# CSSC response Ofqual consultation on Arrangements for assessment and awarding of VTQs 2020/2021

**Your data and rights**

Organisation (if applicable)

Controlled Schools' Support Council

Telephone number

028 9531 3040

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

No

**Consultation questions**

Q1. To what extent do you agree or disagree with our proposed approach to mitigating the

longer term impacts of the pandemic in 2020/21 by permitting awarding organisations to

adapt assessments and qualifications?

Strongly agree

**Please give reasons for your answer**

The Controlled Schools’ Support Council (CSSC) was set up in September 2016 to represent and support the interests of the controlled sector in Northern Ireland. To date 95% of controlled schools have chosen to register with CSSC.

The controlled sector is:

• large – it accounts for 49% of all schools and caters for over 144,719 children, making it the largest education sector in Northern Ireland

• diverse – providing education across all school types – nursery, primary, secondary, grammar and special schools. Within this, controlled integrated and controlled Irish Medium schools are included

• inclusive – providing education for children of all faiths and none (62% of pupils define as Protestant, 10% Catholic, and 28% ‘other’) and over a two fifths of newcomer pupils in Northern Ireland.

The Controlled Schools’ Support Council (CSSC) welcomes the opportunity to comment on, the Arrangements for the assessment and awarding of Vocational, Technical and Other General Qualifications in 2020/2021 published by The Office of Qualifications and Examinations Regulation (Ofqual).

Please note this is an officer response. To meet the time frame it has not been possible to bring to Council for approval.

CSSC recognises the necessity and urgency to develop an approach mitigating the impact of the pandemic in 2020/21 by permitting awarding organisations (AOs) to adapt assessments and qualifications within a clearly specified extended extraordinary regulatory framework.

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CSSC agrees that, where possible, assessments are preferable to the calculation of results process as a mechanism for confirming the attainment of knowledge, understanding and skills by learners. CSSC is concerned about the timeframe within which the development of adapted assessments and qualifications can take place and be communicated to teachers who begin teaching on 24 August 2020. CSSC requests that Ofqual, in their regulatory capacity, seeks to encourage AOs to make the appropriate adaptations to assessments and qualifications as soon as possible in order to enable the timely planning for teaching, learning and assessment by schools. The impact on teacher and learner wellbeing, of delayed information, cannot be underestimated.

Q2. To what extent do you agree or disagree with our proposed approach to take an

objectives-based approach, supported by additional guidance to develop consistent

approaches, rather than prescribing a single approach to adaptation?

Strongly agree

**Please give reasons for your answer**

CSSC strongly agrees with an objectives-based approach where learners, taking qualifications, receive fair results and are neither advantaged or disadvantaged compared to their peers or previous cohorts of learners. It is critical that Ofqual ensures through their regulatory processes that any adaptations made to assessments and qualifications should not undermine the validity and reliability of that qualification. The provision of additional guidance should support AOs in implementing appropriate adaptations that will

ensure consistency without the need to prescribe one single approach.

Q3. Do you have any comments on the objectives we have proposed to underpin awarding

organisations’ decisions about the adaptation of assessments and qualifications?

CSSC considers the objectives to be largely fit for purpose in a time of unprecedented change. Some further clarification is needed regarding consistency and flexibility. Paragraph 26 in the consultation document states that Ofqual, “should allow awarding organisations to make tailored decisions about what to do with each of their qualifications” yet objective 29d states, “Common approaches to adaptation should be followed where qualifications signal similar knowledge, understanding and skills, or practical competence, and have the same assessment approaches.” CSSC whilst welcoming consistency that increases the validity and reliability of qualifications, would emphasise that any coordinated approach by AOs must not result in undue time pressures being placed on schools in preparing for the delivery and assessment of qualifications. CSSC also seeks assurance from Ofqual that any adaptations to assessments and qualifications are communicated to schools within a realistic timeframe in order for schools to best prepare their learners and for the learners to be enabled to give the best account of their learning through the assessment process. CSSC welcomes the proposed streamlining of communications with schools particularly in the current

climate where schools are responding to many additional and extraordinary demands on a daily basis.

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Q4. Do you have any comments on our plans to develop and consult on additional statutory

guidance and on any changes to the Extended ERF later in August, to support the

interpretation and implementation of these objectives?

CSSC believes that additional statutory guidance would be helpful in supporting the interpretation and implementation the objectives. The opportunity to contribute to a consultation on the additional guidance and any changes to the Extended ERF would also be welcomed.

Q5. Do you have any comments on the issues we should consider in any guidance we

develop around Special Consideration? Guidance providing further clarity pertaining to the current pandemic context would be welcomed such as in the situation of sustained, localised lockdowns or for situations affecting individual learners impacted by Covid-19.

In being sympathetic to the current challenges, the Regulator should always be mindful of maintaining the integrity of the qualifications so that learners are neither advantaged nor disadvantaged by any decisions.

