



Open consultation

# Part 6 – Impact assessments

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**Applies to England**

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## Equality impact assessment

Ofqual is subject to the public sector equality duty under the Equality Act 2010. This assessment considers the potential equality impacts – positive and negative – arising from our proposals to regulate V Levels, Foundation Certificates and Occupational Certificates, both for students who share particular protected characteristics and for those who may be affected due to other factors such as their socio-economic background. We welcome views on the impacts identified, suggestions for mitigation, and any additional impacts not covered.

### **What do we know about the cohort likely to take these qualifications?**

Ofqual's internal analysis of the diversity of the 18-year-old cohort showed that, in 2023, 60% of 18 year-olds took A Levels only, 23% took VTQ Performance Table Qualifications (PTQs)<sup>[footnote 1](#)</sup> only, and 16% took a mixed programme of at least one A Level and at least one VTQ PTQ. Around 1% of students completed a T Level.

Our analysis of the 2023 cohort showed that overall there were small differences in the types of students taking A Levels, VTQ PTQs, mixed programmes and T Levels, in terms of special educational needs (SEN), eligibility for free school meals (FSM), gender and ethnicity. For example, 5.7% of students studying only VTQs had special educational needs (SEN), compared with 4.7% of students studying only A Levels, and 6.7% studying mixed programmes. 3.1% of students studying T Levels had SEN. Separate analysis by DfE suggests that the proportion of enrolments for students aged 16 to 19 with a disability on level 2 vocational and occupational qualifications is 25%.

14.8% of students studying only VTQs were eligible for free school meals (FSM), compared with 7% studying A Levels, 11.8% studying mixed programmes and 9.4% taking T Levels. Using the income deprivation affecting children index (IDACI), for those taking only A Levels, the highest percentage of students sat in the lower IDACI categories (less deprived), and the lowest percentage of students sat in the higher IDACI categories (more deprived). The opposite was true for the VTQ only group where there appeared to be fewer students in the lower IDACI categories and more in the higher IDACI categories.

Ofqual publishes an annual [equalities analysis](#) that explores how attainment gaps for students with different characteristics vary over time. The most recent analysis showed the probability of an 'average' student attaining the top grade in Applied Generals and Tech Levels was 5.2% and 10.6% respectively. The probability of an 'average' student attaining a grade A or above was 18.2%. This difference may reflect the lower prior attainment of the cohort taking Applied Generals and Tech Levels, compared with A Levels.

## Accessibility

Accessibility is fundamental to effective and valid assessment, and this is reflected in Ofqual's regulatory requirements. Assessments should be designed to test subject content in a way that is as accessible as possible, without introducing unnecessary barriers to students showing what they know, understand and can do.

Awarding organisations are required by Ofqual to:

- comply with equalities law, removing any unjustifiable disadvantage for students who share a particular characteristic, including students with SEND
- meet Ofqual's rules on assessment design and have regard to [Ofqual's statutory guidance](#) on designing and developing accessible assessments

Ofqual's guidance sets expectations for the accessibility of assessments, including that they are:

- well-targeted and construct relevant – assessing only the knowledge, skills and understanding intended to be assessed, as set by DfE's subject content
- free of irrelevant design features that can create unnecessary barriers. For example, non-essential images may disadvantage visually impaired students

Because of the complexity of assessment design, Ofqual's guidance helps awarding organisations balance competing factors and avoid irrelevant features that could unfairly disadvantage certain groups. Awarding organisations must monitor and refine their assessments to prevent disadvantage.

Ofqual will review the accessibility and quality of the new V Level, Foundation Certificate and Occupational Certificate qualifications through:

- assessment strategies, which must demonstrate that assessments are fair, valid, reliable, high-quality and deliverable
- accreditation processes, to ensure new qualifications meet regulatory requirements (including accessibility)
- ongoing monitoring once qualifications are in delivery

## Reasonable adjustments

Under the Equality Act, awarding organisations are required by law to provide reasonable adjustments for disabled students. Awarding organisations should design assessments with accessibility in mind, minimising the need for reasonable adjustments. However accessible an assessment is, some students will always need reasonable adjustments (or access arrangements<sup>[\[footnote 2\]](#)</sup> to access it in a way which is comparable to other students. Ofqual's proposals for V Levels, Foundation Certificates and Occupational Certificates will not impact on the

obligations on awarding organisations to provide reasonable adjustments, providing standards, confidence and fairness are maintained.

