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Open consultation

Part 2 – V Level proposals

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Applies to England

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V Levels

DfE has [set out its intention](#) to introduce V Levels at level 3. V Levels will be new qualifications that offer a vocational pathway for students who want to explore different sectors before deciding where to specialise. They will exist alongside A Levels and T Levels to enable students to study a range of vocational areas.

Each V Level will be equivalent in size to one A Level. This means students will be able to combine V Levels with A Levels, creating a programme that reflects their interests and career ambitions. V Levels will be designed against common content

specified by DfE, linked to occupational standards.

The first V Levels will be available from September 2027 in education, accounting and finance, and digital systems and data, with more subjects to follow over time. The content for the first tranche of V Levels being first taught from September 2027 is currently being consulted on by DfE, and you can [see more information about this here](#).

We propose to put in place rules at a qualification level that will apply to all V Levels. We also propose to put in place some subject-specific rules for each V Level subject to further support consistency and comparability in these qualifications. We set out below the rules we propose for V Levels and where relevant, individual V Level subjects.

Qualification design

Qualification purpose

The purpose of a qualification sets out what it is for and informs design decisions taken by awarding organisations. Purposes can relate to:

- how the information provided by a qualification result will be used
- what knowledge, understanding and skills a student will gain by taking the qualification
- the role of the qualification in engaging students on their programme of study

Qualifications are usually designed to do each of these things to differing degrees. Well-designed qualifications should have clear purposes that they are designed to meet. One way of ensuring comparable approaches between awarding organisations is for Ofqual to specify general purposes and their relative priority, to help awarding organisations balance any trade-offs needed when designing qualifications. We propose to take this approach for V Levels.

Proposal

A key role for V Levels will be their use to support progression to higher study, higher technical training or apprenticeships. As such, results are likely to play an

important role in selection decisions by higher education institutions and employers, meaning the information they provide will be of particular importance. It will also be important for the qualifications to provide students with the skills to progress, and to provide an engaging course of study for students. In line with this, we propose the following purposes for V Levels, prioritised as follows:

- A. To provide accurate and consistent information concerning Learners' attainment in relation to the knowledge, understanding and skills assessed as part of the qualification.
- B. To provide information about attainment that can be used in decisions about the selection of Learners for higher study, higher technical training or apprenticeships.
- C. To provide Learners with the ability to apply knowledge, understanding and skills to practical work-related activities.
- D. To provide Learners with nationally agreed knowledge, understanding and skills in relation to a broad vocational area, in order to prepare them for higher study in a relevant subject area.
- E. To provide Learners with nationally agreed knowledge, understanding and skills in relation to a broad vocational area, in order to prepare them for higher technical training and apprenticeships in a relevant subject area.
- F. To motivate Learners to complete the qualification and to progress to higher study, higher technical training or apprenticeships.
- G. To provide a basis for schools and colleges to be held accountable for the performance of their Learners.

These purposes must all be met to the greatest extent possible. Where trade-offs are required, the purposes should be prioritised in the order they are set out, with A being the highest priority. Awarding organisations should develop their own qualification-specific purposes for their individual qualifications, based on these general purposes.

As it is proposed to introduce requirements setting out the purpose of these qualifications, we propose to disapply General Conditions E1.1 and E1.2 which require qualifications to have an objective for V Levels. This is because the purposes we propose would replace those objectives referred to in the General Conditions, so therefore ensures there is no conflict with the General Conditions.

Our proposed Condition VL4 and associated requirements to require this is set out in [Annex A](#). We propose to disapply General Conditions E1.1 and E1.2 as a result of this proposal.

Question 3

Do you have any comments on the proposed purposes for V Levels and/or the order in which they are prioritised?

Qualification size

Ofqual requires an awarding organisation to determine the size of a qualification by estimating the amount of time it might typically take for a student to achieve. This includes supervised time spent on activities such as teaching, learning or taking assessments, described as guided learning hours, and time spent on unsupervised activities, such as self-directed study. Together, these two aspects are described as Total Qualification Time.

Proposal

DfE intends that the size of V Levels should be 360 guided learning hours (GLH). To ensure this, we propose to require awarding organisations to design their qualifications to meet the size specified by DfE. We will do this by disapplying Ofqual's existing General Condition relating to qualification size (E7 – Total Qualification Time) and replacing it with a bespoke Condition which reflects DfE's requirements.

Our proposed Condition VL5 is set out in [Annex A](#).

