Professional Assessment Ltd

Grading and Marking Policy

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Overview

The availability of grading within a qualification (apprenticeship standard) essentially signals the intention to acknowledge and reward different levels of performance or achievement above a pass. If the grading is to have meaning and purpose, it must have a clear relationship with the qualification's (standard) objective and target proficiency and all users must be able to interpret the grade in the same way.

Consistent and reliable marking and grading requires the effective design and development of assessment instruments, as well as a process for assessment confidentiality and identifying potential risks in any aspect of the qualification cycle. Grading and marking also must be able to assimilate inclusive and fair assessment, clearly communicate the assessment requirements, provide a mechanism to query or dispute results and deter practices that could lead to the unfair awarding of a qualification or grade.

Finally effective grading and marking requires those involved in the assigning of grades and marks to be objective, unbiased and have a consistent set of parameters against which marking and grading takes place, this requires PAL as EPAO[1] to have trained and competent assessors, with a suitable set of internal quality checks and balances that supports consistency and reliability in the assessment results we award to apprentices.

Policy Scope

This policy should be read in conjunction with Professional Assessment Limited's (PAL):
- ➢ Development Policy
- ➢ Plagiarism and Cheating Policy
- ➢ Training and Development Policy
- ➢ Assessment and Quality Assurance Policy
- ➢ Resit and Retake Policy
- ➢ Conflict of Interest Policy
- ➢ Special Considerations and Reasonable Adjustments Policy
- ➢ Appeals and Enquires Policy
- ➢ Risk Management Policy
- ➢ Malpractice and Maladministration Policy
- ➢ Data and GDPR Policies.
- ➢ Confidentiality Policy

The apprenticeship standard assessment plans determine grades, grade levels, and grade weightings. Most Apprenticeship standard assessment plans specify the knowledge, skills, and behaviours to be assessed and graded by specific and discreet methods of assessment. Some older assessment plans allow for assessment of KSBs across assessment components[2]. Professional Assessment Ltd (PAL) will grade end-point assessments based upon the grading criteria provided in the relevant Apprenticeship standard assessment plan.

The role of the End-Point Assessment Organisation (EPAO) is to design and develop appropriate assessment instruments and marking schemes to support reliable, valid, and transparent independent assessment which reflect the apprentice's (learner's) ability.

Apprenticeship standard assessment plans and standards are reviewed, typically on a three-year cycle and the plan and standard in situ at the apprentice's programme commencement, form the basis for the end-point assessment

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[1] Note Ofqual refer to regulated organisations as AOs, PAL continues use the term EPAO and we may use the terms interchangeably

[2] New and revised assessment plans have discrete assessment components.

(EPA), unless PAL is guided otherwise by the relevant external quality assurance (EQA) body[3] or the Institute for Apprenticeships and Technical Education (IfATE).

Who is this Policy for?

PAL assessors (includes associates)[4]; employers; apprentices; providers; centres; internal quality assurers (IQAs); EPA managers; Quality Manager; Qualifications Director; Resource Development Lead; Resource Development Support Officer; Consultants/TAs;[5] Business Operations Director; Director of Audit and Compliance; Managing Director.

Purpose

The purpose of this policy is to:

➢ Establish the roles and responsibilities of the marking and grading function
➢ To detail how marking and grading is determined
➢ To ensure that a fair and consistent practice of marking and grading is applied

Reliable and fair grading and marking requires stringent quality assurance throughout the design, development, delivery and awarding of results.

Mastery within qualification grading

Apprenticeship assessment plans advocate a basic mastery requirement, in respect of grading which means that an apprenticeship standard (qualification) Pass cannot be achieved without having achieved a pass in all assessment components and successfully meeting **all** the Knowledge, Skills and Behaviours (KSBs) as prescribed in the assessment plan.

Who can Grade and Mark?

PAL assessors who have the required qualifications, occupational competence, and experience, as per the requirements of the specific assessment plans are permitted to grade and mark assessments and the PAL quality team will sample final assessment decisions and confirm the overall grade awarded.

Centres and third parties are not involved in the grading and/or marking of any assessments undertaken by PAL. For MCQ, SJT and scenario-based question tests, PAL uses online systems where grade boundaries and marking criteria are pre-determined, in line with the specific assessment plan guidance. Providers, employers, and apprentices should confer with the relevant assessment plan, so they are familiar with the grade parameters and test requirements. PAL will additionally provide such guidance in the apprenticeship standard specification and on-line resources.