Ofqual collects and publishes data on access arrangements, including reasonable adjustments for disabled students, for GCSEs, AS and A Levels. Ofqual has not historically collected and published equivalent data for other qualifications but we are considering the potential for collecting this data for V Levels, Foundation Certificates and Occupational Certificates when they are introduced.

## Summary of anticipated equality impacts and mitigations

Ofqual's overall approach to regulating V Levels, Foundation Certificates and Occupational Certificates is intended to support DfE's steer that these qualifications should have greater consistency and comparability than is the case for current post-16 qualifications. Overall, we think this will result in a positive equality impact, as all students, regardless of which pathway they take, will be taking a high-quality, consistent national qualification.

The table below sets out the potential equality risks for each proposal in turn, together with any mitigations designed to address them.

Proposal	Equality impacts	Mitigation
<b>Accreditation</b>	Introducing an accreditation requirement will have a positive impact as awarding organisations will not be able to award the new qualification until it has met Ofqual's accreditation criterion. Ofqual's review will determine whether a qualification is capable of complying with all of the General Conditions of Recognition, Qualification Level Conditions and, for V Levels, Subject Level Conditions. This will include checking that the qualification meets Ofqual's rules and guidance in relation to equalities law, assessment design and accessibility.	Not applicable

<b>Assessment strategy</b>	Ofqual's proposal that awarding organisations should develop and keep under review an assessment strategy will mean that awarding organisations have to explain their overall approach to the design, development and delivery of their qualifications. This will mean that awarding organisations have to set out how they will meet Ofqual's rules and guidance including those in relation to equalities law, assessment design and accessibility. We consider this will have a positive impact.	Not applicable
<b>Size</b>	Ofqual proposes to require awarding organisations to develop qualifications in line with the sizes specified by DfE. As the size specified is a matter for DfE, we do not consider that Ofqual's proposal has any particular equality impact.	Not applicable
<b>Purposes</b>	Ofqual has developed purposes in line with DfE's policy intentions for each qualification. Ofqual proposes that awarding organisations should develop assessments in line with the general purposes set out. For example, in the V Level purposes, the highest priority is given to the information about a qualification the result provides, reflecting DfE's policy intention that V Levels can be used for progression to higher education. This proposal impacts on some of our other proposals, for example to have a 7-point grading scale to reflect the full range of achievement expected from the V Level cohort. As the purposes reflect DfE's policy intentions, we do not consider that Ofqual's proposals have any particular equality impact.	Not applicable
<b>Subject content and assessment</b>	Ofqual proposes that awarding organisations should develop	Not applicable

## objectives

assessments that cover the national subject content, and for Occupational Certificates, the relevant parts of the occupational standards, as specified by DfE. Subject content is a matter for DfE, and DfE will conduct their own equality impact assessment on their draft content. As our proposal reflects DfE's policy intention, we consider that Ofqual's proposal will have no identifiable equality impact.

We also propose setting assessment objectives for V Levels. This will help to ensure that assessments developed by awarding organisations against national subject content are designed in a comparable way and support the setting and maintenance of standards. Overall, this should have a positive impact on all students, as it will support consistency across awarding organisations.

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### Assessment design/structure

#### Assessment methods

We propose that the new qualifications include a balance of assessment methods. By specifying a balance of assessment methods, we think this could have a positive impact as students will not be wholly assessed by either timetabled assessments marked by the awarding organisation or by assessments marked by the centre.

