

**Full OCR response to DfE/Ofqual [consultation](#): alternative arrangements for the award of VTQs and other general qualifications in 2021**

*The following responses were submitted via the on-line response form.*

**Proposed qualifications in scope for alternative arrangements in 2021**

**Question 1:**

*Are there any other written exams due to take place from April onwards this academic year, that should be in scope and therefore not go ahead?*

Paragraph 10 of the consultation already identifies OCR Cambridge Nationals and Cambridge Technicals as being in scope. There would normally have been an exam series for these qualifications in May.

There are smaller versions of some of these qualifications which do not count in performance tables, plus some ex-performance table qualifications that would still need to be in scope, as follows:

OCR Level 2 Cambridge Technical Certificate in Business Administration	603/3278/5
OCR Level 1/2 Cambridge National Award in ICT	600/4774/4
OCR Level 1/2 Cambridge National Certificate in ICT	600/4776/8
OCR Level 1/2 Cambridge National Award in Engineering Design	601/1410/1
OCR Level 1/2 Cambridge National Award in Principles in Engineering and Engineering Business	601/1272/4
OCR Level 1/2 Cambridge National Award in Engineering Manufacture	601/1218/9
OCR Level 1/2 Cambridge National Award in Systems Control in Engineering	601/1406/X
OCR Level 1/2 Cambridge National Award in Creative iMedia	600/7652/5
OCR Level 1/ 2 Cambridge National Award in Sport Science	600/5120/6
OCR Level 1/ 2 Cambridge National Award in Sport Studies	600/5122/X
OCR Level 1/2 Cambridge National Award in Health and Social Care	600/4777/X

**Question 2:**

*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?*

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

**Question 3:**

*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?*

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

Awarding Organisations (AOs) should not be required to offer assessment remotely (i.e. remote invigilation) if the AO is concerned about the level of risk. For OCR, the alternative arrangements are likely to look like the forms of evidence we required for Functional Skills last summer to support a CAG – practice tests.

### ***T Levels – core component assessment***

#### **Question 4:**

*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?*

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

This suggests that something similar could be applied to Tech Level qualifications where there is an examined component, with in-flight learners (those not completing in summer 2021) taking the exam next year. The alternative is that learners receive a CAG for their examined component this year which could be brought forward the following year.

### ***Proposed qualifications not in scope of alternative awarding arrangements***

#### **Question 5a:**

*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?*

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

Our licence to practice qualification for managers of road haulage companies, CPC, falls into this category. Many centres managed to deliver exams in November as they were able to set up exam rooms with extra space to enable social distancing. We have advised centres that these exams can only go ahead where public health guidelines are strictly followed.

We note that concerning assessments which are critical to progression to employment, the consultation states: “Where these can be delivered in line with public health measures, including remotely, the Department’s policy position is that they should be permitted to continue to proceed.”

**Question 5b:**

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

N/A

**Level 4 and 5 qualifications**

**Question 6:**

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

We agree with the consultation that higher level qualifications should be treated in exactly the same way as level 3 and below, according to the design and purpose of each qualification.

**Principles for assessment approach for proposed qualifications in scope of alternative awarding arrangements**

**Question 7:**

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

No.

However, the approach to teacher assessment will need to be flexible and pragmatic in the way the key constructs, essential knowledge, skills and understanding of the qualification are to be addressed.

It is important to recognise that this will present some challenges – not all assessment can readily be undertaken remotely. Some of our digital qualifications require access to a range of software and technologies which can only be accessed in the premises of a school or college. With the strong possibility that schools will not open before Easter, there will be very little time to teach and assess these requirements. There are similar issues in other subjects, notably sport and engineering.

**Question 8:**

*Do you agree that internal assessment should continue, where relevant, for all students and other learners where possible?*

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

The more formal assessment information we have about learners the easier our malpractice, appeals and complaints processes will be to manage. Given we are expecting a high volume of these, their manageability is a key concern. Internal assessment, even if only partially

completed, will form valuable evidence for teacher assessed grades. It will also keep candidates engaged with their course of study for as long as possible.

However, the extensive feedback we have had from centres confirms the view that many students have missed very large amounts of education and training. Many students, particularly the disadvantaged, have struggled to access remote learning at all, or have had to do so using mobile phones or shared devices. We anticipate that there will be many examples of students who have incomplete or missing internal assessments, and that their progress in the subject has been hindered by loss of learning, but we would still wish to award them the grade they deserve. The use of 'where possible' in the question is therefore important.

