

## Consultation on alternative arrangements for the award of VTQs and other general qualifications in 2021: the OCR response

The following provides a summary of the key points arising from OCR's detailed response to the DfE and Ofqual consultation on the arrangements for VTQs in 2021.

### 1. Principles

OCR believes there are **five principles** guiding the process for awarding grades which should apply equally to VTQs and GQs. 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.

### 2. Principles for assessment

A form of **teacher assessment** is appropriate for all of the qualifications in scope for alternative arrangements. However, the approach to teacher assessment will need to be flexible and pragmatic. This will present some challenges – not all assessment can readily be undertaken remotely and some will require access to on-site technologies, equipment or space.

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, extensive feedback tells us that many students have missed very large amounts of education and training. 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. It is important therefore 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 VTQs.

The **gathering of evidence** to fill gaps should not be a bureaucratic exercise using up precious learning time and taking 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, teachers should be allowed to use their discretion when assigning grades to learners whose evidence is incomplete, which encompasses knowledge

of the learner and of that learner's circumstances. This would also give a parity of approach with GQs.

### **3. Evidence where exams have not taken place or assessments completed**

Teachers should be allowed 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. We suggest the following, which could be used in varying degrees for both GQs and VTQs:

1. Exam board standardised assessment (for GQs this would be an exam board paper, while for VTQs, 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.

### **4. January exams**

Exams sat in January may not have been taken under optimal circumstances and some students may have performed less well than would normally be expected. 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.

### **5. VTQ qualifications in scope for alternative arrangements in 2021**

**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.

**Functional Skills** qualifications should be permitted to go ahead where they can be delivered in line with public health measures from April onwards but 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.

Our licence to practice qualification for managers of road haulage companies, **CPC**, falls into the category of a practical exam that is required for employment. We have advised centres that these exams can go ahead, but only where public health guidelines are strictly followed.

### **6. Parity with GQs**

Much **greater alignment with GQ processes** would mean centres do not have to run two separate processes involving the same teachers and learners. The proposals for VTQs are more time-consuming than the proposals for GQs, are less flexible and have consequences for results release which could cause disadvantage for students seeking to progress to the next stage of learning. We recommended ways to address this including the removal of NEA external moderation and optional use of banked evidence.

The principle that VTQs must **maintain standards** over time needs revisiting. If imposed this is likely to lead to lower grades than usual this summer for VTQs 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. We should also consider the challenges of securing a standard for learners completing in 2022 who will also have suffered serious disruption to their learning because of Covid.

## **7. Guidance for teachers and learners**

Strong, clear, early guidance will be essential but even though centres are being asked to approach assessment very differently this year, we should draw on the best practice that many centres used in 2020 in standardising their judgments, recording decisions and 'signing off' the final grades for both GQ and VTQ. We provided examples of the types of guidance that could be helpful including exemplar procedures and pro formas, assignments and tasks that could generate evidence of performance, record-keeping, special consideration, appeals, and training on marking.

Guidance will also be required on sufficiency of evidence, coverage of subject content, potential weighting of evidence, how to make judgements based on a basket of evidence and what to do where the evidence shows inconsistent performance. It is particularly important that such advice should be consistent between boards, GQs and VTQs, and be in line with any emerging regulatory requirements.

## **8. Appeals and Special Consideration**

As far as possible, the process for **appeals** must be 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 AOs. The greater the deviation between GQ and VTQ, the greater the complexity and confusion for centres and learners.

In 2020 grade protection was offered to all GQ learners but not to VTQ 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. 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.

**Special consideration** cannot be used to compensate for lost teaching time.

## **9. Private candidates**

We see no reason why the approach for VTQ 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.

## **10. Equalities impacts**

Full consideration should be 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.

There will need to be consideration 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.

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