

## Exceptional Arrangements for Assessment and Grading in 2020

### Irish National Teachers' Organisation (INTO) Response to the Consultation on the Assessment and Grading of Vocational, Technical and Other General Qualifications: May 2020

The Irish National Teachers' Organisation (INTO), founded in 1868, is the oldest and largest teachers' trade union in Ireland. It represents 40,633 teachers at primary level in the Republic of Ireland and 7,086 teachers at primary and post-primary level in Northern Ireland. Total membership is over 47,000

Question	Response
<p>Question 1: To what extent do you agree or disagree with our proposed approach to qualifications which fall out of scope of the extraordinary regulatory framework?</p>	<p>Awarding organisations should be mindful of a reduced capacity in centres to deliver content if they adapt assessment and delivery or delay same.</p> <p>Reference to “previous years” should make specific reference to the current cohort and awarding organisations should be mindful of the reality that cohort ability changes year on year in each centre. OFQUAL have also given guidance as to how standardisation, performed by awarding organisations, cannot take account of supposed upward or downward trajectory.</p> <p>Overall, the proposed approach appears to be a fair, practical and consistent method to award qualifications during the current crisis.</p>
<p>Question 2: To what extent do you agree or disagree with our proposed approach to determining to which learners the extraordinary regulatory framework applies?</p>	<p>INTO welcomes the proposed list of the qualification titles in the appendix to bring clarity to teachers and heads of centres.</p> <p>There should be a suggested timescale for the students that will not receive a grade/certification as these learners signed up for a timebound course as means to entry into either another level of education or employment.</p> <p>For learners sitting a mixed set of tradition academic and vocational subjects, if it is not possible to generate a grade for these students, delay could have a serious impact going forward – is there any way of ensuring progression on a ‘conditional’ basis in those circumstances? For example, allowing learners to begin their planned studies with a caveat of completing the required assessment in due course. Other stakeholders in FE and HE have a role to play here.</p>
<p>Question 3: 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?</p>	<p>The flexibility is required to allow different centres to ensure that as many students as possible can receive grades and qualifications that they would have received had this crisis not taken place.</p> <p>Balanced autonomy and flexibility is required. There are specialist advisors with subject specific knowledge within awarding organisations that have specific details of nuances and trends within subjects and components. This autonomy should allow for the organisation to make calculated and reliable judgements.</p> <p>Any such delegation and flexibility must be mindful of workload of teaching staff, examination officers and head centres and should make reference to respecting the professional integrity of such</p>

	<p>staff. While delegation and flexibility may be required in the current context, awarding bodies must be unambiguous in relation to providing guidance that assists in the avoidance of maladministration and/ or malpractice.</p> <p>The needs of the learners must be central and mindful of additional challenges faced by SEN students.</p>
<p>Question 4: To what extent do you agree or disagree with the key principles we have set out?</p>	<p>INTO agrees broadly with the key principles and the order in which they have been set. However, concerns expressed regarding reference to “previous years” remain. This does not appear to allow for centre specific change in cohort ability. Trust in teacher/ tutor judgement must be primary.</p> <p>In terms of teacher judgement, INTO would welcome clear guidance for centres on the exact nature and type of “evidence which ensures that they are sufficiently valid and reliable”. This appears to be absent at present and could lead to ambiguity and difficulty for centres.</p>
<p>Question 5: 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?</p>	<p>INTO broadly supports organisations being able to deliver the qualifications as normal where it is possible. This can remove any doubt regarding the validity of the results given. However, safety of learners and workers must always be the prime consideration and centres should not be encouraged, either explicitly or by lack of clear guidance, to put employees or learners at risk in attempting to complete qualifications ‘normally’. There is an assumption that this guidance refers to assessment already completed or assessment that can be carried out safely and with the required integrity, remotely. However, this should be unambiguous.</p> <p>There may be an equality of access issue and as such it would be preferable if there was one agreed method of completing qualifications across centres. Inconsistent delivery could lead to inconsistent results and potential difficulty for centres and awarding bodies in terms of appeals and other potential challenges.</p> <p>Issues of access to technology are likely to arise and some learners could be disadvantaged as a result. This is likely to put added pressures on tutors and learners and hence there is a need for clear, unambiguous guidance on ‘normal’ completion of qualifications.</p>
<p>Question 6: To what extent do you agree or disagree with our proposed approaches for the different categories of qualifications?</p>	<p>INTO agrees with the proposed approaches to different categories of qualification. However, it must be recognized that to “delay assessment” may not be viable option for centres with limited resources in relation to budget/timetable/ material resource/ staffing and so on.</p>
<p>Question 7: To what extent do you agree or disagree with the</p>	<p>INTO agrees that, during this crisis period, where it is possible to provide calculated results, awarding bodies should do so.</p>