We are proposing that V Levels will include a proportion of timetabled assessment, marked by the awarding organisation. For the first tranche of V Levels this will be 40% of the overall marks, but this may vary depending on the

The impact of requiring terminal assessment is mitigated by this approach allowing for more teaching and learning time to ensure students are well prepared for the assessment, and a reduction in assessment (and any associated pressure) throughout the course. A proportion of the

subject content set by DfE. Our regulations will ensure consistency across awarding organisations so that V Levels in the same subject will have the same proportion of timetabled and centre-marked assessment. This will have a positive impact on all students as they will have the opportunity to demonstrate what they know, understand and can do in more than one type of assessment, and they will have a more consistent experience of assessment regardless of which awarding organisation's qualification they take. We also propose to put in place a terminal assessment requirement, whereby 40% of the overall assessment for the qualification must be taken in the final series of the two-year course and that this must be a timetabled assessment, set and marked by the awarding organisation. This approach means that a significant proportion of assessment will take place at the end of the course. While this could increase exam anxiety for some students, it will support standard setting in the overall qualification.

We propose that all assessments should be set by the awarding organisation, with centre adaptation of certain aspects of assessment which are not time-tabled permitted. Requiring assessments to be set by the awarding organisation should have a positive impact overall by increasing the consistency of experience for students. Centre adaptation may have a positive equality impact as centres will be able to contextualise the assessment to take into account the facilities or equipment available, and will still be required to make reasonable adjustments

assessment is likely to take place in year 1 of course. This, combined with a compensatory approach to marking, will mean that a student's grade will not be entirely reliant on their performance at the end of the qualification.

in line with their obligations under the Equalities Act.

For Foundation Certificates and Occupational Certificates we are proposing a specified proportion of timetabled assessment, marked by the awarding organisation (40% and 30% respectively), with guidance for awarding organisations on how to decide which part of the content to assess in this way.

It is important to note that this does not have to be in the form of a written test or examination and awarding organisations may develop other forms of assessment that meet our requirements. Regardless of assessment method, disabled students will be entitled to reasonable adjustments, as they would be with any regulated qualifications.

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**Assessment design/structure**

**Synoptic assessment**

We propose to include requirements that awarding organisations must include questions or tasks in their assessments which allow students to produce developed responses. It is possible that this may have a negative impact on some students with SEND or English as an additional language. Ofqual research (yet to be published) suggests some disabled students find extended writing tasks more challenging, anxiety inducing, and sometimes require use of skills (i.e. use of grammar) they struggle to show and that are ancillary to assessment objectives. However, for some students, such as neurodiverse students, there may be a positive impact compared to responding to

We do not intend to specify in which assessments developed responses are required. This could mean they are included in assessments that are not timetabled, which may reduce students' anxiety and allow more time to demonstrate their knowledge, understanding and skills.

selected response questions (for example, multiple choice) as they may take selected response questions literally or be frustrated by the lack of context they feel they need to answer.

Students with disabilities that mean they have difficulty with extended responses would be entitled to reasonable adjustments, as they would for any qualification.

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**Modular assessment and assessment availability**

Ofqual is proposing to require that the new qualifications are modular, with limits on the number of assessment series and submission windows available per year.

Not applicable

Modular assessment approaches can support student motivation and engagement, and mastery learning. For example, Baird et al., 2019, in their review for Ofqual on modular and linear GCSE exams, found that for some students, such as disabled or low attaining students, modular assessment designs can support learners to maintain a consistent level of engagement and performance where it otherwise might be more variable.

The opportunity to retake assessments in modular qualifications can be viewed negatively as leading to grade inflation or more positively as allowing students, particularly those who are disadvantaged, to attain more highly than they otherwise could (Baird et al., 2019). We have not proposed restricting opportunities to retake assessments, although the availability of assessments will naturally limit the number of opportunities to retake assessments. We think this is

proportionate as it will allow some opportunity to retake assessments but will prevent students from repeatedly retaking assessments, which would have an impact on time available for teaching and learning. Overall, we think this approach would have a positive impact.

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**Grading scale**

We propose setting a common grading scale for each of V Levels, Foundation Certificates and Occupational Certificates. We believe this will have a positive impact on all students, as grading will be consistent across awarding organisations. The proposed length of grading scales will also have a positive impact.