Question 4

To what extent do you agree or disagree with the proposal to disapply GCR E7 and to require awarding organisations to design V Levels, in line with the size specified by DfE?

Qualification content

The content to be covered within a qualification and the way in which it is assessed are important for ensuring the intended qualification purposes are met. DfE is

developing content for V Levels and is currently consulting on the content for those intended to be first taught from September 2027. You can [see this here](#).

Proposal

We propose to require awarding organisations to comply with the DfE set content and any related requirements, and to explain how they have done so as part of their assessment strategy. This will mean we can review up front the extent to which content is appropriately covered as part of accreditation. Requiring adherence to the content and any other related requirements will support other controls we propose to put in place, including assessment objectives, and those relating to assessment.

Our proposed Subject Level Conditions VL(Digital Systems and Data)¹, VL(Accounting and Finance)¹ and VL(Education)¹ and associated requirements are set out in [Annex A](#).

Question 5

Do you have any comments on the proposal to require awarding organisations to comply with the DfE set content and any other related requirements for V Levels?

Assessment objectives

Assessment objectives are one way of ensuring that the assessments made available by different awarding organisations are designed in a comparable way for a given subject. They are intended to:

- ensure students are assessed on an appropriate balance of the key abilities for that subject
- help ensure the assessment of those abilities – and as such the level and nature of demand of qualifications in a subject – is comparable between awarding organisations and over time

They are used by awarding organisations when designing and setting their assessments, each series and over time, and are considered by Ofqual as part of accreditation and as part of ongoing monitoring when qualifications are in delivery.

Proposal

For assessment objectives to be effective, they must reflect the expectations in the subject content. For the first V Levels in digital systems and data, accounting and finance, and education, having considered the draft content, we propose to specify the same assessment objectives and weightings for each, which awarding organisations must meet. The assessment objectives and weightings we propose are:

Assessment objective	Weighting
AO1 – Demonstrate knowledge and understanding of concepts, principles, requirements and contextual factors relevant to the subject area	30 to 35%
AO2 – Apply knowledge and understanding to plan, carry out tasks, produce outputs, and use information appropriately	35 to 40%
AO3 – Analyse and evaluate information, situations and evidence to make judgements, draw conclusions and make recommendations	25 to 30%

To ensure assessment objectives are applied consistently by awarding organisations, we also propose to issue subject-specific guidance that will set out how the assessment objectives should be interpreted, and includes:

- the ‘elements’ within each assessment objective, that is, the discrete aspects that questions or tasks could target and/or seek to credit – our expectation is that each and every question or task should target or seek to credit at least one of the elements, and may target or seek to credit multiple elements across one or more assessment objectives
- the coverage expectations, such as in relation to the different elements within each assessment objective and how those elements should be sampled over time
- the key areas of emphasis in each assessment objective and the particular meaning for the subject of any key terms and phrases used – defined terms are shown in bold text, followed by their definitions

For V Level subjects in future tranches, we will consider whether the assessment objectives and weightings proposed above are appropriate or whether alternatives need to be specified. Whether the assessment objectives and weightings are the same or different, we will set subject-specific guidance on assessment objectives for subjects being developed for future tranches.

Our proposed Conditions VL(Digital Systems and Data)1.2, VL(Accounting and Finance)1.2 and VL(Education)1.2, the associated requirements and the guidance on assessment objectives are set out in [Annex A](#).

Question 6

Do you have any comments on the proposed assessment objectives or the weightings set out?

Grading scale

It is important that qualifications have grading scales that signal to users of qualifications what results mean. The grading scale ensures results can be relied on as an indicator of the level of attainment a student has demonstrated. This helps students, employers, schools, colleges, further and higher education institutions and the public understand and interpret the results of qualification and assessments.

The Secretary of State has written to Ofqual to set out that V Levels should have a single grading scale. This will ensure consistency between awarding organisations for qualifications designed against the same content and which must meet the same assessment requirements. The Secretary of State has also said that the grading scale should recognise the full range of achievement of the intended cohort and be straightforward to interpret in line with other qualifications a student may be taking to support UCAS tariff allocation.

In determining what the grading scale should be, Ofqual has considered both the length of that scale (how many grades there are), and the labels for the grades on that scale (what each grade is called).

Proposal

We propose the following grading scale for V Levels:

- A* to E, N and U (Ungraded)

The N grade is intended to recognise achievement at a level below the A*-E scale.

We set out our rationale for this proposal below.