<p>aims of our proposed approach to calculating results?</p>	<p>However, it is fundamental that there should be no advantage or disadvantage to candidates given that they are likely to have missed out on over one term of learning opportunities.</p> <p>Reference to “grades they would have most likely achieved” is welcome as many of these assessments are either all or majority continuous assessment. INTO refers to previous comment on the need for primacy of teacher judgement and caution around previous centre performance in the production of grades and awards.</p> <p>The proposed aims should ensure as fair an approach as possible during these unprecedented circumstances.</p>
<p>Question 8: 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?</p>	<p>INTO broadly agrees with the minimum threshold, if there is to be general acceptance as to the validity and consistency of value in the qualifications then a minimum evidential threshold is needed. Students have worked hard for these qualifications and need to know that the hard work that they have completed is recognised and reflected in the qualifications.</p> <p>A bank of evidence may be available for some subjects to assist in determining grades, whether it is externally examined/externally moderated. Where available across centres such evidence could be used. If the use of consistently available externally moderated and externally examined data could provide the “one source of trusted evidence”, then this would lessen the burden on centres in determining the percentage of mark gained, used to determine what a candidate would have achieved if 100% of the course was attempted.</p> <p>Previous records of centres in relation to assessment and quality assurance would give a trusted indication of accuracy of results indicated by the teachers. Again, a list of suggested/required ‘trusted’ evidence would help.</p> <p>At this stage in the year 50% to 70% of Guided Learning hours should have taken place so much evidence of student performance should have been gathered if assessment plans have been adhered to. This evidence should be supported by internal verification/moderation.</p>
<p>Question 9: Do you have any comments on the approach to providing learners with calculated results?</p>	<p>Calculated results appear to be as likely a method of providing as many learners as possible with fair results in line with what they would have achieved, should sufficient weight be given to centre judgement.</p> <p>However, this needs to be coupled with a recognition that the burden on centres, in terms of workload and potential for challenge and litigation needs to be lessened by whatever approach OFQUAL and the Awarding Bodies take.</p> <p>In relation to banked evidence INTO believes that more clarity and guidance is required for centres and teachers.</p>

	<p>Issues are likely to arise with new centres and centres who have experienced challenges with external verification in previous series. Absolute clarity and clear guidance is essential to assist in the avoidance of maladministration and malpractice claims.</p>
<p>Question 10: To what extent do you agree or disagree with our proposed approach to the adaptation of assessments?</p>	<p>INTO believe that it is necessary to allow adaptations to assessments to provide verifiable evidence for the completion of particular courses. INTO agree that, for particular qualifications, it is necessary to have particular evidence to ensure competence in relation to professional tasks and in particular for the purposes of health and safety</p> <p>It should be made clear that adaptation is strictly temporary. Online standardisation and moderation is already in operation in many competencies and learning areas, therefore the capacity for this already exists.</p> <p>Very clear guidance will be required to avoid inconsistency and the noted potential for additional workload for teaching staff who are already under increased pressure in working from home. Again, robust guidance is required in relation to avoidance of the additional pressures related with concerns about malpractice, maladministration and breaches of equality legislation in provision for learners who may be covered under such law as applies in each jurisdiction covered by the OFQUAL 'Exceptional Arrangements'. Adaptations will need to take in the needs and circumstances of the learners. For example, if online testing is to be implemented the learner requires access to the necessary technology, if materials are to be completed remotely some learners will be disadvantaged as they will not have the support they would normally be provided with at the centre.</p>
<p>Question 11: To what extent do you agree or disagree that delaying or re-scheduling assessments should be the option of last resort?</p>	<p>INTO take the view that delaying or re-scheduling of assessment should be a last resort and avoided where possible. Students need qualifications to move to new qualification levels, apprenticeships and third level studies. Their progress should not be hindered if at all possible.</p> <p>There is a risk for some learners that delay will become an end to their engagement in education.</p> <p>Where delay is unavoidable, measures must be in place to assure learners, centre leaders and staff that such delay will not lead to learners simply not completing. This will require additional funding for both centres and students where EMA, TFS payments etc. apply, which, while outside of the gift of OFQUAL, should none-the-less inform those conversations which take place between OFQUAL and the relevant Governmental bodies.</p> <p>INTO notes that there will be financial implications for learners leaving education and entering the workforce without qualifications and this fact lends additional importance to the avoidance of delay where possible.</p>