Not applicable

For V Levels, introducing a longer grading scale than currently exists in many 360 GLH Applied Generals, and a slightly longer scale than exists for A Levels, will allow for greater differentiation across the attainment range. We think this will have a positive impact as the achievements of lower-attaining students will be recognised.

There is some evidence from another country (Sweden) that a grading structure with more individual grades can be discouraging, particularly for lower attaining students. However, these students were in a different country with a different culture and educational and assessment context, so there may be factors at play other than grading structure. Other studies suggest greater levels of feedback (through grades) can support better learning and engagement amongst students.

For Foundation Certificates and Occupational Certificates, we are

proposing a shorter Pass/Merit/Distinction grading scale. The existence of 2 additional grades above pass will have a positive impact as it will help to motivate students to develop their expertise beyond the minimum needed for a pass, whilst recognising the attainment of higher achieving students.

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<b>Standard setting</b>	Ofqual proposes to set requirements for standard setting, including the way in which qualitative and quantitative evidence is used and the way in which grade boundaries for key grades are set. We do not think this approach will have any particular equality impacts but will increase fairness for all students (compared to current qualifications) as grading will be more consistent across awarding organisations.	Not applicable
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<b>Marking and moderation</b>	<p>Ofqual proposes that for V Levels, awarding organisations should use numerical mark-based approaches, and for Foundation Certificates and Occupational Certificates, assessments can be either numerically marked or directly graded. Either way, we propose requiring a compensatory approach to marking, whereby strong performance in one part of a qualification can compensate for less strong performance in another part. We think this may have a small positive equality impact as there will be no 'hurdles' to students passing a qualification overall.</p> <p>Direct grading can support students with the lower levels of attainment by setting out learning outcomes in detail, which can support the least able students to progress. However, numerical marking</p>	Not applicable
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gives awarding organisations greater control over standard setting. For V Levels, where entry to higher education might be predicated on achieving a particular grade, we think that having greater control over standard setting is important, which supports our proposal for numerical marking. For Foundation Certificates and Occupational Certificates, which are aimed at students with lower prior attainment, we are proposing to permit either direct grading or numerical mark-based approaches (or a combination of the 2), and awarding organisations can determine the best approach for their qualification.

We have also proposed centre-marked assessments must be Moderated by the awarding organisation. We consider this will have a positive impact and increase fairness for all students as this will mean that any issues identified with centre marking must be resolved before results are issued, as is the case for students studying A Levels or Technical Qualifications within T Levels, where Moderation rules already apply.

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**Reviews of Marking, Moderation and Appeals**

Ofqual is seeking views on introducing rules about reviews of marking, moderation and appeals, similar to those already in place for GCSEs, AS and A Levels and Technical Qualifications within T Levels. We do not currently have these rules in place for other level 2 and 3 qualifications. The introduction of these rules could therefore have a positive impact on fairness for all students, and in particular for students with SEND or from lower socio-economic backgrounds who are

Not applicable

more likely to study these qualifications.

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**Retaking Core Exams in TQs within T Levels**

Ofqual has proposed to allow additional flexibility in how TQ Core Exams are retaken, in line with DfE's policy. This increase in flexibility could have a positive impact for students with SEND by reducing the assessment burden if students need to retake the TQ Core.

Not applicable

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**On-screen assessment**

In relation to on-screen assessment, the proposals in this consultation have been developed in line with the proposals for GCSEs, AS and A Levels on which we consulted between December 2025 and March 2026. The anticipated equality impacts of those proposals are set out in more detail in the [equality impact assessment](#) for that consultation.

As noted earlier in this EIA, the cohort taking existing level 2 and level 3 VTQs includes a higher proportion of students with SEND and students from lower-socio-economic backgrounds than for A Levels. This suggests that issues of digital inequality could arise in this context. Our proposed approach therefore takes account of this risk.

