

# Regulating on-screen assessment

## Consultation response

### Executive summary

AQA is an independent education charity, providing high quality assessments that are fair, reliable and support students in their educational journey. Today, we're the largest provider of academic qualifications taught in schools and colleges. We set and mark the papers for over half of all GCSEs and A-levels taken every year. But exams are only part of the story – we also make sure the content of our qualifications support great teaching.

Our qualifications are designed to suit a range of abilities and include GCSEs, AS and A-levels, the Extended Project Qualification and Technical Awards. Our qualifications are internationally recognised and taught in more than 40 countries around the world and they're highly valued by employers and universities.

AQA welcomes the opportunity to respond to Ofqual's consultation on on-screen assessment (OSA), not least because it's an area in which we have given a great amount of thought to for some years now but because we believe it presents the opportunity to advance and improve our education system for the better.

We are clear in our response that OSA:

- can be introduced in a way that helps with inclusion for students with SEND;
- reduces existing security threats in the paper-based system;
- creates environmental benefits;
- and will support with faster marking and earlier results.

With 120 years of assessment expertise, and with existing experience of delivering digital assessment in Wales, AQA is confident that the proposals outlined in our response suggest ways in which OSA can be introduced in a way which maintains momentum and progresses this vital step forward in the examination system.

Summarising our response:

**Guiding principles:** It is right to consider which subjects are best suited to OSA, and equally important to retain pen and paper for the foreseeable future. OSA should be introduced where it improves validity, accessibility and the student experience. Our Student Advisory Group and wider stakeholder engagement confirm strong support for a phased, evolutionary rollout. There is a risk however that if piloted too rigidly, the innovation of those awarding organisations that have the expertise and operational capacity to deliver high-quality OSA specifications will be stifled and the benefits unrealised.

**Specification limits:** AQA supports a steadily paced introduction of OSA but believes the proposed blanket limit of two specifications per awarding organisation is unduly limiting and counterproductive. It risks stifling innovation, weakening the evidence base and signalling unnecessary anxiety about digital exams. All awarding organisations should be permitted to offer OSA versions of regulated qualifications

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(subject to accreditation), where existing OSA provision has been approved by Ofqual. This would allow boards with the capacity and expertise to progress at an appropriate pace. As the largest exam board, with 57% of national entries, AQA is operationally positioned to deliver more than half of the OSA specifications when accredited. Rational caution is wise; excessive caution will restrain momentum and may provoke public concern rather than allay it.

**Subject restrictions:** AQA agrees some subjects should be restricted but recommends lowering the cohort threshold from 100,000 to 50,000 entries. Launching on-screen assessments with small-cohort subjects and across a range of assessment methods would allow centres and students to become familiar and improve their confidence with systems in an evolutionary way. Ofqual should also clarify how exemptions interact with the cap and how thresholds will be reviewed over time.

**Separate specifications:** AQA supports requiring OSA to be delivered through separate specifications. Mixed-mode options within a single specification would create comparability challenges. However, Ofqual should allow limited use of anchor items for research purposes to build the evidence base on mode effects, as seen in international jurisdictions.

**Platforms:** AQA agrees with Ofqual's platform priorities but emphasises that familiarisation extends far beyond the platform itself. Digital pedagogy, typing fluency, navigation skills and accessibility familiarisation must be embedded from the outset.

**Devices and security:** AQA supports prohibiting student-owned devices in the early rollout to protect integrity and reduce malpractice risk, while recognising that some candidates with specialist accessibility needs may require exceptions. Devices should not be exam-only; dual-use aligns with normal ways of working and helps to reduce anxiety. Digital exams offer significant security advantages. They eliminate the risks associated with distributing confidential assessment materials to schools and colleges to be stored in advance of exams and with transporting millions of paper scripts, where losses in the logistics network are an ever-present possibility. OSA will reduce opportunities for malpractice too, enabling secure offline delivery with the potential for enhanced (and lower cost) invigilation.

**Delivery:** While Ofqual is right to identify delivery challenges, it is essential not to overlook the long-term benefits. OSA removes inefficiencies in the system, streamlines candidate management, improves access arrangements, eliminates lost scripts and enables faster marking and earlier results. All this will be carried out with support to centres to ensure they are equipped and able to confidently deliver AQA's OSAs. Environmental benefits are also substantial, with at least 9% reduction in carbon emissions per exam (more if the purchase of new computers is discounted).

