

Alternative arrangements for the award of VTQs and other general qualifications in 2021

Introduction

Please confirm:

I have read the consultation proposals

Your data and rights

Name

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Position (if applicable)

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Do you wish any part of your response to remain confidential?

No

Part A - Policy Overview

Q2. Do you agree that written exams for other general qualifications that are not GCSEs, AS or A levels due to take place from April onwards this academic year, should be subject to alternative arrangements similar to that taken for GCSEs, AS and A levels, as addressed in part B of this consultation?

Yes

Comments:

Yes, they should also have alternative arrangements.

Q3. Do you agree assessments for Functional Skills qualifications should be permitted to go ahead where they can be delivered in line with public health measures, including remotely, from April onwards, and otherwise be awarded through alternative arrangements set by Ofqual?

Yes

Comments:

Yes, although we would welcome more clarity on exactly what the alternative arrangements would be for those unable to access the remote assessments. Students should not be disadvantaged from not being able to access the assessments either because of health reasons, lack of access to technology or an appropriate space to take an assessment, and so we must ensure that all learners are able to receive an award.

Q4. Do you agree that T Level core component exams should not go ahead this summer and should be taken in the second year, but that students should still have the option to take the employer-set project?

No

If not, why?

Delaying the core component to the second year could cause an unmanageable workload for students and teachers, and take too much learning time out of the timetable. As other VTQs which have internal and external assessments in the first year that cannot take place have access to alternative arrangements, it would seem a matter of equity that this should also apply to T Levels.

Q5a. Do you agree that practical exams required for employment and apprenticeships should continue to go ahead throughout the academic year, where they can be delivered in line with public health measures, or otherwise will need to be delayed?

Yes

Q5b. If you do not agree, which practical, occupational competence exams do you think should not go ahead?

We agree that adapting practical exams so that they can continue in line with public health guidance is essential to avoid individuals being unable to progress in their careers, gain employment or move onto another qualification. Awarding organisations should be encouraged to develop suitable adaptations as quickly as possible and communicate these clearly within an agreed timeline to avoid unnecessary delays. However for those who need to delay, or already have had assessments delayed, we also need a clear plan to help them move on successfully. Staff and students should not be forced into unsafe situations to take assessments but we could consider offering provisional qualifications to students that are formalised when the remaining requirements can be safely undertaken. Of course, these may not offer full competence, but could be a way of unlocking some of the benefits of qualification to allow for some progression in a safe and controlled manner.

Q6. What, if any, important differences of approach do you think need to be taken to exams for Ofqual-regulated Level 4-5 qualifications?

UCU does not believe that the level of qualification is the foremost consideration in determining the approach. All VTQs should follow the same principles and approach regardless of the level. We would also welcome more information on how Ofqual will work with HEIs/OfS to ensure consistency in approach.

Q7. Are there any qualifications in scope of alternative awarding arrangements where a form of teacher assessment is not appropriate?

No

Comments:

No, we believe that teacher assessment based on a wide range of evidence is appropriate for all the qualifications in scope.

Q8. Do you agree that internal assessment should continue, where relevant, for all learners where possible?

Yes

Comments:

Yes, although they should not be presented 'as normal' and should be recast within the context of the new arrangements. We must also acknowledge that students will have suffered differential learning loss and that they should not be pressured to complete internal assessments where they will not be able to represent themselves to their best abilities. Other arrangements are still essential to mitigate against this.

Q9. Do you agree with the impacts we have identified and are there any other impacts, including equalities impacts, of the policy set out in Part A that should be considered?

As awarding organisations have allowed adaptations to assessments for some months now, an evaluation should be undertaken to measure the impact on students with protected characteristics, and to ensure they are not being unfairly disadvantaged in progression or achievement. If 'other evidence' for a qualification award is allowable then this policy should be clearly set out so that all students know their rights.

The disproportionate effect of covid-19 on people with existing health conditions and disabilities, BAME communities, and socio-economic disadvantage is proven. Given the ongoing disruption to education caused by the pandemic we should start thinking now about how to make arrangements for next year that are fair and equitable for all students.