All assessment decisions are recorded using the PAL's prescribed documentation and marks and grading are based on the relevant assessment plan guidance, to include the issue of grades by assessment components and the aggregation of results.

It is essential that all assessors receive appropriate training and briefing prior to undertaking any grading or marking to ensure they are aware of the requirements and regulations governing the conduct of assessment. PAL's briefing, training and internal (PAL) Padlets addresses what is required for each specific apprenticeship standard.

The Qualifications Director is responsible for the effective design and development of assessment instruments that support reliable marking, and they oversee the training of personnel involved in the design

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[3] Note as of 31/12/2022 nearly all of apprenticeship standards have Ofqual or the OfS as the EQA body. IfATE is responsible for the oversight of apprenticeship standard development and accompanying assessment plans.
[4] Note PAL uses the term assessors; independent assessors (IAs) and independent end-point assessors (IEAs) interchangeably.
[5] Consultant/Technical Advisors.

and development elements of all assessment instruments. The Development team are also responsible for testing the efficacy of assessment instruments, prior to their implementation.

The Quality Manager, who reports to the Business Operations Director is responsible for the quality assurance activities associated with assessment delivery.

Quality Assurance

Quality assurance of assessment consists of several elements. These can be distinguished according to the different stages of the assessment process at which they operate:

> **Pre-assessment activities** (including guidance for apprentices, employers, providers and assessors about the assessment activity and pre-testing of assessment instruments) - **PAL's Development Team**

> **The assessment itself** (including measures to assure the fairness of assessment conditions, such as invigilation, appropriate adjustments, and application of special considerations where applicable, and scrutiny of assessment instrument performance to include apprenticeship standards reviews)- **PAL's Quality Team, the Development Team will lead on assessment instrument performance evaluation, supported by the Quality Team**

> **Marking** (including use of individual apprenticeship standard assessment plans, in respect of KSB coverage, and grade boundaries, the independence of the assessor from the apprentice and in some instances, double-marking or blind marking). **PAL's Quality Team**

> **Internal Quality Assurance** (scrutiny of the assessment activity by internal quality assurers (IQAs); standardisation of assessment marking through activities such as standardisation and internal **mechanisms to challenge grades and marks). PAL's Quality Team**

Appendix one provides further context regarding the context of vocational assessment grading.

The Quality Manager oversees PAL's sampling strategy, which is a risk-based approach to sampling, and the quality team will sample the following for all apprentices:

a. Overall scores and final grades- ensuring relevant metrics, and assessment protocols used to cross-check and support assessment decisions, in line with the assessment plan and PAL specification guidance.

b. The content of report and language used is the report accurate, does not indicate any unfair bias in its judgments and evaluative and the decision making is valid, reliable, and fair.

c. Feedback and decisions sufficiently justified, with evidence to support the decision. Reporting is in line with PAL's protocols and within the specified assessment window. Marks and grades are confirmed.

This impartial and independent checking and confirmation of marking and results ensures the application of marking is consistent and applied fairly by all assessors, assessing any apprenticeship standard.

Marking and Assessment Criterion

The assessment of standards assesses how well an apprentice has performed against a predetermined set of descriptive criteria, in some aspects of assessment the grade is just a pass or fail, in most cases, grading recognises non-achievement and levels of performance. Apprenticeship standards criteria seek to describe a range of skills, knowledge and behaviours that correlate with the grade boundaries. In essence, they define what an excellent/good, a satisfactory and an unsatisfactory performance looks like, in the assessment setting.

The level of risk in the marking process, which adds pressure to boundary decisions, is influenced by the levels of clarity in the standard assessment plans, (for which PAL has no jurisdiction), the quality of the assessors' understanding of the KSBs and proficiency constructs, the training and guidance provided to the assessor and quality assurance activities that aid consistency and comparability of assessment outcomes.

It is the responsibility of PAL to articulate their interpretation of the standards and how they will assess and grade such assessments, in line with the stated assessment plan. PAL also has a responsibility to ensure all stakeholders are familiar with the standard requirements and assessment methodology.

PAL, as an EPAO, cannot offer feedback on the suitability of training delivery and training programme design, nor provide any sort of advice that could be construed as offering specific training guidance to enhance or improve grade outcomes.

PAL's assessment feedback and grading should inform apprentices and associated third parties where competence was demonstrated, and level of performance achieved.