**Vocational and technical qualifications:** AQA agrees that the guiding principles for general qualifications can be applied to vocational and technical qualifications. Shared principles will help avoid a two-tier system and support consistency across the landscape.

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## 1. To what extent do you agree or disagree with Ofqual's proposed guiding principles?

**Strongly agree** / Agree / Neither agree nor disagree / Disagree / Strongly disagree.

AQA welcomes the opportunity to respond to this consultation on on-screen assessment (OSA) and that Ofqual is seeking views to guide its way forward.

As will be drawn out through our response to this consultation, AQA agrees that thought must be given to which subjects are best suited to OSA. But we need greater clarity on the exemptions for qualifications which are already offered digitally. Pen and paper must be retained - we do not advocate a complete, or even dominant replacement. This corresponds to Ofqual's guiding principle that OSA maintains, and wherever possible, enhances the quality of experience for students and centres.

When introduced, AQA's approach to OSA will be to work with subjects where OSAs are proven, and to ensure platforms and devices are appropriate for all students. Our response to this consultation will also highlight our thoughts on how OSA can improve accessibility for students with special educational needs.

As the UK's largest exam board, extending OSA is a key objective for AQA, but we need to get the experience right. As part of our response, we have spoken to members of AQA's Student Advisory Group about their thoughts on OSA. Our Student Advisory Group is made up of around 18 students from different types of schools and colleges across England and help us make important decisions about the future of exams. Their views, as well as the views of other stakeholders we work with are highlighted throughout our response. We have also regularly surveyed teachers, students and parents on this issue, and those responses are also incorporated.

AQA's extensive stakeholder insight and significant assessment expertise mean that, although we agree Ofqual has outlined the right guiding principles for the implementation of OSA, we are confident that AQA's OSAs will be introduced in a way which:

- is inclusive for students with SEND;
- reduces existing security threats in the paper-based system;
- creates environmental benefits;
- and will support with faster marking and improved quality control for results.

However, if we move too tentatively, we collectively risk stifling the innovation of those awarding organisations that have the expertise and operational capacity to deliver high-quality OSA and thereby risk losing the opportunities to improve the curriculum and assessment system for all students.

Safety and security of OSA will rightly be a consideration for Ofqual, just as it is with paper-based assessments. We believe OSA will prove more secure and reliable and AQA will work to ensure we derive those benefits.

AQA has engaged constructively with Ofqual on this topic over a number of years now, including making previous submissions for OSA, and we look forward to seeing progress.

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**2. To what extent do you agree or disagree with the proposal to allow each awarding organisation to introduce no more than 2 new specifications using on-screen assessment within General Qualifications (GCSEs, AS and A Level)?**

Strongly agree / Agree / Neither agree nor disagree / Disagree / **Strongly disagree**

AQA supports an evolutionary approach to rolling-out on-screen assessment (OSA), but there should be greater flexibility built into the regulations. A confidence-building strategy is required to ensure this process can move forward at a practical pace, building on lessons learned through the pilots. The two-specification limit in phase one is unduly restrictive and counterproductive. Such a cautious approach risks slowing progress to the point where the system cannot build the momentum or evidence base it needs to demonstrate potential. The proposed cap would also limit the diversity of students that experience OSAs and therefore the intelligence that we can build from OSA across a broader range of small cohort subjects, by fundamentally limiting the range of assessment types that can be explored.

The removal of the cap in specifications would allow us to pilot a range of assessments and subjects in a mix of educational establishments and for students from all socioeconomic backgrounds – a crucial facet of evidence that would be very hard to elicit in a much-reduced and small number of qualifications. With less constraint we could gain a rich understanding of a subject designed for digital, those with digital components alongside paper or NEA components and essay-based subjects more quickly. Our experience shows that confidence grows through doing, not delaying.

Instead of applying a blanket two-specification limit on the number of digital assessment specifications an awarding organisation can introduce, and given that Ofqual has the ability to dictate the pace, we would recommend a competent and controlled expansion of OSA over time (agreed, board by board with Ofqual), rather than an arbitrary cap-based approach. This will avoid stifling innovation and progression for centres that are ready and keen to adopt OSA. A more proportionate model would also increase consistency across GCSE and A-level – especially where a GCSE OSA subject is followed by an A-level in that same subject – and enable boards with the capability to innovate at a pace that suits them, rather than being limited by others. As England's largest exam board, AQA received 57.27% of the total national entries across GCSEs, AS and A-levels. It does not seem right to us that we should be limited to the same range as awarding organisations with less than a tenth of the market. In addition, through the work of one of our subsidiaries, AlphaPlus, we are already delivering adaptive online personalised assessments in Wales for procedural numeracy, reading and numerical reasoning, providing AQA with a strong operational position to deliver at least half of the available OSA specifications following their accreditation.

