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Open consultation

Part 3 – Foundation Certificate and Occupational Certificate proposals

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Applies to England

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Foundation Certificates

DfE has [set out its intention](#) to introduce Foundation Certificates at level 2. These will be one-year qualifications providing broad scope in a specific vocational area. They will support students who are looking to progress to further study at level 3, but who

require additional teaching and learning before they are ready to do so. Each Foundation Certificate will be between 240 and 300 GLH. They will form part of a further study pathway providing broad scope in a specific vocational area, and may be taken alongside English and maths qualifications.

Foundation Certificates will be designed against common content specified by DfE, linked to occupational standards. The first Foundation Certificates will be available from September 2027 in digital systems and data and education and early years. More subjects will follow over time. DfE is currently consulting on the content for tranche 1 subjects, 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 Foundation Certificates to support DfE's intention for there to be greater consistency between awarding organisations.

Occupational Certificates

DfE has also [set out its intention](#) to introduce Occupational Certificates at level 2. These will be 2-year qualifications for students who want to progress into employment or an apprenticeship but need to develop their skills before doing so. They will form part of a wider 2-year occupational pathway, where students may also take other qualifications alongside, such as English and maths.

Occupational Certificates will be designed against common content specified by DfE, based on occupational standards. These will range in size between 540 and 720 GLH. A proportion of the qualification will be based on DfE-set core content providing an overview of a sector, and a proportion on occupation-specific content from relevant occupational standards, also specified by DfE.

The first Occupational Certificates will be available from September 2027 in culinary skills, hospitality (accommodation), hospitality (food and beverage), and early years practitioner. More subjects will follow over time. DfE is currently consulting on the nationally set content for tranche 1 Occupational Certificates, and [information about this can be found here](#).

We propose to put in place rules at a qualification level that will apply to all Occupational Certificates to support DfE's intention for there to be greater consistency between awarding organisations.

Qualification design

Purpose

Qualification purpose is as important for Foundation Certificates and Occupational Certificates, as it is for V Levels. 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 Foundation Certificates and Occupational Certificates.

Foundation Certificates

Proposal

Foundation Certificates, taken as part of a further study pathway, are intended to help students who are not ready to immediately progress to a level 3 qualification to get to that level. It will be important, therefore, that students acquire and can demonstrate the necessary knowledge, understanding and skills so that they are ready to progress to a level 3 qualification in a related area. For many students, it is likely that progression will be to a level 3 qualification in the same school or college and their qualification results are also likely to be considered alongside other activities and achievements undertaken as part of their pathway. For this group of students who may not be able to progress straight to level 3 study, it will also be important Foundation Certificates are designed so that students are engaged with their learning and to want to progress to the next level of study.

We propose to require awarding organisations to design Foundation Certificates to

meet the following purposes:

- A. To provide Learners with nationally agreed knowledge, understanding and skills in relation to a broad vocational area, to prepare them for level 3 study in a relevant subject area.
- B. To provide Learners with the ability to apply knowledge, understanding and skills to practical work-related activities.
- C. To motivate Learners to complete the qualification and to progress to further study at level 3.
- D. To provide accurate and consistent information concerning Learners' attainment in relation to the knowledge, understanding and skills assessed as part of the qualification.
- E. To provide information about a Learner's readiness to progress to level 3 study.
- F. 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.

Our proposed Condition FC4 and associated requirements are set out in [Annex B](#). We propose to disapply General Conditions E1.1 and E1.2 as a result of this proposal.

Question 25

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

Occupational Certificates Proposal

Occupational Certificates are intended to support students to work towards competence in their given occupation. They are intended to indicate that a student is ready to progress to employment, not that they are fully competent in that occupation. It will be important therefore that the acquisition and demonstration of the skills needed to enter employment is prioritised in assessment design, as well

as ensuring the assessment design engages students so they progress into related employment.