The guiding principles consulted on for GCSEs, AS and A Levels, and which have guided our approach to V Levels, Foundation Certificates and Occupational Certificates, set out expectations for fairness and accessibility, including that on-screen assessment should maintain, and wherever possible enhance, accessibility for students with special educational needs and disabilities. In practice, the accessibility impacts of on-screen assessment may vary depending on individual needs and assessment design, and our proposals therefore seek to support accessibility, including for those students with SEND who may benefit from an on-screen mode of assessment.

For V Levels in tranche 1, we have considered the use of on-screen assessment on a subject-by-subject basis, in line with these guiding principles.

For Foundation Certificates and Occupational Certificates we do not propose placing restrictions on awarding organisations' use of on-screen assessment. For these qualifications, risks in relation to digital inequality and centre capacity are mitigated by the expectation that entry volumes are likely to be small, and that the use of on-screen assessment is more established in technical and occupational

qualifications.

Our proposals will not restrict the availability of on-screen assessment as a reasonable adjustment where this is necessary and appropriate to meet specific accessibility needs of disabled students.

## Next steps

As well as seeking views on the potential equality impacts of our proposals through this public consultation, Ofqual will seek views from experts in accessibility and equalities (including through its [Access Consultation Forum](#)) to inform its decisions.

### Question 48

Are there any other potential equality impacts (positive or negative) on students who share a particular protected characteristic or are from a lower socio-economic background arising from our proposals, either individually or in combination? Where possible, please separate your answer by protected characteristic.

### Question 49

Are there any additional steps that Ofqual could take to mitigate any potential negative impacts resulting from the proposals, either individually or in combination, on students who share a particular protected characteristic or are from a lower socioeconomic background?

## Regulatory impact assessment

Ofqual has a duty under the Apprenticeship, Skills, Children and Learning Act 2009 to avoid introducing or maintaining unnecessary regulatory burden.

# Introduction

This regulatory impact assessment sets out the potential impacts to stakeholders that may result from implementing the proposals set out in the consultation. To identify these impacts, we have assumed a hypothetical baseline where access to the markets is restricted in accordance with our proposals in the recognition consultation, but we do not introduce any further rules or requirements. To be clear, we are not consulting on the baseline, nor are we presuming the outcome of the recognition consultation.

We have taken a risk-based approach in developing the proposals in this consultation. More prescriptive requirements are applied only where necessary to meet our statutory objectives, including maintaining public confidence in regulated qualifications and ensuring high standards.

The majority of the proposals are focused on technical aspects of qualification design and delivery. From an impact perspective these proposals act in a similar manner, leading to similar types of costs and benefits across a consistent set of stakeholders. Therefore, to more clearly communicate and differentiate the overall effect of the proposals, we have grouped them into 3 categories:

- Proposals focusing on the design of the new qualifications
  - These include proposals around the purpose of the qualifications; assessment objectives; grading and standard setting; assessment structure and availability; the degree of timetabled and centre-marked assessment
- Proposals focusing on the delivery of the new qualifications
  - This includes the proposals affecting Moderation and CASS controls for centre-marked assessments, as well as the mechanism for students and centres to request reviews and appeals of marks and grades
- Proposals focusing on additional regulatory oversight for the new qualifications
  - This is specifically focused on the proposal to require new qualifications to go through our accreditation process

## **Impact of proposals on users of the new qualification types (students, centres, employers and higher education institutions (HEIs))**

The economic value of qualifications depends on their ability to accurately represent students' capabilities. This supports effective matching into further education and the labour market and therefore contributes to appropriate wage setting, productivity and growth.

The proposals set out in this consultation aim to protect this value by ensuring that students, employers, HEIs and other stakeholders can rely on the information the qualifications convey. The proposals focusing on the design and delivery of the new qualifications work to this goal by ensuring that the technical aspects of the qualifications are suitable for their intended content and purpose, and that there is appropriate oversight of marking to support reliable and consistent grading. Given the importance that the new qualifications are intended to have in the labour market, we are also proposing an additional layer of oversight, accreditation, which we use for qualifications such as GCSEs and A Levels.