To inform our response we've spoken to several sector leaders who told us that they support a model that factors in entry share, arguing that flexibility would make the regulations more proportionate and targeted. AQA's proposed model supports Ofqual's controlled approach, while avoiding the risk of stifling innovation in organisations that have the expertise and operational capacity to deliver high-quality OSA specifications that will improve the curriculum and assessment system for all students.

A blanket limit also prevents awarding organisations from developing OSA specifications across the range of subject types that are most suited to on-screen delivery. Our evidence shows there are clear

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gains for OSA in essay-based A-level subjects, subjects with NEA components, and specifications that already incorporate digital content. Students themselves share this view. Members of AQA's Student Advisory Group told us they support a phased rollout but do not want to see "their subjects less valued" or excluded from early innovation simply because of an arbitrary numerical cap.

Sector leaders we spoke to also told us that the limit should look at qualification size. Having more than two specifications with smaller qualification entries would give breadth of testing, based on the suitability of the specification, and still support Ofqual's controlled approach.

OSAs offer clear benefits for students with SEND. AQA's 2023 research – including interviews with SENCOs and focus groups with students and teachers – found that SEND students are more positive about OSAs, that assistive technology is easier to deliver digitally and that OSA reduces reliance on scribes and readers. Students with dyslexia and handwriting difficulties reported that digital formats better support their needs. Given this, a rigid two-specification limit could delay benefits for the subjects where they are most needed.

Sector sentiment has also shifted substantially since 2023. Recent polling we carried out with teachers reinforces a positive shift on this:

They told us:

1. 44% feel informed about OSA (an increase from 5%),
2. 67% believe GCSEs and A-levels should be delivered digitally within five years (an increase from 35%),
3. 65% believe their school will be ready to deliver them (an increase from 43%)

Not only has sentiment shifted towards embracing OSA but points two and three show that a majority in the sector now agree OSAs are the right thing to do and feel ready to deliver them. It would be an error to set a limit on the number of specifications available for OSA when the sector is ready to embrace them. Moving too slowly undermines confidence, where instead a step-by-step, evidence-led approach is required.

**3. To what extent do you agree or disagree with the proposal for Ofqual to keep under review the limit of 2 new on-screen specifications per awarding organisation and to revisit the policy, as appropriate, based on wider system changes and/or new evidence?**

**Strongly agree** / Agree / Neither agree nor disagree / Disagree / Strongly disagree

AQA strongly agrees that the two-specification limit regulation should be kept under review. We would go further than this and propose a regular review cycle of any limit – for example, each year – to avoid a five-year lag between the implementation of an on-screen specification and any subsequent expansion.

It will be vital for Ofqual to define clearly what such a review would entail, including its frequency and purpose, with the primary objective of avoiding any stifling of innovation and ensuring that students benefit from the improvements on-screen assessment (OSA) makes to the exam experience and the wider system benefits from improvements to exam series delivery.

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Further, these regulations rightly focus on the early steps of introducing OSA, but we would welcome Ofqual and the Department for Education articulating a longer-term vision which explores how this intersects with other qualification reforms that are in train, and what regulations could look like once OSAs are established within the system. Having this vision clearly articulated and shared publicly will better allow schools and colleges to plan.

Our research also shows that the ability for schools and colleges to deliver OSA increases where they have a longer lead time. Exams officers agree, and told us to “start small, learn from it, and build”. This supports an evolutionary rollout, highlighting the importance of relaxing any flexible specification-limit regulation as we learn more about the practical benefits of OSA and as public confidence grows even further.

#### **4. To what extent do you agree or disagree with Ofqual’s proposed subject restrictions?**

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree

Overall, the proposals align with AQA’s strategic direction and provide a “green light” for the initial rollout of on-screen assessments (OSA).

However, we believe the proposed cohort size threshold of 100,000 entrants is too high. Launching on-screen assessments with small-cohort subjects would allow centres and students to grow familiarity and confidence with systems. Therefore, we recommend reducing the proposed cohort size threshold to 50,000 entries and allowing for more than two specifications per year. Applications should be measured against awarding organisation capacity, rather than an arbitrary cap.