Apprenticeship standards in the main adopt 'controlled response item'[6] mark schemes for Multiple Choice Questions (MCQs) or Situational Judgement Tests (SJTs) or tests including scenario-based questions. Mark schemes for these types of knowledge tests are mainly points-based with a single correct answer. Short and extended answer questions can be points-based with the added inclusion of a wider list of acceptable answers and the detailing of marker guidance.

For other assessment methods, including professional discussion/structured interview and questioning following a project or presentation, many of these assessment activities deploy a level-based marking format, which incorporates any grading criteria from the assessment plan and offers a clear structure for the assessors. To fill in the gaps on assessment guidance, omissions often found in assessment plans, protocols have been defined to guide independent assessors on the number of questions and the procedures for any follow-up questions to ask. Indicative content has also been laid out for pass grades and above, for independent assessors to reach consistent assessment decisions and differentiate across achievement levels.

In developing marking guidance, PAL considers the subject matter, the designated assessment method as prescribed by the assessment plan, the abilities and competence being assessed and how the results will be used. Some Apprenticeship assessment plans detail weightings[7] and where they exist, PAL adheres to such guidance and builds this into the aggregations of results.

PAL has marking criteria for each apprenticeship standard we are approved to assess.

What do we mean by marking criteria?
Marking criteria are essentially PAL's standards of judgement for the set assessment(s) they are informed by the specific assessment plan.

Why is it important to have marking criteria?
From the assessor perspective:
  ➢ To ensure that marking is reliable

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[6] A mark scheme which lists the points that are acceptable for an answer. This will normally award one mark per acceptable point up to a given maximum, and there are usually a few more acceptable answers than the maximum mark. Such schemes can be used for items carrying just a couple of marks to assessing an essay. Such a scheme will also need to indicate any variations in the expression of each acceptable point which will be allowed. Mark Schemes in Knowledge Based Qualifications: A Good Practice Guide (Qualifications Wales, 2019)

[7] New and revised assessment plans tend to have equal weighting across assessment components.

- ➢ Good marking criteria and should ensure that different markers can assign consistent grades
- ➢ To ensure that assessors are measuring what the assessment is intended to measure

Good marking criteria makes feedback production more efficient and less labour intensive.

From an apprentice, provider, and employer perspective:
- ➢ To ensure consistent, reliable, and comparable outcomes
- ➢ To support credibility of the apprenticeship programme and final grades
- ➢ To reduce any issues of bias in marking, (intended or unintended)

Borderline-checking

The quality team, as part of the quality assurance sampling process, will identify and assign a moderator to borderline assessment outcomes. Borderline cases are judged as results, where an apprentice has missed a grade by 1-2 marks, where assessment plans are open to plausible alternative interpretations. **The Quality Manager can use discretionary judgement in deciding if to employ borderline moderation or not.**

In cases where the Quality Manager elects borderline moderation, they will request a full moderation of all the assessment components, based on the evidence available. For evidence such as portfolios, projects or assignments, blind marking will be used. For assessments such as competency-based interviews, observations, professional discussions and skills challenges and presentations, open marking will be used.

Grading

Grading differentiates apprentice performance, provides motivation and ambition by recognising high achievement and helps to raise industry confidence in vocational qualifications (standards). If grading is to have meaning and purpose, it must have a clear relationship with the standard's objective proficiency. All users of the standard must be able to interpret the grades in the same way, and the assessment documentation must define the grading criteria.

> **A successful independent assessment requires the apprentice to meet all the knowledge, skills, and behaviours criteria, to achieve a pass.**

Apprenticeship standard assessment plans do have a variance of different grade criteria and grade boundaries. Some plans have fail, pass, merit and distinction, and some standards have fail, pass and distinction. Differing grade boundaries mean some assessment plans will set a pass at 50% and a distinction at 70% and others will make the pass at 70% and a distinction 85% and there are various grade boundaries in between. The nature of the standards and assessment plans means that different metrics are applied to different standards.

> **An (AO) end-point assessment organisation can only use the grade criteria and boundaries stipulated by the assessment plan.**

Approaches to the achievement of grade outcomes differ between standard assessment plans. Some apply a mark scheme with grade boundaries for each assessment method/component, which culminate in an overall score and grade. Others weight specific KSBs to influence grading. Weighting of assessment methods is determined by the assessment plan and replicated in assessment tool design.