<p>Question 12: To what extent do you agree or disagree with our proposals around decision-making and record keeping?</p>	<p>INTO broadly agrees with these proposals.</p>
<p>Question 13: To what extent do you agree or disagree with our proposed approach to oversight of awarding organisations?</p>	<p>Agreement or otherwise is difficult given the vagueness of this aspect of the proposal. ‘If things go wrong’ covers a multitude of scenarios. There will be a fear among frontline staff who are delivering adapted assessments and so on, that they will bear responsibility ‘if things go wrong’. Clear and unambiguous guidance and direction is required at all times to protect staff and centres from inadvertent acts of malpractice and maladministration in these most uncertain of times. A published and agreed list of relevant ‘trusted’ evidence as mentioned, for each qualification, should reduce the number of examples of ‘things going wrong’. Awarding organisations must make guidance absolutely clear for centres.</p>
<p>Question 14: To what extent do you agree or disagree with our proposed position on the delivery of an assessment opportunity to learners in autumn 2020?</p>	<p>The uncertainty around the COVID-19 crisis makes agreement or disagreement difficult. Where possible an award should be made to learners this summer (2020) to avoid such a scenario happening. While there is a balance to be struck in providing further assessment opportunities to learners, this is likely to place further financial burden on schools/centres in terms of staffing, timetabling and other resources. The proposal does not allow for potential protracted difficulties with the current pandemic. Further contingency planning must be in place for a number of scenarios including continued need for social distancing, future centre closures, ill health or self-isolation among teachers and so on.</p> <p>Funding is central to any ambition to allow students to sit an autumn assessment. So too the problems created for FE and HE providers in potentially deferring significant numbers of entries for 2020/21 academic year. Joined up planning is required with such providers at Post 16 and Post 18 to allow for either delayed starts to new courses, or to allow for students to commence new courses prior to completion of assessment.</p>
<p>Question 15: To what extent do you agree or disagree with our proposed approach to appeals?</p>	<p>It is hard to agree or to disagree with something so vague. <i>“Our rules do not require that appeals can be made against teacher judgements and they do not require awarding organisations to accept appeals directly from learners. However, neither do our rules prohibit these approaches and ordinarily awarding organisations have discretion to include additional grounds should they wish to do so.”</i> INTO has some concern regarding this proposal. It could be interpreted as a ‘passing of the buck’ to centres and therefore our members. This appears to have the potential to put undue pressure on teachers and undermines professional integrity. This</p>

