

Ofqual consultation on extraordinary framework for vocational and technical qualifications in 2020

May 2020

The Royal Society of Biology responded to Ofqual's consultation on extraordinary framework for awarding bodies responsible for vocational and technical qualification awards in 2020 following closure of schools and colleges due to Covid-19. To inform this response, the Society drew on its response on exceptional arrangements for A levels and GCSEs, and consulted with RSB's Education and Science Policy Committee, Education Policy Advisory Group, Accreditation Committee and Employer Advisory Group.

Qualifications falling in the scope of the extraordinary regulatory framework:

All qualifications from Entry to Level 6

- Which are approved for funding in England and delivery 14 to 16, 16 to 18, and 19 plus (including advanced learner loans), and;
- Which are not A levels, AS levels or GCSE or Advanced Extension Awards and Extended Project Qualifications

Ofqual will work with Qualifications Wales, CCEA Regulation and SQA Accreditation to make sure it is clear to awarding organisations which rules apply when Ofqual regulated qualifications are awarded in Wales, Northern Ireland and Scotland.



Figure 2: Qualifications falling within scope of the direction

Scope and approach

Q1: To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
The Royal Society of Biology agrees that learners taking vocational and technical and other general qualifications should be issued fair results this summer to allow them to progress to the next stage of further or higher education or employment. We				

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recognise the challenges if seeking an approach that fits all vocational and technical qualifications, particularly where qualifications require an assessment of occupational competence.

Q2: To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
The Royal Society of Biology agrees with the approach taken given the complexity of students completing courses over longer periods, options to certificate early, nested nature of some qualifications, and avoiding disruption to the following year of teaching by not requiring practical or portfolio assessments over a number of weeks, and recognises that technical and vocational qualifications have significant differences to the GCSE and A level qualifications which are usually taken at 16 and 19.				

Q3: To what extent do you agree or disagree with the balance we are proposing to strike across the 3 elements of: delegation to awarding organisations, flexibility, and consistency?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q4: To what extent do you agree or disagree with the key principles we have set out?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q5: To what extent do you agree or disagree with our proposal to allow awarding organisations to deliver their qualifications as normal where they are able to?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q6: To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
The Royal Society of Biology agrees that, for consistency, qualifications used for progression to further or higher education should be treated in the same way as GCSEs and A levels. We have responded to Ofqual's separate consultation on the exceptional arrangements for these qualifications and would draw attention to points made in that response; and will refer to this throughout the following response.				

The Royal Society of Biology notes the importance of ensuring standards set by professional bodies are met in awarding qualifications that signal professional competence. Where all competencies have not yet been met, or an adapted assessment is unavailable as may be the case in technical qualifications in the sciences, every effort should be made to ensure that the student can progress.

The Royal Society of Biology recommends that employers, professional bodies and regulating bodies are consulted on the final approach proposed by awarding bodies for each qualification that requires professional competency to be assessed.

Q7: To what extent do you agree or disagree with the aims of our proposed approach to calculating results?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
<p>The Royal Society of Biology supports the proposed aims of providing calculated results and welcomes confidence in teachers' professional judgement, combined with other evidence to arrive at a calculated grade.</p> <p>Guidance should be provided by awarding bodies to ensure historical data on qualification functioning and centre outcomes does not detrimentally impact individual students. It is well known that different cohorts do not have the same distribution of ability. Care needs to be taken to ensure that comparisons of grades are made over a number of years, not simply the cohort from the previous academic year within an institution.</p> <p>The Royal Society of Biology recognises the many factors that can influence historic data, for example:</p> <ul style="list-style-type: none"> - Cohorts may vary drastically in terms of size, attainment and demography. - Individual centres may have made significant changes to their curriculum to improve cohort attainment. - Current Year 13 are the first students to have experience the new GCSE specifications and 9 to 1 grading system. Their experience and GCSE results will be significantly different to that of previous A level cohorts. <p>The Royal Society of Biology recommends: Guidance should be provided for further and higher education providers and employers: Clear, concise and easy to access communications on the approach taken for this cohort will be crucial to help them understand what the grades mean and the way that they have been calculated. Detailed memory of the arrangements will be short-lived, while future employers are likely to remember that things were different this year.</p>				

Q8: To what extent do you agree or disagree with our proposal that the minimum evidential threshold is that any approach to providing calculated results needs to be based upon at least one source of trusted evidence along with a sufficiently robust basis for quality assurance?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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If students were on track in completing competencies in their course, and are not required to meet any further levels of occupational or professional competency before certification, we believe they should be awarded a calculated result and qualification as if they had no disruption. The Royal Society of Biology feels this would be in line with the approach taken for GCSE and A level qualifications.

