



# Correspondence

## Post Qualifications Admissions consultation response

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## Introduction

Ofqual is the independent qualifications regulator for England. We currently regulate c160 awarding organisations. Last year certificates were issued for nearly 12,000 regulated qualifications. The level 3 qualifications we regulate include AS and A levels, a number of academic qualifications with a similar purpose, such as the International Baccalaureate and the Pre-U, and vocational and technical qualifications used for entry to higher education, such as BTECs.

We also regulate GCSEs, Functional Skills, technical qualifications in T levels and a wide range of other qualifications. We are currently providing external quality assurance (EQA) for 100 new apprenticeship assessment standards.

Our statutory objectives include securing qualification standards and promoting public confidence in regulated qualifications.

## The proposed models of Post Qualification Admissions

The Department for Education has set out its desire for a better and fairer system for students seeking entry to higher education in the UK. The case for change focuses on three areas: concerns about the inaccuracy of predicted grades on which offers are currently based, a need for greater simplicity and transparency and concerns about the increase in the use of unconditional offers which may not be in students' best interest.

The consultation proposes that Post Qualification Admissions (PQA) could address these issues, suggesting it would deliver a better system for all those applying to universities in the UK – emphasising in particular the benefits for social mobility.

The consultation proposes two possible models of PQA: the first with applications and offers being made post the issue of results, and the second with applications submitted before results and offers made post results. Both models would rely on results for level 3 qualifications, including AS and A levels, being released to students around the end of July or early August – around 2 to 3 weeks earlier than happens currently.

The intention under both models is that students would start the university term in October. The Department for Education wishes time to be gained to allow the earlier issue of results through compressing the exam timetable and reducing the time available for marking.

## Our view

We welcome the government's consultation on PQA. We understand the wish to improve the current admissions arrangements and we stand ready to help to bring this about. We recognise the benefits that could be achieved through PQA.

We are keen to support the reform and are confident that the qualifications system can play its part in delivering changes that the government wishes to see. However, any changes to the timing of exams, marking and results must be able to be safely delivered, and any resulting new risks must be manageable. As the qualifications regulator in England, it is right that we set out our considerations of both how PQA might safely be achieved and the risks associated with any change.

Having considered the proposals and discussed them with awarding organisations, we believe a small reduction in the marking window could be explored. However, our view is that such an adjustment alone will be insufficient to deliver PQA. If the chosen model were to seek to rely only on a compressed marking period, then in our view, the reduction in marking time would introduce delivery risks that are simply too great and would be unacceptable.

This part of the process cannot bear all the weight – changes should be spread more widely, across all parts of the system. We set out in this response the other changes that could also be put in place to implement a revised admissions system.

## Marking process and timescales

Awarding organisations are responsible for delivering assessments and issuing results for their regulated qualifications, operating within our framework of requirements and guidance. All level 3 qualifications where end of course assessments are typically taken in the summer, and marked immediately before results are released in August, will be affected by changes that require results to be released earlier.

Marking is a complex exercise, with many millions of individual components to be marked by tens of thousands of examiners each summer. For GCSE, AS and A level qualifications almost all assessment and marking takes place at the end of the course, and volumes of exam entries and certificates issued are high, meaning that the challenge to delivery posed by PQA is likely to be greatest for these qualifications ([footnote 1](#)). We set out in detail the expected impacts and risks for these qualifications below.

There are four exam boards recognised by Ofqual to offer GCSE, AS and A level qualifications in England and who are responsible for marking students' exam scripts. This involves recruiting and training (or 'standardising') examiners, scanning and distributing scripts, examiners marking these scripts – supervised and monitored by senior examiners – awarding meetings and final quality checks before results are issued.

We believe a limited reduction in marking time could be explored, but if the pressure put on marking by PQA is too great then a number of issues and risks to delivery arise. These are set out below:

### Quality of marking

- we require exam boards to deliver high quality marking: research suggests that overall the quality of marking of GCSEs, AS and A levels in England is good, and compares favourably to other examination systems internationally. The exam boards quality assure marking throughout the marking period, monitoring individual examiner performance, with additional checks before final results are issued. It is a priority for us that the current quality of marking is not compromised by a reduction in the time available for both marking and quality assurance

### Examiner capacity and delivery of timely results

- examiners are not a permanent workforce: they are recruited afresh each year. In some years and in some subjects it can be challenging for exam boards to recruit sufficient numbers of examiners – and as the process relies on teachers choosing to take on this work, it is difficult to predict in which subjects there may be limited capacity in a given year. A reduced marking period would mean that more examiners are required. We could not be certain that there would be sufficient examiner capacity
- we require exam boards to issue results on time: insufficient examiner capacity could lead to late results, in turn leading to delayed university admissions decisions. AS and A level results are currently issued to all students on the same day, with other level 3 results issued on or around the same time. This is essential - if some results were to be issued on time and others late, this would create unfairness in access to university places, disadvantaging those whose results are delayed

### Loss of contingency

- current arrangements for marking, including quality assurance, take the full marking period – it is not the case that there is an existing gap between completion of marking and results being issued that could be utilised. The current timeframe allows for a limited amount of contingency time, for example if marking in a particular subject proceeds more slowly than expected. If the time available for marking is reduced beyond the timeframe we consider can be safely delivered, then any such contingency time is lost
- it is also worth noting that the system is supported by complex and interdependent technology systems - reduction of the timeframe would lead to an overall reduction in system capacity to cope with technology outages, reducing resilience

The same impacts and risks would arise for other level 3 qualifications for which the delivery approach and timescales are similar – some of which are offered by the same exam boards, increasing the burden on those organisations, and others offered by other regulated awarding organisations. The issue of results for other qualifications could also be impacted if the awarding organisations had to divert resources to manage earlier level 3 results.

