Hayes School		
HELOA	Imperial Society of Teachers of Dancing	Longfield Academy
Hereford Sixth Form College	Incorporated Society of Musicians	Loreto Sixth Form College
Highfield	Institute of Commercial Management	Loughborough College
Highgate School		LTE Group
Hillview School for Girls	Intech Centre	Luton Sixth Form College
Hilton UK&I	International Dance Teachers Association	Make UK
HIT	JCoSS	Mallard Days Educational Services
HIT Training	John Hanson Community School	Malvern College
HIT training		
HIT Training Ltd	Jurys Inn and Leonardo Hotels	Manchester Enterprise Academy
Hit/C2C Training		
HMC	Ken Stimpson Community School	Manor School Sports College
HMRC		
Hockerill Anglo European College	Keyham Lodge School	Mark Rutherford School
HOLEX	King Edward VII School, Sheffield	Mayflower High School
Holgate Meadows School	King's College School Wimbledon	McAuley Catholic High School
Holy Cross Sixth Form College Bury	Lancaster & Morecambe College	MEI
Hope Learning Trust	LaSWAP sixth form	Millfield
Hopwood Hall College	LeAF Studio	Minsthorpe Community College
HSDC		Mitchells & Butlers

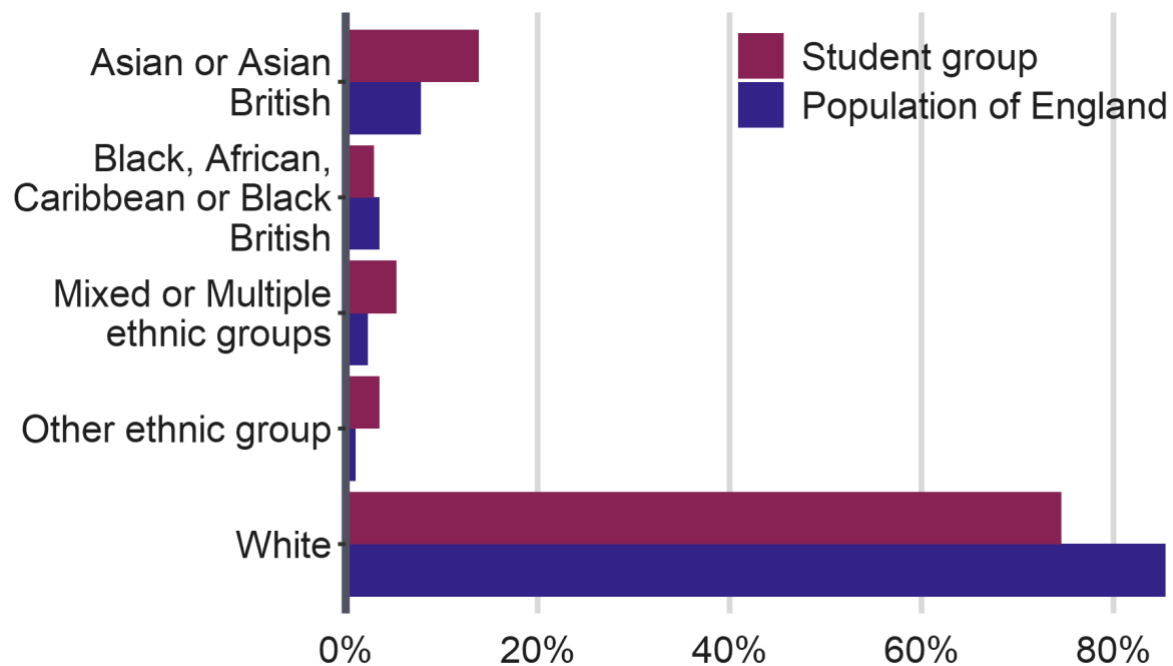
MOOR END ACADEMY	Norfolk Adult Learning	Pangbourne College
Myerscough College	North Bristol Post 16 Centre	Pearson
NAHT	North Hertfordshire College	Peter Symonds College
NASEN	North Kesteven Academy	Petroc FE College
National Association of Schoolmasters and Union of Women Teachers	North Yorkshire County Council	Plumpton College
National Deaf Children's Society	Northampton College	Plymouth College
National Education Union	Northgate High School	Portsmouth College
National Training Federation for Wales	Northumberland College	Pret a Manger
National Union of Students	Northumbria University	Priestley College
Natspec	Nottingham College	Priory School
NCFE	Nottingham Trent University	Professional Assessment Ltd
NCG	Oak Bank SEMH School	Quantum Care Ltd.
NCTJ Training Ltd.	Oaklands College	Queens Park Community School
New City College	OCN London	Reigate College
New Era Academy	OCR	Reigate Grammar School
New German school Alexandria	Okehampton College	Richmond upon Thames College
Newcastle & Stafford Colleges Group	Oldham Sixth Form College	Riverside College Halton
Newcastle School for Boys	Open Awards	Ron Davis centre
Newfield Secondary School	Open College Network NI (OCN NI)	Rosendale School
NHBF	Ormiston Ilkeston Enterprise Academy	Royal Horticultural Society
NHS Employers	Oundle School	Royal National College for the Blind
NOCN	Outwood Academy Portland	RSL Awards
		Runshaw College
		Salesian School
		Sawtry Village Academy