There is no compensation rule in assessment plans from the perspective that an apprentice can fail to demonstrate competence in any KSB and still achieve a pass (compensation is a marking process that allows for marginal error in a limited number of assessment areas on the basis that overall performance remains sufficient to merit the award of the standard).

A compensation rule allows an apprentice who is just below the pass level in one component to compensate for the shortcomings by a correspondingly above the minimum mark in another component. The vast majority of assessment plans are explicit about the requirement to pass all components and meet all criteria.

Additionally, some assessments such as MCQ tests are comprised of two parts and the apprentice is required to pass both parts of the test, in order to pass, regardless of if their % score equates to a pass; other tests may require the passing of questions related to specific areas of occupational skills and knowledge. Marking functions must assimilate all the assessment features as described and required by an apprentice assessment plan, to ensure reliable marking by PAL and comparability of assessment outcomes across EPAOs.

Feedback

Independent end-point assessment reports must offer feedback that makes clear to the apprentice the outcome and grade of the assessment. Judgements need to be evaluative, constructive, and objective. As an EPAO, PAL provides an assessment report or mark sheet for each element of assessment for internal use, and an overall summary report which provides apprentices, employers, and providers with information regarding competence across the standards and assessment activities.

Resits and Retakes

Some assessment plans specify a maximum number of resits or retakes, others do not. Where there is no limit to the number of resits or retakes an apprentice can have, PAL defines the approach to resits and retakes and any limitations on final grades.

epaPRO, PAL's assessment management system will record all assessment components and outcomes, this includes fails and voided assessment and such data is collected by Ofqual on an annual basis.
PAL will adhere to the number of resits and retakes allowed by the specific assessment plan and will not offer further resits or retakes, unless there is a case for applying exceptional circumstances. Apprentices, employers, and providers should refer to the relevant version of an assessment plan in respect of resits and retakes.

It should be noted apprentices when undertaking resits and retakes will in the case of tests, undertake a different test version and in respect of other assessments, such as professional discussions, questions etc. will be changed. PAL will incorporate the assessment plan requirements, where plans specify a specific approach to re-assessments. See: PAL's Resit and Retake Policy for further information. PAL personnel will also have access to the resit and retake table, which provides a breakdown for each standard, the maximum number of resits and retakes and whether grade capping is applied.

Grade Capping

Providers, employers, and apprentices should refer to the respective assessment plans to check the resit and retake allowances and the impact on grading. For many standards, a resit or retake will result in an overall limiting grade of a pass.

PAL makes available via the PAL website its essential policies, which includes this policy and our resit and retake policy, and PAL will ensure that any resits, and retakes are conducted in accordance with the assessment plan, and do not undermine the assessment process or advantage or disadvantage an apprentice.

Grading and Marking Responsibilities

It is the responsibility of the Quality Manager and the quality team to ensure all assessors and IQAs know how to apply, and use marking schemes and allocate grades correctly.

The Qualifications Director is responsible for the provision of marking guidance and any appropriate amplification; this will include the sanctioning of suitable exemplars and templates that offer guidance to the apprentice, as well as

supporting equitable marking and grading. The Qualifications Director will be supported by the resource development team and Quality Manager in these tasks and activities.

The Quality Manager and quality team are responsible for implementing marking strategies and sampling assessment decisions to guarantee accurate assessment judgements.

The Qualifications Director is responsible for the sign-off of all assessment instruments and will oversee the reviews of all assessment instruments and grading and marking guides. In their absence these responsibilities will fall to the Managing Director, supported by the Resource Development Lead.

The Quality Manager and IQAs are accountable for sampling assessments, confirming marking, and grading decisions to ensure assessment across all standards and assessors is consistent, fair, and reliable.

Assessors are responsible for undertaking assessment and marking, in accordance with the assessment and marking guidance provided. IQAs will sample assessment activities based on the individual risk banding of the assessor for the standard, as well as factor in any specific challenges the specific assessment plan brings to the end-point assessment and the quality team will confirm the accuracy of assessment and grades awarded.

The quality assurance process facilitates standardisation activities, which assessors are required to attend, in line with the minimum number of standardisations, as stipulated in the respective assessment plans and determined by PAL's Quality Assurance arrangements.

The EPA team are responsible for the accurate communication of results to all relevant stakeholders, these include employers, providers, the Education and Skills Funding Agency (ESFA) and Apprenticeship service. For employers and providers, we encourage these parties to use their assigned log-in to EPAPro to track assessment progress and assessment outcomes and grading.

