

Extraordinary
Regulatory
Framework:
Guidance for
Centres and
Head of
Centres

About Trinity College London

Trinity College London is a leading international awarding organisation and independent education charity that has been providing assessments around the world since 1877. We specialise in the assessment of communicative and performance skills covering music, drama, combined arts and English language. With over 850,000 candidates a year in more than 60 countries worldwide, Trinity qualifications are specifically designed to help learners progress. Our aim is to inspire teachers and candidates through the creation of assessments that are enjoyable to prepare for, rewarding to teach and that develop the skills needed in real life.

At the heart of Trinity's work is the belief that effective communicative and performance skills are life enhancing, know no boundaries and should be within reach of us all. We exist to promote and foster the best possible communicative and performance skills through assessment, content and training that is innovative, personal and authentic.

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Chief Executive | Sarah Kemp

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Introduction

In line with the [Ofqual guidance](#), certification of the Trinity College London (Trinity) Skills for Life (SfL) examinations will follow the Extraordinary Regulatory Framework (ERF) model. Under this model, learners who were due to take the SfL exams between 20th March and 31st July may receive certificates based on calculated scores and results. The basis for the calculated scores and results will be the provisional centre assessment grades provided by the instructor(s)/tutor(s) teaching the affected learners together with learners' prior attainment evidence, wherever possible. The aim of this document is to offer guidance and clarify the processes Trinity will follow to ensure the robust awarding and certification of SfL qualifications under Ofqual's ERF model.

Terms under which the process is offered by Trinity for SfL Qualifications

Trinity has adopted the definition provided by Ofqual for centre assessment grades.

"Centre Assessment Grade (CAG) is the term used throughout to refer to the evidence-based, provisional judgement of a candidate's component result which a centre submits to the awarding organisation."

The following terms governing the process around CAGs have been agreed by all awarding organisations (AOs) offering SfL qualifications:

1. CAG is used for each award, not the full certification. Centres will be required to calculate the grade for each award rather than at certificate level:
 - o Award in Reading
 - o Award in Writing
 - o Award in Speaking and Listening
2. Certification of Individual Awards based on CAGs is a one off, time-limited process offered to minimise disruption caused by the measures taken in relation to the Covid-19 pandemic so that, as far as possible, learners due to take assessments for ESOL SfL between 20 March and 31 July 2020 are not disadvantaged.
3. Eligible learners are all learners who were expected to take the assessment / exam between 20 March and 31 July. This includes:
 - o Learners attempting the assessment / exam for the first time:
 - o Learners resitting the assessment.
4. Centres must **NOT** submit CAGs for any learner they would not expect to have taken the exam / assessment during this period.
5. Centres must submit CAGs at the component level.
6. There will be no second submission for 'fail' learners. In line with the current guidance, "fail" learners will need to sit the exam when circumstances allow it.
7. Centres are expected to submit one submission to Trinity.
8. In line with the latest Ofqual guidance detailed in the [Extraordinary regulatory framework: Vocational and Technical Qualifications, COVID-19 Conditions and Requirements](#) and in the [Extraordinary regulatory framework: Vocational and Technical Qualifications, COVID-19 Guidance](#), for final calculated results that have been approved by Trinity, centres or learners will not have the right to appeal against the **result**. Instead, an appeal based on whether the **process** was followed will be offered.

9. Trinity reserves the right to request to review evidence used by centres to reach judgements about CAGs. This will be part of the quality assurance of the centre's submission. The evidence should be kept by centres for a year from the date results are issued.
10. As part of the quality assurance of a centre's submission, Trinity may ask the centre to reconsider its submitted CAGs, but Trinity will not itself change CAGs for any learner without the agreement of the centre.
11. It is expected that, for a range of reasons related to the current situation, some centres may not be able to participate. These may include, for example:
 - o Centres with furloughed staff
 - o Centres who do not have access to the evidence

In such cases, every effort will be made to minimise disadvantage but delaying assessment may be unavoidable.

12. Trinity will take all reasonable steps to support centres in resolving quality assurance queries about a centre's submission, but as a last resort may reject all or part of the submission.
13. Trinity will provide a timeline to centres for submission of CAGs.
14. Trinity will provide a timeline to centres for certification.