Further, Ofqual needs to clarify what would happen if entries rise above or fall below the threshold and whether the cap itself should be subject to periodic review. AQA would welcome Ofqual and the Department for Education articulating a longer-term vision for what regulations could look like once OSAs become more established within the system. Having this vision clearly articulated and shared publicly will better allow schools and colleges to plan. In addition, our research shows that the ability for schools to deliver OSA increases the longer the lead time. This supports an evolutionary rollout, highlighting the importance of relaxing any subject restrictions as we learn more about the practical benefits of OSA and as public confidence grows even further. AQA proposes this vision should include an ambition to follow a stepped increase in the national entries’ threshold, subject to satisfactory performance.

Substantial ambiguity in the consultation wording prevents unqualified agreement. The limit interacts awkwardly with exemptions (e.g., computer science, food prep and nutrition), creating uncertainty about how quickly digital provision could expand. Only allowing two subjects from each exam board means we won’t learn enough if we don’t do more, more quickly. It will also result in an inevitable delay meaning exam boards cannot scale beyond two subjects, due to the lengthy cycle Ofqual proposes for reviewing progress post-first delivery. (For example, if we demonstrate the deliverability and efficacy of a component in one foreign language, we are restrained from making the gains across other foreign languages where the assessment mode is identical, which is clearly an arbitrary constraint.) The specification limit could also inhibit the ability for exam boards to sequence subjects coherently (e.g., GCSE → A level), undermining continuity for students. AQA instead proposes a more regular review mechanism to ensure continuity and increase innovation.

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In the short term, the candidate threshold does not prevent AQA from developing any subjects it would want to prioritise for OSA. However, the rationale is not well explained and seems arbitrary, especially as the cap is national, not per-board.

To assist, we propose that Ofqual should articulate a long-term vision for digital assessment, given the scale of investment which is described. As part of this, Ofqual must outline:

- what success looks like,
- how fast the sector should evolve,
- and the principles that will guide future reviews.

**5. To what extent do you agree or disagree with the proposal to require on-screen assessment to be offered in a separate specification, that is, not to allow choice of mode between paper-based and on-screen assessments within a single specification?**

**Strongly agree** / Agree / Neither agree nor disagree / Disagree / Strongly disagree

Requiring on-screen assessments (OSA) to be delivered through a separate specification, rather than offering students a choice of mode within a single specification, is the most robust approach to ensuring fairness, comparability and manageable implementation across the system.

AQA supports the proposal to require OSA to be offered via a separate specification, primarily to address comparability risk and fairness. However, substantial clarification from Ofqual is needed, especially regarding access arrangements and the practical meaning of “specification” versus “component”.

AQA agrees with the proposal to require OSA to be offered in a separate specification rather than allowing students to choose between paper and digital modes within the same specification. Allowing students a choice within a specification would create comparability challenges. Different modes introduce different cognitive and performance demands, which could undermine fairness and stable standards. A single mode per component avoids this problem. AQA is clear in our view that mixed-mode options within a component are undesirable.

On-screen and paper-based assessments are not interchangeable. They introduce different cognitive demands, different interaction patterns and potentially different performance behaviours. Allowing optionality would also require extensive research into standards maintenance across options and modes.

A single-mode approach per specification or component provides the clarity needed to maintain standards.

**6. To what extent do you agree or disagree with the proposal that, where an exam board offers both on-screen and paper-based specifications for the same subject, the assessments must use substantially different questions?**

Strongly agree / Agree / **Neither agree nor disagree** / Disagree / Strongly disagree

While AQA does not intend to offer different on-screen and paper-based specifications for the same subject (e.g., A-level Philosophy digital and A-level Philosophy paper-based), if some boards offered

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digital versions and others paper versions, the requirement for “substantially different questions” would complicate maintaining standards across boards at an awarding level. This would add significant complexity to awarding and could disrupt comparability.

Prohibiting shared or overlapping items across modes could also unintentionally hinder the development of a robust evidence base for understanding mode effects. The consultation requests more evidence, yet the proposal could restrict the ability to generate it. To analyse the mode-effect between different assessments requires ‘anchor items’, a small number of identical questions asked across different assessments. International jurisdictions that have successfully rolled out dual-mode assessments use shared anchor items to compare performance across modes – e.g. the State of Massachusetts in the USA, Finland, and New Zealand. Anchor items have been deployed to grow the evidence base on mode effects. Anchor items are normally a small subset, can be time-controlled, and can be used analytically rather than for awarding, mitigating fairness concerns around students spending time on marks-irrelevant items. Even a small set would help understand what is driving differences across paper and digital versions. Where a single exam board offers both paper and digital specifications, anchor items could be included for analysis purposes.