Given the issue of lost learning, it is important that a wide range of evidence, including incomplete internal assessments and other candidate work should be used to inform judgements about a final grade without relying entirely on the outcomes of completed internally set units. Such an approach, using a 'basket of evidence' would align better with that proposed for general qualifications and help to address the principle that there should be parity between GQs and VQs.

Feedback from centres suggests that many of them do not wish to use all of the completed internal assessments that they have already submitted. In a normal year they would have resubmitted some of these units because they were taken early and therefore did not reflect the student's subsequent improvement. Centres should not have to use the grades issued for units taken early in a programme where they feel this is the case. This would help to create some consistency with approaches in previous years. In previous years, candidates would have had the opportunity to re-sit these units and this should not be denied them this year.

As already stated, completing internal assessments will be challenging. We are also concerned, and know from experience, that the gathering of evidence to fill gaps could become a bureaucratic exercise with an emphasis on bureaucracy over learning. This would use up precious learning time and take the focus away from engaging with learners to hone the essential skills and knowledge they will need for their planned progression to the next stage of learning. To mitigate this risk, it will be necessary to allow teachers some 'benefit of the doubt' when assigning grades to learners whose evidence is incomplete. Allowing teachers to base teacher assessed grades on the evidence relating to what has been taught, which may not be complete units, would also give a parity of approach with GQs.

### ***Equalities impacts***

#### **Question 9:**

*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?*

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

#### Comments:

While we agree with the impacts identified, we believe more consideration must be given to the principle that GQs and VQs should be treated with parity. As we know that VQs have a higher proportion of disadvantaged learners and learners with protected characteristics, this

principle must be maintained. The table below summarises the key differences in approaches proposed:

Area	GQ	VTQ
External moderation of NEA	No	Yes
Use of banked evidence	No	Yes
Basket of evidence as the basis for grades	Yes	No
Short papers provided by exam board	Yes	No
Aim to maintain standards	No	Yes
Results release	Early July ahead of UCAS process	August as usual
Appeals	Conducted before usual results day	Conducted after usual results day

We suggest that the differences highlighted here show that the requirements for VQs are more time-consuming, less flexible and have consequences for results release which could cause further disadvantage when seeking to progress to the next stage of learning.

We have suggested changes in other question responses that would address some of these issues. They are:

- The requirement to externally moderate NEA for VQs should be removed as is proposed for GQs. The removal of external moderation would reduce some of the extra time needed to deliver VQ results and help towards a better alignment of VQ and GQ results days.
- The use of banked evidence for VQs to inform the final grade should be optional with some of the principles about currency of evidence proposed for GQs being adopted
- The basket of evidence approach proposed for GQs should be extended to VQs
- The principle that VQs must maintain standards over time needs revisiting. As with GQs, it is not clear what this means in the current context and if imposed this is likely to lead to lower grades than usual this summer for VQs and therefore disadvantage VTQ learners. There will be few levers available to AOs to align standards between centres this summer, so the notion of applying a truly national standard is flawed.

It isn't evident that full consideration has been given to students with disability or a learning need, where they are entitled to classroom support from a learning support assistant as part of their Individual Learning Plan. These students have been impacted greatly during school closure as online lessons with the teacher do not mitigate for the loss of the assistant sitting next to them in the classroom explaining, clarifying, encouraging and enabling progress. They have been severely disadvantaged and to expect these students to produce work on their own is unreasonable.

### **Alternative regulatory arrangements**

#### **Question 10:**

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

- Strongly agree
- Agree
- Neither agree nor disagree
- **Disagree**
- Strongly disagree

Comments:

It isn't entirely clear that all the qualifications that should be covered by these regulatory arrangements have been identified. Qualifications categorised as Technical Awards, Tech Levels and Technical Certificates must be included as they count towards performance tables. Also, our legacy Cambridge National in ICT, which no longer counts in performance tables, must be included. The consultation appears to have overlooked vocational qualifications that have no examined component.

There are other vocational qualifications with no examined component which need to be in scope as learners taking them will have been impacted by the pandemic and it must be possible to issue grades where not all the assessment has been covered.

For OCR, the following vocational qualifications were in scope for the 'calculated' approach last summer:

Life skills qualifications at Entry Level and our legacy Cambridge Technicals (2012 suite).

Also, we have vocational qualifications normally used by adults that are used by some post-16 learners as part of full time programmes of study, such as Administration (Business Professional). Last summer we used 'adaptation' as the mitigation. This year it may be appropriate to use Teacher Assessed Grades where the disruption, including the closure of schools and colleges has impacted on teaching, learning and assessment. This could of course have unintended consequences for adults who take the same qualification and we cannot use different awarding arrangements for different types of learners. Further discussions are needed between regulators, awarding organisations and other stakeholders on the appropriate approach for vocational qualifications that are used by different types of learners including those in full time education. The consultation outcomes should not prevent AOs from having the option to offer alternative arrangements for vocational qualifications used by different types of learners.