We propose to require awarding organisations to design Occupational Certificates to meet the following purposes:

- A. To provide Learners with nationally agreed knowledge, understanding and skills related to progression to a specific occupation, and transferable skills relevant to that overall sector.
- B. To provide Learners with the ability to apply knowledge, understanding and skills in relevant practical and occupationally-specific contexts.
- C. To motivate Learners to complete the qualification and progress to a specific occupation.
- D. To provide employers with accurate and consistent information concerning Learners' attainment in relation to the knowledge, understanding and skills assessed as part of the qualification.
- E. To provide information about a Learner's readiness to progress to an apprenticeship or employment.
- F. 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.

Our proposed Condition OC4 and associated requirements are set out in [Annex C](#). We propose to disapply General Conditions E1.1 and E1.2 as a result of this proposal.

Question 26

Do you have any comments on the proposed purposes for Occupational Certificates 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 (GLH), and time spent on unsupervised activities, such as self-directed study. Together, these two aspects are described as Total Qualification Time.

DfE intends that the sizes of Foundation Certificates and Occupational Certificates should be as follows:

- Foundation Certificates – 240 to 300 GLH
- Occupational Certificates – 540 to 720 GLH

Proposal

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 Conditions FC5 and OC5 are set out in [Annex B](#) and [Annex C](#).

Question 27

To what extent do you agree or disagree with the proposal to disapply GCR E7 and to require awarding organisations to design qualifications, in line with the sizes specified by DfE for:

- Foundation Certificates
- Occupational Certificates?

Qualification content

DfE is developing content for Foundation Certificates and Occupational Certificates

and is currently consulting on the content for those intended to be first taught from September 2027 and [you can see this here](#). 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 and the qualifications are consistent and comparable.

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 requirements we propose to put in place, including those relating to assessment.

Our proposed Conditions FC6 and OC6 are set out in [Annex B](#) and [Annex C](#).

Question 28

Do you have any comments on the proposal to require awarding organisations to comply with the DfE set content for:

- Foundation Certificates
- Occupational Certificates?

Grading scale

DfE has written to Ofqual to set out that Foundation Certificates and Occupational Certificates should each 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.

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 qualifications and assessments. In determining what the grading scale should be, it is important to consider 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 both Foundation Certificates and Occupational Certificates:

- Pass/Merit/Distinction and U (Ungraded)

We set out our rationale for this proposal below.

Length of grading scale

Foundation Certificates are level 2 qualifications that support progression to further study at level 3. It is expected that progression to level 3 study will often, if not always, happen within the same institution. Occupational Certificates are level 2 qualifications that support students working towards competence in an occupation so they are ready for progression to employment, but they do not signal full occupational competence.

There need to be enough grades to differentiate appropriately between students' attainment. Depending on the purpose of the qualification, this could be a relatively broad indication of achievement (such as if a student had demonstrated they have particular knowledge, understanding or skills), or more granular differentiation (for example the extent to which a student had demonstrated their knowledge, understanding and skills across a range of content), to inform selection decisions for progression to further study.

Our view is that for both Foundation Certificates and Occupational Certificates, a relatively short grading scale will support the level of differentiation between students needed for these qualifications. We think the scale also needs to be capable of motivating students to develop their expertise in a subject beyond any minimum required level. We propose that a 3-point grading scale will be suitable for the level of differentiation required for Foundation Certificates and Occupational Certificates. The existence of 2 additional grades above the minimum required level (or pass grade) will help to motivate students to develop their expertise and recognise the achievement of higher performing students, providing an appropriate level of differentiation.

Question 29

To what extent do you agree or disagree with the proposal to use a 3-point grading scale for:

- Foundation Certificates
- Occupational Certificates?

Labelling of grading scale

Proposal

Currently, a Pass, Merit, Distinction scale is widely used and understood for existing vocational qualifications that are taken by the cohort of students likely to take Foundation Certificates and Occupational Certificates. We therefore propose for Foundation Certificates and Occupational Certificates, that awarding organisations must use a 3-point grading scale of Pass/Merit/Distinction.