1.1 Types of trusted evidence

All centres must use the key principles and guidance set out by Ofqual for calculated grades. The evidence to be used for CAGs has been categorised by Ofqual as follows:

Category	Category of evidence	Evaluating trust
1	Banked components (internal assessment moderated/verified or completed external assessment)	Where available, high trust
2	Internal assessment grades not yet moderated	Historical data on centre adjustments...
3	Information that can be provided by centres – e.g. 'centre assessment grades', rank order etc.	Teacher cohort experience etc, longevity of qualification
4	<ul style="list-style-type: none"> - AO data about a qualification within a qualification e.g. intra qualification correlation - historical centre stability data 	Depends on statistical relationships between units historically or historic levels of stability etc.
5	Historical centre data e.g. centre risk profiles, centre outcomes	Recency, completeness
6	Learner prior attainment data (i.e. different level SfL component, different exam etc.)	Is this predictive of outcomes in this qualification?

To ensure the robustness of ESOL SfL certification, Trinity will utilise all six categories and will use these categories in the proforma to be submitted to Ofqual in relation to gathering trusted evidence.

Trinity acknowledges that available evidence will vary across centres but retains the right to require more than one source of evidence, if the evidence provided for any learner comes from the weaker categories (i.e. categories 5 and 6).

Trinity has classified the evidence it lists in the *Calculating grades for Skills for Life: Evidence sheet instructions* and in *TCL_SfL form for data collection* as:

Type of Evidence	Degree of Trust
Most recent prior attainment (i.e. same level completed Reading or Writing or Speaking and Listening (S&L) award, banked individual award contributing toward the certificate)	Category 1
Mock exam(s)	Category 2
Practice Test(s)	Category 2
Assessed tasks	Category 2
Classroom work	Category 2
Portfolio items	Category 3
Quizzes / Initial assessment /Diagnostic Tests(s) / Progress tests /homework/	Category 3
Comparison of pass rates based on CAGs with historical data	Category 4
Historical centre profiles	Category 5
Individual learner plans (ILP) status, attendance records, prior attainment of a different level award or certificate	Category 6

1.2 The centre assessment process: role of the Head of Centre

The centre assessment process for SfL qualifications must be overseen and signed off by the Head of Centre. The Head of Centre needs to ensure that:

- Only staff who have taught the learner are involved in providing the learner’s estimated score and result (CAGs).
- The tutors involved in providing CAGs are briefed on the process outlined in this document, are familiarised with the requirements of this document and other associated materials to support the process (i.e. the *Calculating grades for Skills for Life: Evidence sheet instructions*, the criteria used by Trinity to assess the Reading, Writing and S&L components, the pass marks for each SfL component and level, the benchmarked samples and rationales).
- There is sufficient **valid** evidence (from the types of evidence listed in the *Calculating grades for Skills for Life: Evidence sheet instructions*) available to advise and inform the CAGs to be made by the tutors **before** any CAGs are estimated.
- Tutors use the benchmarked samples and rationales to align themselves with the Trinity standards and requirements as much as possible.
- If more than one tutor is involved in teaching any learner for any component, these tutors will standardise their judgements **before** working together to estimate the CAGs.
- Tutor judgement takes into account any reasonable adjustments that were made to the assessment in respect of a learner with special needs ([SEND](#)).

- Judgements are evidence-based and as far as possible an accurate reflection of the learners' knowledge skills and abilities and must not be influenced by a learner's appearance, social background or special educational needs (SEND). More guidance on [objectivity](#) in grading is provided by Ofqual.
- The total number of learners who would have sat the SfL examinations is recorded on the *TCL_SfL form for data collection and CAGs*, if examination activity had not been interrupted by the COVID-19 pandemic.
- Trinity is contacted to discuss additional support and options **before** any CAG is estimated if:
 - tutor(s) who taught any learner is/are not available to offer CAG estimations.
 - no evidence is available to support CAG estimations for any learner.
- CAG(s) is/are not estimated by tutors who have not taught the learner for the component the CAG is submitted (i.e. if a CAG is submitted for the Writing component of SfL Entry 1, the tutor preparing the learner for the S&L component cannot submit CAGs for the Writing component).
- CAGs **are not** submitted for any learner where there is no valid evidence on which to base the estimations.
- The final sign-off is in the form of a declaration that the processes and procedures detailed in this document and all supporting documents provided by Trinity have been followed in full.

Sense-checking the data before submission

The Head of Centre should sense check the data before submission to ensure that:

- CAGs are offered for eligible learners only (i.e. learners who were due to take ESOL SfL exams from 20 March to 31 July 2020)
- the number of CAGs submitted for each component is correct
- different CAGs are submitted for each individual award, if any learner was due to take more than one individual award in the 20 March to 31 July 2020 period
- the proportion of pass/fail rates resulting from CAGs is comparable to the pass/fail rate proportion for an equivalent historic period (e.g. March 20 – July 31st, 2019) or in the absence of historical data, with expectations of how each cohort of learners would perform under normal circumstances. Any variance between pass/fail rates resulting from CAGs and historical pass/fail rates should be accounted for any component as part of the submission.

