

NOCN Record of Mitigations - Summer Assessment Series 2020

Functional Skills Qualifications – Calculated Results

This proforma will be used by NOCN to record its policy decisions regarding learners registered on NOCN Vocational and Technical Qualifications, who have had their learning disrupted by the COVID-19 pandemic. This proforma has been created, by request of the Regulator, and follows the government direction regarding the disruption to Vocational, Technical and Other General Qualifications for Summer 2020. This was communicated to Awarding Organisations on the 9th April 2020:

<https://www.gov.uk/government/news/awarding-vocational-and-technical-qualifications-this-summer>.

The purpose of this document is to record NOCN’s decision making regarding Condition VTQCov8.1(b). This document will be used as a working document and will be amended with additional information if decisions require amending or if further direction or guidance is issued by the Regulators. This document will be provided to the Qualification Regulators upon their request.

Overview	
Qualification(s) in scope	<p>This proforma relates to all Functional Skills Qualifications, which have been categorised by NOCN as requiring a ‘calculation’ mitigation.</p> <p>The full list of respective qualifications is listed in Appendix A.</p>
Mitigation	<p>The mitigation for all qualifications listed in Appendix A is ‘calculated results’.</p>
Rationale for the type of mitigation	<p>The decision of whether to adapt an assessment or issue a calculated result has been made by NOCN per qualification and has taken into account the content of the qualification, how the qualification is assessed, whether the qualification leads to employment or higher education and ensuring that standards can be maintained.</p> <p>In line with the direction provided by Ofqual, NOCN will work with its approved centres to issue calculated results for the majority of its qualifications. This would not be appropriate for all qualifications, specifically where a qualification is designed to signal occupational or professional competence. Therefore, the qualifications selected for calculated results have been assigned this mitigation if:</p> <ul style="list-style-type: none"> • The qualification is not license to practice. • The achievement of the qualification does not signal occupational competence. • There are no, or very minimal, health and safety risks in issuing a calculated result.

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	<ul style="list-style-type: none"> Achievement of the qualification may lead to a learner gaining non-technical employment or progression to higher education.
Operating outside of this process	NOCN expects all centres to act upon this policy and remain within it. If, however, there is good reason, there is no need to calculate results or the learner shows a strong choice to treat their qualification in a different manner, then NOCN will accept 'Normal' qualification delivery or a delay to achievement but this decision needs to be checked with NOCN via assurance@nocn.org.uk and documentation of the decision retained.

Detail of mitigation – for calculation (evidence types)	
Type 1 Evidence: Banked components, marks or grades (NOCN Unit Assessments)	<p>Description: Any unit achievement which have been internally quality assured and externally quality assured by NOCN is banked on NOCN's systems and will automatically contribute to the achievement of a learner's qualification. This also includes any claims made through direct claims status, where external quality assurance has not been completed, but the Centre's EQA has confirmed the robustness of the Centre's quality systems in the awarding of DCS.</p> <p>Level of Trust Applied by NOCN: This evidence will have a high level of trust as it has already been subjected to NOCN's usual and robust quality assurance system and processes. Therefore, NOCN has full confidence in this type of evidence.</p>
Type 2 Evidence: Internal assessment evidence not yet verified by an EQA (Mock Tests)	<p>Description: NOCN will instruct centres to consider assessments already completed but not externally quality assured by NOCN when estimating a learner's final result. To be considered as this type, evidence must be internally quality assured for reassurance of validity. As the majority of NOCN qualifications are pass or fail, banked components (i.e. units or assessments completed) can be used by centres to determine what the learners' outcome would have been on uncompleted assessments or examinations.</p> <p>Level of Trust Applied by NOCN: As evidence has been internally quality assured by the Centre, NOCN would apply a strong level of trust to the evidence, based on the Centre's quality assurance history with NOCN.</p>
Type 3 Evidence:	<p>Description: Where banked assessments, or assessments that have been subjected to the internal quality assurance process within the Centre are not available, the Centre must make a judgement regarding what</p>