**7. Do you have any concerns about the potential impact on students’ ability to take the subjects they want, if some specifications are only available through on-screen assessment?**

AQA does not have concerns about students’ ability to take the subjects they want. There is no evidence to suggest that centres would not offer subjects solely because they move to on-screen assessment (OSA). Nonetheless it will be important that the transition to OSA is evolutionary and builds trust and confidence. In cases where a student genuinely cannot access OSA, established reasonable adjustment routes would ensure full accessibility, just as under current arrangements.

Subject availability at GCSE and A-level is already shaped by wider factors such as staffing, timetabling and institutional specialisms. OSA should be viewed within this broader context rather than as a standalone determinant of choice. When selecting subjects for OSA, we would only do so where it is clearly the most valid and reliable method of assessment, and only after considering the impact on centres and cohorts.

We recognise that some schools and colleges may initially have concerns about IT infrastructure, device availability or bandwidth. These are areas we have already considered extensively, and we are developing support to help centres overcome such barriers. For individual students, existing mechanisms for alternative or adapted formats can be extended where needed, and for those with access arrangements, OSA is likely to improve their experience.

Robust contingency arrangements are also something we have given consideration to as part of our developing plans. While paper-based mitigations do not map directly onto OSA, they provide a strong foundation. We have recent experience of applying these processes in live contexts and are confident they can be adapted effectively. We will continue to work closely with JCQ to ensure consistent, sector-wide contingency planning.

Our Student Advisory Group emphasised the importance of choice and would like the option to undertake OSA in a small number of subjects. They felt that they would be suitable for smaller subjects and that some, especially those with more essay-based questions, would be easier via OSA. One student

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noted that she does two coursework-based subjects which requires her to do a lot of typing, and so, for example, an on-screen exam in A-level History would not be too different. They also noted that on-screen could have the potential for the inclusion of more multimedia sources.

In summary, while any change of this scale carries risk, we believe this can be managed through careful subject-level decisions, strong contingency planning, and a phased approach that maintains confidence across the sector.

**8. To what extent do you agree or disagree that the issues identified above are the right priorities for on-screen assessment platforms? Are there other issues you consider important?**

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree

It is neither practical nor desirable to mandate a single assessment platform for all awarding organisations. This supports resilience, choice, and innovation. Reliance on a single provider poses systemic risk if that provider fails. Allowing multiple platforms reduces single-point-of-failure risk, provided standards are clear.

Research we conducted on student perspectives from a digital test found that students generally responded positively to the on-screen exam, highlighting benefits such as ease of editing, improved legibility of responses and the intuitive design of the platform. Most students found the platform reliable and straightforward to use.

AQA's research is also clear that familiarisation goes far beyond the platform itself. Students and teachers need early access to the full process – sample assessment materials, accessible platforms, and appropriate hardware – well before first teaching. The reality is that OSA requires students to develop new habits: typing fluency, digital literacy, stamina for extended on-screen writing and the ability to navigate source material while responding elsewhere. These skills only become automatic through classroom practice, which means digital pedagogy must be embedded from the outset. Accessibility familiarisation is also essential. Students need to understand how accessibility tools work across platforms and how to adjust their own settings, so they are not disadvantaged. This is particularly important for students with SEND, who stand to benefit greatly from OSAs.

Finally, AQA acknowledges there could be potential burden on centres – particularly exams officers – if they are required to manage many different systems. Ofqual may wish to emphasise the importance of cross-board alignment on core features, workflows, and user experience to mitigate this. Moreover, AQA's Student Advisory Group expressed that cross-board alignment on core user experience, especially navigation and accessibility would be welcomed, would reduce anxiety and make the system fairer. AQA would support greater alignment across awarding bodies on accessibility approaches to promote a consistent candidate experiences and unintended disadvantage.

**9. To what extent do you agree or disagree with the proposal to require exam boards to prohibit use of student-owned devices for completing on-screen assessments?**

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree

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It is sensible in the early rollout of on-screen exams to maintain the integrity and security of the exam system, which is why centre owned devices with a secure exam platform is AQA's preference.