The Business Operations Director supported by the EPA Managers is responsible for the data collection and collation of assessment results and responding to such data requests from the regulator or other agencies.

Authenticity of Evidence

PAL will carry out checks to ensure that evidence provided by the learner/apprentice has been produced solely by them, which may be through a signed declaration or authentication statement. These checks will include ID checks and the use of plagiarism software to confirm learner/apprentice evidence ownership and accurate use of referencing and citations, to include checks regarding AI deployment.

All parties should be familiar with PAL's plagiarism and cheating policy and maladministration and malpractice policy, and the actions PAL will take where it has reasonable belief and/or tangible evidence that work, presented as the apprentice's is falsified in some fashion or form.

Apprentices are required to provide proof of ID prior to end-point assessment and information regarding suitable forms of ID are explained via the PAL Padlets.

Special Considerations and Reasonable Adjustments

PAL is committed to complying with all current and relevant regulations and legislation to the development and delivery of our apprenticeship qualifications (standards). Our aim is to facilitate open access for all apprentices who are eligible for reasonable adjustments or special considerations in assessments, whilst ensuring the assessment of knowledge, skills and behaviours are not compromised in any way for all the protected characteristics within the Equality Act 2010.

The Equality Act 2010 requires that PAL has in place clear arrangements to make reasonable adjustments that ensure that any apprentice with a disability, as defined by the Act, is not placed at a substantial disadvantage in comparison with learner/apprentice who is not disabled.

Assessment must be an inclusive and fair test of an apprentice's knowledge, skills and behaviours as stipulated in the assessment plan. Usual assessment processes for some apprentices may not be suitable, as such PAL ensures that the apprenticeship qualifications (standards) and assessments deployed do not unfairly advantage or disadvantage apprentices undertaking end-point assessment[8].

See: PAL Reasonable Adjustments and Special Considerations Policy.

To ensure that fair access is available to all apprentices PAL implements the Reasonable Adjustments and Special Considerations Policy so that apprentice achievements can be recognised during valid and fair assessments. PAL also makes available Reasonable Adjustment guidance which provides more detailed information regarding the application of reasonable adjustments in the context of assessment and the roles and responsibilities of individuals who can legitimately support adaptive assessments.

Voids and Adjustments

PAL recognises that there will be situations that present themselves where an assessment cannot take place at an agreed time and date and reasonable consideration will be given to each case.

Assessments could be voided for several reasons – the following list is not exhaustive but gives an outline as to why an on-line and remote assessments might be voided:

➢ System error for on-line tests – test fails to load correctly on the test platform, malfunction of the test platform, so either the test cannot progress further or questions not displaying correctly, or test fails to upload correctly after the test completion

➢ Internet connectivity issue for remote assessments – if the internet connection is not strong enough to last the entirety of the assessment there could be drops in the feed where the learner/apprentice is not being monitored for the assessment entirety

Although a rare event, assessments may need to be abandoned or stopped. The assessor is required to notify PAL of an event where an assessment is stopped or abandoned, using the appropriate in-house reporting systems, and ensure records reflect the nature of the incident.

PAL's Special Considerations and Reasonable Adjustments Policy provides clarification on PAL's classification of events that constitute where a special consideration may be justifiably applied.

Special considerations should not give the apprentice an unfair advantage, neither should it mislead an employer/provider regarding the apprentice's achievements for certification. **The apprentice's results must reflect the achievement in assessment and not their potential ability.**

If a special consideration is granted this may result in a post-assessment adjustment to the assessment outcomes and grades of the apprentice. The adjustment will depend on the circumstances and reflect the difficulty faced by the apprentice. The Quality team will make the ruling on the application of special considerations and any impact on final grades.

See: PAL Special Considerations and Reasonable Adjustments Policy and PAL's Resit and Retake policy

Where there has been a clear flaw in the assessment process (for example a mistake with a MCQ test question and/or the wrong option assigned as the correct option), PAL has a responsibility to ensure that this does not have a

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[8] PAL is not able to change the construct of an assessment component, so any reasonable adjustments look at flexibilities within the prescribe assessment method.

significant impact on the fairness or robustness of the final marks. Where such a flaw is identified PAL in the first instance will report this to the regulator. Subject to the regulator's recommendations PAL will develop and implement a suitable adjustment to be applied on an individual or wider cohort basis, dependent on the nature of the flaw and how many apprentices have been subject to the flawed assessment.

