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Correspondence

Letter from Dame Glenys Stacey to AoC, Sixth Form Colleges Association, HOLEX, AELP, the Exams Office and ASCL (HTML)

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Dear Colleague,

As we draw to the end of what has been a long and difficult year, I wanted to put on record my thanks to your members: leaders, teachers, support staff, and exams officers in schools, colleges and training providers who are doing all they can to support and prepare learners for their exams and assessments.

Given the focus of the mainstream and sector media coverage of the [recent announcement on measures for GCSE, AS and A levels](#), I wanted to write specifically to set out the position on vocational and technical qualifications (VTQs), and other general qualifications, to cover:

- an outline of the regulatory framework in place covering qualifications other than GCSE, AS and A levels
- adaptations that have already been put in place and further possible adaptations – including in light of those now being implemented for GCSE, AS and A levels, and where different approaches are more appropriate
- January exams
- work experience placements

1. The regulatory framework

As you may recall, we put in place a new regulatory framework to cover all qualifications other than GCSE, AS and A level, and apprenticeship end-point assessments at the beginning of the academic year. This covers some 15,000 qualifications offered by 160 awarding organisations, and caters for the full diversity of the VTQ landscape, from those with assessments that are very similar to GCSE, AS and A levels to those qualifications that are used for very different purposes (for example, to signal occupational competence) and those that are delivered very differently (including, for example, with on demand assessment).

The regulatory framework gives awarding organisations extensive flexibility to adapt their qualifications so as to free up time for teaching and learning and mitigate the effect of disruptions to teaching, learning and assessment. Awarding organisations are responding by making assessments as manageable and flexible as possible, to address the impact of compliance with social distancing and other public health guidance and to safeguard against disruption because of lockdowns or closure of facilities.

As in normal times, it is for awarding organisations to decide the best action to take in relation to their own qualifications, but the new framework gives them important parameters within which to work – so that qualifications retain their integrity and results remain sufficiently valid and reliable, despite such trying circumstances.

In line with Government policy that assessments should go ahead, there is no provision under our regulatory framework for any calculated results to be issued for assessments taking place this year. I would encourage all teachers to focus on preparing their learners to take assessments and “banking” unit-level results where possible.

2. Adaptations to qualifications

As we have made clear at every stage of our response to the pandemic, fairness to learners is a key priority. Awarding organisations must ensure that VTQ learners are not disadvantaged or advantaged compared with their peers taking GCSE, AS and A levels. Approaches to adaptations will vary, given the range of qualification structures, assessment methodologies and the different contexts for learners.

To give a flavour, some awarding organisations have elected to move the timetable for summer external assessments; others are drawing more heavily on online assessment. Some are changing assessment tasks to accommodate social distancing requirements and reduced access to clients, and others are using witness testimony from professionals in their industry as an alternative to live observation.

We have undertaken significant work with awarding organisations to encourage consistency of approach across similar qualification types and sectors; this includes a programme of engagement with industry bodies in areas such as Health and Social Care, First Aid, Construction and Security. In many cases, this has led to jointly-agreed sector statements between awarding organisations and industry bodies.

But we know that adaptations already announced, while welcome, might not go far enough. We are encouraging awarding organisations to go further – to make full use of the regulatory flexibility available to them in considering further adaptations that strike the right balance between flexibility and validity. We are pleased that Ministers have now agreed to allow assessment of some units to be reduced in qualifications on DfE’s Performance Tables to free up time for teaching and learning.

Under our regulatory framework, awarding organisations can consider whether they want to make similar adaptations as those recently announced by the DfE for GCSE, AS and A levels (such as exam aids, advance notice of topic areas, contingency papers and generosity of grading) – these are most likely to be appropriate for those VTQs that have similar structures and assessment methods to GCSE, AS and A levels and the same progression routes into higher and further education.

For other qualifications that are delivered in different ways (for example, in a modular fashion), different adaptations will be more suitable and, for some, in particular for licence to practise and competency qualifications, it may not be possible to make any further adaptations without compromising the integrity of the qualification. Centres will need to ensure that they are clear what adaptations are being put in place by the awarding organisations they work with.

Awarding organisations are having to balance fairness for candidates who are in the same cohort but taking assessments at different times in the year, so these are not straightforward decisions. A number of awarding organisations have already been in touch with their centres about planned further adaptations in light of the recent announcement and others will do so in January.

We recognise the concern in the sector about the differential impact of lost learning on VTQ learners in particular. We are pleased that the expert group on differential lost learning, that the Department has set up, will include VTQs in its consideration.

3. January exams and assessments

We do expect January exams to go ahead for qualifications where these are scheduled, and we know that many learners are keen to get these results under their belts. We know that some centres have concerns about the challenges of running exams in January in a way that is compliant with public health guidance, particularly from centres that need to facilitate large cohorts of learners. Exam centres may wish to refer to DfE’s [guidance on exams](#).

JCQ’s [Instructions for Conducting Examinations](#), which set out the rules for GCSE, AS and A levels, but which are also often used for written exams in other qualifications, stipulates that chairs for candidates in the same bubble should be 1.25m apart. In line with PHE guidance, a 2m distance between bubbles should be maintained (an example of this is shown in the diagrams at the end of this letter).

We understand that sourcing sufficient invigilators may also be a challenge. Awarding organisations are permitted, under our Extended ERF, to relax invigilation requirements if other risk mitigations can be put in place. This might include flexibility on who is permitted to invigilate. If centres are struggling to facilitate invigilation in the normal way and cannot source alternatives, then I would urge them to get in touch with the relevant awarding organisation(s) as a matter of urgency.

Centres may also wish to investigate whether the [Exams Support Service](#) could help with sourcing venues or invigilators.

We recommend that centres remind all relevant staff of the [guidance on what to do if exams or other assessments are seriously disrupted](#). In particular, centres located close to ports and major routes that might experience congestion as a result of new arrangements following the UK’s exit from the EU, will want to keep contingency arrangements up to date.

We will continue to work with awarding organisations running high-volume January series, and with DfE and sector representative bodies, to monitor the situation and consider whether further contingencies (for example, additional assessment windows) may be necessary.

4. Work experience placements

We hear too that organising work experience placements continues to present challenges for many centres. There are flexibilities with our framework around reducing work experience requirements, but in some cases (including some Performance Table qualifications), access to the workplace is essential to enable learners to demonstrate occupational skills.

We have therefore been working to share good practice between awarding organisations about how to achieve this flexibly. Again, we will keep this under review with DfE colleagues.

With very best wishes for a well-deserved break over the holiday period,

Dame Glenys Stacey

Acting Chief Regulator

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