Length of grading scale

V Levels are intended to support progression to higher education, meaning the scale needs to be long enough to differentiate between students for selection decisions. We anticipate that the range of ability for students taking V Levels will be greater than that for A Levels – based on the prior attainment of students taking existing vocational qualifications, so the scale will also need to be long enough to reflect achievement of students at the high and low ends of the scale.

Proposal

We propose that a longer scale than that currently used for A Levels (6 points - A*-E) is needed to accommodate this full range of achievement for the students who will take V Levels. The grading scale will need to allow for students achieving the highest grades to align with those who achieve the highest grades at A Level, as well as recognising achievement across the full range of abilities, in particular for those students at the lower end of the scale who might otherwise not achieve a grade. We therefore propose adding a seventh point on the grading scale, to ensure that this full range of achievement is accommodated.

DfE are proposing significant changes to the qualifications landscape, and Ofqual therefore expects the profile of students to change over time. We propose to keep under review the extent to which students are being awarded qualifications on the seventh proposed point on the grading scale as reformed qualifications are implemented both at level 3 and at level 2. If, in time, we find that the seventh grade is unnecessary and not being used regularly, we may consult on a proposal to remove that grade to simplify the overall grading scale.

Question 7

To what extent do you agree or disagree with the proposal that V Levels should be graded using a 7-point grading scale?

Labelling of grading scale

As described above, we propose that a 7-point grading scale will be needed to accommodate the full range of achievement for V Levels. We have considered 3 possible approaches suitable for a grading scale of this length:

- a numeric scale (such as 7 to 1)
- an alphabetic scale (such as A* to E with an additional seventh grade), or
- a Pass, Merit, Distinction, scale (with additional labels to accommodate a 7-point grading scale)

Some existing vocational and technical qualifications use a PMDD* grading scale. It would be difficult to expand the labels used in this 4-point grading scale to make it a 7-point scale without introducing additional complexity and lack of clarity. The use of this type of grading scale may also suggest stronger links with existing vocational and technical qualifications than is appropriate. As such, we consider that an alphabetic or numeric scale would be better able to support the length of scale needed, although both have advantages and disadvantages, as set out below.

We have considered the use of a numeric scale, which would be 7 to 1 based on a 7-point grading scale. While a numeric scale may make it less likely that the comparability of grades between V Levels and A Levels would be misunderstood, it is also possible that a numeric scale would be less well understood generally and require greater level of upfront and ongoing explanation. For example, in some contexts the top grade in a numeric grading scale is 1, whereas in other contexts (such as GCSE) the top grade is the highest number. It would be necessary to explain which number relates to the top grade. The numeric grading scale currently used at GCSE, is 9 points (9 is the highest grade). Using a numeric grading scale for V levels, but with only 7 points may make it harder to understand which grade is the top grade and may lead to confusion with GCSE grading, particularly because the GCSE grade 1 represents a pass at level 1.

Proposal

An alphabetic scale similar to that used in A Levels is likely to be most easily understood, as it is already familiar to users. In view of our proposal to use a 7-point scale, an additional label for the grade below E is needed. While the obvious choice for this could be 'F', we consider that this could be perceived negatively. We therefore propose to use 'N' to recognise achievement of a V Level below grade E. Below this, there will be a U (Ungraded) grade.

We recognise that using such a similar grade scale to A Levels may signal greater similarity between the 2 qualification types than is appropriate. V Levels have different purposes, will be available in different subjects and assessed differently

from many A Levels. Even though the qualifications are different, we are aware that many users may seek to draw comparisons between grades labelled in the same way. This could particularly be the case where universities make offers of places based on points allocated for particular grades. While the allocation of points is a matter for universities and UCAS, we recognise such comparisons are likely to be made so it will be important to be clear about what grades are intended to signal, where such comparisons are likely to be made.

Having considered all the options, we propose to use an alphabetic grading scale because of the clarity it provides.

Our proposed Condition VL7.1 and the associated requirements are set out in [Annex A](#).

Question 8

To what extent do you agree or disagree with the proposal that V Levels grades should be labelled A* to E, with an additional grade below E, plus Ungraded?

Question 9

To what extent do you agree or disagree with the proposal to use the label N for the additional grade below E for V Levels?

Assessment design

Assessment method

The assessment of V Levels should reflect their distinctive purpose and the needs of the intended cohort and a range of assessment approaches will be needed to adequately assess the applied and practical nature of the subject content developed by DfE. The introduction of the new qualifications also provides an opportunity to look at how innovative approaches to assessment might be incorporated.