Q6. To what extent do you agree or disagree with our proposed approach to qualifications

taken internationally?

Agree

**Please give reasons for your answer**

It is critical that AOs have robust monitoring processes in place and can demonstrate to the Regulator that assessments and standardising procedures leading to the awarding of regulated qualifications have been carried out with integrity, thus ensuring the validity and reliability of the qualifications.

Q7. To what extent do you agree or disagree with our proposed approach to certification?

Strongly agree

**Please give reasons for your answer**

Where the AOs can demonstrate to the Regulator that the validity and reliability of a qualification has been maintained, then no certification stating Covid-19 required.

Q8. To what extent do you agree or disagree with our proposed approach to appeals in

2020/21?

Agree

**Please give reasons for your answer**

CSSC agrees that a similar approach to appeals as explained in the General Condition of Recognition 1 is sufficient, however, further guidance for AOs and parents/carers and learners would be welcomed particularly where adaptations are made to assessments and qualifications.

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Q9. To what extent do you agree or disagree with our proposed approach to record keeping

and regulatory oversight?

Strongly agree

**Please give reasons for your answer**

As the Regulator places a high degree of trust in the AOs, CSSC strongly agrees that AOs should be required to maintain robust and appropriate records for regulatory oversight.

Q10. To what extent do you agree or disagree with our proposal to develop the Extended

ERF to take account of our proposed approach for 2020/21?

Agree

**Please give reasons for your answer**

CSSC agrees with the proposal to develop the Extended ERF to take account of the Regulator’s proposed approach for 2020/21, however, CSSC would urge the Regulator to be mindful of the timeframe within which the development of adapted assessments and qualifications can take place and be communicated to teachers who begin teaching on 24 August 2020 and the pressures on teachers as they seek to prepare for the teaching, learning, and adapted assessment and qualifications. This pressure should not be

underestimated within the current circumstances due to the pandemic.

Q11. Do you have any comments on the new conditions, requirements and guidance for

2020/21 set out in the Extended ERF?

CSSC represents and supports the interests of the controlled sector in Northern Ireland. We are concerned by the lack of time frame around the provision of effective guidance to schools with regards to any adapted assessment or qualification and indeed whether the usual VTQs will be made available to schools (ExtVTQCov4.1). CSSC appreciates that the Regulator and AOs are also under pressure but would urge the Regulator to give indicative parameters for timescales so that schools could feel confident in their preparations for teaching, learning, and adapted assessment and qualifications.

Q12. Are there other potential positive or negative equality impacts that we have not

explored?

Yes

**If yes what are they?**

CSSC would be concerned that if assessments are adapted to online only methods and learners do not have sufficient experience, time or access to specific software to prepare for this method of assessment, those learners that have limited access to technology due to socio-economic reasons will be disadvantaged and therefore may experience a negative impact. In some rural areas, connectivity issues may present additional problems, thus some learners may find it difficult to access the adapted assessments and qualifications. The case of learners with special needs is also of concern to CSSC. In the event of a localised outbreak

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of Covid-19 that requires some schools to close, learners with special needs who are provided with effective support at school can be disproportionately impacted during long periods working remotely at home. In contrast, for some learners with autism, the opportunity of undertaking an online assessment with no distractions may be preferable to taking a paper-based assessment in the presence of others and thus potentially have a positive impact for the learner.

Q13. Do you have any views on how any potential negative impacts on particular groups of

learners could be mitigated?

CSSC requests that schools are given sufficient notice of adaptations to assessments and qualifications in order to prepare their learners effectively and to provide them with the necessary practice at any new approach to assessment. Where assessments move online, it will be necessary for schools to have enough flexibility in the timing of assessments to accommodate all learners undertaking the assessment or qualification, particularly in areas of socio-economic deprivation.

Q14. Are there any regulatory impacts, costs or benefits associated with the

implementation of our proposals that are not identified in this consultation?

No

**If yes what are they?**

The impact on learners and schools is covered in the section on Regulatory Impact Assessment.

Q15. 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.

There are two key areas where schools will incur additional costs to their already challenging budgets:

• the provision of additional technology for use by learners

• professional development of teachers to facilitate the adapted assessments and qualifications The costs that may not be so easily quantified are the hours of additional work that will be necessary and are clearly identified in paragraph 13 of the section on Regulatory Impact Assessment.

Q16. Are there any additional or alternative approaches we could take to minimise the

regulatory impact of our proposals?

No

**Feedback**

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

find this consultation?

**1 2 3 4 5**

**Very hard to read Very easy to read X**

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Do you have any comments or suggestions about the style of writing?

The documentation was easy to read for professionals within the education sector. For the learners, and family, parents or carers of these learners, the documentation may have proved challenging.

**Your details**

Which nation or country are you based in?

Northern Ireland

How did you find out about this consultation?

**Other (please specify):**

CCEA

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

School, college or teacher representative group