

AQA consultation response

Regulating Post-16 Vocational and Technical Qualifications at Levels 2 and 3

Executive summary

AQA is an independent education charity, providing high quality assessments that are fair, reliable and support students. Today, we're the largest provider of academic qualifications taught in schools and colleges in England. We set and mark exam papers for over half of all GCSEs and A-levels taken every year. Our qualifications are internationally recognised and taught in more than 40 countries around the world, and they're highly valued by employers and universities. And we have recently announced ambitious plans to develop and deliver all the new post-16 qualifications being introduced as part of the post-16 reforms in England, in collaboration with Training Qualifications UK (TQUK), part of the AQA Group.

AQA welcomes the opportunity to respond to Ofqual's [consultation on regulating post-16 vocational and technical qualifications at levels 2 and 3](#) (V Levels, Foundation Certificates and Occupational Certificates), due to be introduced from September 2027.

AQA broadly supports Ofqual's proposed regulatory framework for V Levels, Foundation Certificates and Occupational Certificates. We agree with most proposals on qualification size, content, assessment methods, moderation, standard-setting and the overall approach to on-screen assessment. However, we are concerned about the proposed 7-point grading scale for V Levels and the use of A-level grade labels, which risk undermining credibility, confusing stakeholders, and disadvantaging learners.

Our response also highlights risks in the assessment design particularly of Occupational Certificates, especially where qualification-level compensation could allow learners to pass without demonstrating essential occupational knowledge or skills. We urge Ofqual and DfE to ensure clear non-compensatory requirements for key content, especially in qualifications used as licences to practise. AQA supports modularity, synoptic assessment, numerical marking, and centre-marked components but stresses the need for careful planning around moderation, retakes and centre capacity. Finally, we encourage Ofqual to work closely with awarding organisations to manage implementation risks and support long-term digital innovation in assessment.

AQA's responses that explain our key issues and concerns

Level Grading scale

7. “To what extent do you agree or disagree with the proposal that V Levels should be graded using a 7-point grading scale?”

AQA Response: Disagree

We believe that V Levels should have the same number of grades as A-levels, since they will often be used in the same way, for entry to higher education.

We do not think that the case is made that there should be an additional grade for V Levels: it risks damaging the credibility of the qualification and disadvantaging students who have earned it if it appears to need an additional grade for learners at the lower end of the scale.

8. “To what extent do you agree or disagree with the proposal that V Levels grades should be labelled A* - E, with an additional grade below E, plus Ungraded?”

AQA Response: Disagree

Using a similar grading scale to A-levels would imply a direct equivalence with A-levels which we think these new qualifications may struggle to live up to, and it will make it harder for them to build stakeholder confidence. Using a different grading scale would signal that V Levels are distinctive and valuable on their own terms. We have separately proposed some possible alternative names for the grades.

9. “To what extent do you agree or disagree with the proposal to use the label N, for the additional grade below E for V Levels?”

AQA Response: Disagree

As set out above, we disagree that V Levels should have seven grades or use the A-level grading scale. If Ofqual nevertheless concludes that it should continue with the current proposal, we would suggest P rather than N for the additional grade, which would be aligned with the pass grade for the level 2 certificates. There is a significant risk that an N grade would be taken to mean ‘Near Pass’, as for some existing qualifications, or ‘Narrow Failure’, as used for A-levels in the late twentieth century, rather than (as Ofqual has proposed) being unambiguously a pass grade.

V Level Assessment design (Assessment method)

10. “Do you have any comments on the risks and benefits of the proposed assessment methods, in particular in relation to centre-marked assessments, and how any risks might be mitigated?”

We welcome the flexibility given to awarding organisations to manage the risks to centre-marked assessments, in terms of both design and delivery.

11. “Do you have any comments on the proposal to specify the proportion of Assessment by Examination and non-exam assessment for V Levels, or on the proportions specified?”

We support the proposal, though we note that the design means that it may be possible for students to pass the qualification on the basis of their non-exam assessments alone, even if their performance in the timetabled assessments was poor. There is a risk that this may damage confidence in the qualification.

V Level Assessment design (Assessment structure and availability)

15. “To what extent do you agree or disagree with the proposed approach to the availability of V Level assessments?”

