



Ofqual
Earlsdon Park
53-55 Butts Road
Coventry CV1 3BH

17 May 2019

Dear Sir/Madam

Natspec response to consultation on moderation and verification of centre assessment judgements

Natspec is the membership association for organisations which offer specialist further education for students with learning difficulties and disabilities. We represent 86 colleges from across the UK. Our vision is that all young people with learning difficulties or disabilities can access quality education and training which supports their aspirations for skills, work and life. Our members provide multi-disciplinary specialist support and expertise which enables students aged 16 to 25 to make a successful transition to adult life.

We set out below our response to Ofqual's proposals to change the requirements on awarding organisations for setting controls associated with centre assessment judgements. Natspec understands and supports Ofqual's intention to revisit the requirement that awarding organisations check results for each group of learners. The rule as it stands is currently being broken by many awarding organisations and we appreciate that Ofqual, as the regulator, cannot ignore this.

However, we regard Ofqual's proposed changes as unnecessarily heavy-handed, particularly for lower level qualifications. We believe the associated increase in costs, which awarding organisations will undoubtedly pass on to centres, will result in many smaller providers, including some of our members, being unable to afford to offer qualifications in the future. We would be interested to know if Ofqual has carried out an equality impact assessment, as we suspect that learners with SEND, who are one of the key user groups of Entry and level 1 qualifications, would be likely to be particularly affected by the change of approach.

Ofqual claims to operate a risk-based approach to the regulation of qualifications. Treating all qualifications at different levels and of different types, and all centres regardless of their track record in relation to their assessment practice, in the same way would appear to be inconsistent with this claim. We believe that established centres with a proven track record for accurate assessment decisions and robust internal moderation or verification procedures should be allowed to make 'direct claims', in particular in relation to low-risk qualifications (e.g. Entry and level 1), thus increasing their ability to



be responsive to learners and reducing unnecessary bureaucracy and cost. Some of our members report that the incentive of achieving and retaining direct claims status has in fact encouraged them to continuously improve their internal QA procedures.

We welcome the clearer definitions of, and distinction between, moderation and verification. We support the position that internally assessed qualifications should be subject to either moderation or verification in all cases; this is the externality that differentiates external accreditation from centre-certification. However, we believe the nature of the controls proposed seem unnecessarily heavy-handed for lower level, low-risk qualifications. We would not support moderation as the default position for all external quality assurance; whichever approach is more fit-for-purpose should be applied.

We do not support the proposed minimum levels of awarding organisation control for verification. Three annual visits for a small centre with minimal numbers of learners will push up costs enormously, quite probably to a point that they cannot afford to use qualifications that require verification, despite the fact that this would help them work flexibly to meet learners' needs. Smaller providers already have their qualification choices restricted to certain awarding organisations because of minimum spend requirements (set to ensure awarding organisation viability). This would restrict their choice further and work against the principles of personalisation and high-quality provision that sit at the heart of the government's SEND reforms.

Independent specialist colleges already receive inspection visits from Ofsted (and, if residential, also from CQC or Ofsted Care) and quality audits by local authorities (LAs) commissioning high needs places, with some colleges working with over 50 LAs. This represents a huge burden in terms of staff time. They will struggle to accommodate three additional awarding organisation QA visits from each organisation they use. At a minimum, this will drive them to work with a single awarding organisation, rather than select the qualifications that best meet learners' needs; smaller colleges are more likely to withdraw from qualification use altogether. For small centres with small numbers of learners, any enhanced verification controls that go beyond the already unmanageable controls proposed as standard would be disproportionate to the point of crippling.

It would seem reasonable that all awarding organisations should set out their approach to moderation and verification, although Ofqual should be prepared to accept a range of fit-for-purpose models for the associated controls. Any minimum requirements prescribed by Ofsted should be the minimum necessary to ensure consistent internal verification/moderation standards; Ofqual should not prescribe specific approaches.



We agree that revoking of certificates in relation to higher level or license to practise qualifications is appropriate, but it should not be an expectation in response to *all* incorrect results, particularly where there is low risk associated with a wrong result having been issued and/or where the result is only inaccurate by a small margin, but there would potentially be much upset for the learner, who was not at fault.

We very much hope you will take into account the issues that we have raised when reaching decisions about how to proceed in relation to this matter.

Yours faithfully

Ruth Perry
Senior Policy Manager