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<p>Centre assessment decisions/other Centre information about learners (Class tests)</p>	<p>would have been the most likely outcome of the learner sitting the required assessments. This will usually be for remaining units or assessments not completed. Centres must make a professional judgement derived from evidence held within the Centre and which have been reviewed by subject tutors/assessors and relevant heads of department.</p> <p>Level of Trust Applied by NOCN: NOCN will place a proportionate level of trust to this type of evidence based on the records provided by the Centre and how they have justified their decision making. The Centre's previous quality assurance history with NOCN will also be taken into account.</p>
<p>Type 4 Evidence: Historical data about qualification functioning (Teacher/Instructor predictions) (particularly pertinent to practical modules)</p>	<p>Description: NOCN will take into consideration the historical relationships between different components within a qualification to inform how achievement of one or more units may signify the likelihood achievement of another unit. Therefore, centres must consider the content of units they are estimating and whether they can use any banked units the learner may already have to inform the calculated result.</p> <p>Level of Trust Applied by NOCN: The trust in this type of evidence will be overseen by quality assurance activities in reviewing Centre evidence and the specific content of units. Where there is sufficient trust and availability, the use of banked assessments will allow for the prediction of the outcome of missing assessments. Used appropriately, this type of evidence will provide a reasonable and justifiable calculated result.</p>
<p>Type 5 Evidence: Centre data and information (Class participation and level of understanding in class)</p>	<p>Description: Historical evidence of a Centre's performance will be used to determine the confidence in the Centre's ability in generating predictions of a learner's estimated result. To successfully quality assure the Centre's estimated results, NOCN will utilise its external quality assurers to generate predictions of Centre ability based on their previous findings and risk ratings from quality assurance visits. There will be less appropriateness of use of previous Centre achievement rates for portfolio-based qualifications, but this will be taken into consideration for examination-based qualifications, such as Functional Skills.</p> <p>Level of Trust Applied by NOCN: All NOCN centres have a risk-rating applied by their external quality assurer following a monitoring activity. A Centre's risk rating, findings from previous monitoring visits and the outcomes of investigations will lead to the level of trust applied to a Centre on a case by case basis. More confidence and trust will be applied to centres with a lower risk rating and those who have not been subject to Sanctions.</p>
<p>Type 6 Evidence:</p>	<p>Description: For some NOCN qualifications, centres may be able to make use of a learner's prior achievement when calculating grades. For example, attainment of a similar qualification at a lower or higher</p>

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<p>Learner's Prior attainment Data (Grades from past qualifications)</p>	<p>level. Only where the relationship between prior attainment data and qualification outcomes has shown to be predictive will this be useful. Due to the varying nature of NOCN qualifications, centres and NOCN may not find it possible to rely on this data alone, however it could sufficiently support a calculated result which has other evidence.</p> <p>Level of Trust Applied by NOCN: This will have a lower application of trust regarding individual calculated grades due to it being situational and the differing natures of qualifications.</p>
<p>Type 7 Evidence Class attendance (how frequently an individual attended training)</p>	<p>Description: Class Registers</p> <p>Level of Trust Applied by NOCN: Low level of trust but a good indicator of possible attainment.</p>

Detail of mitigation – for calculation	
<p>Method for 'calculating' grade</p>	<p>For the qualifications listed in Appendix 1, NOCN will liaise with its Approved Centres to, where it is possible and safe to do so, estimate and issue a calculated result for learners who have been affected by the COVID disruption. A calculated result will be based on a centre's Centre Assessment Grade (CAG).</p> <p>As the majority of NOCN qualifications are assessed via completing a paper-based portfolio, NOCN will request CAGs at a qualification level.</p> <p>Definitions</p> <p>A Centre assessment grade (CAG) is the term used throughout this document to refer to the evidence-based, provisional, judgement of a learner's component result which a Centre submits to NOCN. Only when quality assured by NOCN will a calculated result be issued.</p> <p>A calculated result will be confirmed by NOCN for each learner following quality assurance activities. The calculated result will be used to claim for learner achievement of the component/qualification and therefore</p>

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must be robust to still meet qualification and sector requirements. Learners who receive a calculated result will be issued with the same qualification certificate that they would have expected to receive if they completed their qualification outside of the COVID-19 disruption.

A learner's CAGs should only be judged by Tutors/Assessors with direct experience of teaching that learner the subject and component for which the CAG is being judged. Where more than one Tutor/Assessor is responsible for teaching or assessing a learner a unit/qualification, these Tutors/Assessors should work together to reach a judgement about the learner's CAG.

CAG Methodology

Tutors/Assessors must identify eligible learners before starting the process of judging learner CAGs. Centres must **NOT** submit CAGs for any learner they would not expect to have taken the exam / assessment during this period.

The following forms of evidence should be used to support judgement, where these are available:

- Previous centre-marked attempts at practice or mock assessments.
- Formative assessment results. Formative assessment is defined as assessment undertaken to check learning has taken place and assess progress towards unit or qualification achievement. This can be centre-devised or a commercially-available product. This does **not** include initial and diagnostic assessment (see below).
- Any other learner work towards the qualification or unit (i.e. work they have independently undertaken in class or at home)
- Learner work demonstrating the skills assessed by the unit or qualification that has been completed in support of another qualification learning aim.