AQA Response: Agree

We broadly agree, but with the caveat that manageability of timetabled assessments may prove to be a significant challenge for the larger-volume subjects in future tranches. We would recommend that Ofqual leads a piece of work over the next year with awarding organisations and providers to assess centre capacity particularly during the summer exam series, and consider whether changes need to be made to regulation of subjects in future tranches.

We agree with the proposal for one submission window each academic year to submit marks for centre-marked assessments for moderation. It is important that awarding organisations have flexibility over when this window is, to help with manageability and resourcing both within centres and for awarding organisations, notably with recruitment of moderators. We believe it may be preferable to have the window before the May/June exam series.

There are also some subjects, most obviously in agriculture and horticulture, where there are practical or seasonal limits on when assessments (and therefore moderation) can happen, so Ofqual may need to consider more flexibility when it comes to consider the regulatory arrangements for those subjects.

V Level Assessment design (Terminal assessment)

17. “To what extent do you agree or disagree with the proposal to require awarding organisations to design V Level qualifications which include terminal assessment, set and marked by the awarding organisation and taken simultaneously by students in the final series in which they complete their qualification?”

AQA Response: Agree

Ofqual and awarding organisations will need to carefully explain the terminal assessment requirement and its implications to centres, given the risk of misunderstanding, which may lead to detriment to students.

V Level Assessment design (Retakes)

19. “Do you have any comments on the proposed approach to retakes in V Levels?”

On balance we agree. There is a case for having an additional window for timetabled assessment retakes, so students who did less well than expected in their exams do not have to wait for a whole year before having an opportunity to retake; but given likely volumes and some of the challenges with standard-setting, we do not think this would be feasible for tranche 1. We may want to revisit this option once V Levels are established and the implications can be better assessed.

V Level Assessment design (Moderation of centre-marked assessments)

22. “To what extent do you agree or disagree with the proposal to require awarding organisations to conduct Moderation of all centre-marked assessment in a V Level?”

AQA Response: Agree

As Ofqual reviews and develops its approach to and requirements around moderation, it should take into account the distinct issues with vocational qualifications, and not focus that work solely on GCSEs and A-levels.

V Level Setting and maintaining standards

23. “Do you have any comments on the proposed approach to setting and maintaining standards in V Levels?”

We agree. There is a case for also designating the C/D grade boundary as an additional “key” grade boundary, but on balance we think it is sufficient to stay with the proposal made by Ofqual, which aligns with A-levels. We welcome the opportunity to continue to work with Ofqual to define the types of evidence that may be used to set and maintain standards, and principles on how that evidence should be weighted.

The proposal for awarding organisations to share data with each other will need further consideration on the practicalities. JCQ has data-sharing agreements in place to facilitate sharing between member organisations but there may need to be a role for Ofqual in the process where awarding organisations outside of JCQ offer V Levels.

V Level Reviews of marking, reviews of Moderation and appeal

24. “Do you have any comments on the arrangements that should be available for students to request reviews of marking, moderation and appeals of results in V Levels?”

We think that the approach should broadly mirror that used for GCSEs and A-levels: it is important not to disadvantage higher education applicants who are taking V Levels rather than A-levels, and it will be easier for providers to navigate if the processes are broadly similar.

We should recognise that some of the detailed arrangements may need to be different though: reviews of moderation and appeals may take more time and work differently from general qualifications given the amount of non-exam assessment in V levels. This will need to be carefully planned for, and guidance issued to centres and learners, especially given the time-pressures around entry to higher education. We should consider lessons from existing qualifications where these pressures are already being managed.

Foundation Certs and Occupational Certs Qualification design (Purpose)

25. “Do you have any comments on the proposed purposes for Foundation Certificates and/or the order in which they are prioritised?”

We note that both Foundation and Occupational Certificates will vary in size - in the case of Occupational Certificates the largest (equivalent to six GCSEs) will be a third bigger than the smallest. We think this is appropriate given the different needs of different occupations. It does mean, though, that the level of demand especially of Occupational Certificates will vary significantly between subjects. This will affect how learners, providers and employers view the qualifications and how they are taught. DfE, Ofqual and awarding organisations will need to work together to communicate what these qualifications means and how they should be used.