All students, but particularly those who have suffered disproportionately from learning loss, are in need of a tailored support package to ensure their transition to their chosen destination is successful and that learning loss can be addressed to help their progression. There is nothing in the consultation that points to the provision of any support or assessment of how different groups have been affected and what solutions could help overcome the challenges faced. We need a funded solution that encompasses extra teaching and support staff, summer catch-up sessions, foundation years and ongoing transition support to help students firstly make up what they have lost out on, and to continue to make progress when they have moved on.

Part B - Approach to awarding VTQs and other general qualifications

Q10. To what extent do you agree or disagree that the alternative regulatory arrangements should only apply to the qualifications identified in Part A of this document?

Neither agree nor disagree

Q11. To what extent, do you agree or disagree that the alternative regulatory arrangements should apply to all learners expecting to sit exams or assessments in the academic year 2020/2021 for the qualifications identified as in scope in Part A of this consultation?

Agree

Comments:

UCU agrees that all learners should be included as proposed. However we also believe that it is not only 2020/21 students who will need alternative arrangements. 2021/22 will also not be a normal year, as students will have experienced disruption in the previous year and so provision should begin to be made now for students expecting to sit exams or assessments in the following academic year. We need to recognise the effects of this pandemic will be long lasting and it is more than the immediate cohort of students that will need support, adaptation and a different approach to their learning and assessment.

Q12. Should other general qualifications such as Pre-U, AEA, Core maths and the International Baccalaureate be included under the measures proposed for GCSEs, AS and A levels or under the alternative arrangements for awarding VTQs we propose to put in place?

Comments:

Other general qualifications should also be assessed on a broad range of evidence. Some, such as core maths, might benefit from being assessed by project, so whichever arrangements could allow for this would be suitable.

Q13. For learners expecting to sit assessments in January, are there any particular factors that would need to be taken into account in the development of the alternative regulatory arrangements to seek to ensure fairness?

It is regrettable that we have already started on an unequal footing between vocational and general qualifications with some vocational assessments still going ahead in January despite the lockdown. Students deserve clarity over how their qualifications will proceed and must receive reassurance that they will not be disadvantaged whatever happened with their January assessments. There needs to be transparency over the working groups developing the arrangements as referred to in the document.

Q15. To what extent do you agree or disagree with our proposal to permit awarding organisations to make awards when not all internal assessments have been completed in qualifications in scope of the new regulatory arrangements?

Strongly agree

Comments:

We agree that this is essential so as not to disadvantage learners who have been unable to complete internal assessments.

Part B - Approach to awarding VTQs and other general qualifications

Q16. Do you have any comments on what should be the guiding principles for awarding organisations for the award of qualifications where exams do not take place and/or where learners cannot complete all internal assessments?

Although we understand that awarding organisations need to be able to take different approaches to adaptations for their different qualifications because there is such a wide variety of VTQs, there needs to be greater emphasis on the expectation that similar qualifications should have similar approaches to adaptations regardless of the awarding organisation. For instance, recently UCU became aware of a situation where staff and students were expected to attend a centre in person for a paper-based ESOL assessment whereas other awarding organisations for ESOL were offering online assessments that could be conducted remotely and so would not require staff and students to travel and attend in person.

UCU does not support mandatory exam board papers for GCSEs, AS and A Levels and would therefore not want to see these arrangements ported to VTQs. A broad range of evidence should be used instead to assess performance and should take into account a range of factors such as students' accessibility to remote learning, mental and physical health and other personal issues throughout the year. Assessment must be weighted to reflect the strongest performance of the student regardless of when in the course it was undertaken.

Q17. Do you have any comments on how Principle 2 might apply for in scope qualifications in light of the new approach to assessment proposed for GCSEs, AS and A levels?

In practice, principle 2 must be applied to ensure that decisions taken for GCSEs, AS and A Levels also happen at the same time for the VTQs in scope. This did not happen for the January assessments, causing students and staff a lot of stress and upset, and must be rectified for future decisions. Results days and appeals processes should be harmonised to ensure fairness. There should also be a recognition that many students take a mixed programme and will be subject to two different regulatory regimes. The presentation of the regulations to external audiences therefore needs to be clear and user friendly.

