

## On the right level (for Ofqual EQA)

By David Jenkins-Handy

Ofqual's major focus has always been fairness for students. The regulations that they apply, the General Conditions of Recognition, are about reducing the risk of a serious event negatively impacting learners. We can see this as Ofqual's ground zero from which they have built all their regulation. Prevention of detriment to learners is the key to understanding Ofqual's approach to regulatory enforcement and supervision of awarding organisations.

For End-Point Assessment Organisations (EPAOs) wading through the complexities of recognition, grasping this golden thread that runs through Ofqual's regulation (prevention of detriment to learners) is an essential. So, where can it all go wrong? For many EPAOs, the biggest vulnerability is in applying the correct level to ensure the validity of their assessments.

Paul Newton, Ofqual's Chair of Research, dismisses those EPAs that simply "mirror the assessment plan" but are not actually valid.<sup>1</sup> He is referring to the attempt to tick boxes rather than deliberate on the actual knowledge, skills and behaviours to demonstrate competence. Such deliberations, however, require an understanding of the level of competence (the occupational level) that is being tested.

Ofqual places considerable emphasis on the role of levels in assessment and provides regulation to support EPAOs compliance with the application of levels to end-point assessment; *EPA Qualification Level Conditions and Requirements* (Ofqual/18/6402/2 July 2018).

Detriment to learners, if the level is incorrect in an assessment, could involve unfairly setting the challenge to high or setting the level of challenge to low, making it nearly impossible to accurately differentiate outcomes of assessment between learners. Where, then, is there a potential to breach these Conditions and Requirements that insist EPAOs apply levels correctly?

The chief problem for assessment organisations trying to meet Ofqual's level requirements is the lack of clarity that exists for some assessment practitioners, over how to differentiate between the levels themselves. General descriptions abound and can leave assessment practitioners floundering.

A good example of a high-level, generic descriptor is found in the extract given below from a table of levels published for guidance, which merges a range of descriptors. In the table, the descriptors are condensed to a couple of bullet points.

Level 3	<ul style="list-style-type: none"><li>• ability to gain or apply a range of knowledge, skills and understanding at a detailed level</li><li>• appropriate if you plan to go to university, work independently or (in some cases) supervise and train others in their field of work</li></ul>
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<sup>1</sup>See Paul Newton [https://www.youtube.com/watch?v=gd5n9\\_UJsBI](https://www.youtube.com/watch?v=gd5n9_UJsBI)

Level 4	<ul style="list-style-type: none"> <li>• specialist learning, involving detailed analysis of a high level of information and knowledge in an area of work or study</li> <li>• suitable for people working in technical and professional jobs, and/or managing and developing others</li> </ul>
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The differences, while carefully calibrated, are not set in a manner that is easy to translate into assessments. More importantly, mapping an apprenticeship standard and the associated assessment plan to these general descriptions is not served well by the requirements expressed in the first bullet point for each level.

As high-level formulae for the levels they do have the merit of simplicity. However, the moment an EPAO tries to apply the descriptors in the context of an actual assessment plan, things start to unravel. It would strain any assessor's capability to evaluate the level of an assessment on the basis of these descriptors.

For example, how would one establish whether the ability to 'gain' a range of knowledge is found in a knowledge test consisting of 40 multiple-choice questions and also a portfolio and a professional discussion? Presumably, the actual intention with the descriptor is to show that knowledge has been gained, not how it is gained.

This leads to another question; why is this requirement to gain knowledge peculiar only to all level 3 qualifications? Equally strange is that the first thing we learn about a level 4 qualification is that level 4 involves specialist learning; surely, this is a requirement of every apprenticeship standard or technical and vocational qualification, whatever the level?

Frustrating as this situation is for assessment designers, for EPAOs' compliance practitioners they have the burden to consider the expectation laid out by Ofqual in their Conditions and guidance and by IfATE in their EQA framework. The reason to establish the appropriate level is a straightforward attempt to minimise detriment to learners but requires some discussion.

It is not simply automatically a matter resolved after becoming recognised by Ofqual. Getting the level for an assessment right, concerns maintaining compliance with EQA requirements, which includes meeting the Conditions set out by Ofqual.

Compliance with Condition EPA3.2(a) refers to 'Specific examples of events which could have an Adverse Effect' where "there is a substantial error in the awarding organisation's assessment materials". One specific point that can have a major impact on the quality of EPAOs assessment materials is if assessment developers have not set the appropriate level in terms both of questions and guidance for assessors.

The EQA framework establishes the expectations for ensuring the readiness of EPAs in step 3 of the EQA process, which states that this step "Ensures EPAOs are ready to deliver EPAs on time with high-quality materials **at the appropriate level**". The risk, therefore, is clearly one where an EPAO could be in breach of EPA3.2(a).

If an EPAO cannot demonstrate that the assessment materials are set at the right level, then the EPAO is not ready to deliver EPAs. A recognised EPAO could be in breach of EPA3.2(a)

where the organisation is delivering their EPAs not set at the correct level indicated by the Standard being applied.

So, what can EPAOs do to ensure that they are compliant with the regulation? One route, frequently tried, is to align assessments at a level benchmarking against qualifications at the same level. So, a good example of a level 3 qualification is a GCE A level. The question is, is it reasonable to expect a professional, vocational and technical education assessment to look and feel the same as an A level assessment? The former are competency-based assessments while A levels are academic qualifications.

Trying to take such a benchmarking route against qualifications at the same level is needlessly complex, is difficult and only offers a best-guess approach. Ofqual's own guidance under General Condition E and the Ofqual descriptors found on IfATE's website broadly characterise how to capture information necessary to define the level of an EPA.

*Once the awarding organisation has designed the qualification, they could look at the descriptor for the level above and below the proposed level for the qualification and compare the knowledge and skills descriptors for each level with the knowledge, skills and understanding which the holder of the qualification is expected to demonstrate. 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's admission that the 'fit does not have to be perfect' is reassuring. Aligning assessment materials with a level is not an exact science. My own view is that it is important to have a clear rationale in place for the development of assessment materials that can account for how they are aligned to the level indicated by an Apprenticeship Standard.

There is clarity to be found in the level descriptors published on IfATE's website. The tables consist of five columns: Level, Knowledge descriptor, Skills descriptor, Occupational competence and, finally, Autonomy and accountability. While the table provides a more complex characterisation of a level than the high-level descriptors referred to, earlier, it has the benefit of giving the granularity that can support the design and development of appropriate assessments.

Making a sound basis for the design and development of appropriate assessment materials, putting things on the right level, will involve resourcing the mapping and alignment activities to avoid tripping into the rabbit hole of 'simply mirroring the assessment plan'.

Building on a clear and credible design and development model will demonstrate to Ofqual and IfATE that an EPAO understands how to apply levels properly. That, in fact, it has the right approach to the design, development and delivery of its EPAs. The regulators can then be confident that the EPAO has the right capabilities (and assessment materials) in place and is ready to deliver its end-point assessments.