A process of filling any critical gaps in evidence could be used to inform Teacher Assessed Grades.

### ***Learners in scope of the alternative regulatory arrangements***

#### **Question 11:**

*To what extent, do you agree/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?*

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

No comments

### **Consistency with GCSEs, AS and A levels**

#### **Question 12:**

*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:

The other general qualifications OCR would wish to be included under measures proposed for GQs are:

- Art and Design Entry Level
- Computer Science Entry Level
- English Entry Level
- Geography Entry Level
- History Entry Level
- Latin Entry Level
- Mathematics Entry Level
- Physical Education Entry Level
- Science Entry
- Free Standing Maths Units
- Core Maths
- Extended Project Qualification

### **January exams**

#### **Question 13:**

*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?*

We should accept that exams sat in January may not have been taken under optimal circumstances and that some students who took them may have performed less well than would normally be expected. This means that, where a centre judges that a student's result from the exam clearly doesn't fairly reflect the level they are performing at, the result should not be used to calculate the final grade.

It is also our view that deliverability and comparability needs to be considered in decisions on appropriate alternative arrangements. This applies both to learners who took exams but under normal circumstances would re-sit, and those who were not able to sit exams in January.

Candidates may have a number of different types of gaps in their evidence of performance:

- those caused by assessments not going ahead last June (covered under the VTQ ERF and calculated grades),
- those caused by assessments they were unable to take in January (in the case of exams these would be covered by EERF and could be treated as special consideration cases),
- those caused by assessments not going ahead this June,
- cases where Covid restrictions have prevented the completion of NEA.

For deliverability for schools and AOs, and for parity in how grades are reached between candidates certificating in June 2021, there needs to be a degree of flexibility in the amended regulatory requirements that will allow teachers to make grading decisions based on incomplete evidence of performance.

### **Assessment by exam**

#### **Question 14:**

*Do you have any comments on how exams could be defined for qualifications in scope of the alternative regulatory arrangements?*

In this context, an exam should be defined as anything that is not marked by a teacher or directly assessed by centre staff before AO quality assurance.

### **Internal assessment**

#### **Question 15:**

*To what extent do you agree/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**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

Without this, there is no parity between GQ and VQ candidates.

### **Principles**

#### **Question 16:**

*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?*

We believe there are **five principles** guiding the process for awarding grades. These are:

1. The **physical safety and mental health** of students, teachers and everyone in schools and colleges at all times.
2. Supporting student **progression** to the next stage of education or into employment.
3. **Fairness** – results for all students must be as fair as possible.
4. **Collaboration and transparency** between schools and colleges and exam boards, and with everyone invested in this process.
5. **Deliverability and simplicity** – an approach that is flexible to the changing demands of the pandemic is key.

These should apply equally to VQs and GQs.

The principle of fairness should encompass a further principle that, where some evidence is missing, teachers should be able to use their discretion in arriving at a judgement which encompasses their knowledge of the learner and of that learner's circumstances. This is sometimes described as 'the benefit of the doubt'. Without this, it may not be possible to



operate the proposed new principle that AOs must seek to issue results to as many learners as possible. We accept that this must be done in line with the requirement that the validity and reliability of the qualification is not compromised.

**Question 17:**

*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 our response to question 9 we have set out why we believe the requirements for VQs, as proposed, are likely to disadvantage VGs against GQs. We struggle with the concept of 'peers' as most students taking the main VQs in scope will be taking GQs as well. It may indicate the lack of an even playing field that no similar set of principles (particularly principle 2) are proposed in the GQ consultation.

**Question 18:**

*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?*

It is not clear how we 'maintain standards from previous years' as it is not clear that exam boards will have many 'levers' with which to control outcomes or standards. Nor is it clear which previous years we are referring to – 2020 having been a particularly unusual year. We should also consider what challenges will be involved in securing a standard for learners completing in 2022 who will also have suffered serious disruption to their learning because of Covid.

The standard for GQs will emerge from teacher judgements arrived at through standardisation within centres, with the process being monitored by awarding organisations. If we do not allow a similar process for VQs it seems likely that VQ 'peers' will be disadvantaged. Most students taking VQs will be taking GQs at the same time so this disparity will be very obvious to them and their teachers.

The principle of fairness must also be applied. As one of our stakeholders commented, "We are in unprecedented times – how can standards be similar when candidates may not have studied a significant proportion of content?"