Assessment is therefore likely to include a variety of forms such as practical or skills tests, simulated tasks or demonstrations and projects.

V Levels are intended to support progression to higher education, higher technical training or an apprenticeship. They are also likely to be used in school and college accountability measures. This means that V Levels will be considered alongside other qualifications, such as A Levels and T Levels, when admissions decisions are made by higher education. The results of V Levels will also need to be secure for use in assessing the quality of teaching and learning in schools and colleges. The methods of assessments used must be fit for each of these intended purposes.

Our proposals are intended to give awarding organisations the flexibility to use a variety of forms of assessment, tailored to the subject content and providing students with a distinctive, vocational assessment experience, whilst securing standards and public confidence in the new qualifications in line with their intended use. This will include:

- assessments timetabled by the awarding organisation, taken by students at the same time and marked by the awarding organisation
- assessments taken under specified conditions but not timetabled, which can be marked by teachers in schools and colleges or by the awarding organisation

Timetabled assessments

Timetabled assessments which are marked by the awarding organisation often take the form of a written examination. This can provide the opportunity to directly test students' knowledge and understanding of the vocational area they are studying to secure that the foundations of essential knowledge for vocational ability are in place. They are also valuable in promoting and assessing student learning across the full range of the subject content.

Written tasks can also assess students' ability to apply their knowledge and understanding, either by mirroring work-place activities or by situating the tasks in authentic vocational scenarios, using case studies or pre-release materials.

Practical, skills-based tasks can also be taken simultaneously by students and marked by the awarding organisation. We recognise that the requirement for timetabled assessment may pose challenges for these types of assessment because it requires all students to take the assessment simultaneously. For example, if students need to use specialist equipment to undertake a practical task at the same time, a school or college would need to have enough equipment for every student. The extent to which practical assessments are used in this way is also likely to vary by subject, depending on the subject content. Awarding organisations

will also need to consider how to make sure that assessments are manageable for centres and can be delivered securely.

All forms of assessment must have robust oversight by awarding organisations so that results are fair and reliable but timetabled assessments which are marked by awarding organisations have the highest level of awarding organisation control. Simultaneous assessment is important where a student might have an advantage if they were able to access the assessment task in advance. It also reduces the risk of assessment materials being shared in advance and so reduces the risk of malpractice.

This approach to assessment is therefore important in securing valid and reliable assessment of the proposed V Level subject content.

Other forms of assessment

A wide range of forms of assessment, taken under specified conditions but not timetabled may also be used. This may include skills tests, performances, or demonstrations where the assessment of those practical skills cannot or does not need to take place simultaneously to secure the reliability of the assessment. Projects or extended tasks taking place over an extended period of time may be used to assess the application of knowledge and understanding. We propose that these assessments may be marked by the awarding organisation or by centres, with scrutiny of centre-marking by the awarding organisation.

In designing such assessments, awarding organisations will need to consider potential risks, for example pressures on centre marking and student malpractice, including the use of generative Artificial Intelligence (AI). To mitigate such risks, awarding organisations should choose forms of assessment that are less open to AI misuse, such as performances or practical demonstrations, or the creation of physical products. Alternatively, when setting controls for how assessments must be taken, they could specify high levels of supervision, restrictions on internet access, or secure storage of work between sessions.

One way Ofqual seeks to ensure consistency and comparability is by specifying the balance of assessment methods and the level of control that awarding organisations have over the assessments. This can help ensure content is assessed in similar ways and support the setting and maintenance of standards, which is key to securing public confidence in the new qualifications.

In determining our regulatory approach, we have considered the following:

- the need to strike a balance between valid assessment of subject content while

reducing the vulnerability of the assessments to pressures on centre marking and threats to authenticity, including those resulting from generative AI, and manageability for centres and awarding organisations

- the requirements of the particular subject, to enable awarding organisations to design assessments which reflect the most effective way to assess that content given the purpose of V Levels
- the need to support the assessment of applied learning and practical skills, for example using extended tasks or skills tests
- the role of assessments which are timetabled and taken simultaneously by all students in supporting the maintenance of standards

We are keen to ensure that the balance of assessment methods is appropriate for the purposes of these qualifications and their vocational subject content, and that the benefits and risks of each of these approaches have been fully identified and considered. We would therefore welcome views on our intention to permit both assessment methods, in addition to the specific proposals made later in this consultation.

Question 10

Do you have any comments on the risks and benefits of the proposed assessment methods, in particular in relation to centre-marked assessments, and how any risks might be mitigated?