Results of initial and diagnostic assessment can be used but only in the following ways:

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- As a benchmark to gauge progress made towards the unit requirements by the learner
- Where this provides evidence that the learner had already met one or more of the unit's assessed requirements at the point at which the initial / diagnostic assessment was taken.

The Centre must consider each eligible learner in turn. For each learner whose CAG is being judged, the Tutor/Assessor should consider:

- At least one piece of valid evidence that demonstrates the learner's progress towards the assessment requirements of the component.
- The assessment requirements of the component.
- (Where available) the pass descriptor for the component being considered.
- Their knowledge of the learner's ability.
- Any permitted support that would have been given to that learner in completing the assessment (at Entry level).
- Any reasonable adjustment that would have been made to the assessment for that learner in respect of a disability.

The Tutor/Assessor should use the evidence, as well as their professional expertise, to reach a considered judgement about whether that learner would have passed or whether the learner would have failed the component had they taken the assessment in the usual way. All available evidence should be used and the minimum requirement for judging a learner's CAG is that there must be one piece of valid evidence available.

The evidence used may only show partial achievement of the component's requirements. In reaching a decision about each learner's component CAG, Tutors/Assessors must make a judgement that includes a reasonable consideration of whether the candidate would have passed had the scheduled programme of learning taken place and been completed by the learner. This includes a judgement where learning has been disrupted about whether the learner would have passed had they completed the full programme of learning. Centres should bear in mind the learner's progression aim when providing a 'pass' CAG for a learner and that this means they believe that the learner would be able to operate in an employment setting in respect of the skills that will be certificated.



	<p><u>Submission of CAGs</u></p> <p>NOCN will issue a series of communications to its Approved Centres to inform them of the procedure for the submission of calculated results. This will involve centres populating a pre-created Excel spreadsheet to formally record the CAGs for all learners affected by the COVID-19 disruption. The spreadsheet will be provided by NOCN and must be submitted back via NOCN’s registration and award system, Quartzweb, to avoid data protection issues.</p> <p><u>Calculated Results</u></p> <p>Once the spreadsheet of Centre CAGs have been returned by a Centre, NOCN will implement quality assurance activities to ensure that a fair and robust process has been followed. Once quality assurance activities have been completed, NOCN will confirm the calculated grades for each learner submitted so that the Centre can claim for any due certificates.</p>
<p>Methods for quality assurance</p>	<p>NOCN will implement a quality assurance model, which will have a similar approach to its EQA approach in monitoring Centre assessment decisions. Once spreadsheets have been submitted by centres, a NOCN EQA will review the CAGs against the details of the evidence the Centre has stated they have used to make their judgement. The quality assurance activities will be used to review the appropriateness of the centre’s evidence in determining a CAG and reviewing the Centre’s approach in completing the overall CAG process.</p> <p>Due to the varying nature of NOCN qualifications and the varying natures of how centres may assess them, there will not be one standard approach by the EQA that can be employed. Rather, NOCN will instruct EQAs to use their own professional judgement in line with the guidance to be provided by NOCN. The EQA will pay particular attention to the levels of trust applied by NOCN to the six different types of evidence that centres may submit. The level of trust applied to each type of evidence will determine how much extra evidence the Centre would need to provide to come to a safe judgement regarding the CAG.</p> <p>The EQA will also utilise the outcomes from their previous external quality assurance visits at the Centre and will use this intelligence to determine where to target their activities. In line with this, EQAs risk rate all of their centres either Low, Moderate or High. NOCN’s policy on Centre monitoring is that centres who are rated as</p>

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	<p>higher risk (i.e. centres who fail to meet recognition and qualification requirements) receive more monitoring than those rated low (i.e. centres who consistently meet requirements).</p> <p>In all cases, the EQA will challenge centres to provide a sample of documentary evidence to support their judgements. The sample size will be determined from:</p> <ul style="list-style-type: none"> • The EQAs confidence in the Centre to conduct the CAG process accurately, fairly and robustly. • The outcomes of previous external quality assurance activities. • The quality assurance risk rating applied to the Centre. <p>Where the EQA feels a higher sample size is necessary, they will request this from the Centre.</p> <p>In reviewing the documentary evidence provided by the Centre, the EQA will:</p> <ul style="list-style-type: none"> • Review the details of the evidence the Centre has used to calculate a CAG to determine whether they believe the evidence is sufficient. This till take into account the level of trust applied by NOCN to the evidence category. • Place a focus on how effective the Centre has been at following the CAG process and following NOCN guidance. • Review the evidence to ensure the principles of valid, reliable and current are satisfied. <p>The EQA will work directly with centres to adjust results, where this is necessary.</p> <p>NOCN will complete standardisation activities of EQA decisions to ensure a consistency of decisions across different EQAs before issuing calculated results to centres. Amendments to EQA decisions will be made where deemed necessary by standardisation outcomes.</p>
<p>Provide rationale for how this maximises use of</p>	<p>By applying levels of trust to each evidence type and taking this into consideration when performing its quality assurance process, NOCN will ensure that calculated grades maximises the use of the most trusted evidence.</p>