***Arrangements for awarding qualifications where exams do not take place and/or learners cannot complete all internal assessments***

**Question 19:**

*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?*

The process outlined in paragraph 85 is described as something an awarding organisation should 'go through'. This is not possible. Given that every learner will have faced a different level of disruption and would have unique evidence, judgements about the sufficiency of evidence, the assessment of the gaps, and decisions about what would be needed to fill those gaps (where this is deemed necessary) would need to be gone through for each candidate. For our Cambridge Nationals alone, we anticipate there will be more than 140,000 candidates.

We would also struggle to provide detailed guidance on what to do if, say, unit X had been completed, but unit Y had not. To ensure every optional pathway is covered we would have

to combine units using every possible combination. To apply that approach to Nationals and Technicals would involve thousands of possible unit combinations. This would not be possible in time for results in the summer.

The process described would need to be carried out by teachers with guidance and training on the overall approach, possibly with exemplars, from AOs (in the same way as is proposed for GQs). We are aware that this places a burden on centres and would advise a less granular approach than is suggested by the described process. We would expect to allow teachers to make holistic judgements about a student's grade based on available evidence and to make judgements about when extra evidence is required. A key aspect when making that judgement would include their knowledge and experience of working with that student, including a knowledge of their circumstances. Where some evidence is missing, teachers will be best placed to make a judgement about whether they are able to give benefit of the doubt. The bar for evidencing each learning outcome should not be set too high.

Paragraph 87 gives some examples of what might be used as evidence. The first, 'a portfolio of evidence' is not helpful for obvious reasons. We suggest the following, which could be used in varying degrees for both GQs and VQs:

1. Exam board standardised assessment (for GQs this would be an exam board paper, while for VQs, this would be banked units)
2. NEA
3. Mocks
4. Termly assessments
5. Practical performances or creations – where different to NEA
6. Classwork
7. Ephemeral evidence – observed performance
8. Teacher testimony
9. External tests which provide wider contextual information.

### ***Learner eligibility***

#### **Question 20:**

*Do you have any comments on the arrangements that should be put in place to authenticate the eligibility of candidates or claims for the award of in scope qualifications?*

We think that the exact method for authenticating the eligibility of learners should be based on approaches that were successful last summer, for example the use of Head of Centre declarations.

### ***Guidance to teachers and learners***

#### **Question 21:**

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

Strong, clear, early guidance will be essential. However, we should bear in mind that, even though the way in which centres are being asked to approach assessment is very different to that taken in summer 2020, there is merit in drawing on the best practice that many centres used in standardising their judgments, recording decisions and 'signing off' the final grades for both GQ and VQ. It should be taken into account that most teachers have long experience of monitoring students' progress against grades, predicting grades and working closely with qualification specifications and supporting materials. We are not starting with nothing.

Although there should be room for flexibility, the extent to which standard processes are adopted and set out in clear guidance will help to mitigate some of the risks of there being a high number of appeals and answer some allegations of malpractice. We would recommend a set of exemplar procedures which explain the processes for quality assuring judgements within a centre. We would also explore the use of a proforma to be used with learners to keep a record of assessments undertaken, evidence used to validate judgements and a target grade. JCQ is proposing the use of such a proforma with general qualifications and we would support the same approach for students taking a VQ. Again, as students taking the VQs that are in scope are likely to be taking GQs as well, this would support a consistent approach between the two types of qualifications and show students that both types of qualification are being treated equally.

Any process must generate a clear audit trail of how judgements were arrived at and be supported by records of the evidence used so guidance will be needed on record-keeping. There should be guidance on the steps required to minimise the risk of unconscious bias and how all judgements must be subject to review by a 'second pair of eyes'.

For examined components, AOs can provide sample scripts and information and training about how to mark particular items. This can only be done with assurance where items are drawn from past papers: 2021 materials or newly-created questions or papers won't have a standardised mark scheme, any data on performance or any examples of real student responses. Exam boards couldn't provide grade boundaries for anything less than full question papers and we would not recommend the use of full papers in this context.

AOs can provide assignments and tasks which would generate evidence of performance directly related to the requirements of topics within a given specification. This could include advice on marking and criteria that help to indicate the level of performance and exemplar candidate work.

Guidance will be required on sufficiency of evidence, coverage of subject content, potential weighting of evidence and what to do where the evidence shows erratic or inconsistent performance. It is particularly important that such advice should be consistent between boards, types of qualifications, and be in line with any emerging regulatory requirements.

We would also include guidance on the types of evidence that can be used (listed in our response to question 19), how to make judgements based on a basket of evidence, how to use the teacher's own knowledge of a candidate's performance over time and when it would be appropriate to give the benefit of the doubt when evidence is incomplete.