SENDAT - Priory School	St George's CofE Foundation School	Tameside College
Sendat Priory School	St Georges School	Tauheedul Islam girls high school
SESN	St John Bosco Arts College	TCHC Group LTD
Sheffield Hallam University	St Leonards School	Telford Langley School
Sir George Monoux College	St Patrick's College	The Bedford College Group
Sir John Hunt CSC	St Peter's School	The Billericay School
SK College Group	St Thomas Aquinas CMAT	The Blackpool Sixth Form College
Skills and Education Group Awards	St Thomas More Catholic High School	The Brooke House Sixth Form College
Skillsfirst Awards	St Wilfrid's	The Carlton Academy
Solihull Academy - Alternative provision	St Wilfrid's CE Academy	The Chalk Hills Academy
Solihull College & University Centre	ST. ANTHONY'S COLLEGE	The Charles Dickens School
South Eastern Regional College	St. John Fisher Catholic Comprehensive School	The Cornwall College Group
South Essex College	St. John the Baptist School	The Exams Office
South Lincolnshire Academies Trust	St. John's, Marlborough	The GORSE Academies Trust
South Thames Colleges Group	Stafford Manor High School	The King Edward VI School
Southport College	Stamford Park Trust / Ashton Sixth Form College	The King's School, Canterbury
Sparsholt College Hampshire	States of Guernsey	The Knights Templar School
St Albans School	Stratford upon Avon School	The Learning Machine Ltd
St Edward's College, Liverpool	Suffolk New College	The Manchester Grammar School
St Francis Xavier Sixth Form College	Swanshurst School	The Marsh Academy
St George's C of E Foundation School		

The Mirfield Free Grammar	University of Brighton	WMG Academy for Young Engineers
The Perse school	University of Hertfordshire	Wolverhampton Adult Education Service
The Pingle Academy	University of Reading	Woodlands Community College
The Polesworth School	University of Wolverhampton Multi Academy Trust	Working Men's College
The Priory School, Shrewsbury	Uxbridge College	WQE
The Sheffield College	VTCT	Xaverian College
The Sheffield UTC Academy Trust	Waltham Forest College	
The Sixth Form College, Colchester	Warwickshire College Group	
The Skinners' Kent Academy Trust	WCSM	
The Westleigh School	West Lakes Academy	
The Wildlife Hospital Trust	West Nottinghamshire College	
Thomas Knyvett College	West Thames College	
Thornton College	Westfield School	
Thorpe St Andrew School and Sixthform	Westminster Adult Education Services	
Tonbridge Grammar School	Westminster School	
Tonbridge School	Weston College	
Total Comms Training Ltd	Whitbread PLC	
Trinity School DA17 6HT	Whitefield School	
Truro and Penwith College	WHITGIFT SCHOOL	
University and College Union	Wildern School	
University of Bradford	Windsor Academy Trust	
	Winstanley college	
	Withington Girls School	
	WJEC-CBAC	

## Annex B: Diversity of the responses from students and the students' parents or carers were responding on behalf of

Figure 55: ethnicity or respondents compared to population of England



Source: Office for National Statistics 2011 Census

Table 2: ethnicity or respondents compared to population of England

Ethnic group	Percentage of population of England	Percentage of student group
White	85%	75%
Mixed or Multiple ethnic groups	2%	5%
Asian or Asian British	8%	14%
Black, African, Caribbean or Black British	3%	3%
Other ethnic group	1%	3%

## Disability

Using a definition of disability consistent with the core definition under the Equality Act 2010, an estimated 8% of children in the UK identify as disabled ([Family Resources Survey 2018/19](#)).

