

Speech to AELP Annual Conference 2019

I'm delighted to be here to talk about ensuring quality – not just in T Levels, but across the range of regulated qualifications, including apprenticeship End Point Assessments.

Ofqual places a premium on high quality and assessment validity. Our statutory objectives include securing and maintaining qualification standards and promoting public confidence in them. We take this very seriously.

Ofqual is, of course, particularly in the public consciousness over the GCSE and A level exam season. But I am always keen to stress that our assessment and regulatory expertise is equally applicable to vocational and technical areas.

Whatever type of qualification – or indeed End Point Assessment – there is a judgement to be made about knowledge, skills and behaviours. How that assessment is designed, developed, and delivered has to be right – for the subject or skill area, and for those who will use and depend on the qualification result. The same principles of validity apply whether an academic or vocational assessment – but of course the assessment approaches vary.

Fairness

We regulate on behalf of users, which is a broad church. It includes employers, higher education establishments and training providers. But of course it also includes learners; whether a student in school, an apprentice or an adult learner. We work to secure consistent and reliable assessments and to ensure fairness.

Fairness includes making sure assessments cover the expected content and are clear and error-free, that marking is completed on time and is of high quality, and that grade boundaries are set to fairly reflect the demand of the paper.

Fairness means designing qualifications so that they are accessible to the full range of students who will take them, and that the requirements are clear to all teachers and trainers. This includes making sure that students who need them have access to enlarged or Braille question papers, or a scribe, or other reasonable adjustments.

It means dealing with any malpractice that might give some students an unfair advantage over others. And it means taking account of any serious disruption or other events which might affect individual students' performances on the day.

Ofqual is focused on making sure the qualification system is fair for everyone, so that they're competing on a level playing field. This is important if students, parents, teachers, trainers, employers and

universities are to have confidence in results.

T Levels

When it comes to regulating the Technical Qualification that sits within T Levels, we will be working with the same seriousness and focus that we regulate GCSEs and A levels. To do this, we have taken the opportunity to introduce tailored rules that we have put in place for these new, high stakes qualifications that will operate in parallel with the Institute's contract management process.

But regulating with the same seriousness and focus as General Qualifications doesn't mean treating them the same – both our approach, and the design of the Technical Qualification – enables appropriate tailoring of the assessment to the subject content that has been set by employers, through the Institute for Apprenticeships and Technical Education ('the Institute').

I want to stress this point because Ofqual is sometimes accused of "over-academising" assessments, and I want to put this misconception to bed. It's important to recognise that Ofqual is not a content-setting body. In the case of T Levels, the subject content is – quite properly – being set by panels of employers, through the Institute. Ofqual's role at this stage is to ensure that the content could lead to a qualification that will support valid outcomes. It is not to determine how academic the subject matter is.

We can – and do – encourage flexibility. So for Technical Qualifications there is flexibility in terms of the size of the core versus the occupational specialism. There is flexibility within the core, in terms of the weightings for the core exam and the core project.

And of course there is flexibility in the assessment methods for practical tasks. Validity requires the most appropriate form of assessment to be used for each Technical Qualification – we should expect to see a variety of approaches, much as we do in the apprenticeship End Point Assessments we regulate.

As you'd expect, we are working closely with the Institute to bring together our respective expertise and maximise the different levers available to our organisations. The Institute is running tenders to select awarding organisations to deliver Technical Qualifications. And the Institute will subsequently approve each qualification to ensure it meets employers' needs and the requirements of the contract.

From an Ofqual perspective, we have consulted on and introduced Technical Qualification-specific rules, including issues like the number of assessments, timing, retakes, marking, recognition of prior learning and reviews of marking, moderation and appeals.

We are using materials from the tendering process to inform our recognition decisions. As you'd expect, we're looking hard at each organisation to be sure that they have the capacity and capability to deliver the Technical Qualification, should they win the contract.

And we will be accrediting the Technical Qualifications, employing our assessment expertise to consider them from the perspective of our rules, which dock with the Institute's contractual requirements.

Our rules are intended to help secure appropriate comparability, and to ensure that there is a consistent level of demand across all Technical Qualifications. Employers – through the Institute – will be setting the initial grade standards, and Ofqual will regulate to maintain those standards over time and across the cohort. Simply put, our aim here is to ensure that a candidate would get the same grade for a given performance, whenever and wherever the assessment is conducted.

This approach, where we consider the fitness for purpose of the awarding organisation as well as the lifecycle of the qualification they propose to deliver, is a tried and tested method. We have seen the importance of checking quality at the start, through accreditation and technical evaluation. And we have learned much from monitoring how the assessments run in practice. We are experienced in using the full range of our regulatory levers to keep things on track and have applied it across the range of qualifications we regulate.

Functional Skills qualifications

Reform offers a great opportunity to build in quality and for Functional Skills qualifications, I hope you've been following our regular updates on how the new English and maths qualifications are progressing through our technical evaluation process. As you'll be aware, first teaching for the new versions is this September. Our focus is now on a safe transition from old to new and you should all be preparing for the removal of old versions.