Candidate-owned devices could undermine exam integrity, increase malpractice risk and exacerbate inequalities between centres and candidates. At the same time, a blanket regulation may disadvantage some candidates, particularly those requiring specialist accessibility software and private candidates; some of those candidates will need to use personal devices.

AQA is also conscious that centres differ in device access and usage. Some candidates have daily access to laptops; others may only use devices occasionally. This creates disparities in familiarity, typing fluency and confidence that could materially affect outcomes. Therefore, this regulation should also consider the infrastructure investment required.

**10. To what extent do you agree or disagree with the proposal that devices used for on-screen assessments should not be required to be exclusively used for this purpose?**

**Strongly agree** / Agree / Neither agree nor disagree / Disagree / Strongly disagree

AQA agrees devices used for exams need not be exam-only. Expecting centres to maintain a pool of exam-only devices is financially and logistically unrealistic for most schools and colleges.

Using the same devices for learning and assessment can also support normal ways of working and reduce anxiety, which in turn supports device familiarity for students. AQA's centres (schools and colleges who deliver AQA exams) also tell us they already manage shared device estates; dual-use aligns with existing practice.

We will need clear, shared accountability in the OSA delivery process: awarding organisations should not be responsible for centre-owned devices. Centres should be responsible for the upkeep of the devices while awarding organisations play their part in providing guidance to centres.

**11. To what extent do you agree or disagree that the issues identified above are the right priorities for devices used in on-screen assessments? Are there other issues you consider important?**

Strongly agree / **Agree** / Neither agree nor disagree / Disagree / Strongly disagree

AQA agrees that Ofqual has identified the correct core priorities for devices used in on-screen assessments (OSA). Minimum technical specifications, pre-assessment device testing, and robust security are all necessary and foundational to successful OSA delivery.

Minimum technical specifications are essential to ensure reliable platform performance and greater consistency in candidate experience. Pre-assessment testing is crucial for identifying compatibility issues and confirming platform performance under exam conditions.

Security is also recognised as non-negotiable for preventing unauthorised internet or file access, protecting exam content and maintaining public confidence in OSA. In the early phases, at least, no student should have access to the internet while sitting an exam on-screen.

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These priorities will not be sufficient on their own and depend on implementation and a clear shared responsibility between awarding bodies and centres. AQA is playing its part in developing an OSA platform that does not require internet connection during the assessment time. Internet connectivity will be required for centres to download OSA content, but it must not be a risk once the candidate is sitting the assessment.

AQA's centres operate with different hardware estates. A single minimum standard may be technically correct but practically difficult for some schools and colleges to meet without additional funding. Minimum specs must also be dynamic and regularly reviewed, otherwise centres risk falling out of compliance.

**12. Are there specific security risks relating to on-screen assessment platforms, digital devices, or data management that you feel are not fully addressed by the issues identified above?**

AQA agrees that Ofqual has identified the correct headline security risks associated with on-screen assessment (OSA). Protection against cyber-attacks, prevention and detection of malpractice, secure data management and platform integrity are all seen as essential and are critical to the secure delivery of high-stakes qualifications. Many of these issues are not in any way new to the exam system. Indeed, most of them already pertain, because exam papers are already digitised from the point of arrival with exam boards.

However, there is a need to ensure security requirements remain proportionate and support innovation. In fact, innovation in OSA provides opportunities to increase physical security risk and resilience to disruption, as outlined in AQA's [2023 policy report](#). One main security benefit is that OSA will reduce the requirement for physical exam scripts having to travel across the country, eliminating risks that include loss, theft and damage. Additionally, AQA's OSA plans will eliminate some risk of malpractice, locking down exams offline with enhanced invigilation.

Safety and security of on-screen assessment (OSA) will rightly be a consideration for Ofqual, just as it is with paper-based assessments. AQA, as the most trusted and popular exam board, has a strong track-record in delivering exams safely and securely. Last summer alone saw us process more than 180 million sides of exam paper in the course of seven weeks and issue 3.5 million grades. These standards of efficiency and security demonstrate that we can be trusted to deliver exams to a high standard and we would carry these across to OSA.

**13. Do you have any specific delivery concerns about on-screen assessments that you do not think are addressed by the issues identified above?**

AQA agrees that Ofqual has identified the principal delivery challenges associated with on-screen assessment, all of which are significant and require careful mitigation.