Proposal

We have considered the draft subject content for V Levels being first taught from 2027 in digital systems and data, accounting and finance, and education against the considerations above, and based on this, propose to specify proportions of assessment methods as follows.

Timetabled assessments set and marked by the awarding organisation

Other forms of assessment

40%

60%

We will consider the balance of assessment methods for subjects in future tranches as the content for these is developed. Any alternative expectations for future qualifications would be specified on a subject-by-subject basis.

To support awarding organisations in meeting these requirements, we are proposing to put in place guidance on how to meet these expectations, to determine which aspects of the subject content are most appropriately assessed through each assessment method. This will help minimise the level of variation between awarding organisations while providing a degree of scope for awarding organisations to take different approaches where legitimate.

Our proposed Subject Level Conditions VL(Digital Systems and Data)2.1, VL(Accounting and Finance)2.1 and VL(Education)2.1 and associated guidance are set out in [Annex A](#). So that there is consistency across all Ofqual regulations, in our proposed Conditions, requirements and guidance, timetabled assessment, set by the awarding organisation and taken simultaneously by students is defined as Assessment by Examination. Other assessments are defined as Non-exam Assessment.

Question 11

Do you have any comments on the proposal to specify the proportion of each assessment method for V Levels, or on the proportions specified?

Synoptic assessment

Given the purpose of these qualifications, we think it is important that awarding organisations consider the intended vocational nature of V Levels, and the importance for students of being able to demonstrate and apply their overall knowledge, understanding and skills, from across the course of study, in realistic contexts. We would expect opportunities to do this to exist across all assessment methods. To support progression to higher level study and training, we also think it is important students have the opportunity to produce developed responses where they can demonstrate extended reasoning.

Proposal

With this in mind, we propose to require that in designing assessments, awarding organisations ensure students have opportunities to:

- demonstrate the ability to draw together different areas of knowledge, understanding and/or skills from across the full course of study
- produce developed responses which allow them to construct a sustained line of reasoning – or an equivalent logical sequence, depending on the nature of the task – which is coherent, relevant and effectively structured
- demonstrate knowledge, understanding and skills in response to authentic, vocationally-related contexts and scenarios

The approach taken to meet these requirements is likely to vary by subject. We do not propose to specify any weightings for these requirements. Awarding organisations may therefore take different approaches, but we would expect students to be required to demonstrate them in both timetabled assessment and the other forms of assessment.

Our proposed Condition VL6 and associated requirements and guidance are set out in [Annex A](#).

Question 12

Do you have any comments on the proposed approach to synoptic assessment described above for V Level assessments?

Setting assessments

Requiring awarding organisations to set assessments provides a high level of control to ensure assessments appropriately assess the subject content developed by DfE and comply with our requirement for synoptic assessment.

Proposal

As explained earlier in the section on assessment methods, we propose that awarding organisations must set all timetabled assessments. For other assessments, awarding organisations must also set assessments and specify the conditions under which students must attempt the assessment tasks. This will be particularly important for assessments which are not timetabled and taken simultaneously and/or taken over an extended period of time, where there may be an increased risk of malpractice, including the use of generative AI. This is likely to include the level of supervision and students' access to the internet.

Our proposed Condition VL6 and associated requirements and guidance are set out in [Annex A](#).

Question 13

To what extent do you agree or disagree with the proposal to require awarding organisations to set all assessments for V Levels?

Proposal

We are aware that schools and colleges operate in a variety of different contexts, according to their geographic location and the level of resources available. Ofqual therefore proposes to permit awarding organisations to allow centres to adapt certain aspects of assessments (such as the context of the questions or tasks), provided this does not change the level of demand of the assessment or its reliability. This would apply only to assessments which are not timetabled or taken simultaneously by students. For example, if an assessment ordinarily requires the use of a specific software package, an awarding organisation could permit centres to use a different but equivalent software package. This would ensure the same knowledge, understanding and skills were assessed, with the same level of demand and the conditions of the assessment unchanged. Centres will not be allowed to change the knowledge, understanding and skills assessed, the level of demand of the assessment, or any conditions specified by an awarding organisation.

We propose to put in place guidance on the extent to which awarding organisations may permit centres to adapt assessment tasks.

Our proposed Condition VL6 and associated requirements and guidance are set out in [Annex A](#).

Question 14

Do you have any comments on the proposal to permit awarding organisations to allow centres to adapt certain aspects of assessments as described?

