

Natspec response to Ofqual and DfE consultation on awarding of GCSE, AS and A level grades and of vocational/technical qualifications



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Introduction

Natspec is the membership association for organisations which offer specialist further education for students with learning difficulties and disabilities. We represent 99 colleges and approximately 6,000 students, all with high needs. The majority of our member colleges offer some form of accredited provision, the greater proportion focused on vocational qualifications, personal, social and/or employability qualifications, and English and maths qualifications. A small number offer GCSEs and A levels, sometimes in partnership with a general further education college.

This response covers the Ofqual and Department for Education (DfE) consultations on awarding both general and vocational/technical qualifications.

Key points for consideration

1. We support the aims of Ofqual and DfE to minimise the impact of the pandemic on the progression opportunities of young people.
2. We have some concerns, though, that there is the potential for disadvantaging learners with SEND, unless Ofqual is explicit in setting out the responsibilities of awarding organisations – and centres - for ensuring equal and fair access to assessment.
3. We note the statement in the Ofqual/DfE consultation on vocational and technical qualifications that

We do not, however, consider that it would be appropriate to disadvantage those learners who have been able to and continue to be able to complete internal assessment, on the basis of some learners being unable to.

This position is only tenable if alternative, accessible arrangements are in place to provide learners who have *not* been able to complete internal assessments with another means to achieve the qualification.

4. Awarding organisations would benefit from Ofqual providing some guidance and examples of the reasonable adjustments that they should be prepared to make to accommodate young people with SEND. Minimum standards for the adjustments that an awarding organisation *must* be able to offer would be helpful. This will be important in ensuring consistency of access across different awarding organisations.
5. Special arrangements under normal circumstances allow adjustments for learners that mirror their 'normal way of working'. There must be acknowledgement that 'normal ways' have significantly changed in recent months and that what was previously considered 'normal' may not currently be possible. For example, a learner who would normally be assisted by a scribe may not have access to this kind of support if they need to sit a short exam paper at home.

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6. It will be particularly important that full access arrangements are in place for any short exam papers, if learners are to be required by either awarding organisations or centres to take these. These arrangements must take into account the diverse environments in which different learners may be having to sit these exams.
 7. Centres will need to be creative in ensuring learners with SEND are able to access the exams and awarding organisations will need to be flexible in agreeing special arrangements. The Department for Education should arrange for advice from specialist SEND organisations to be available to support this process.
 8. Individual learners with SEND, and those who understand them best (teachers, support staff and families) should be involved in determining the most satisfactory adjustments before seeking agreement for these with the awarding organisation.
 9. When identifying forms of assessment evidence, teachers should be advised to involve support staff and other relevant specialists working with learners with SEND to ensure the assessment tasks do not present unnecessary barriers and to help them determine what adjustments may be needed.
 10. Where teachers are putting forward work completed during the course of the learning programme as assessment evidence, they must assure themselves that learners with SEND were fully able to access the assessment task and had the support they would normally have when producing assessment evidence (albeit potentially in a different form). Where this is not the case, and it is the only evidence available to meet the requirements for awarding, there must be a process for factoring in that lack of support when determining the qualification outcome (grade or pass).
 11. It must be possible for learners with SEND to appeal an awarding decision if there is evidence to suggest that they have been unfairly disadvantaged because of their SEND.