We are keen to ensure that colleges and training providers have all the information needed to prepare, so we have published a range of resources and links on our website. We have encouraged awarding organisations to publish specifications and materials to help with preparation, in draft if necessary.

I do want to remind you that the last date for registering learners on the current qualifications is 31 August, and after that all new registrations must be on the reformed qualifications.

A regulated approach to apprenticeships EQA today

And we take equal interest in our regulation of apprenticeship End Point Assessments. Back in 2017, we first published a document setting out our approach, and the regulated approach to External Quality Assurance is now really well established.

At every stage we are focused on meeting the needs of employers and protecting the interests of apprentices. We have engaged proactively and reactively to ensure these outcomes. In May, we presented to the Institute's Quality Assurance Committee what we have found from our External Quality Assurance activity thus far.

We set out our view that you need to build in quality and validity at the start. We see evidence that comparability between End Point Assessments (EPAs), developed and delivered by different End Point Assessment Organisations (EPAOs) against specific standards, can diverge.

Where assessment plan design allows for variances in approach there is a risk to consistency for that EPA. We've employed an ongoing programme of technical evaluation of EPA materials, working with sector experts to identify and mitigate these divergent approaches.

We can also see that the EPA market is maturing – though not necessarily in ways that we might have expected. Currently, fewer EPAOs have put fewer EPAs on our Register than we'd anticipated.

We are also seeing some EPAOs deciding some EPAs are not sustainable for them, and looking to withdraw from that part of the market. We are clear that apprentices should not be left high and dry. So where necessary we are intervening to protect the interest of learners by steering the pace or sequence of withdrawals. We will continue to monitor this maturing market closely in support of the Institute.

And EPAOs are responding to the changes and challenges of this new market.

Established awarding organisations are taking steps to strengthen their subject expertise so that they can deliver against assessment plans and meet the needs of specific sectors and industries.

And a variety of new organisations are looking to rise to the challenge of providing EPAs. Some of these are very niche organisations with evident depth of expertise and influence in their industry and sector. Some are finding the rigours of designing and applying robust assessment methodologies challenging.

They need to be able to demonstrate their capability and capacity to develop all the relevant required types of assessment as specified in the assessment plan. So we have seen them considering how they can develop this and we have supported their thinking and development.

Finally, we can see that our regulatory framework is having a wide influence over the quality of EPAs, across the apprenticeship system. We are seeing the strengths of our Conditions being applied by awarding organisations – wherever and whenever they provide an EPA, and not just where we are the EQA provider.

Looking ahead

So, it is from that evidence base that we should look ahead.

The Institute has the statutory responsibility for overall quality assurance of the apprenticeship programme: that is something we support strongly.

But the EQA options and arrangements are complex. As previously mentioned, the Institute has asked us how we might work as part of an optimised system

for EQA, and particularly how we might work with professional bodies and employers.

Our response reaffirms our view that the simplest, most streamlined and consistent delivery of quality assurance for all non-degree apprenticeships would be through Ofqual regulation. We have signalled that we are prepared to extend our role as EQA provider.

Where EPAOs are already recognised members of the regulated community, this can be done quite quickly. Where EQA is currently provided by professional bodies and other groups – we could (and would wish to) – work in partnership with those professional bodies. That way we can combine our assessment expertise with their sector and subject expertise; together we can be more than the sum of our parts.

We have also committed to further developing our EPAO fora, so that they better reflect the depth and breadth of EPAO delivery. We remain committed to sharing best practice.

And finally, we have signalled our intent to extend the reach of our expertise. We intend to introduce a ‘field force’ to look at how assessments are working in practice at the point of delivery.

We’ll be undertaking on-site monitoring of EPAs, to gather intelligence from employers and apprentices and to strengthen the evidence base for our risk-based, targeted interventions. We want employers and professional bodies to be confident that EPAs provide an accurate measure of occupational competence. And we want to ensure that the assessment is fair for apprentices.

This field force will also inform our views of the delivery of other types of qualifications. This is a natural extension of our proposals to strengthen controls over centre-based judgements and the moderation and verification of assessments.

This work started with our evaluation of how Direct Claims Status operates. You might recall that we recently consulted on changes to our rules, and I was pleased to see the warm reception our proposals received from AELP in particular. We’re working through the consultation responses now, and you can expect to hear more in September.

Conclusion

So you can see that the approach we adopt to regulation is geared completely towards securing high quality assessment products that command public confidence, protect the interests of learners and deliver what employers and others need from them.

The messages I’d like to leave you with are that:

We have increased our focus on vocational and technical qualifications, treating them with the same seriousness as GCSEs and A levels.

We recognise the need for flexible approaches to assessment – one size does not fit all and our priority is to ensure validity and fairness.

We are fully engaged in the government's reforms and believe strongly that regulation plays a critically important role in assuring quality and fairness.

Thank you.