However, AQA has reflected on the positive impact on-screen assessments (OSA) can have on delivering an exam series and is clear and knows from experience that OSA would remove major inefficiencies in the system.

AQA commissioned Blue Marble in 2023 to study the environmental impact of OSAs and findings – which found a minimum 9% reduction in carbon emissions per examination (potentially a much higher

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reduction in time). It's clear that there is a long-term system design benefit, reducing environmental cost and supporting wider Government sustainability goals.

Moreover, there are multiple other long term operational benefits for centres. AQA's research found that exams officers and IT leads reported OSAs:

- streamline candidate management;
- reduce manual handling;
- eliminate risk of lost scripts;
- simplify access arrangements.

The exam script marking process – which is already conducted on digital platforms – will also see improvements as the transfer of scripts to marking platforms will be more streamlined. A-level results could be delivered days or even weeks earlier, which will benefit university admissions and students.

Ofqual is right to focus on delivery concerns, but the long-term benefits of OSA on delivery must not be overlooked.

**14. To what extent do you agree or disagree that the guiding principles proposed in this consultation for general qualifications could be used for vocational and technical qualifications with similar purposes? Please explain your answer and highlight any additional impacts or considerations we should take into account.**

**Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree**

Examples of good practice in on-screen assessment (OSA) already exist in vocational and technical education and our recommendation is that the regulator considers what is working well and where constructive examples exist to inform OSA in general qualifications. Clearly there are differences in subject matter, but areas such as fairness and security are considerations which straddle both and which can be modelled for consistency in general and vocational standards.

There is no reason why these guiding principles could not be implemented for both vocational and technical qualifications. The underpinning purpose of any assessment is essentially the same – to identify competence in a specific subject at a specific level. From this perspective, we think it is important to use the same guiding principles as just that, i.e. guidance.

Given that this consultation is taking place at the same time as curriculum and assessment reform, as well as changes to vocational and technical education, it is important that a two-tier system of on-screen/digital assessment is not created between general and technical qualifications which are delivering similar educational outcomes. Having a set of shared principles across both is one way to help to achieve this which would be beneficial for students, schools and teachers alike.

**15. Are there any other impacts that we have not identified and should consider?**

On-screen assessments offer clear benefits such as improved legibility, reduced handwriting fatigue, better accessibility through universal design features and closer alignment with the digital skills students' need beyond school and to better prepare them for the world of work.

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The proposals are uncertain about how access arrangements would operate. We need greater clarity. Impacts may include:

- whether some students would effectively require a different version of the exam;
- a risk of unintentionally creating additional specifications if modified versions differ materially;
- the need to rethink existing rules around word-processed scripts.

While an either/or choice of digital or paper components within specifications protects against mode effects in specifications, it could raise awarding implications between boards. There is a potential issue around maintaining standards when one component within a subject moves to digital with one board while others remain on paper with another board. For example, mode effects might arise in Geography if Board A is digital and Board B pen and paper.

Market-level impacts and subject-specific distortions may also not have been fully captured. The cap on on-screen assessments means that some boards or subjects may move earlier to digital formats, meaning that other boards – operating in a competitive market - may face reputational or market disadvantages.

**16. Other than those we have identified, are there any ways in which we could mitigate potential negative impacts?**

More clarity is needed on access arrangements, including how modified formats (e.g., reduced-digital versions required by some students) fit within the regulatory framework. Clear guidance would prevent inconsistency across centres and ensure that students with additional needs are not disadvantaged.

AQA is uncertain about how Ofqual is using the term ‘specifications’ in the context of phrases like “paper-based and on-screen assessments within a single specification” and how this maps onto existing qualification structures. At AQA, we use the term ‘specification’ to refer to the entirety of a course (e.g. GCSE English Literature, or A-level Geography), which is then assessed through several ‘components’ (e.g. Paper 1 & Paper 2, or Exam and Non-Examined Assessment components). Early clarification would reduce operational complexity, prevent divergent interpretations across exam boards and ensure that qualifications are designed in a way that aligns with regulatory expectations. This point is critically important: we believe that in a given *subject* it makes sense to have, for example, one *component* assessed on-screen, and another continue pen and paper.

Changes in mode are likely to influence patterns of performance in complex ways. A coordinated JCQ-level approach to awarding would help ensure that standards are maintained consistently across boards. Ofqual could support this by providing clearer expectations about how standards should be set and maintained as components transition to digital.