The proposals focusing on the delivery and additional regulatory oversight of the new qualifications will also increase costs for centres relative to the notional baseline where the more basic form of [Centre Assessments Standards Scrutiny](#) is adopted. A more comprehensive Moderation process may require both one-off and ongoing costs for centres as they first establish and then maintain appropriate systems and procedures. Centres which do not already engage in Moderation that meets Ofqual's requirements may face higher set up costs due to lack of familiarity with similar requirements – for example, having to conduct additional training across their staff body to support effective delivery.

We are consulting on the potential for including a system for students to review and appeal their marks. We will consult separately if necessary on any specific rules we propose to put in place, which will include a more detailed consideration of associated impacts, but it is appropriate to note at this stage that any system would necessarily lead to additional costs for centres and awarding organisations.

The price of the new qualifications may be different to the price of qualifications that are currently in the market and taken by 16 to 18-year-olds. This is due to a wide variety of factors, including the additional requirements that awarding organisations must follow as proposed in this consultation to secure that these qualifications command confidence, standards are maintained and are consistent between awarding organisations. On the other hand, awarding organisations will be required to make use of nationally set content to aid the development of their qualifications, which will have some efficiency benefits. We expect that most of the market will involve a degree of competition, which should have some positive effect on pricing.

These factors taken in aggregate mean that centres may experience initial

uncertainty in budgeting for qualification fees as the market is established and awarding organisations publish their prices. It is possible that centres may experience fees that are different and potentially higher relative to the baseline scenario.

We will continue our price transparency work, including publishing a yearly analysis of qualification fees in the Qualification Price Statistics report, in order to support centres and other qualification purchasers in making informed decisions about the value for money of their offer.

## **Impact of proposals on awarding organisations**

DfE's reforms are intended to simplify the post-16 landscape, making it more navigable for students, educational institutions and employers. The proposals in this consultation support the establishment of the new vocational qualifications by reducing the risk of issues in their design and delivery, supporting stakeholders to put their confidence in those aspects of the qualifications from the start. This would increase their value to users and encourage wider adoption and sustained use. Awarding organisations delivering these qualifications would benefit from this shared investment in building a strong reputation and from reduced risk that poor design or delivery could damage that reputation.

We are aware that our proposals will need to be implemented during a period of multi-faceted reform, including changes to other qualification sectors such as apprenticeship assessment. While the direction and sequencing of reform is set by government more broadly, we understand that resources for qualification development may already be stretched, which could add to awarding organisations' overall costs.

The proposals relating to technical aspects of the design of new qualifications, such as the grading system and balance of assessment methods, introduce an additional developmental cost to awarding organisations. In the absence of our proposed rules, awarding organisations would have had to make their own decisions on these aspects of qualifications and assessment. The additional cost that awarding organisations face as a result of our rules depends on how different their decisions would otherwise have been.

Additionally, the proposals relating to grading and setting standards for V Levels may introduce additional on-going costs for any awarding organisations who would have taken a different approach in the absence of the proposals. The proposals

concerning assessment availability may also increase annual costs to a degree depending on whether it prevents an awarding organisation from leveraging economies of scale by aligning the assessment window with its other qualifications.

The proposals concerning assessment availability and terminal assessment may lead to additional administrative and monitoring costs to awarding organisations. This is particularly the case with V Levels, where students have the option of assessment in either year 1 or 2 of their course, and awarding organisations will need to monitor individual student choices.

The proposals relating to the delivery of the new qualifications, particularly the introduction of Moderation, could create substantial ongoing costs for awarding organisations. The main cost arises from the increased resource required for a more comprehensive approach compared with the minimum CASS requirements assumed in our baseline for non-Moderated assessments. Awarding organisations will also need to invest in appropriate resources to carry out the necessary work at scale, especially if the eventual demand for the new qualifications is intended to be very large.

Many awarding organisations may be accustomed to the requirement to establish and maintain an assessment strategy following their use in other qualifications. The specific requirement may be less well known to others, though the principle of documenting and reviewing a qualification lifecycle is likely to be familiar to many awarding organisations. There may be assessment strategy familiarisation requirements in some instances, and for all awarding organisations there will be cost involved in meeting this requirement, keeping the document under ongoing review, and updating the strategy should Ofqual require.