## Use of technology

We have considered whether technology could deliver efficiencies in the marking process. Much of the marking process for GCSEs, AS and A levels is already digitised – the majority of scripts are scanned, issued to and marked by examiners on screen; technology allows senior examiners to monitor examiner performance in real time, and technology is used for a range of quality assurance methods, for example the use of 'seeded' scripts. Our view is that there is limited further gain to be made through exploring further digitisation in marking.

Assessments for these qualifications are taken on paper – were they to be taken on-screen then there would be no requirement for collecting and scanning scripts and therefore time would be saved. However, delivering this sort of large-scale change would require time, investment and extensive testing to ensure assessments could be safely delivered in this way.

We have published a [review of the current barriers to online and on-screen assessment](#). We do not think it would be possible to deliver change of this nature and scale in the short term, within the timescales planned for the introduction of PQA.

At the same time we would highlight that in the medium term, it is likely that ways to further digitise examinations processes could be developed. The experience of the pandemic is leading many to investigate the potential of technology in assessment both to give further resilience to the exams system and potentially to streamline it; further down the line we anticipate that this could support PQA.

## Other adjustments that should be considered

We recommend that other adjustments should be considered as part of the assessment of how a PQA system could be successfully and safely delivered, including:

### Adjustments to the exam timetable

#### Start date

- there could be scope for a small adjustment, to bring the timetable for GCSEs, AS and A levels forward by a week to the start of May – though we acknowledge this would have a small impact on the teaching and revision time available to schools and colleges and their students. The start date could not be brought forward much earlier, given that Easter and the associated school and college holidays often fall in the latter part of April, and the loss of teaching time would anyway be too great

#### Structure and composition

- there could be scope for AS and A levels to take up early slots in the exam timetable, to enable marking to start earlier. There would though be implications to be explored, including the earlier availability of examiners and the impact on the marking of large entry GCSEs. Given the number of subjects to assess, we consider there is limited scope to compress the timetable

### Early release of results to UCAS

- level 3 results are currently shared with UCAS, under embargo, around one week before they are released to students. Time can be gained in the process if a new admissions model negates the need for higher education providers to receive results before they are issued to students

### Introducing a fixed results date

- releasing results on a fixed date, rather than a Thursday in results week in mid-August, could save time. The current arrangements mean that AS and A level results are released on a later date in some years than in others. A small time saving could be achieved if the results date were to be fixed at the earliest date on which results are currently released – though this saving would only be made in years where results would be issued later under current arrangements, not in all years

### Adjustments that HE providers can make

- we consider that the range and nature of changes that higher education providers could make to their recruitment processes and term times should be fully explored

We consider that a combination of the adjustments summarised above would be needed to deliver PQA successfully and safely. If the reform seeks to rely too heavily on a reduction in the marking period for level 3 qualifications then the risks to delivery will be too great.

We suggest it may be sensible to pilot the aspects of any new approach that awarding organisations would be required to deliver before rolling out system wide changes, to test and give confidence that the model is deliverable. This would also provide an opportunity to identify unforeseen and unintended consequences and make any necessary changes to the approach.

## Reviews of marking, moderation and appeals

The implications for reviews of marking, moderation and appeals, process and timescales, should also be carefully considered. In a typical year when exams take place around 60,000 AS and A level grades might be challenged, with around 13,000 resulting in a change of grade. A student's final results will only be confirmed once any reviews of marking or appeals have been concluded.

Currently universities aim to hold places open for students pending the outcome of their review of marking. Although the proportion of grade changes is small, we recommend that any PQA model should consider the implications for such students, and what provision may be made for those whose results change after results are released.

## Summary

The qualifications system can play its part in supporting the introduction of PQA if the risks we have highlighted are avoided. Limited changes to the time available for marking could be explored in order to contribute, along with a range of other adjustments across the system, to the delivery of PQA. We consider it may be sensible to pilot the aspects of any new approach that awarding organisations would be required to deliver, to provide assurance that the model is deliverable.

Once decisions are confirmed, we are committed to working with the Department for Education, awarding organisations and relevant stakeholders across the system to implement the reform.

1. We reported in our [annual qualifications market report](#) that exam boards issued 5.3m GCSE certificates, 717k A level certificates and 68k AS certificates in England in the 2019 to 20 academic year. [↩](#)

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