	<p>may also have the potential to tie centres up in appeals for considerable periods of time.</p> <p>In so far as possible normal procedure for appeals should apply. However, where this is not possible, clear and explicit guidance is required for centres and teachers.</p>
<p>Question 16: To what extent do you agree or disagree with our proposed position in relation to certificates?</p>	<p>It should be made explicit that certificates will be no different than those awarded in 2019 or in previous years.</p>
<p>Question 17: To what extent do you agree or disagree with our proposed approach in relation to private learners?</p>	<p>Centres should not be required to provide results for private candidates without sufficient evidence and/or where the candidate has not engaged with the centre.</p> <p>In this case the private candidate they should be offered a reimbursement of their fees or at least a percentage of it.</p>
<p>Question 18: To what extent do you agree or disagree with our proposed approach in relation to learners who are not yet registered for an assessment?</p>	<p>Every opportunity should be afforded to those not already registered to do so in order to avoid disadvantage to learners.</p>
<p>Question 19: 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?</p>	<p>There should be no difference in arrangements for International students where and every effort should be made to award such learners. Differences in the period of 'lockdown' from country to country may require consideration in determining what evidence and so on is acceptable and in ensuring that there is no disadvantage to international learners and the unique challenges they may face.</p>
<p>Question 20: Do you have any comments about our proposed position in relation to awarding organisations facing financial difficulties?</p>	<p>INTO believe that schools and colleges should receive, in part or in full reimbursement of payments where normal marking, moderation and standardisation have not taken place. A transparent sharing of costs incurred to awarding bodies to date should be shared with centres and refunded entry fees, in full or part, justified on that basis. Any reduction in cost to awarding bodies should be passed on to centres.</p> <p>Those awarding bodies facing financial difficulties should seek support through 'existing protocols'. It would be prudent for OFQUAL to add it's voice to the call for additional and increased funding of education, including for the provision of an appropriate and accessible suite of qualifications which does not place further burden on centres and which contributes to the narrowing of opportunities for students as a result.</p>
<p>Question 21: To what extent do you agree or disagree with our proposed position in relation to the issuing of results for Functional Skills qualification learners?</p>	<p>No opinion.</p>

Question 22: Do you have any comments on the proposed regulatory framework?	No opinion.
Question 23: Are there other potential equality impacts that we have not explored? If yes, what are they?	<p>There is likely to be an impact on Post 16 uptake of courses across centres and a loss of momentum for some learners who teachers and centre leaders have worked hard to keep engaged in education. There is scope for awarding bodies to work with the various Education Departments across OFQUAL's jurisdiction to assist centres in reaching out to our most disadvantaged kids who, through no fault of their own have missed one third of teaching time in the academic year 2019/20.</p> <p>Reference is made to those learners who share 'Protected Characteristics' but there is little detail in terms of what consideration has been given to those learners. Differences in equality legislation in England and Wales as compared with Northern Ireland make response to this more complex, however, it is highly likely that those covered, for example, under the DDA in Northern Ireland will experience barriers that others who are not disabled will not. Access to additional support for example, is unlikely to be available while schools, colleges and other education and training providers are closed or offering limited opening. Due consideration must be given to candidates who are on the Child Protection register, homeless, 'looked after', suffered recent bereavement or illness. All such learners may face unique challenges that should be considered when calculating grades and so on. It would be useful to highlight this with centres prior to requests for estimations and so on.</p>
Question 24: Do you have any views on how any potential negative impacts on particular groups of students could be mitigated?	<p>Consistency and a robust system will go some way to preventing potential negative impact.</p> <p>OFQUAL and awarding organisations should consider how they might contribute in encouraging pursuit of education among learners who share protected characteristics or who are economically or socially disadvantaged. In part this requires consideration of accessibility for some groups of students and will necessitate a challenge to a model of education increasingly based more on macro-economic development and less so on human development.</p>
Question 25: 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?	There is no cost benefit outlined for centers.
Question 26: What additional costs do you expect you will	Autumn assessments may lead to increased cost of entries and staffing. Delayed results may lead to decreased entry to some

<p>incur through implementing this framework? Will you save any costs? When might these costs and savings occur? Please provide estimated figures where possible.</p>	<p>courses as students delay/ defer uptake of places or additional costs are incurred in increased staffing to assist with 'catch up'.</p>
<p>Question 27: Are there any additional or alternative approaches we could take to minimise the regulatory impact of our proposals?</p>	<p>Could the examiners/moderators awarding organisations have already contracted be used to lessen the burden and vail of their expertise in some way.  OFQUAL and the awarding organisations should lend support to calls for increased funding of education to mitigate for the COVID-19 crisis and the decade of austerity that has stripped capacity and left so many education providers and associated bodies much more vulnerable to unforeseen crises.</p>