Potential flaws may be identified by assessors, reported by third parties, or revealed as a result of quality assurance checking or a comparison of assessment outcomes and grades by different assessment methods.

Where an assessment adjustment occurs, the details of the process and reasons for its use will be agreed with the relevant regulator. The approved adjustment and its rationale should then be communicated clearly too all apprentices who took/experienced the flawed assessment.

Any report to the regulatory bodies will detail the rationale for marks adjustment; the method used; the method used to inform relevant stakeholders; and any remedial measures implemented as a result of marks/grade/outcome adjustment.

PAL will also review its processes and policies in connection with the assessment mistake, evaluate if there is a need for further training and development of personnel and withdraw or correct the flawed assessment with immediate effect. If the erroneous assessment outcome is a result of maladministration or malpractice, PAL will invoke the M&M policy and take appropriate action based on the outcome of any investigation.

Appeals
See: PAL's Appeals and Enquiries Policy

Data Security
PAL recognises the importance of data security and takes several measures to ensure the security of personal data. These include training all staff on data protection and cyber security.

Access to personal data is password-protected, and only those with permission are granted access. Any misuse of personal data by our employees is considered a disciplinary offence and a full investigation is automatically initiated. Any misuse of data by any of our associates and consultants/technical advisors will result in an investigation and the potential termination of their service level agreements.

All personnel associated with PAL are required to sign confidentiality agreements and service level agreements and contracts of employment highlight the requirement to protect materials, information, and intellectual property.

See: PAL Data Policy; PAL GDPR Policies

Security of Assessment Materials
See: Confidentiality Policy and Development of Resources Policy

Issuing of Results
See: Results and Awards policy

Regulatory References
PAL is required to establish and maintain compliance with regulatory conditions and criteria. This policy relates to Ofqual General Conditions of Recognition: compliance of qualifications with regulatory documents D5; results for a qualification must be based on sufficient evidence H5; issuing results H6.

Condition EPA1 Compliance with Assessment Plans and gateway requirements.
Condition EPA3 Notification to Ofqual of certain events in relation to EPAs

Date created: 6th June 2018
Last review: 15th September 2023
Next review: 15th September 2024
Person Responsible for Review: Qualifications Director
This Policy has been agreed by Linda Martin, Managing Director.

Appendix One - Background to Grading Vocational and Technical Qualifications to include Apprenticeship Standards

The information included in this appendix takes directly from the following research and report:

> Research and Analysis- Grading Vocational & Technical Qualifications
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> Recent policies and current practices
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> Paul E. Newton from Ofqual's Strategy, Risk and Research directorate
>
> November 2018- Ofqual Ofqual/18/6441/3
>
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There are plenty of precedents for grading VTQs, both historically and internationally. However, in England, under the influence of Competence-Based Assessment (CBA), such practices waned. CBA took root in England, in the 1990s, with the introduction of National Vocational Qualifications (NVQs), as a direct result of dissatisfaction with the traditional General Qualification (GQ) assessment approach when applied in vocational settings. The hallmarks of CBA are very distinctive, including design requirements such as:

➢ The atomistic specification of measurement standards in terms of learning outcomes and assessment criteria.
➢ A mastery measurement model, meaning that a certificate of competence could be interpreted to mean competent across each and every learning outcome and assessment criterion.
➢ Assessment based on the exhaustive sampling of learning outcomes and assessment criteria.

In recent years, following the publication of the Wolf Review, the Richard Review, and the Whitehead Review, grading has become a political imperative; particularly for VTQs that are to be recognised in school and college performance tables; as well as for new Apprenticeships, and for new Technical Qualifications.

In the research associated with this report the research revealed that mastery was not the only measurement model in operation. In fact, four different aggregatory principles were observed:

1) **Mastery** – overall result represents (or tends towards) the lowest level of proficiency across a specified domain, or subdomain.

2) **Compensation** – overall result represents an average level of proficiency across a specified domain, or subdomain.

3) **Configuration** – overall result represents a particular pattern, or configuration, of proficiencies across a specified domain, or subdomain; and

4) **Charity** – overall result represents (or tends towards) the highest level of proficiency across a specified domain, or subdomain.

All the sampled qualifications connected with this research operated aspects of both mastery and compensation. Many of the qualifications operated at least three of these principles simultaneously, and some all four. Apprenticeship standards and associated assessment plans are predicated on the mastery principle.

