

VTQ Contingency Regulatory Framework (VCRF):

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.

Trinity College London
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Introduction

In line with [Ofqual guidance](#), exams and assessments for English for speakers of other languages (ESOL) Skills for Life (SfL) qualifications should continue where they can be delivered in line with public health measures. Alternative arrangements are available only for those Learners who cannot access the assessments and need a result to progress. Certification of the Trinity College London (Trinity) Skills for Life (SfL) examinations using alternative arrangements will follow the VTQ Contingency Regulatory Framework (VCRF) model. Under this model, Learners who cannot access the exam and who cannot delay taking an SfL award between 1st August 2020 and 31st August 2021 may receive certificates based on Teacher assessed grades (TAGs). 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 VCRF model.

Ofqual guidance about ESOL Skills for Life Qualifications

Trinity has adopted the categorisation and definitions provided by Ofqual for the alternative arrangements of ESOL SfL exams.

ESOL SfL exams fall under **Category B qualifications**.

"Category B qualifications are used to support progression to further or higher study, but which do not have the same characteristics as GCSEs, AS and A levels and are not delivered in the same way.

For those Category B qualifications:

- *which do not have to follow an academic cycle*
- *are 'smaller' qualifications (low Guided Learning Hours)*
- *where Learners take assessments when they are ready and not at fixed points during the academic year*
- *which are not only taught in schools and colleges, and/or*
- *which do not include any assessment or occupational skills but may be assessing some element of proficiency*

*we expect an awarding organisation **to continue to make assessments available to Learners** where possible.*

*Where Learners **are ready** to take an assessment and can safely do so, remotely or in person, an awarding organisation should enable them to do so. However, **where Learners are not able to safely access an assessment** for these qualifications, an awarding organisation should put in arrangements for awarding using alternative evidence. This may include the use of Teacher Assessed Grades." (Ofqual, 2021, pp. 19-20).*

"Teacher Assessed Grade (TAG) is the term used throughout to refer to the information provided by a Centre in relation to a Learner's performance at award level."

Trinity's awarding model under the VCRF

The following process around TAGs as well as terms governing this process have been agreed by all Awarding Organisations offering Sfl qualifications:

In line with Ofqual guidance and the VCRF, Trinity will continue to offer Sfl exams to **all Learners** who have **completed** their learning and **are ready to take exams** following public health and safety guidance. As Trinity offers a number of flexible dates every month, it is expected that the vast majority of Learners will be able to take their Sfl exams in their Centres. Learners who **are ready** to take an Sfl assessment but **are unable to access a Centre** may be awarded through alternative arrangements including TAGs, **irrespective of award**. Trinity's alternative arrangements, including TAGs, will vary in proportion to the stakes of the award and its purpose. For Level 1 and Level 2 Sfl awards, Learners who **can safely access** a Centre **must** take an exam. Figure 1 presents an overview of Trinity's TAG decision-making process.

The following issues may be mitigated through alternative arrangements and assessment adaptations, including TAGs include:

- assessments that are impacted by public health and safety guidance/restrictions, such as social distancing measures
- restricted access to Centres meaning that Learners, though ready to take an exam, are not able to attend as frequently as they ordinarily would
- health reasons (Learner(s) shielding or self-isolating)
- insufficient testing capacity to accommodate Learners impacted by Centre closures in January/February needing immediate certification (ie Learners have left the area, Learners completed the course and will not continue, etc.)