It would also be very helpful for fairness and transparency if all awarding organisations could clearly list their qualifications and the adaptations or alternative arrangements that apply. Currently these can be difficult to find and are not presented in the same format.

Q18. Do you have any comments on whether Principle 4 is still appropriate for in scope qualifications, awarded where exams do not take place and/or all internal assessments cannot be completed?

UCU does not agree with principle 4 being in place. It was this principle which led to the chaos around the summer 2020 results and the systemic bias against already disadvantaged students. It is concerning that it remains in place as this leaves the door open to a repeat of some of the negative outcomes of summer 2020. We have to recognise that standards in years prior to 2020 were achieved not in the midst of a pandemic, and so it is wrong to continue with this principle. Appropriately recognising student achievement and enabling progression should be the priority instead. Furthermore, Post-16 providers must not be measured and compared on outcomes as the usual performance measures should not apply.

Part B - Approach to awarding VTQs and other general qualifications

Q19. Do you have any comments on our proposed approach to arrangements for awarding in scope qualifications where exams do not take place and/or learners are unable to complete all internal assessments?

It will be necessary to be mindful of the burden placed on teachers and students if additional assessment evidence is required. There would be little point in deciding that exams and internal assessment cannot go ahead but pressuring students and teachers into providing further evidence for assessment.

Consistency between awarding organisations offering similar qualifications is critical to ensuring fairness for students, and Ofqual should set very clear guidelines to awarding organisations around this.

Q21. Do you have any comments on the guidance that should be put in place to support teachers and learners to implement the new arrangements?

We agree that teachers and learners need clarity and the relevant information from awarding organisations as soon as possible. There also needs to be a feedback loop between awarding organisations and centres so that if any requirements are too burdensome or difficult to fulfil this can be reported.

Q22. To what extent do you agree or disagree with our proposed approach to Special Consideration?

Disagree

Comments:

Further guidance is needed about the relationship between special consideration and adaptation, for instance whether a student be subject to both for the same qualification. This might be particularly relevant for SEND students. We are also concerned that the special consideration condition seems to leave open the possibility of a student not being awarded a grade, for reasons outside of their control. Again this would seem to be a disproportionate risk for SEND students and we would like Ofqual to look again at how we can be inclusive of all learners when applying special consideration.

Q23. To what extent do you agree or disagree that we should supplement General Condition I1 with additional guidance around appeals for qualifications in scope?

Comments:

Yes we agree that further guidance around appeals is necessary. Students from lower socio-economic groups are less likely to appeal their grades than their wealthier peers. A UCU-ComRes report (2014) highlighted that social class and school attended is associated with the level of information, advice and guidance a young person receives. For older and mature students the access to advice and guidance is even more patchy and uneven, where it exists at all. This disproportionate access to information, advice and guidance for students from disadvantaged backgrounds and mature students means that clarity and impartiality over the communication of the appeals process is imperative. UCU also strongly believes that a no-detriment position is necessary, whereby no student will receive a lower grade or award should they take up an appeal.

The document is unclear about the proposed timeline of results/appeals. The harmonisation of vocational and technical qualification results with general qualification results is essential to ensure that students are not unfairly advantaged or disadvantaged in securing progression destinations. Similarly we must work with the devolved administrations to ensure that the four home nation results and appeals processes are aligned.

Q25. To what extent do you agree or disagree with our proposed approach for private candidates/learners?

Disagree

Comments:

The composition of private learners is likely to include a high proportion of students who have SEND needs that have been unable to be met by their local centres, students who have been excluded from mainstream provision, young carers, young parents or mature students who are balancing a combination of work, study and caring responsibilities. Because of this it is imperative that these students are not further disadvantaged by having to wait to take an assessment at the next available opportunity. We currently do not know when such an opportunity will arise. Ofqual should make it clear that awarding organisations should secure these students a grade where other candidates are able to be awarded one.