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the most trusted evidence	Where evidence is used by centres where there is insufficient levels of trust, the EQA will work with the Centre to determine whether alternative sources of evidence can be explored. Where there is insufficient evidence to satisfy the EQA making a judgement of issuing a calculated result, NOCN will work with the Centre to adapt assessments or to delay assessment as a last resort.
Minimum evidential threshold	To ensure a robust process, NOCN suggests a minimum evidence threshold of one piece of valid evidence, along with additional supporting judgments, where these are available.
Expected overall profile of results	As the NOCN qualification in scope for this proforma are not 'pass/fail', they are achieved when the learner has met all relevant assessment criteria, NOCN expects that centres have a similar achievement rate to previous and future years. Where there are any large increases or decreased in achievement rates, this will be investigated before results are confirmed to centres.
How will the 'overall check on outcomes' be included into the overall model	<p>This will be built into the quality assurance methodology. NOCN will perform an overall check on the results profiles of centres and on EQA judgements as part of standardisation activities before results are confirmed to centres. NOCN will have one single submission window of results by centres to prevent no result being issued until standardisation and an overall check on outcomes is reviewed and is seen to be satisfactory.</p> <p>Where there are any identified anomalies or differences to previous or future years, NOCN will investigate the reasons why. This may involve performing further quality assurance activities or adjusting grades, if this is deemed necessary by the evidence presented by the result profile.</p>
Timeline for mitigation	<ul style="list-style-type: none"> • 13th May - NOCN publishes policy statement and guidance to centres regarding the summer 2020 assessment series • By 27th May - Centre ensures all affected learners are registered with NOCN. • By 5th June – Centre develops their own policies for determining CAGs. • 8th June – Spreadsheet template for submission of CAGs is made available to centres. • From 8th June to 31st July – Centre determined CAGs, records this on the NOCN spreadsheet template and submits to NOCN via Quartzweb. • 6th July to 13th August – NOCN quality assurers CAGs. NOCN informs Centre of decision following completion of activities.

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	<ul style="list-style-type: none"> • By 19th August – Centre submits claims using calculated grades issued by NOCN for all Functional Skills Qualifications. • From 19th August – NOCN issues any due certificates to learners using its normal procedure.
<p>Outline key risks identified and the mitigations</p>	<p><u>Engagement with Centres</u> Due to the current lockdown in the United Kingdom, we could face non-engagement from centres who are closed, which may lead to learners not being certificated or included in the process as normal. NOCN will actively communicate with centres through bulletins, updates on our website and email and telephone communication where possible. NOCN will keep a record of all centres who have engaged with the process and will inform the Regulator where it believes learners may be in the system to inform next steps.</p> <p><u>Centre Ability to Determine CAGs</u> As it is a new process, centres may struggle to determine CAGs or may make incorrect or ill-informed decisions. NOCN will employ a quality assurance strategy to ensure that a representative sample of results are quality assured for each Centre before results are released. NOCN will also provide support and guidance to centres regarding the CAG process.</p> <p><u>Malpractice Regarding CAGs</u> Centres may use the process to determine CAGs for learners who should not have been involved in the process, including new learners registered at the Centre or learners who were not due to certificate in the period. NOCN will reduce this risk with its quality assurance strategy. Centres who have been placed on a Sanction within the previous 6 months, or who have been rated as high risk regarding their quality of NOCN provision, will receive more quality assurance intervention. Where NOCN does not hold confidence in the Centre in following the CAG process, it will not accept the Centre's CAGs.</p> <p><u>Certificate Recalls Following Ease of Lockdown</u> There is a risk that after lockdown eases and NOCN resumes its normal quality assurance activities, there is a risk that CAGs may be identified that should not have been issued. NOCN will take all preventative measures to decrease the likelihood of this occurrence. If it does occur, NOCN will take all reasonable steps to prevent the occurrence of an Adverse Effect and only as a last resort will NOCN revoke a certificate. If this is the case, NOCN will inform the Regulators.</p>



