

Consultation on changes to Ofqual's regulatory framework for national assessments

How to respond to this consultation

The closing date for responses is **20 December 2017 at 23:45**.

You can answer as many of the consultation questions as you like. You do not have to answer all of the questions, unless you wish to do so.

Please respond to this consultation in one of three ways:

- complete the online response (click 'Respond online' on the [consultation homepage](#)).
- complete this response form and email your response to consultations@ofqual.gov.uk. Please include the consultation title (Reforming functional skills qualifications in English and maths) in the subject line of the email and make clear who you are and in what capacity you are responding.
- Post your response to: Reforming functional skills consultation, Ofqual, Spring Place, Herald Avenue, Coventry, CV5 6UB, making clear who you are and in what capacity you are responding.
- **We can only consider your response if you fill in the 'About you' section at the end of the document.**

How we will use your response

- Your response will be used to help us shape our policies and regulatory activity.
- After the consultation ends, we will publish a summary of responses received.
- We will not include your personal details in any published list of respondents, although we may quote from your response anonymously.

Sharing your response

If you respond on behalf of an organisation, we will list your organisation's name and may publish your response in full unless you tell us not to. If you want any part of your response to stay confidential, you should explain why you believe the information you have given is confidential. If you check the box below, we will not include your details in any list of people or organisations that responded to the consultation.

I want part of my organisation's response to remain confidential.

Please explain which sections of your response you want kept confidential, and why:

Members of the public are entitled to ask for information we hold under information access law (such as the Freedom of Information Act 2000). We may have to disclose information covered by these laws. On these rare occasions, we will usually anonymise responses, or ask for consent from those who have responded, but we cannot guarantee confidentiality.

Contacting you

Ofqual may sometimes follow-up responses received. If you are happy to be contacted about your response, please complete your details below.

Telephone number:

Email: AAIASecretary@aaia.org.uk

Consultation questions

Question 1: Do you have any comments on Part 1 of our proposed framework (National assessments and responsible bodies)?

It is both useful and helpful to state with clarity the responsibility of bodies involved in National Curriculum (NC) Assessments, in particular the role of Local Authorities (LAs) as against a background of restructuring and cuts some appear to be unaware of their statutory role and resulting responsibilities in this area.

Is there a way this could be given higher profile?

How does Ofqual monitor and evidence LA and Academy compliance?

Question 2: Do you have any comments on our approach to regulating national assessments as set out in Part 2, Sections B and C of our proposed framework?

Section 320: How will Ofqual evaluate the impact of their advice to a responsible body?

Question 3: Do you have any comments on our proposed approach to setting out in advance our key areas of focus each year?

It is very useful to have this information in advance: in addition, an outline of the scope of each key area to be focused on would be welcome.

Question 4: Do you have any other comments on Part 2 of our proposed framework (Ofqual's role)?

Section 190 Manageability: it is essential that information is provided 'in a timely manner'. This has been sadly lacking in recent years which has too often led to confusion, uncertainty and unnecessary additional workload, e.g. in 2017, last minute changes from STA regarding moderator standardisation requirements at Key Stage 1 (KS1) and, at the time of writing, the unacceptable delay in publishing of the 2017-18 Early Years Foundation Stage (EYFS) Assessment and Reporting Arrangements (ARA)

Question 5: Do you have any comments on our proposed approach to remove prescriptive requirements from our framework and instead focus more on outcomes?

Sections 380 – 420: The Association for Achievement and Improvement through Assessment (AAIA) welcomes this approach and Ofqual's more explicit expectations. They will continue to support all those involved in assessment.

It would be helpful to have these set out clearly in the ARAs for EYFSP, KS1 and KS2.

Questions: Consultation on changes to Ofqual's regulatory framework for national assessments

Question 6: Do you have any comments on any aspect of the changes described above?

AAIA welcomes the emphasis on providing an expert view on proposed assessment changes, and on notification of significant failings. As recent changes work through and proposed changes are mapped out, these will be essential.

Question 7: Do you have any other comments on Part 3 of our proposed framework (Expectations of responsible bodies)?

*Section 430: How will the 'Expectations of Responsible Bodies' be drawn sufficiently to the attention of **all** Responsible Bodies (e.g. Academies, LAs, Governors) and the need for appropriate action be emphasised to these bodies?*

How likely is it that the pressure as a result of these expectations will result in positive action for change?

How will Ofqual evidence that sufficient funding has been earmarked by LAs to carry out their NC Assessment responsibilities given cuts in funding and the pressure of their other statutory responsibilities e.g. Special Educational Needs/Disabilities (SEND)

Question 8: Do you have any comments about the clarity, language or structure of the proposed new regulatory framework for national assessments?

The document is very clearly stated and comprehensive in scope.

Question 9: Do you have any comments on our proposal that the new regulatory framework for national assessments should take effect from the date it is published, anticipated in Spring 2018?

Question 10: Do you have any other comments on any aspect of our proposed new regulatory framework for national assessments?

Q 9 & 10:

We agree that the new framework should take effect from the date of publication.

How does Ofqual intend to publish the reviewed 'Regulating National Assessments'?

How will Ofqual ensure it receives adequate press?

Question 11: We have not identified any ways in which the proposed framework will unduly increase the regulatory impact of our proposals. Do you have any comments on this assessment?

If there is any increase in impact, it will be outweighed by the benefits

Question 12: Are there any additional steps we could take to reduce the regulatory impact of our proposals?

Question 13: Are there any costs or benefits associated with our proposals which we have not identified?

Question 14: We have not identified any ways in our proposed changes to the framework would impact (positively or negatively) on people who share a protected characteristic¹. Are there any potential impacts we have not identified?

Greater emphasis on an expert and independent view on proposed assessment changes, and on notification of significant failings would help to highlight the impact of changes on students who share a protected characteristic; this would represent a necessary and highly valuable feature of the proposals.

Question 15: Are there any steps we could take to mitigate any negative impact resulting from these proposals on people who share a protected characteristic?

Question 16: Do you have any other comments on the impacts of the proposals on people who share a protected characteristic?

¹ 'Protected characteristic' is defined in the Equality Act 2010. Here, it means disability, racial group, age, religion or belief, pregnancy or maternity, sex, sexual orientation and gender reassignment.

About you

To evaluate responses properly, we need to know in what capacity you are responding to the consultation. We will only consider your response if you complete the following section. Questions marked with a * are required.

Name *: Pauline Cue

Organisation (if applicable): Association for Achievement and Improvement through Assessment (AAIA)

Position (if applicable): Secretary

Is this a personal response or an official response on behalf of your organisation? *

Personal response (please answer the question 'If you ticked 'Personal response'')

Official response (please answer the question 'If you ticked 'Official response'')

If you ticked 'Personal response', which of the following are you? *

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (please state below)

If you ticked 'Official response', which of the following are you? *

Awarding organisation

Local authority

School or college (please answer the question 'School or college type' below)

Academy chain

Questions: Consultation on changes to Ofqual's regulatory framework for national assessments

- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question 'Type of representative group or interest group' below)

School or college type

- Comprehensive or non-selective academy
- State selective or selective academy
- Independent
- Special school
- Further education college
- Sixth form college
- Other (please state below)

Type of representative group or interest group

- Group of awarding organisations
- Union
- Employer or business representative group
- Subject association or learned society
- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

Nation*

England

Wales

Northern Ireland

Scotland

Other EU country: _____

Non-EU country: _____

How did you find out about this consultation?

Ofqual's newsletter

Ofqual's social media channels

Other social media channels

Ofqual's website

Internet search

Other: *by direct invitation from Ofqual to respond*