A more recent perspective treats qualification design as a process of 'measuring the learner' with (more or less explicit) reference to a **proficiency specification**.

Developing a proficiency specification is not simply a matter of characterising the proficiency **construct**, i.e., the boundaries of the content domain, and the elements of knowledge and skill that it includes. It is also a matter of characterising the proficiency **scale**, i.e., the features that distinguish different levels of proficiency.

Consequently, the **proficiency construct-scale** explains what it means for one candidate to have achieved a higher level of proficiency than another. It is therefore obviously relevant to qualifications that award higher grades. Yet, it is equally relevant to qualifications that only award a passing grade because that still requires us to specify what distinguishes a candidate who is minimally competent from a candidate who is not yet competent.

The introduction of National Vocational Qualifications (NVQs) in England, during the 1990s, reflected a shift in perspective from 'assessing the curriculum' to 'measuring the learner'. NVQs were conceptualised *purely* in terms of measuring learner competence, regardless of whether or not that learner had followed a formal course of learning, bounded by a curriculum. Instead of a curriculum, NVQs specified the **elements of competence** that comprised a domain of practice (thereby articulating the construct), alongside **performance criteria** that were used to judge whether or not each element had been achieved (thereby articulating the scale). The model underlying this shift in perspective – which was known as **Competence-Based Assessment** (CBA) – generalised beyond the NVQ context to influence the design of VTQs (and qualification frameworks).

Recent policy context

Recent debate over assessment practices within VTQs in England has been influenced by a number of high-profile reports, including:

1.   Wolf (2011) Review of Vocational Education.

2.   Richard (2012) Review of Apprenticeships; and

3.   Whitehead (2013) Review of Adult Vocational Qualifications in England.

Each of these reports identified grading as a growing concern:

One fundamental problem for educational institutions is that they are competence- based awards which are meant to attest that someone has reached a particular threshold or level of workplace competence. […] However, any candidate for educational progression needs to demonstrate not only a specific level of competence, but relative performance, otherwise the qualification is of little use to selectors. While a considerable number of QCF awards do allow for grading, awarding bodies told the review that this had been very difficult to achieve.

(Wolf, 2011, pp.86-7)

Also, similar to a university degree, I believe that the test at the end of an apprenticeship should be graded. Prospective employers should be able to use the grade in the test as evidence of the apprentice's ability and potential.

(Richard, 2012, p.56)

Vocational qualifications provided for adults should be designed to use a pass, merit, distinction structure or a more detailed scale, where such differentiation will increase the qualifications' value to employers and individuals […]

while acknowledging that for some qualifications, including some licenses to practice, the costs of introducing grading may outweigh the benefits.

(Whitehead, 2013, p.35)

A subsequent report from the Independent Panel on Technical Education (Sainsbury, 2016) also mentioned grading, albeit in passing.

The government has responded to these reports by promoting the increased use of grading within VTQs, Apprenticeships, and Tech level (T level) Technical Qualifications (e.g., BIS, 2014; DfE, 2017a). Grading has also been specified as a blanket requirement of qualifications submitted to the Department for Education (DfE) for consideration as Technical Awards, Technical Certificates, Tech Levels or Applied General qualifications, for inclusion in the key stage 4 and 16-to-18 performance tables from 2020 (DfE, 2017b).

The General Conditions of Recognition GCR

QCF regulations, which were specific to QCF qualifications, were superseded by the General Conditions of Recognition (GCR), which now apply to all regulated qualifications in England, whether GQs or VTQs. The GCR regulations do not specify design requirements in anywhere near the same level of detail as the QCF regulations did[9]. This permits greater variation in the design of VTQs – thereby supporting innovation – and assumes that validity ought to be the primary consideration when designing qualifications. In relation to the present report, with its focus on grading and levelling, the key regulatory documents are the:

1. General Conditions of Recognition (Ofqual, 2016); and the

2. Qualification and Component Levels Requirements and Guidance for All Awarding Organisations and All Qualifications (Ofqual, 2015a).

Levels

Although the QCF was withdrawn, and the focus for both design and regulation shifted back from units to complete qualifications, the concept of qualification levels (which had been associated with the NQF, prior to the QCF, and with NVQs too) was retained. The Regulated Qualifications Framework (RQF) was introduced to help people to understand the range of qualifications that Ofqual regulates, and to support consistency in how AOs describe the size and challenge, or demand, of the qualifications they offer. The RQF adopted the existing QCF levels (Entry 1 to 3; Levels 1 to 8) and mapped onto the Framework for Higher Education Qualifications, as well as to the European Qualifications Framework. Although level descriptors were updated, the demand of those levels was not changed. The descriptors were revised to become more outcomes-focused, to cover both GQs and VTQs, setting out the knowledge and skills that might typically be expected of someone with a qualification at that level.