A Pass grade is likely to be perceived as a positive achievement, which would support the engagement purpose for these qualifications, while the achievements of more highly achieving students would be recognised through Merit and Distinction grades. A Pass grade will not necessarily indicate that a student is able to progress to all possible level 3 qualifications, nor to employment. Schools, colleges and employers will be able to set their own entry requirements, using the grades achieved, alongside other evidence of suitability for progression, for example English and maths qualifications where taken as part of the wider further study or occupational pathway.

Our proposed Conditions FC8 and OC8 and associated requirements are set out in [Annex B](#) and [Annex C](#).

Question 30

To what extent do you agree or disagree with the proposal that grades should be labelled Pass/Merit/Distinction, plus Ungraded for:

- Foundation Certificates
- Occupational Certificates?

Assessment design

Assessment methods

One way to help ensure consistency and comparability is through requiring awarding organisations to take similar approaches to assessment design. This can help ensure content is assessed in similar ways and ensure that an appropriate balance of methods is used to support the setting and maintenance of standards to secure public confidence in the new qualifications. The results of Foundation Certificates and Occupational Certificates also need to be secure to support their likely use as part of school and college accountability measures.

Our proposals are intended to give awarding organisations the flexibility to use different forms of assessment to prepare students for level 3 study in the case of Foundation Certificates or employment in the case of Occupational Certificates. This will include:

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

Assessments which are timetabled, set and 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 set and marked by the awarding organisation and taken simultaneously by students. We recognise that the requirement for simultaneous sitting of this type of assessment may pose

challenges. 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 assessments set and marked by awarding organisations, timetabled and taken at the same time by all students 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 task in advance. It also reduces the risk that tasks are shared in advance and so reduces the risk of malpractice.

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. These assessments may be marked by the awarding organisation or by the centre, with scrutiny 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 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.

Proposal

We propose to specify the balance of assessment methods for Foundation Certificates and Occupational Certificates and set out the specific proposals below.

To support awarding organisations in determining which aspects of the subject content are most appropriately assessed through each assessment method, we also propose to put in place guidance to inform awarding organisations' decision making. 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.

Foundation Certificates

We think it is important the balance of assessment methods reflects that these qualifications are intended to prepare students for further study at level 3, including the forms of assessment they may encounter when they progress, while also reflecting the vocational and applied nature of the subject content. It should include a proportion of the assessment where awarding organisations have a high level of control to support the setting and maintenance of standards. We therefore propose for Foundation Certificates that awarding organisations must design their qualifications to include the following:

Timetabled assessments set and marked by the awarding organisation	Other forms of assessment
40% of overall marks or grades	60% of overall marks or grades

We propose the same balance of assessment methods should be used for all Foundation Certificates in tranche 1. We will consider, as content is developed, whether exemptions for any subjects in later tranches are required, and if so, exempt specific subjects from this requirement and/or specify alternative proportions. Where an exemption does exist, it would apply to all awarding organisations offering the qualification, and we would not permit exceptions for individual awarding organisations.

Our proposed Conditions FC7 and associated requirements are set out in [Annex B](#).

Question 31

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

Occupational Certificates

It is important the balance between assessment methods reflects that these qualifications need to prepare students for entry into level 2 occupations, so require students to be assessed in ways that reflect this. We think that it is important that a proportion of assessment has a high level of control by the awarding organisations to support standard setting but the proportion of occupationally specific skills in the

subject content suggests that this should be a lower proportion than for Foundation Certificates. We propose that the same approach should be taken for all Occupational Certificates and will not vary by subject. We propose for Occupational Certificates that awarding organisations must design their qualifications to include the following:

Timetabled assessments set and marked by the awarding organisation	Other forms of assessment
30% of overall marks or grades	70% of overall marks or grades

We propose the same balance of assessment methods for all Occupational Certificates in tranche 1. We will consider, as content is developed, whether exemptions for any subjects in later tranches are required, and if so, exempt specific subjects from this requirement and/or specify alternative proportions. Where an exemption does exist, it would apply to all awarding organisations offering the qualification, and we would not permit exceptions for individual awarding organisations.