	<p><u>Staff Resource to Comply with Extraordinary Regulatory Framework</u> A lot of work is required to ensure that the process can occur in the timescales required and that it is completed in a compliant manner. NOCN will review resources at regular intervals to ensure timescales are met and are met to a high standard.</p>
Other information	<p><u>Appeals</u> Complying with the direction provided by the Secretary of State, NOCN will allow learners to have a right of appeal regarding the process for grade or outcome estimation. Learners will not be able to appeal their qualification final grade or outcome, but will be able to appeal regarding the process and where they believe their registered Centre, or NOCN as their Awarding Organisation, has not followed the correct process in determining their result. Ofqual has recognised that allowing appeals by learners regarding teacher judgements and validity of evidence supplied for grade or outcome calculation would be undesirable and impractical and NOCN supports this view. NOCN will ensure that the availability of an appeal regarding the process is made clear to both learners and centres by ensuring that an appeal statement is published and shared on our official website. The appeal statement will bolt-on to NOCN’s current appeal policy and the procedure for which appeals will be heard and addressed will follow a similar process.</p> <p><u>Policy on No Response</u> A pragmatic approach will be taken regarding centres who are not able to complete the grade calculation process due to the COVID-19 disruption. NOCN supports an open dialogue with its centres and through external quality assurers will proactively communicate with centres to determine the practicability of the Centre in completing the grade calculate process to the required standard. Where a Centre refuses to work with NOCN to support learners in obtaining their final outcomes or grades, or where there are substantial cause for concern regarding a Centre’s ability to complete the due process, NOCN will promptly report this to the Regulator.</p> <p><u>Policy on Late Submission</u> This will be on a case-by-case basis. Dependent on the individual circumstance and date of submission after the deadline submission date, NOCN will report details of this to the Regulator to determine the appropriate next step. NOCN will make it clear to centres that they have the responsibility to prevent the disadvantaging of learners by timely submitting their calculated grades to NOCN to allow for the required quality assurance processes to take place.</p>



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Expected date(s) of results issue	By 19 th August 2020 for all Functional Skills Qualifications.
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Version Control

Version No.	Date Created	Version Details
1.0	11/05/2020	Initial version created.
2.0	19/05/2020	Further information and clarification added regarding Centre assessment grades (now referred to as 'CAG'). This has been updated to reflect the outcomes of the FAB working group.

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General Qualifications – Calculated Results



Appendix A - QAN and qualification titles covered by this Policy:

Title	QAN
NOCN Functional Skills qualification in English at Entry 1	500/8835/X
NOCN Functional Skills Qualification in English at Entry 1	603/5270/X
NOCN Functional Skills qualification in English at Entry 2	500/9334/4
NOCN Functional Skills Qualification in English at Entry 2	603/5268/1
NOCN Functional Skills qualification in English at Entry 3	500/9320/4
NOCN Functional Skills Qualification in English at Entry 3	603/5272/3
NOCN Functional Skills qualification in English at Level 1	500/8499/9
NOCN Functional Skills Qualification in English at Level 1	603/5266/8
NOCN Functional Skills qualification in English at Level 2	500/9469/5
NOCN Functional Skills Qualification in English at Level 2	603/5264/4
NOCN Functional Skills qualification in Information and Communication Technology (ICT) at Entry 1	500/9762/3
NOCN Functional Skills qualification in Information and Communication Technology (ICT) at Entry 2	500/9763/5
NOCN Functional Skills qualification in Information and Communication Technology (ICT) at Entry 3	501/0749/5
NOCN Functional Skills qualification in Information and Communication Technology (ICT) at Level 1	500/9764/7
NOCN Functional Skills qualification in Information and Communication Technology (ICT) at Level 2	500/9765/9
NOCN Functional Skills qualification in mathematics at Entry 1	500/8466/5
NOCN Functional Skills Qualification in mathematics at Entry 1	603/5273/5
NOCN Functional Skills qualification in mathematics at Entry 2	500/9335/6
NOCN Functional Skills Qualification in mathematics at Entry 2	603/5271/1
NOCN Functional Skills qualification in mathematics at Entry 3	501/0834/7
NOCN Functional Skills Qualification in mathematics at Entry 3	603/5265/6
NOCN Functional Skills qualification in mathematics at Level 1	500/8501/3
NOCN Functional Skills Qualification in mathematics at Level 1	603/5269/3
NOCN Functional Skills qualification in mathematics at Level 2	501/1158/9
NOCN Functional Skills Qualification in mathematics at Level 2	603/5267/X