26. “Do you have any comments on the proposed purposes for Occupational Certificates and/or the order in which they are prioritised?”

DfE has proposed that the Early Years Practitioner Occupational Certificate should be a Licence to Practise. It may be that subjects in future tranches are also treated as such. This needs to be reflected in the articulated purposes of the qualification, perhaps as an optional purpose.

More generally, we are concerned that there is a mismatch between purposes D (‘provide accurate and consistent information concerning Learners’ attainment’) and E (‘provide information about a Learner’s readiness to progress to an apprenticeship or employment’), and the proposal to use compensation at qualification level. That means that employers will not be able to be confident that applicants with an Occupational Certificate have demonstrated the key knowledge, understanding and skills required for the relevant occupations. Two learners with the same grade may have achieved very different outcomes. Even though Occupational Certificates are not intended to demonstrate occupational competence (and could not do so), employers may reasonably assume that learners who have spent two years studying for one will have developed and demonstrated certain key knowledge and skills relevant to that occupation. The qualification will lose credibility and value if it transpires that a learner could pass the qualification without having done so.

The extent to which this is a problem may vary by subject. We would therefore recommend that the DfE-led content development process should be able to identify topics that are essential for candidates to pass in order to achieve the qualification, and that Ofqual amends its regulations accordingly to move away from qualification level compensation. In some cases it may be that all modules need to be passed, as with many existing vocational qualifications.

An alternative but more radical change would be to require for all Occupational Certificates that all learning outcomes/components need to be passed in order to pass the qualification.

In any case, we would strongly urge that the Early Years Practitioner Occupational Certificate is not made an outlier with a completely different structure from all other Occupational Certificate subjects, reflecting its status as a licence to practise: that would be hard to explain and justify, and would mean that the difficulties the proposed purposes present for other subjects would be left unaddressed.

Foundation Certs and Occupational Certs Qualification design (Qualification content)

28. “Do you have any comments on the proposal to require awarding organisations to comply with the DfE set content for Foundation Certificates and Occupational Certificates?”

We agree with this proposal. In future tranches, where subjects are available as both Foundation and Occupational Certificates, we recommend that DfE should ask subject development groups to develop common content across the two qualifications (core content within Occupational Certificates) where that can be done without undermining their distinct purposes. That would potentially allow co-teaching, which would help centres to offer a broader range of options, as well as allowing learners to delay committing to a particular pathway, enabling them to keep options open. Where that is possible, Ofqual should make sure that its conditions do not prevent AOs from developing common assessments that meet the requirements of both qualifications.

Foundation Certificates and Occupational Certificates Grading scale

29. “To what extent do you agree or disagree with the proposal to use a 3-point grading scale?”

AQA Response: Agree

On balance we agree with this proposal. As noted above, Occupational Certificates will be large qualifications, and will vary significantly in size. We considered whether the grading scale should be used to signal that range in some way, for example by using double grades. We concluded that there was no way of doing that that would be transparent and easy for employers and others to understand. We therefore support the proposal, while noting that it will be important to find other ways to help users to understand these qualifications, given their size and their diversity.

Foundation Certificates and Occupational Certificates Assessment design (Assessment methods)

31. “Do you have any comments on the proposal to specify the proportion of each assessment method for Foundation Certificates, or on the proportions specified?”

It is essential that the proportions are specified rather than being left to individual awarding organisations.

32. “Do you have any comments on the proposal to specify the proportion of each assessment method for Occupational Certificates or on the proportions specified?”

It is essential that the proportions are specified rather than being left to individual awarding organisations. Reflecting the concerns articulated elsewhere about use of compensation within Occupational Certificates, we are worried that some students may choose to miss the 30% timetabled assessments altogether and are able to pass the qualification on the basis of their non-exam assessment, which would undermine the purpose of the qualification to provide ‘accurate and consistent information about learners’ attainment’.

Foundation Certificates and Occupational Certificates Assessment design (Synoptic assessment)

33. “Do you have any comments on the proposed approach to synoptic assessment described above for Foundation Certificates and Occupational Certificates?”

We agree that synopticity is important, so that students can demonstrate they understand how the different skills and knowledge they have developed fit together and how they would be applied in an occupational context. We are comfortable with the draft requirements in annexes B and C, though we do not think the reference to ‘extended reasoning’ in part 3 is clear or helpful as a description of Ofqual’s intentions.