Our proposed Conditions OC7 and associated requirements are set out in [Annex C](#).

Question 32

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

Synoptic assessment

To support progression to employment or level 3 we think it is important students have the opportunity to demonstrate their overall understanding of the course of study and to produce developed responses where they can demonstrate extended reasoning, across all assessments. Given the purpose of these qualifications, we also think it is important that there are opportunities for students to demonstrate and apply their overall knowledge, understanding and skills in realistic contexts.

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 that 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 across timetabled assessments and other forms of assessment in all Foundation Certificate and Occupational Certificate subjects.

Our proposed Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 33

Do you have any comments on the proposed approach to synoptic assessment described above for:

- Foundation Certificates
- Occupational Certificates?

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

We have explained earlier in the consultation that we propose to require awarding

organisations to set all timetabled assessments. We also propose to require awarding organisations to set all other assessments and to 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 Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 34

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

- Foundation Certificates
- Occupational Certificates?

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 that are not timetabled. 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 Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 35

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

- Foundation Certificates
- Occupational Certificates?

Assessment structure and availability

The Secretary of State expects Foundation Certificates and Occupational Certificates 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 other 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 both Foundation Certificate and Occupational Certificate assessments available as follows:

- one or two assessment series each academic year for timetabled assessments

- one or two submission windows each academic year for centres to submit marks or grades for centre-marked assessment to awarding organisations for Moderation

Awarding organisations will be able to decide whether to offer one or two assessment series or submission windows for each assessment method, based on their specific qualification. We also propose that it will be for awarding organisations to determine whether to make the timetabled assessment or other assessments available at the same time, or to make them available in separately. We do not propose to specify the precise timing of any of the assessments, but would expect for one of these to take place in the summer to support progression.

We think it is important there is flexibility for awarding organisations to determine an approach that reflects the design of their qualifications. It is also important to give schools and colleges some flexibility to tailor assessment opportunities to meet student needs. Setting some restrictions on the availability of assessments will, however, support the setting and maintenance of standards, as it means in each series there will be a larger volume of student evidence available for use in standard setting than if assessments were available on-demand.

Our proposed Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 36

To what extent do you agree or disagree with the proposed approach to the availability of assessments for:

- Foundation Certificates
- Occupational Certificates?

Retakes

Proposal

We do not propose to restrict retakes for students taking Foundation Certificates or Occupational Certificates. 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 will restrict, to some extent, how often students are likely to retake assessments. When retaking timetabled assessments, we propose that awarding

organisations should be permitted to allow students to carry forward marks or results for centre-marked assessment already achieved. 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 Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 37

Do you have any comments on the proposed approach to retakes in:

- Foundation Certificates
- Occupational Certificates?

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

As explained earlier in the consultation, we propose that awarding organisations will be required to mark all timetabled assessments. 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 them themselves. Our proposed assessment guidance includes considerations for an awarding organisation in determining its approach to marking.

Our proposed Conditions FC7 and OC7 and associated requirements and guidance are set out in [Annex B](#) and [Annex C](#).

Question 38

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

- Foundation Certificates
- Occupational Certificates?

Proposal

For Foundation Certificates and Occupational Certificates, unlike V Levels, there is less need to differentiate finely between different levels of student performance for the proposed grading scale, which might require awarding organisations to use a common marking approach or the use of numerical marks. We propose to permit awarding organisations to design assessments using either numerical mark-based approaches, directly graded approaches, or a combination of these

Directly graded approaches are used in many vocational and technical qualifications where, rather than allocating numerical marks, students' levels of attainment and achievement of specific grades are determined directly by assessors, by applying assessment criteria at the point of assessment. Such approaches may enable schools and colleges to use pedagogical approaches that may be effective in engaging the students expected to take these qualifications, designed by setting out learning outcomes in detail, which can support students to progress.

It will be for awarding organisations to determine their approach to marking and to explain this through their assessment strategy.

Question 39

To what extent do you agree or disagree with the proposal to permit awarding organisations to design assessments using numerical mark-based approaches, directly graded approaches, or a combination of these in:

- Foundation Certificates
- Occupational Certificates?