Awarding organisations will also need to invest in appropriate support and training for centres to ensure they are able to efficiently engage with the awarding organisation's processes, to support effective and secure assessment.

We are proposing that the new qualifications should be accredited to ensure only those of an appropriate quality can be delivered. This could create minor to moderate additional costs for awarding organisations, particularly if qualifications do not meet the accreditation criterion and need to be resubmitted. We are committed to running an efficient decision-making process to keep any additional cost to a necessary minimum. These costs are one-off for each qualification, rather than recurring. Awarding organisations with prior experience of accreditation may incur lower additional costs, whereas those unfamiliar with the process are likely to spend more time becoming accustomed to the requirements and therefore face higher costs.

# Summary of anticipated impacts

This overview is intended to support respondents in identifying any additional impacts, costs, or benefits that may not have been captured in the preceding analysis.

We have provided a broad sense of scale for the change in cost or benefit that each impact stemming from the proposals introduces. We have categorised costs and benefits as either experiencing a reduction, none/negligible increase, minor to moderate increase, or major increase relative to the baseline of no additional rules or requirements above the General Conditions for these qualifications.

We are asking stakeholders to engage with us to more fully understand the scale of the impacts related to the proposals in this consultation, and therefore the information in the table below is subject to change.

## Impact on awarding organisations

### Impacts from proposals focusing on the design of the new qualifications

- There will be additional development costs for awarding organisations depending on how different their design decisions would have been in the absence of our proposals.
  - **Minor to moderate increase in costs**
- There will be additional delivery costs for awarding organisations relating to the proposals setting out the maintenance of standards, including building a range of evidence to support grade boundaries.
  - **Minor to moderate increase in costs**

### Impacts from proposals focusing on the delivery of the new qualifications

- Our proposals on assessment availability may limit the ability of awarding organisations to capitalise on economies of scale in qualification delivery. This is most likely for V Levels, which will have a single assessment window each year.
  - **Minor to moderate increase in costs**
- Our proposals on assessment availability and terminal assessment may lead to additional administrative and monitoring costs as awarding organisations need to maintain a record of when each student chooses to take their assessments through their course.
- Our proposals restricting on-screen assessment for V Level assessment by

examination to digital systems and data V Levels in the initial tranche may lead to higher overall and unit costs for awarding organisations where on-screen assessment is cheaper than paper-based assessment.

- **Minor to moderate increase in costs**

- There will be additional costs in reviewing and addressing reviews and appeals to marks and grades awarded.

- **Increase in costs – the extent depends on the final policy**

### **Impacts from proposals focusing on additional regulatory oversight of the new qualifications**

- Awarding organisations will benefit from stronger brand value and increased demand as users view the new qualifications as more trustworthy and reliable.

- **Major benefit**

- There will be additional administrative costs for awarding organisations as a result of engaging with the accreditation process for new qualifications.

- **Minor to moderate increase in costs**

- There will be additional costs resulting from the requirement to produce and maintain an assessment strategy applicable to their new qualifications.

- **Minor increase in costs**

### **Impact on students**

- Increased confidence in qualification quality improves students' ability to use the qualification for progression into work or further training, supporting labour market efficiency and economic growth.

- **Major increase in benefit (for students, employers and educational institutions)**

### **Impact on centres and other stakeholders**

#### **Impacts from proposals focusing on the delivery of the new qualifications**

- Centres will face additional costs familiarising themselves and complying with moderation requirements – including the initial investment in developing appropriate processes.

- **Minor to moderate increase in costs**

- There will be additional costs in reviewing and addressing reviews and appeals to marks and grades awarded.

- **Increase in costs – the extent depends on the final policy**

- Centres will face lower risk of poor-quality delivery for V Level assessment by examination and associated costs as a result of our on-screen assessment

proposals.