Foundation Certificates and Occupational Certificates Assessment design (Assessment structure and availability)

36. “To what extent do you agree or disagree with the proposed approach to the availability of assessments?”

Foundation Certificates: Agree

Occupational Certificates: Agree

For Foundation Certificates, we would suggest that the requirements make clear that either or both of (1) timetabled assessments and (2) centre-marked assessments need to have two windows in the academic year, in order to fulfil the requirement that the qualification should be modular.

Foundation Certificates and Occupational Certificates Assessment design (Retakes)

37. “Do you have any comments on the proposed approach to retakes in Foundation Certificates and Occupational Certificates?”

We think there should be limits to resubmission of centre-marked assessments. With Occupational Certificates there will be up to four opportunities to submit marks during a two-year course. For some types of assessment, this creates the risk of students spending significant amounts of teaching time redoing assessments. We would therefore propose that there should be a maximum of one opportunity for a student to resubmit revised evidence for centre-market assessments (for example, discrete tasks within a substantial assignment). If they wished to retake centre-marked assessment again they would need to submit a substantially revised form of evidence.

More generally, there are two issues related to retakes which we do not think are sufficiently clear in the current proposals. First, the draft conditions say that when retaking timetabled assessments, AOs should be permitted to allow students to carry forward marks or results for centre-marked assessments, but the opposite is also true: when retaking centre-marked assessments, students should be able to carry forward the results from timetabled assessments, and we think that should be spelled out. Additionally, it should be clear that when retaking timetabled assessments, the highest grade rather than the most recent should be used for the qualification award.

Second, we do not think it is sufficiently clear whether, after the first awards, Foundation or Occupational Certificate awards can be made other than in the summer term, given that there is no terminal assessment requirement. Some students doing retakes may wish to cash in their award as soon as retake assessments have been completed. We recommend that Ofqual works with the awarding organisations to review the risks and benefits of allowing certification at different points in the year, which would particularly benefit retake students, given the low volumes and the challenges of standard-setting, and noting that awarding organisations are required to set out through the assessment strategy how they will secure this.

Foundation Certificates and Occupational Certificates Assessment design (Moderation of centre-marked assessments)

40. “To what extent do you agree or disagree with the proposal to require awarding organisations to conduct Moderation of all centre-marked assessment?”

Foundation Certificates: Agree

Occupational Certificates: Agree

As Ofqual reviews and develops its approach to and requirements around moderation of centre-marked assessments, it should take into account the distinct issues with vocational qualifications, and not focus solely on GCSEs and A-levels.

Foundation Certificates and Occupational Certificates Setting and maintaining standards

41. “Do you have any comments on the proposed approach to setting and maintaining standards in Foundation Certificates and Occupational Certificates?”

We support the proposals, though we note that (for both Foundation and Occupational Certificates), the combination of direct grading, moderation and awarding is untried, and more generally there is a risk of unexpected approaches by centres in managing and planning assessments, and cashing in. We would therefore urge Ofqual to assess and manage these risks carefully, working with the awarding organisations, and be ready to issue guidance and change the approach if problems emerge.

We do not think that the proposed compensatory model is appropriate for Occupational Certificates, in particular but not only the Early Years Practitioner and any other future subjects which are used as licences to practise. We do not believe that DfE’s statutory ‘full and relevant’ criteria for early years qualifications can be met with a compensatory model, because it would make it possible for learners to pass the qualification without having the required skills, knowledge and understanding in areas such as

safeguarding or health and safety. Even in relation to Occupational Certificates that are not designated as licences to practise, we do not think that the proposed purposes of the qualification, including ‘to provide accurate and consistent information concerning Learners’ attainment’, are consistent with a compensatory model.

We also believe that awarding organisations and centres should be able to recognise the achievements of learners who have completed some but not all of the assessments, short of the award of a qualification. Given that some learners doing Occupational Certificates may be at risk of becoming NEET, it will be important that any who do drop out – for whatever reason – are able to take a record of the assessments they have achieved to help with future progression (for example to an apprenticeship), rather than being left with nothing. This will be particularly significant if they have completed the core content, and would be a valuable benefit of the qualification’s modular structure.