Figure 56: proportion of respondents identifying as disabled

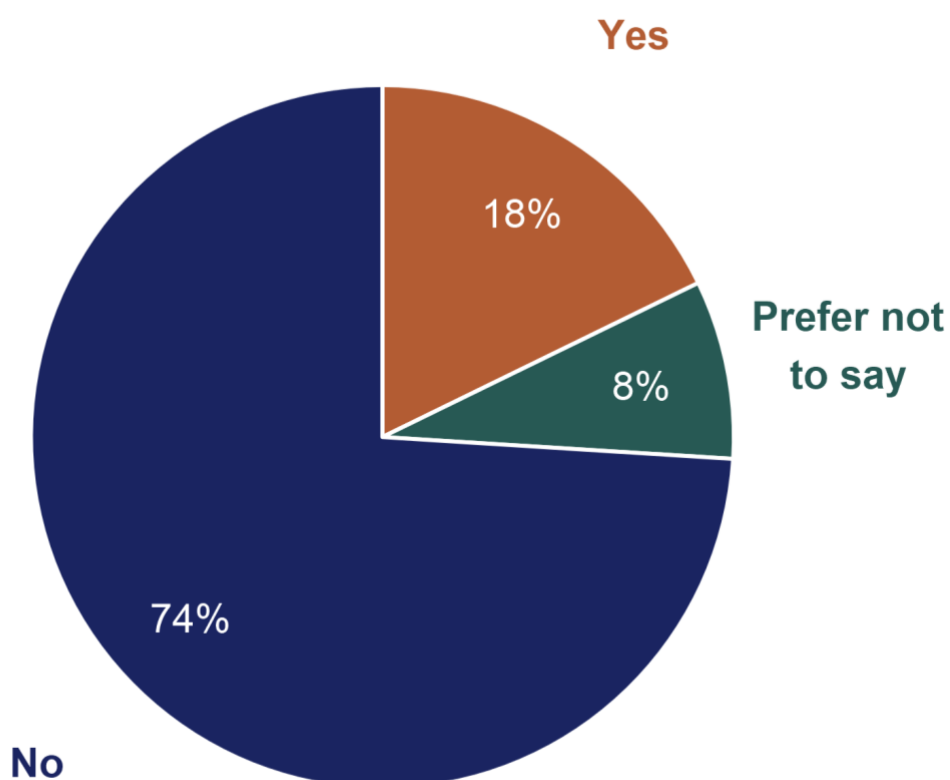


Table 3: Proportion of respondents identifying as disabled

Do you consider yourself to have a disability or long-term health condition (mental health and/or physical health)?	Percentage
Yes	18%
Prefer not to say	8%
No	74%