Assessment structure and availability

The Secretary of State expects V Levels to have a modular assessment structure,

so assessment can take place at appropriate points during the course of study. The approach to assessment availability needs therefore to allow for this.

Modular approaches can range from on-demand, where assessments can be taken at any time, to approaches with a more limited number of assessment opportunities. Centres can often choose when to enter students for modular assessments – they may choose to make use of all assessment opportunities, taking some assessments in one year and some in another, or may decide to enter students for all assessments at the end of the course.

The flexibility provided by modular assessment approaches needs however to be considered alongside the impact on the teaching and learning, manageability for schools and colleges and the impact on maintenance of standards. Having frequent assessment opportunities may disrupt teaching and learning, lead to students being entered for assessments before they are ready and be administratively burdensome for centres. A more limited number of assessment opportunities could free up time for teaching and learning, helping students develop a more secure understanding of the material they are studying. It would also mean that awarding organisations have a larger volume of student work during each assessment series, which supports setting and maintaining standards.

Proposal

We propose to require awarding organisations to design their qualifications to have a modular assessment structure, where Components can be assessed at different points during the qualification, with results combined to give an overall result, and to make V Level assessments available as follows:

- one assessment series each academic year for timetabled assessments (For V Levels in tranche 1, this will be in the final year of their course because of the terminal assessment requirement discussed later in this consultation document)
- one submission window each academic year for centres to submit marks for any centre-marked assessment to awarding organisations for Moderation

We propose to require that the timetabled assessment takes place during May or June, and welcome views on this. This approach will support the setting and maintenance of standards, as it means that in each series there will be a larger volume of student evidence available for use in when setting standards.

The proposed approach seeks to strike a balance between allowing for modular approaches, providing consistency for centres in terms of the number of assessment opportunities available regardless of the awarding organisation, and allowing some flexibility over when students take assessments across the 2-year

course.

Our proposed Condition VL6 and associated requirements are set out in [Annex A](#).

Question 15

To what extent do you agree or disagree with the proposed approach to the availability of V Level assessments?

Question 16

Do you have any comments on when the assessment series should take place and whether the timing should be specified by Ofqual?

Terminal assessment

Proposal

To further support the setting and maintenance of standards and ensure that grades are trustworthy and reliable over time so that students' achievement is properly represented, we propose to put in place a requirement for terminal assessment whereby a proportion of the assessment is taken at the end of the 2-year course. By requiring an assessment to be taken at the end of the 2-year course, awarding organisations are better able to ensure that final grades most accurately reflect students' overall level of attainment.

For V Levels, this terminal assessment must be set by the awarding organisation (in line with the proposal on setting assessments), timetabled so it is taken by all students seeking to complete the qualification at the same time and marked by the awarding organisation. This approach supports the maintenance of standards because it gives awarding organisations the highest level of control over grade boundaries.

The proportion of terminal assessment needs to be substantial enough to have a clear impact on overall results and we propose for V Level subjects in tranche 1 that this proportion should be 40% of the overall marks. As discussed earlier in the section on assessment methods, the terminal assessment does not have to be in the form of a written exam and should reflect the applied nature of V Levels. It

should require students to demonstrate their ability across the subject content and in doing so, provide an opportunity to correlate student performance across all assessments.

As subject content is developed for V Levels being taught in future years, we will consider whether a 40% terminal assessment requirement is appropriate for those subjects, based on the amount of content in subjects that can be most validly assessed in this way. If future tranches do not include sufficient content to meet this terminal assessment requirement, we will specify alternative arrangements on a subject-by-subject basis.

Our proposed Condition VL6 and associated requirements and guidance are set out in [Annex A](#).

Question 17

To what extent do you agree or disagree with the proposal to require awarding organisations to design V Level qualifications which include terminal assessment, set and marked by the awarding organisation and taken simultaneously by students in the final series in which they complete their qualification?

Question 18

Do you have any comments on the proposal to require the proportion of terminal assessment for V Level subjects in tranche 1 to be 40%?

Retakes

Proposal

We do not propose to restrict retakes for students taking V Levels. They will be permitted to retake an assessment in any series in which it is offered, although the number of assessment series overall each year and the terminal assessment requirement will restrict how often students are likely to retake assessments. We propose that awarding organisations should be permitted to allow students to carry forward marks for centre-marked assessments already achieved when retaking other

assessments. We propose that when retaking centre-marked assessments, students should be able to submit new evidence or submit a revised form of evidence previously submitted.