- **Minor to moderate increase in costs**

## **Impact from proposals focusing on additional regulatory oversight of the new qualifications**

- Awarding organisations may pass on a portion of the costs associated with the additional rules and requirements they must comply with. This means the fees for the new qualifications may be different to the qualifications they are replacing or would have been introduced in the absence of the additional scrutiny.
- **Minor to moderate increase in costs**

### **Question 50**

Are there any impacts of these proposals (individually or combined) that we have not identified? Please outline any additional costs or benefits that you foresee.

### **Question 51**

For all identified impacts (including any additional ones identified), what do you expect their scale to be? This could include the activities required, the level of resource commitment, financial outlay, or the nature and value of any benefits.

### **Question 52**

Do you have any suggestions for reducing or mitigating the costs associated with these proposals?

## **Impact of on-screen assessment proposals**

In our recent consultation on regulating on-screen assessment for GCSEs, AS and A Levels, we set out our view of the impacts on awarding organisations, centres and students. We have applied the same guiding principles in developing our proposals for the use of on-screen assessment in the new qualifications.

Our approach to regulating on-screen assessment for the new qualifications is

intended to manage risks to standards, fairness and public confidence and ensure secure and reliable delivery. At the same time, our proposals also allow awarding organisations to use on-screen assessment where appropriate and risks can be effectively mitigated.

While we recognise that the evidence on the benefits of on-screen assessment is limited, we believe our approach will have positive impacts for students, centres and awarding organisations. The benefit to students and centres comes from the reduced risk of costly financial and reputational issues should they choose to use on-screen assessment. Awarding organisations are likely to benefit from a reduced risk to the reputation and perceived value of those qualifications arising from delivery issues.

There may be additional costs to stakeholders as a result of tranche 1 subject-based restrictions on on-screen assessment in V Levels. Awarding organisations may experience higher delivery costs where paper-based assessment is more costly than on-screen assessment, and higher unit costs where fixed technological costs cannot be spread across a greater number of assessments. This could lead to higher fees compared to a baseline where no additional restrictions on on-screen assessment are imposed, or where opportunities to deliver assessments via on-screen assessment in permitted subjects are not taken up.

Unlike the GCSE, AS and A Level proposals, we are not proposing that awarding organisations maintain different specifications for paper-based and on-screen assessment. We are also not proposing any additional restrictions on the use of on-screen assessment for centre-marked assessments in V Levels or for Foundation and Occupational Certificates. These proposals are intended to limit the introduction of unnecessary costs on students, centres and awarding organisations.

## **Innovation**

Ofqual has a duty under the Apprenticeships, Skills, Children and Learning Act 2009 to have regard to the desirability of facilitating innovation relating to the provision of regulated qualifications. Ofqual has committed to surveying awarding organisations' views of the impact of its regulatory requirements on innovation and to consider any revisions required in response.

The proposals we are making are intended to support the design and delivery of V Levels, Foundation Certificates and Occupational Certificates in line with DfE policy and Ofqual's statutory objectives.

The proposals to introduce Conditions, requirements and guidance for these qualifications, which would otherwise be regulated against the General Conditions, may limit the scope for innovation to some extent. Specifying the proportions of different types of assessment, and restricting availability of those assessments, could be seen to restrict more innovative approaches being developed.

We have however only proposed requirements where we consider these necessary to secure Ofqual's objectives, and to meet DfE's policy intent for these qualifications. Where we have proposed additional Conditions, requirements and guidance, we have been no more prescriptive than is necessary, meaning awarding organisations will have some flexibility in their approaches and within which they can innovate.

Given the intention to ensure comparability between awarding organisations offering qualifications designed against the same subject content, we consider the approaches we have proposed to be necessary. They will allow scope for innovative approaches, but within defined parameters.

### Question 53

Do you have any comments on the impact of the proposals on innovation by awarding organisations?

1. VTQ Performance Table Qualifications at level 3 are Applied Generals and Tech Levels, at level 2, Technical Certificates, and at level 1/2, Technical Awards [↩](#)
2. Access arrangements is the term commonly used by awarding organisations, schools and colleges to describe both those adjustments provided as reasonable adjustments for disabled students and those provided as a form of special consideration for non-disabled students. [↩](#)

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