Q26. To what extent do you agree or disagree with our approach to awarding for qualifications in scope which are also taken internationally?

Agree

Q27. To what extent do you agree or disagree with our approach to regulatory oversight and record keeping?

Agree

Part B - Equalities Impact Assessment

Q28. Are there other potential positive or negative equality impacts that we have not explored?

Yes

If yes: what are they?

The consultation misses the opportunity to examine whether our assessment models for VTQs are fit-for-purpose so that we can not only address the equality issues in our education system that coronavirus has thrown into sharp relief but also proactively build a fairer and more equitable system where we enable students to excel to the best of their abilities rather than seek to constrain achievement.

Ofqual must also consider what the equality impact on VTQs due to be taken next and future years will be and how the regulatory framework can adapt to that.

Q29. Do you have any views on how any potential negative impacts on particular groups of learners could be mitigated?

Covid-19 has had an unequal impact on students and communities. The disproportionate effect of covid-19 on people with existing health conditions and disabilities, BAME communities, and socio-economic disadvantage is widely documented. The priority must be to ensure students can progress as planned, including gaining employment, seeking a promotion or new career, as well as those wishing to start a university, college or sixth form course or an apprenticeship. Given the ongoing disruption to education caused by the pandemic we should not be planning for next or subsequent years on a business as usual basis and should start thinking now about how to make arrangements for all students that are fair and equitable.

We must provide sufficient good quality, wide-ranging destinations for students to move into. Institutions need financial assistance to provide the necessary support for students to help remedy the effects both of learning loss and the mental health impact of the pandemic. An investment in this will help save costs in the future from students falling out of education or not progressing as they should because of a lack of support.

Work to help students catch up from last year's disruption has already taken place over the summer and this year, and we now know that a significant amount of lost learning will also need to be caught up on next year. We shouldn't however be trying to fit the usual amount of teaching into the duration of courses, and we need to amend expectations accordingly. Extra teaching and support staff hours will need to be funded, and the possibility of fully funded foundation years for students and summer catch-up funding are also options that should be considered. It is clear that the disruptive effect of this pandemic will last for more than the immediate cohort of students and tailored support must be available to all.

There also needs to be greater use of contextual admissions by destination institutions to factor in the impact of the pandemic on the individual applicant's circumstances. The department could set clear guidelines for the use of contextual admissions for sixth forms, FE colleges and HEIs. Students will need greater support with admissions, especially those who are already disadvantaged. Institutions should conduct evaluations of outcomes in student recruitment and retention according to protected characteristics and vulnerable student communities and use the learning to develop wrap-around support for students.

Teachers and support staff have been doing their best to help students, but provision is uneven and dependent on capacity in individual institutions. The key thing this year is to enable student progression. No student should be left behind because of the impact on them of covid-19. UCU members care deeply about the students they teach and we want to ensure that they are given the opportunity to fulfil their ambitions and aspirations despite the terrible effects of this pandemic.

We also need to recognise that the decision to cancel assessments does not just affect young people. There are many adult learners and work based learners whose assessments have been delayed and who are in need of government support to progress. There are also apprentices who have not been able to take their end point assessments and are therefore unable to complete their apprenticeship. Adults have been affected by digital poverty, the responsibilities of homeschooling, working and studying during a pandemic, and so we must consider their specific needs in our approach. Overall we need a 'no student left behind' mindset, an inclusive ethos that enables students to move on to their chosen destination, rather than a restrictive and exclusionary system that rations good outcomes. Those who are already stuck in the system should be urgently prioritised for intervention to allow them to progress.

Your details

Which nation or country are you based in?

England

How did you find out about this consultation?

Other (please specify):

Direct email

Is this the official response from your organisation or your own, personal response?
This is the official response from my organisation

Your details (official response)

Which of these options best describes your organisation?
Other representative or interest group

Your details (representative group)

Type of representative or interest group
Union

Feedback

We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation? (Please from 1 very hard to read to 5 very easy to read)				
1	2	3	4	5
Very hard to read	X			Very easy to read