Our proposed Condition VL6 and associated requirements are set out in [Annex A](#).

Question 19

Do you have any comments on the proposed approach to retakes in V Levels?

Marking assessments

The approach to marking is another important control awarding organisations have over assessments. We think it is important appropriate levels of control are in place, to support the setting and maintenance of standards, and to ensure comparable approaches across awarding organisations. The level of control is affected by whether an awarding organisation marks assessments itself or permits centres to do so. Awarding organisations have more control over assessments they themselves mark, but in some cases, for example where a performance or demonstration is being assessed, centre marking may allow for a more valid assessment. These considerations must also be balanced against the manageability, for awarding organisations and for centres, of the approach to marking.

Proposal

For V Levels, we have already proposed that the terminal assessment is marked by the awarding organisation. This provides the highest level of control and is important for setting and maintaining standards. For other assessments, we propose to permit awarding organisations to allow school or college marking, or to mark assessments themselves. Our proposed assessment guidance includes considerations for an awarding organisation in determining its approach to marking.

Our proposed Condition VL6 and associated requirements and guidance are set out in [Annex A](#).

Question 20

To what extent do you agree or disagree with the proposed approach to marking

Proposal

We intend to require awarding organisations to use numerical marks, with a separate standard setting process used to determine the number of marks required to achieve each grade. This is the approach used for GCSEs, A Levels and Key Stage 4 Technical Awards and Technical Qualifications in T Levels.

Given the intended use of V Levels for progression to higher education and higher technical training, numerical marking will support the greater level of differentiation allowed for in the proposed grading scale. The approach will also allow for compensation of performance between different areas of the subject content across and within components.

Our proposed Condition VL6 and associated requirements are set out in [Annex A](#).

Question 21

To what extent do you agree or disagree with the proposal to require awarding organisations to use numerical marks for all V Level assessments?

Moderation of centre-marked assessments

Where awarding organisations permit centres to mark assessments, there need to be appropriate controls in place for awarding organisations to ensure marking is accurate and consistent. Ofqual requires awarding organisations to have arrangements in place known as Centre Assessment Standards Scrutiny (CASS) to oversee centre-marking.

Awarding organisations can determine their own approach under these requirements, for example deciding the types of checks they do, how often these occur, and when these happen, based on the design of their qualification. Such approaches are used in many vocational and technical qualifications and typically involve awarding organisations periodically sampling and checking school or college marking. Awarding organisations consider whether any adjustments are needed, and depending on how the qualification is delivered, may do this before or after results are issued. This means that not all components or all students are necessarily

available to be sampled from each year, as long as all are sampled over a period of time.

We also specify a particular form of CASS, known as Moderation. Moderation is defined in Ofqual's rules and is how school or college marking of centre-marked assessment in GCSEs, AS and A Levels, Key Stage 4 Technical Awards and Technical Qualifications within T Levels is checked. Moderation provides a higher level of awarding organisation control, as it requires checks to be completed across all components, and adjustments made, before results are issued.

Moderation in qualifications such as GCSEs and A Levels typically involves an awarding organisation sampling centre marking, and then where necessary, making adjustments to all of a centre's marking, based on its review of the sample. Ofqual does not specify the exact process to be used for Moderation though, so approaches other than those used in the qualifications above may also be capable of meeting this requirement.

Proposal

Where an awarding organisation allows schools or colleges to mark assessments in a V Level, we consider it important that this marking from across all components is checked, and where necessary adjusted, ahead of results being issued. We propose therefore that centre-marked assessments in V Levels should be subject to Moderation as defined in Ofqual's regulatory framework, and to add V Levels to the List of assessments that must be Moderated under General Condition H2.3(a)(i).

We recognise that V Levels will have a higher proportion of centre-marked assessment, and the nature of those assessments may lead to different types of evidence being produced to that produced in other qualifications where Moderation is used. Our rules do not specify a particular approach, and awarding organisations may make adjustments in different ways and may take different approaches to the sampling and checking of the results so long as they meet the requirements of checks and necessary adjustments taking place before results are issued.

Question 22

To what extent do you agree or disagree with the proposal to require awarding organisations to conduct Moderation of all centre-marked assessment in a V Level?

Setting and maintaining standards

Setting and maintaining grading standards is a critical responsibility for an awarding organisation to ensure that grades are trustworthy and reliable over time so that students' achievement is properly represented. The approach to setting standards is impacted by the qualification and assessment design, which in turn should be influenced by the need to maintain standards.