Declaration

The final sign-off from the Head of Centre should be in the form of a signed letter of declaration to be submitted in PDF format with the Evidence Sheet. The declaration should include confirmation that:

- for all components, where a CAG is submitted, only staff who were/are teaching the component(s) to the learner provided the CAG estimations
- at least one piece of valid evidence (see above) per learner was used to inform tutors' judgements
- the Head of Centre has **overseen** the process for calculating CAGs

- **the Head of Centre has sense-checked** the CAGs by comparing the numbers and proportions of pass/fail resulting from the CAGs for each component with either the expectations about how this cohort of learners would perform under normal circumstances or against the centre's historical data (if available)
- any factors accounting for possible differentiation from centre historic pass/fail rates and pass/fail rates based on CAGs can be rationalised and explained.

1.3 The centre assessment process: role of tutors

The centre assessment process for Sfl qualifications requires that tutors explore the evidence gathered for any learner to estimate CAGs. The tutors need to ensure that:

- CAGs are offered only for learners they have taught
- they are familiar with the processes outlined in this document and other associated materials (i.e. the *Calculating grades for Skills for Life: Evidence sheet instructions*, the criteria used by Trinity to assess the Reading, Writing and S&L components, the pass marks for each Sfl component and level, the benchmarked samples and rationales)
- they use the benchmarked samples and rationales to align themselves with the Trinity standards and requirements as much as possible
- if they are teaching any learner for any component with other tutors, then they will standardise their judgements before working together to estimate the CAGs
- the CAG is based on sufficient valid evidence (from the ones listed in the *Calculating grades for Skills for Life: Evidence sheet instructions*)
- judgements are evidence-based and as far as possible an accurate reflection of the learners' knowledge skills and abilities and must not be influenced by a learner's appearance, social background or special educational needs (SEND)
- their judgement takes into account any reasonable adjustments that were made to the assessment in respect of a learner with special needs ([SEND](#))

1.4 Further information on Trinity's External Moderation Model

As part of the Quality Assurance process Trinity will moderate a percentage of all submitted calculated results, collecting the evidence submitted that has contributed toward a CAG. This evidence will be subject to review by an ESOL marker or examiner. The objective of the moderation is to ensure that:

- centres have tangible proof of the evidence referenced for each learner
- evidence cited corroborates the submitted CAG

Moderation may be undertaken either before or after results and/or certificates have been issued and as such the centres should keep the learners' records and evidence for a year.

1.4.1 Moderation - Sampling selection

Trinity is committed to moderating submitted calculated grades, and these will be drawn from a range of centres selected following the criteria listed below. Trinity may request to see the evidence for the entire cohort of learners for whom results were calculated or for a proportion of its learners (i.e. 10% of the cohort or ten (10) learners, whichever is the greater number).

- High-risk centres
- Centres with irregular submissions: Centres flagged through statistical analysis
- Randomised selection

1.4.2 Centre submission of evidence

Once a centre is selected for moderation, it will be informed by email and given a 'Moderation Excel file', which lists the candidate details including the evidence that needs to be submitted, this information is extrapolated from the original Trinity Spreadsheet submitted by the centre.

Centres will have a 3-week period to compile the evidence cited for each learner, and submit through the following process:

Digital evidence submission

Once centres have been selected for moderation they will be asked to upload evidence for some learners to the Trinity Portal in the form of PDFs.

This can include:

- Scanned documents relating to listed evidence
- Screenshots of recorded evidence (e.g. ILPs, Mock results)
- Any other digital files supporting evidence listed.

All evidence should be named with: the candidate number, the full name and type of evidence. For example: '1-12345678_John.Smith_writing.sample'

In the event a centre is unable to submit the required evidence, please contact your Trinity representative.

Once evidence is received, Trinity will allocate moderators (Trinity ESOL examiners or markers) to review the evidence submitted and complete the 'Moderation Excel File'. This process can only be implemented once the Trinity head office opens.

Figure 1: Flow diagram – moderation process



1.4.3 Moderation process outcomes

Moderators will return the completed 'Moderation Excel File' files to head office for analysis, this will demonstrate the validity of the evidence submitted, highlight any areas of disagreement between the moderator and the CAGs and flag any security issues (i.e. inconsistency in handwriting or voice inconsistencies in case of recorded evidence). The outcomes of the external moderation activities will contribute to the centre risk assessment rating (RAG).