The exam board should check that school and college senior leaders know what is expected of them and their teachers and that they have secured the necessary training for their staff. It will be necessary to define what the minimum level of training required should be.

We also think that clearer guidance should be provided to centres about how they might apply a special consideration adjustment for eligible candidates. This is especially important if it is decided that the assessments must be delivered in a specific timeframe. However, even if that is not the case, there may be an expectation that some form of special consideration should apply.

AOs will need to have external quality assurance arrangements in place. These should be limited to checking that processes have been followed, and should not involve the reviewing of teachers' academic judgement. The quality assurance arrangements should be the same as those proposed for general qualifications which include:

- the quality assurance of the overall approach of all centres,

- checking the arrangements from a sample of centres across the full range (including those targeted through an assessment of risk), and,
- where necessary, further, in-depth review of a centre's arrangements.

### ***Special consideration***

#### **Question 22:**

To what extent do you agree/disagree with our proposed approach to Special Consideration?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

We strongly agree with the proposed approach to special consideration as it reflects both current practice and the view we took when considering the role of special consideration in the context of the pandemic. The decision that special consideration cannot be used to compensate for lost teaching time was agreed internally and at JCQ (for GQs).

### ***Appeals***

#### **Question 23:**

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

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

We agree that additional guidance would be useful. We also think it is important that, as far as possible, the process is aligned with the GQ appeals process. This alignment will mean it is a fairer and more accessible process for all learners and it will also make it more manageable for awarding bodies. The greater the deviation between GQ and VQ, the greater the complexity and confusion for centres and learners.

In 2020 grade protection was offered to all GQ learners but not to VQ learners. This was a very problematic disparity that we would not like to see repeated.

We would wish to discourage appeals from students directly to AOs – students should come to AOs with complaints or if they believe there has been malpractice.

### ***Certificates***

#### **Question 24:**

*To what extent do you agree/disagree with our approach to certification for qualifications in scope?*

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:  
No comments

### ***Private candidates***

#### **Question 25:**

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

We see no reason why the approach here should not align with the approach for GQs. We do not support the proposal in the GQ consultation that private candidates should be able to sit exams 'as usual', but if this were permitted for private candidates taking GQs, the same would have to apply to vocational exams.

### ***Qualifications also taken internationally***

#### **Question 26:**

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

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:  
No comment

### ***Regulatory oversight and record keeping***

#### **Question 27:**

*To what extent do you agree/disagree with our approach to regulatory oversight and record keeping?*

- Strongly agree
- **Agree**

- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

Regulatory oversight and accurate record keeping will be a key part of ensuring valid qualifications and awards. We appreciate there may need to be more requests for data and information for monitoring purposes than in a normal year, but we would ask that these are only asked for where necessary and that reasonable notice is given.

### ***Equalities impact assessment***

#### **Question 28:**

*Are there other potential positive or negative equality impacts that we have not explored? If yes, what are they?*

The items identified in the consultation are all appropriate. There will need to be considerations of any learner who cannot access the required resources to study or complete assessments remotely. Limited access to remote learning can be particularly acute where the learner has protected characteristics, so this will be something to consider across all qualifications.

We draw your attention to our response to question 9 on equalities impact.

#### **Question 29:**

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

Greater consistency between the arrangements for GQs and VQs would reduce the impact on particular groups of learners and disadvantaged learners (see our response to question 9).

### ***Regulatory Impact Assessment including costs***

#### **Question 30:**

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

We would expect there to be costs involved with adapting processes and with the production of supporting materials, quality assurance guidance and the delivery of training to centres and teachers.

#### **Question 31:**

*Are there any regulatory impacts, costs or benefits associated with the implementation of our proposals that are specific to teachers not identified in our consultation? If yes, what are they?*

We may have identified a more substantial role for teachers in the processes of gathering and judging evidence than is indicated in the proposals as set out (see our response to question 19).

#### **Question 32:**

*What additional costs do you expect you will incur through implementing our proposals? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.*

We are likely to see an increase in appeals which will incur some additional cost, but until the process is more clearly defined it will not be possible to estimate what this might be.

**Question 33:**

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

Much greater alignment with GQ processes would mean centres do not have to run two separate processes involving the same teachers and learners.

The introduction of some flexibility in teacher assessment to allow them take into account their knowledge of their students and make holistic judgements, rather than simply having to gather evidence to cover most of a specification, will both reduce the level of bureaucracy required and allow more time for learners to focus on getting the learning they need to support them in their next learning destination.

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