Q9: Do you have any comments on the approach to providing learners with calculated results?

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Q10: To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Q11: To what extent do you agree or disagree that delaying or re-scheduling assessments should be the option of last resort?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Q12: To what extent do you agree or disagree with our proposals around decision-making and record keeping?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Q13: To what extent do you agree or disagree with our proposed approach to oversight of awarding organisations?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
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Q14: To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
<p>As in the Royal Society of Biology's response on exceptional arrangements for GCSEs and A levels, the Royal Society of Biology feels that careful consideration should be taken as to whether an unprecedented autumn exam series should go ahead. The inclusion of an autumn assessment opportunity may impact teaching time the following year, require late admission to be permissible for courses students would normally progress onto, or increased rates of deferral to 2021/22.</p> <p>The House of Commons briefing paper (link below) states that Universities are already concerned about an increased number of students deferring their places in 2020/21, and suggest that alterations to the timing of admission cycles may be required.</p> <p>RSB response on exceptional arrangements for GCSEs and A levels (2020) http://www.rsb.org.uk/images/RSB_Ofqual_response_A_level_and_GCSE_exceptional_arrangements.pdf</p> <p>House of Commons briefing paper (2020) Coronavirus: implications for the higher and further education sectors in England https://commonslibrary.parliament.uk/research-briefings/cbp-8893/</p>				

Q15: To what extent do you agree or disagree with our proposed approach to appeals?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q16: To what extent do you agree or disagree with our proposed position in relation to certificates?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q17: To what extent do you agree or disagree with our proposed approach in relation to private learners?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q18: To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q19: To what extent do you agree or disagree with our intention to not require any particular approach for adapting assessments and/or issuing results to international learners?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Q20: Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?

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Q21: To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners?

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Extraordinary Regulatory Framework

Q22: Do you have any comments on the proposed regulatory framework?

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Equality Impact Assessment

Q23: Are there other potential equality impacts that we have not explored? If yes, what are they?

Yes	No
<p>The Royal Society of Biology welcomes the suggestion that awarding organisations conduct their own equality impact assessments in considering approaches used to issue results. We recognise that Ofqual is unable at this stage to identify issues for particular groups of students due to the variety of qualifications and possible approaches for adapting or delaying assessment.</p> <p>For the sciences bias affecting these groups, particularly gender, has an impact throughout formal education. Where possible, teachers providing centre judgements should be made familiar with unconscious bias issues. We would be supportive of Ofqual providing awarding bodies and providers with signposting material on unconscious bias or other equalities training.</p>	

The Royal Society of Biology would further recommend that an equalities declaration is part of any data submission to the awarding bodies. This is in line with our recommendations for the exceptional arrangements for GCSEs and A levels.

Q24: Do you have any views on how any potential negative impacts on particular groups of students could be mitigated?

The Royal Society of Biology recommends:
A concise summary document distributed to students along with their award certificates in 2020 should be valuable to students, FE and HE institutions and future employers. While the aims of the exceptional arrangements are to award grades fairly and ensure the current cohort of students can progress appropriately, in a few months or years this detail will be forgotten while an employer or HEI admissions tutor may remember that there were exceptional arrangements in place.
Guidance provided to students at the time they receive their results would help them answer any questions they may face.

Regulatory Impact Assessment

Q25: Are there any regulatory impacts, costs or benefits associated with the implementation of this framework that are not identified in this consultation? If yes, what are they?

Yes	No
The unknown percentage of students that may appeal their grades is of great uncertainty and could increase costs dramatically.	

Q26: What additional costs do you expect you will incur through implementing this framework? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.

The Royal Society of Biology is not directly involved in delivering vocational and technical qualifications

Q27: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?

Yes	No

Feedback

We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation?

Very hard to read	1	2	3	4	5	Very easy to read
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Do you have any comments or suggestions about the style of writing?

It would be useful to access an editable word document version of the response – to aid us in drafting responses, and allow us to spend more time reading the consultation document and considering our responses as opposed to typing up question text from a pdf or online survey.

It is helpful when the headings in survey questions and the question numbers are also present in the consultation document, ideally with page numbers to refer to the relevant section of the consultation document.

Comment boxes after each question, as in this consultation, are very helpful. It is far easier to draft a response with comments directly after a question, than try to collate comments on several areas under one text box at the end of a section.

The inclusion of a summary document in this consultation is very helpful for giving a concise overview to our individual members and member organisations that contribute to our policy work.

Demographic details

Which nation or country are you based in? England. Other: The RSB represents members and advises on policy in all four UK nations

How did you find out about this consultation? Other: direct communication with Ofqual subject lead

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

Which of these options best describes your organisation? Other representative or interest group
 Subject association or learned society