Foundation Certificates and Occupational Certificates Reviews of marking, reviews of Moderation and appeals

42. “Do you have any comments on the arrangements that should be available for students to request reviews of marking, moderation and appeals of results in Foundation Certificates and Occupational Certificates?”

We agree with the approach. We should recognise that reviews of moderation and appeals may take more time and work differently from general qualifications given the amount of non-exam assessment in these qualifications. This will need to be carefully planned for, and guidance issued to centres and learners.

On-screen assessment in V Levels, Foundation Certificates and Occupational Certificates

43. “To what extent do you agree or disagree with the proposed approach to the regulation of on-screen assessment in Assessment by Examination in V Levels in tranche 1?”

AQA Response: Agree

Given the rapid timetable for roll-out of the tranche 1 qualifications, and the low volumes involved, we think the pragmatic approach Ofqual has proposed is the right one. We would like to see greater ambition around on-screen assessment in future tranches.

44. “Do you have any comments to inform the development of our longer-term approach for the regulation of on-screen assessment in Assessment by Examination in V Levels?”

In future tranches we would like on-screen assessments to be allowed in all V Levels as well as Level 2 Certificates. We would also like to see digital innovation allowed in non-exam assessments, which could go well beyond on-screen assessment, where it improves validity and engagement.

Equality impact assessment

48. “Are there any other potential equality impacts (positive or negative) on students who share a particular protected characteristic or are from a lower socio-economic background arising from our proposals, either individually or in combination? Where possible, please separate your answer by protected characteristic”

No, beyond the concerns articulated elsewhere in our response about progression and recognition of partial achievement in Occupational Certificates. If these issues are not addressed, we are concerned that students from disadvantaged backgrounds and those with SEND may be particularly affected.

49. “Are there any additional steps that Ofqual could take to mitigate any potential negative impacts resulting from the proposals, either individually or in combination, on students who share a particular protected characteristic or are from a lower socioeconomic background?”

No, beyond points made elsewhere in this response.

51. “For all identified impacts (including any additional ones identified), what do you expect their scale to be? This could include the activities required, the level of resource commitment, financial outlay, or the nature and value of any benefits.”

We expect the scale of impact on awarding organisations to vary across qualification types and delivery models. The largest areas of impact are likely to include:

- qualification redevelopment activity
- assessment design and accreditation requirements
- systems and infrastructure readiness for on-screen assessment
- increased moderation and quality assurance activity
- centre and assessor training requirements

We expect the impacts to be most significant during initial implementation and first delivery phases, before stabilising as operational approaches become embedded.

Potential long-term benefits may include improved consistency, clearer progression pathways and more streamlined qualification structures across the sector.

52. “Do you have any suggestions for reducing or mitigating the costs associated with these proposals?”

We have no suggestions that are likely to have a significant impact, given the constraints under which Ofqual is working. The costs and risks of the vocational reform programme would be lower if the Government had chosen to implement the changes to a less aggressive timetable.

53. “Do you have any comments on the impact of the proposals on innovation by awarding organisations?”

There is plenty of scope for innovation in relation to on-screen and wider digital assessment, though it may not be possible to realise all of those opportunities in the early tranches.

Annex A - Proposed Conditions, requirements and guidance for V Levels

54. “Do you have any comments on the drafting of the proposed Conditions, requirements or guidance for V Levels?”

We note the proposal that ‘knowledge in isolation’ should be limited to 10% of the total marks for tranche 1 V Levels. We believe that this is manageable for the tranche 1 subjects, but (as with GCSEs) there should be scope to vary this proportion on a subject-by-subject basis, so we would encourage Ofqual to review this when considering subject requirements in future tranches.

Annex B – Proposed Conditions, requirements and guidance for Foundation Certificates

55. “Do you have any comments on the drafting of the proposed Conditions, requirements or guidance for Foundation Certificates?”

We note that Ofqual have not proposed to have subject level conditions for level 2 certificates, unlike for V Levels. We can see pros and cons to both approaches, and would encourage Ofqual to keep under review how the arrangements are working as the new qualifications are rolled out, and consider whether there would be benefit to bringing the arrangements more closely into line in future.