**17. Are there any impacts of these proposals (individually or combined) that we have not identified? Please outline any additional costs or benefits that you foresee.**

AQA would ask that Ofqual considers the evidence and the future potential that on-screen assessment has in preparing students for their future careers. Through research and conversations we’ve had with students and teachers, we know that this is something that they see a place for in education, on the proviso, and as we’ve stated, that it is done in an evolutionary way which takes people along on the journey.

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We recommend a balanced approach is considered which means some subjects go digital and others remaining pen and paper.

Our charitable purpose is to raise the quality of teaching and learning by raising the quality of qualifications. That naturally includes supporting young people with the skills they need to enter a rapidly changing and digitised workforce, and to lead responsible, enriched lives.

Much is made of the ostensible potential for introducing a new type of unfairness by examining on-screen. The argument goes that there is a 'digital divide' (which would not be AQA's chosen language) that advantages students from better-off homes, who may have greater access to computing devices, over less privileged students who may not. Our view is that, while there is an entirely legitimate concern to address, the reality is that so far from being an argument against digital exam delivery, it's actually an argument in favour, in so far as requiring digital skills as part and parcel of a student's learning and assessment would ensure that we make every possible collective effort to close that divide, to the extent that it can be shown to exist.

Thorough implementation of the Curriculum and Assessment Review will, rightly, integrate digital fluency more broadly across the curriculum, thereby levelling up young people's digital competency, rather than stifling opportunity for the less advantaged. That impetus should be viewed as a requisite accompaniment of introducing on-screen assessment and digitising examinations.

**18. What is your estimated cost to develop an on-screen assessment specification for an existing paper-based qualification? We are looking for quantitative information, ideally monetary values – but are open to other quantitative data.**

AQA is clear and knows from experience that OSAs form part of the future landscape of assessment. They will improve young people's digital skills, be better for the environment and improve accessibility for students with special educational needs and/or disabilities.

This is an area we have been giving thought to for some years now and as an independent non-profit charity we stand ready to work with Ofqual and others to help deliver OSA in a fair and proportionate way. We also believe that, over time, there is substantial opportunity to reduce the time and cost of exam delivery. Given commercial considerations however, we do not consider it to be appropriate to outline costs to deliver this as part of a public response.

**19. Taken as a whole, how much will these proposals add to your cost of implementing on-screen assessment, relative to a hypothetical scenario where we provided no additional rules? This could include the activities required, the level of resource commitment, financial outlay, or the nature and value of any benefits. Again, we are primarily interested in quantitative information, but value qualitative insights where there is significant uncertainty.**

This is a subject we have engaged with Ofqual over for several years now, including making previous submissions for OSA, and we look forward to seeing this progress.

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As an independent non-profit charity, we stand ready to work with Ofqual and others to help deliver OSA in a fair and proportionate way. It is possible that we incur initial costs that then reduce, or that we derive savings that can only be realised as scale increases. Given commercial considerations however, we do not consider it to be appropriate to outline costs to deliver this as part of a public response.

**20. Do you have any suggestions for reducing or mitigating the costs associated with these proposals?**

To help mitigate costs our suggestion would be to allow exam boards to submit more than two proposals on subjects to be part of the initial pilot for OSA.

It would also be useful to understand are what the success measures are for the first round of OSA – if that level of information was known it would better assist us in tailoring our suggestions and proposals, ensuring they meet the necessary requirements and help make the pilots a success. Without this level of information, it also makes it very difficult for us to plan for the future, as well as providing better support to students and students to prepare for the rollout.

Separately, another way to mitigate costs is around the proposal for substantially different questions for paper/digital versions. This is something which AQA would not do, and the convention would remain the same across paper and digital, which would also keep costs lower.

**21. Do you have any comments on the impact of the proposals on innovation by exam boards?**

The proposals provide a structured starting point for on-screen assessment, but some elements risk limiting innovation. The fixed cap of two digital specifications per exam board in the first phase, combined with a high subject entry threshold, will detrimentally slow progress for organisations that are ready to develop a broader range of digitally appropriate subjects. These limits could delay subject sequencing and constrain innovation in areas where digital delivery would clearly benefit students. Lifting the number of components which can be assessed digitally would increase consistency across GCSE and A-level; boards such as AQA, with the capability to innovate at their own pace, would not then be constrained by others that are unable to develop so confidently and securely.