These qualifications will include common design characteristics, which means that given the intention for greater comparability between awarding organisations, it is appropriate for Ofqual to specify approaches to the setting and maintenance of standards. Where we specify such approaches, we often do this by putting in place requirements about the sources of evidence awarding organisations should use to inform standard setting and ongoing maintenance of standards. This may include qualitative evidence, such as work produced by students or views of employers on the expected standard of performance, and quantitative evidence, such as data showing how well an assessment has functioned, or a breakdown of the proportion of students achieving each grade.

Proposal

For V Levels we propose to put in place requirements covering the way in which standards should be set and maintained, including how grade boundaries for key grades are set. We propose that in setting and maintaining standards for V Levels, awarding organisations should have regard to a range of evidence. The evidence should enable awarding organisations to reflect the level of demand of the specific assessment, be based on consideration of an appropriately representative sample of student work and the standards set in previous years. It should include both qualitative and quantitative evidence, which may include:

- views of senior examiners about the quality of student work
- judgements and data about the difficulty of particular assessments and/or individual questions
- information about the mean mark and the spread of marks for the qualification overall and for individual assessments
- the level of attainment demonstrated by students taking that qualification in assessments or qualifications which they have taken previously

- student work taken from similar level 3 qualifications

We propose that the A/B grade boundary is designated as a 'key' grade boundary and that E/N would also be a key grade. This means that the B, C and D grades would be set arithmetically, by dividing the mark gap between A and E. Grades A* and the N grade (the grade below E) would be set using appropriate statistical and technical evidence.

We propose to set out expectations relating to the use of evidence through our regulatory framework, and to provide guidance to help awarding organisations understand the types of evidence expected and how they should be used.

We also propose to specify requirements each year that awarding organisations must follow, relating to the way in which evidence is used for setting and maintaining standards. This is a similar approach to that used in GCSEs, AS and A Levels and will help support the intention for there to be a high degree of comparability between awarding organisations, as well as supporting the maintenance of standards over time. These annual requirements may include, for example:

- the analysis and use of data from other relevant qualifications to provide statistical evidence to support the awarding process. This may include data relating to qualifications taken previously by students or other level 3 qualifications, as well as V Levels. This data may relate directly to students taking qualifications in the series to be awarded, previous series, or historical data from the same or other qualifications.
- secure sharing of data with other awarding organisations offering V Levels to enable research into and the development of shared statistical indicators to support awarding
- collaborative work with other awarding organisations to support the development of a shared understanding of the features of student performance. This may include secure sharing of student scripts or exemplar material

We are considering whether any further guidance, including in relation to the weight to be given to different sources of evidence in the first awards, may be necessary to ensure comparable standards are set and maintained by awarding organisations and would welcome views on this.

To support approaches to setting initial standards, we propose that awarding organisations should not be permitted to award qualifications in the first year they are made available. This will ensure that the first awards, which will inform the initial standard that awarding organisations will subsequently need to maintain, will be

based on a representative sample of student work from across the 2-year course.

Our proposed Condition VL7 and associated requirements and guidance are set out in [Annex A](#).

Question 23

Do you have any comments on the proposed approach to setting and maintaining standards in V Levels?

Reviews of marking, reviews of Moderation and appeals

It is important students and centres have an opportunity to request a review or appeal of awarding organisation marking or moderation of assessments, if they think they are wrong. Ofqual requires awarding organisations to have appeal arrangements in place. For some qualifications we put in place more specific requirements for an initial review stage ahead of an appeal to be made available. This is particularly the case where students need access to timely reviews, for example if a progression opportunity is at stake. We have such rules in place for GCSEs, AS and A Levels and Technical Qualifications within T Levels.

We are considering whether similar arrangements should exist in V Levels. Similar arrangements could include requiring awarding organisations to make copies of marked assessment materials available to schools and colleges, allowing reviews for administrative errors, having processes in place for requesting reviews of awarding organisation-marked or moderated assessments, having appeal arrangements in place, and setting expectations for the timing of these.

While we think there is potentially merit in putting in place such arrangements, we are interested in views as to whether arrangements that mirror those in GCSEs and A Levels would be appropriate. As reviews and appeals would not take place until results have been issued following the first assessments being taken, we are seeking views on the approach at this stage. We will consider any feedback and consult separately, if necessary, on any specific rules we propose to put in place.

Question 24

Do you have any comments on the arrangements that should be available for students to request reviews of marking, moderation and appeals of results in V Levels?

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