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 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

We recognise the nature of the assessments in Foundation Certificates and Occupational Certificates may lead to different types of evidence being produced to that produced in other qualifications where Moderation is used. We do however consider it important that where an awarding organisation allows schools or colleges to mark assessments in a Foundation Certificate or Occupational Certificate, marking from across all components is checked, and where necessary adjusted, ahead of results being issued.

We propose therefore that centre-marked assessments in Foundation Certificates and Occupational Certificates should be subject to Moderation as defined in

Ofqual's framework, and to add Foundation Certificates and Occupational Certificates to the [List of assessments that must be Moderated under General Condition H2.3\(a\)\(i\)](#).

The proposal to permit both numerical marking and direct grading may affect the processes to moderate these assessments. While Moderation is often associated with assessments that are marked numerically, Ofqual does not specify the exact process to be used for Moderation. Awarding organisations may make adjustments in different ways and may decide to take different approaches to the sampling and checking of results. In directly graded assessments, for example, it may not be possible to apply the same adjustment across a cohort, but it may be possible instead to require a centre to repeat an assessment to adjust its marking to the required standard, where an awarding organisation identifies an issue with a centre's marking. The way a qualification is delivered would need to reflect the Moderation approach being used, for example scheduling assessments sufficiently far ahead of results being issued to allow these checks and any adjustments to be made.

Our rules allow for awarding organisations to take such approaches, so long as they meet the requirements of checks and necessary adjustments taking place before results are issued.

Question 40

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

- Foundation Certificates
- Occupational Certificates?

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.

Proposal

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.

For numerical mark-based assessments, this includes specifying which grade boundaries are key grade boundaries that must be determined by senior examiners, and which are arithmetic, so calculated at intervals between the key grade boundaries.

For numerical mark-based assessments, we propose that the Pass/Ungraded grade boundary is designated as a 'key' grade boundary and that the Distinction/Merit grade boundary would also be a key grade. This means the Merit grade would be set arithmetically, by dividing the mark gap between Pass and Distinction.

We propose that in setting and maintaining standards for Foundation Certificates and Occupational Certificates, awarding organisations should have regard to a range of appropriate evidence, which should include:

- the Level of Demand of the assessments for that qualification
- the level of attainment demonstrated in those assessments by a representative sample of Learners
- the level of attainment demonstrated by Learners taking that qualification in prior assessments or qualifications
- the level of attainment demonstrated by Learners who have previously been awarded the qualification

Where directly graded assessments are used, expected levels of attainment will be determined through the grading criteria, not through any separate awarding process. We propose that awarding organisations should explain key features of the approach taken in their assessment strategies. These include, for example, how it is ensured that the grading criteria are appropriate for the content to be assessed, the level of the qualification and the grading scale, as well as how their consistent

interpretation by assessors is supported. Awarding organisations will be required to explain how they are used in aggregating students' attainment, both for individual assessments and for the qualification as a whole.

We propose that in setting and maintaining standards, awarding organisations should use approaches that ensure that overall assessment is compensatory, to allow for performance in one area to be compensated for by performance in another. We intend to work with awarding organisations to develop more consistent approaches to the overall aggregation of results, including in relation to compensatory assessment approaches.

To support approaches to setting initial standards, we propose that awarding organisations should not be permitted to award Occupational Certificates in the first year they are made available. This will ensure the first awards, which will inform the initial standard awarding organisations will subsequently need to maintain, will be based on a representative sample of student work from across the 2-year course. A similar requirement is not required for Foundation Certificates as these are designed to be 1-year courses.

Our proposed Conditions FC8 and OC8 and associated requirements are set out in [Annex B](#) and [Annex C](#).

Question 41

Do you have any comments on the proposed approach to setting and maintaining standards in:

- Foundation Certificates
- Occupational Certificates?

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 Foundation Certificates and Occupational Certificates. 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 42

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:

- Foundation Certificates
- Occupational Certificates?

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