## Reasonable adjustments

Figure 57: proportion of respondents normally given reasonable adjustments

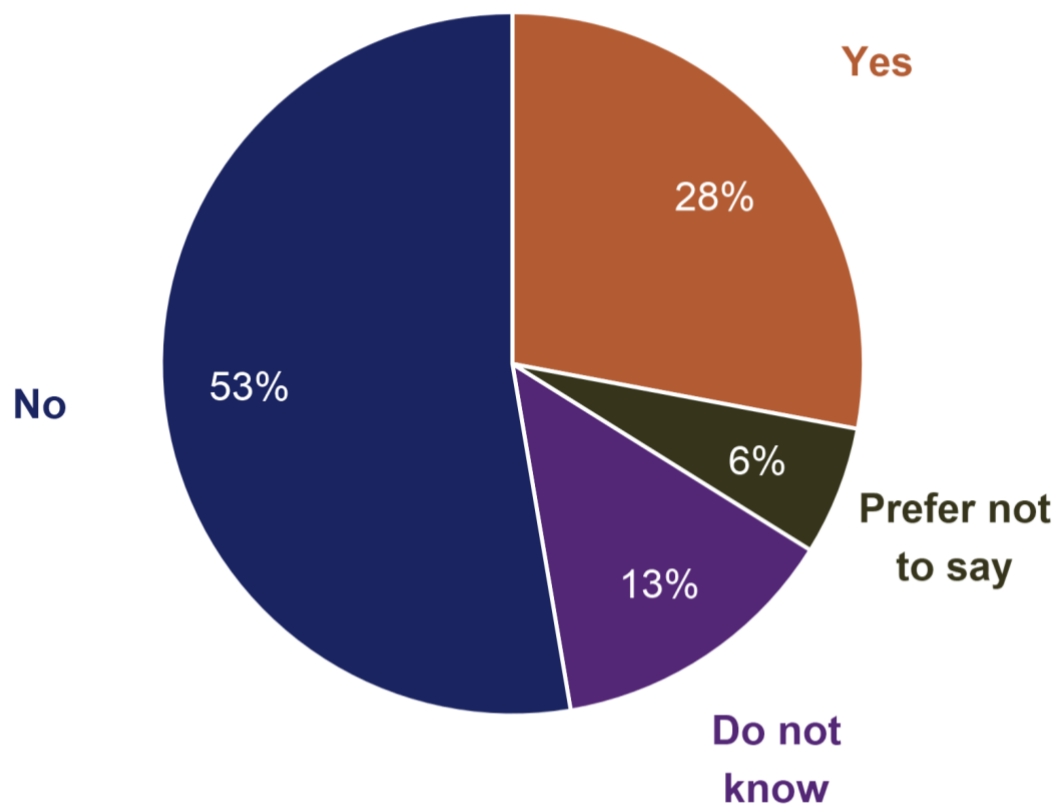


Table 4: proportion of respondents normally given reasonable adjustments

Are you normally given reasonable adjustments when sitting an assessment?	Percentage
Yes	28%
Prefer not to say	6%
Do not know	13%
No	53%



## Year group

Figure 58: responses referring to year group

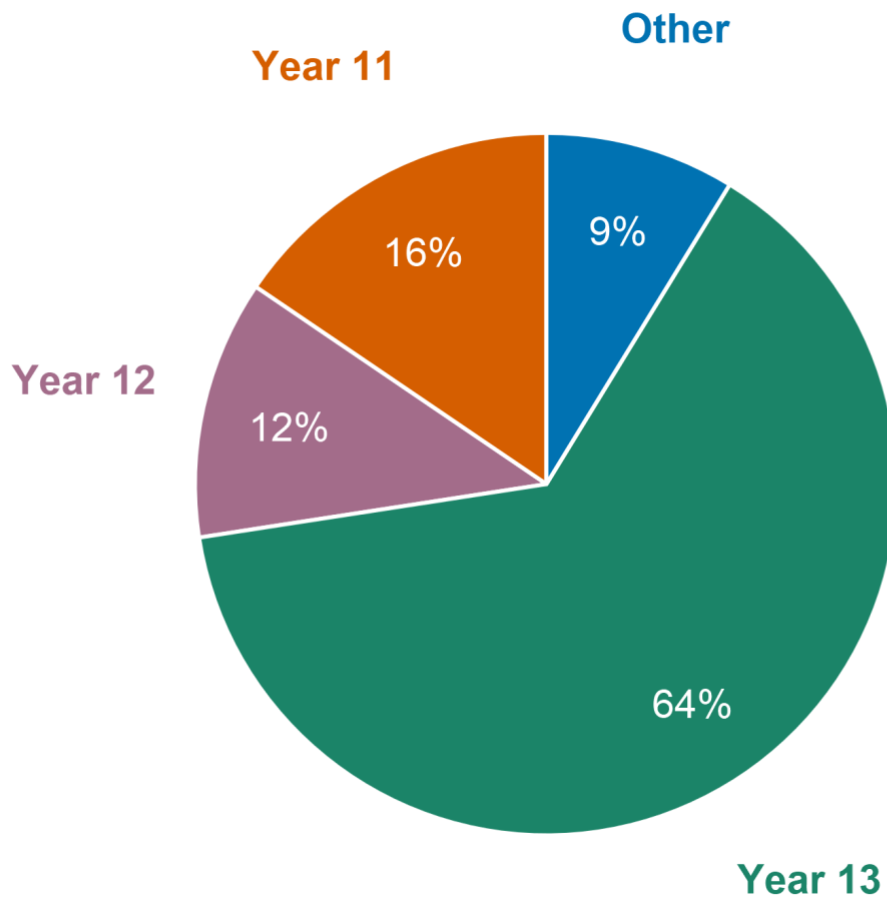


Table 5: responses referring to year group

Year group	Percentage
Year 11	16%
Year 12	12%
Year 13	64%
Other	9%



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