In terms of levelling, the General Conditions does not specify a great deal other than that an "awarding organisation must assign one or more levels to each qualification which it makes available or proposes to make available." (Ofqual, 2016, p.55). The Levels Requirements and Guidance document goes into more detail, including the specification of the descriptors according to which qualifications and components must be levelled. Unlike the QCF level descriptors, the RQF ones are described in terms of only two constructs – knowledge and skills.

Reporting on the outcome of a consultation on the nature of regulation 'After the QCF' the simplification of level descriptors was explained as follows:

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[9] Not only do the many details contained within QCF guidance documents no longer apply, but there are no longer any guidance documents specific to the vast majority of VTQs.

Some respondents suggested that the level descriptors should also include a category for autonomy and accountability.

We considered whether to add this category but given the difficulty associated with aligning knowledge and/or skills with autonomy and accountability in some job roles, we have decided to confirm our original proposal and introduce level descriptors only in the knowledge and skills categories.

This will not prevent awarding organisations from assessing autonomy and accountability in their qualifications, but this should not be factored into a determination of level.

(Ofqual, 2015b, p.2)

The new level descriptors are presumed to: "set out the generic knowledge and skills associated with the typical holder of a qualification at that level." (Ofqual, 2015a, p.5). The descriptors for Levels 2 and 3 are reproduced for illustrative purposes in Annex 3 of this report.

To establish the level of any particular qualification or component, an awarding organisation:

➢ should look at the range of level descriptors and identify the descriptor (or where the qualification will have more than one level, the descriptors) which provides the best match with the intended knowledge and skills outcomes for their qualification. […] The fit does not have to be perfect; qualifications might naturally have a more knowledge- or skills-based focus and so will be a better fit with the knowledge or skills descriptor as appropriate.

(Ofqual, 2015a, p.10)

In contrast to the detailed design requirements of the QCF Regulatory Arrangements and associated guidance documents, the process of assigning levels under the General Conditions is essentially post hoc, intended to link the qualification to the level that best describes it. In particular, there is no longer any explicit indication that levels ought somehow to map onto Bloom's Taxonomy, either conceptually or in terms of how LOs and AC are written.

In respect of apprenticeship standards, it is the contributors to the apprenticeship standard and assessment plan that attributed the level. The EPAO, has to work with the assigned level and pitch their assessment design, development, delivery, and award accordingly.

Grading

Unlike the QCF Regulatory Arrangements, the General Conditions does not explicitly refer to 'grading'. Instead, grading requirements are implied when the Conditions refers to differentiating between 'specified levels' of attainment, for instance:

An awarding organisation must ensure that the specification for a qualification sets out – […]

(f) the knowledge, skills and understanding which will be assessed as part of the qualification (giving a clear indication of their coverage and depth), […]

(h) the criteria against which Learners' levels of attainment will be measured (such as assessment criteria or exemplars), […]

(j) any specified levels of attainment.

(Ofqual, 2016, p.46, condition E3.2)

In designing such an assessment, an awarding organisation must in addition ensure that the assessment – […]

(f) allows each specified level of attainment detailed in the specification to be reached by a Learner who has attained the required level of knowledge, skills and understanding, and

(Ofqual, 2016, p.49, condition E4.2)

An awarding organisation must produce a written document in relation to an assessment which sets out clear and unambiguous criteria against which Learners' levels of attainment will be differentiated.

(Ofqual, 2016, p.49, condition G1.3)

Note that the General Conditions does not require that qualifications must be designed according to a specific measurement model, be that mastery or compensatory. Indeed, there is no regulatory requirement for any VTQ to be based upon either a mastery model or a compensatory model, neither for the passing grade nor for any higher grade.

Finally, it is worth noting that certain kinds of regulated VTQ now have bespoke Conditions. For Functional Skills Qualifications, requirements and expectations are specified for the pass/fail grade only (e.g., Ofqual, 2018a; 2018b); whereas, for Technical Qualifications, requirements and expectations will also be specified for higher grades too (e.g., Ofqual, 2018c).