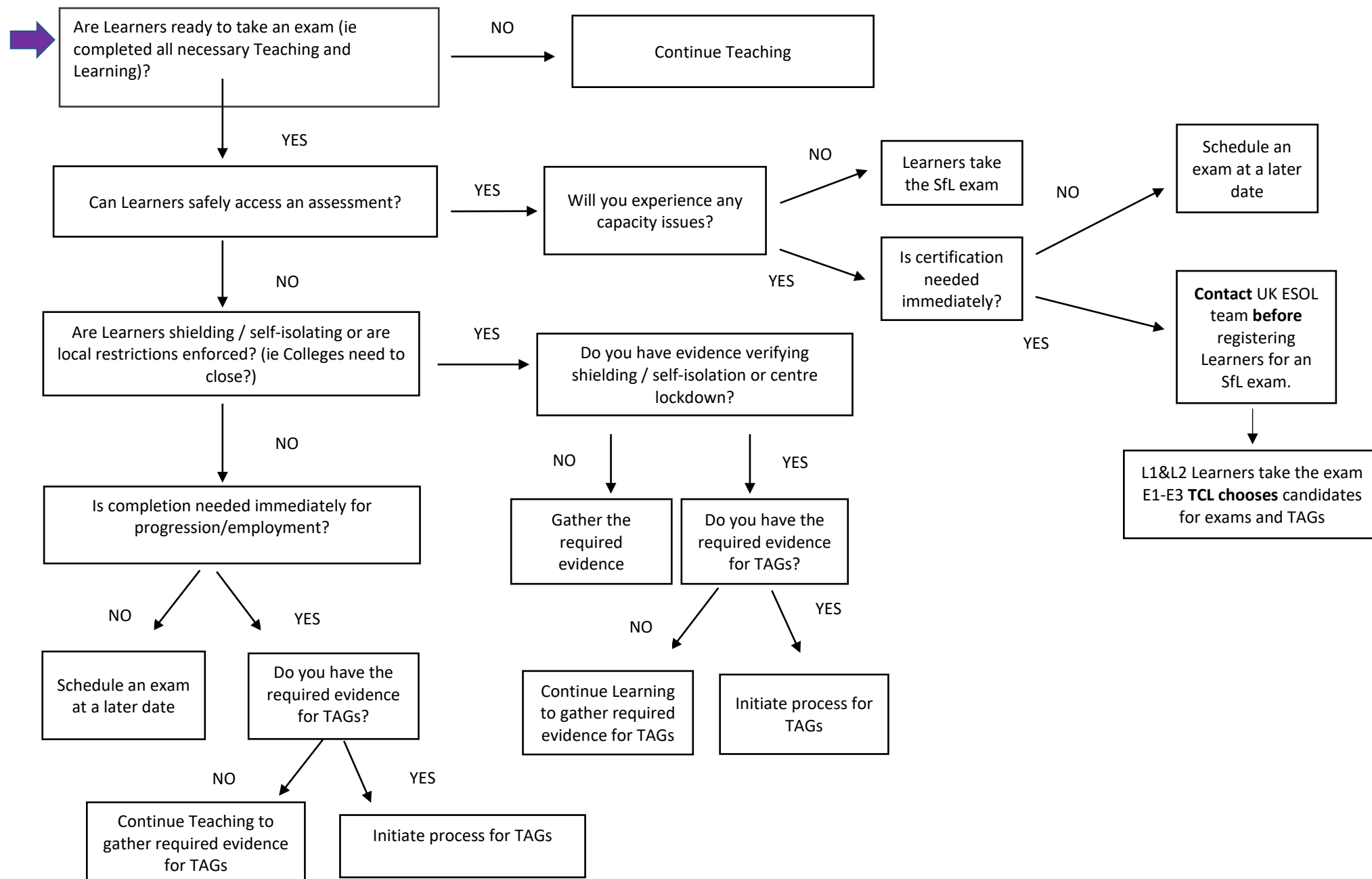
All Trinity ESOL Skills for Life awards will be delivered in our registered exam centres in line with the governmental social distancing rules and other health and safety guidance. The **Skills for Life Speaking and Listening** award will be delivered by **video conferencing** within our registered exam centres. To allow Centres to deliver the **Skills for Life Reading** and **Writing** exams under the existing social distancing rules, whilst maximising exam availability for Level 1 and Level 2 Learners, Trinity will add **extra Reading and Writing dates** for each month exams are offered. The exact number will be determined once the consultation with the Centres is complete.

In line with the VCRF and to prepare for the determination of the type of award (assessment in person, adapted assessments or TAGs), Centres **should provide Trinity with the following information:**

- the number of Learners expected to be taking *each* Sfl award
- when the Learners are expected to take their assessments
- when the Learners need to receive results by
- the reason why Learners need to receive a certificate by the specified due date

To facilitate this data-gathering process, Trinity has prepared a simple survey which has been sent to Centres via email. Please ensure this information is submitted, as this will enable Trinity to ensure the robust awarding (either through exams, adapted assessments or TAGs) of *all* Learners in need of a certificate.

Figure 1: Decision making process to offer TAGs



Terms governing Trinity's TAGs process under the VCRF

The following terms govern Trinity's process around TAGs:

1. TAG is used for each award, not the full certification. Teachers will be required to calculate the grade at the award rather than at certificate level:
 - Award in Reading
 - Award in Writing
 - Award in Speaking and Listening
2. Certification of L1 and L2 individual awards based on TAGs is provided **only for Learners who cannot safely access a testing Centre** and who can provide evidence supporting the need for TAGs.
3. Certification for Entry 1 to Entry 3 individual awards based on TAGs is provided for Learners, who are ready to take an exam. The TAGs awarding process will be used to address insufficient testing capacity issues and to accommodate E1 to E3 Learners impacted by Centre closures in January/February needing imminent certification (ie Learners have left the area, Learners completed the course and will not continue, etc.)
4. Eligible Learners are only the ones *who would expect to take the exam* between 1 August 2020 and 31 August 2021. This includes:
 - a. Learners attempting the assessment for the first time
 - b. Learners resitting the assessment
 - c. Learners needing to be certified immediately but cannot access the Centre safely
 - d. Learners whose Centre access has been disrupted
5. For Learners who **cannot access the Centre safely**, the TAGs process will need to be initiated. To initiate the TAGs process, Centres must apply for TAGs using the Application form for TAGs. The form can be downloaded from <https://learn.trinitycollege.co.uk/sfl/tags>. This application expresses a Centre's intention to initiate the TAGs process for some Learners, states the reason for TAGs and provides supporting evidence illustrating Learners' eligibility for TAGs, including evidence verifying the need for an immediate certification. Trinity will review the application and Centres will be informed by email about whether their request to initiate the TAGs process for some of their Learners has been accepted. The form is submitted to Trinity via email (ukesol@trinitycollege.co.uk).
6. Centres **must NOT** submit TAGs for any Learner they would not expect to have taken the exam / assessment during this period.
7. Centres **must NOT** submit TAGs for any Learners who are not ready to take the assessment.
8. Centres must submit TAGs at the award/component level and not at the overarching certificate level.
9. Centres are expected to initiate a new TAGs process, if needed, for each scheduled test administration as described in this document, having first liaised with Trinity's operations team (ukesol@trinitycollege.co.uk).
10. In line with the latest Ofqual guidance detailed in the [Vocational and technical qualifications contingency regulatory framework, COVID-19 Conditions and Requirements](#) and in the [Vocational and technical qualifications contingency regulatory framework, COVID-19 Guidance](#), for final results derived from TAGs 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.
11. Trinity reserves the right to request to review the evidence used by centres to reach TAGs. This will be part of the external quality assurance of a Centre's submission. The evidence used to support TAGs should be kept by Centres until six months after the date of the issue of the result, or the conclusion of any appeal in relation to that result, whichever is later.

- 12 As part of the external quality assurance process of a Centre's submission, Trinity may ask the Centre to reconsider its submitted TAGs. Trinity reserves the right not to award any Learner who does not meet the minimum evidential threshold.
- 13 Trinity will take all reasonable steps to support Centres to arrive at consistent judgements for Learners taking the same award. To this end, it is compulsory that tutors, as well as Head of Centres, involved in the TAG process will participate in the Assessment training sessions conducted by Trinity.
- 14 Trinity will take all reasonable steps to support Centres to internally quality assure the TAGs prior to their being submitted to Trinity, but as a last resort Trinity reserves the right to reject all or part of the submission. To this end, it is compulsory that tutors, as well as Heads of Centre, involved in the TAG process will participate in the Quality Assurance training sessions conducted by Trinity.

1.1 Evidence requirements and guidance to support Teacher Assessed Grades

In line with the VCRF, where TAGs will form the basis of the result Trinity will:

- a. request a Centre to provide a result in respect of each individual SfL award for each Learner at the Centre or Private Candidate working with the Centre who meets the conditions detailed in pages five and six of this document, to whom the awarding organisation is required to issue a result (under Condition VCR3.1),
- b. take all reasonable steps to ensure that Centres judge the Teacher Assessed Grade against the standard set for the qualification in previous years in which assessments took place,
- c. take all reasonable steps to ensure that the Teacher Assessed Grade is based on the Centre's judgement as to the individual Learner's actual level of attainment and is based on appropriate evidence.

Following Ofqual's suggestion, the evidence considered by a Centre may include the following:

General guidance for Centres	
a.	Performance on any assessment for the qualification even if this has not been fully completed. Where relevant and possible, Centres should support Learners to complete assessment tasks as far as possible, and for Centres to mark those assessments.
b.	Performance on any class or homework assessments and mock exams taken over the course of study.
c.	Records of the Learner's performance over the course of study in the relevant qualification, including, for example, progress review data, classwork, and/or participation in practical activities, demonstrations and performances.
d.	Any other relevant evidence.

1.1.1 Establishing the minimum evidential threshold

Trinity has grouped the sources of evidence into three categories, Category A, B and C. To ensure the robustness of ESOL SfL certification, Trinity will ask for evidence from at least two categories, with **category A being mandatory** for all Learners. The sources of evidence will also be recorded in the proforma to be submitted to Ofqual to support consistent and reliable TAGs.

Trinity acknowledges that sources of information may vary across centres and for this reason **a minimum of one piece of evidence must come from category A and at least one additional piece of evidence must come from categories B or C**. Trinity retains the right to ask for more evidence to support the validity and reliability of a Learner's TAG.

Trinity has classified and ordered by importance the sources of information it lists in the Supporting Teacher Assessed Grades for Skills for Life: Evidence sheet instructions and in the TAGs, TCL SFL form for data collection as follows:

Sources of information	Rank order (Category)
Performance on any Trinity set task (end of course test)	Rank 1 (Category A)
Mock exam(s) taken over the course of study	Rank 2 (Category B)
Practice Test(s) and other assessed tasks (ie Progress Tests) set by the Centre over the course of study	Rank 2 (Category B)
Classwork, Individual Learning Plans (ILPs) or Portfolio items completed by the Learner over the course of study	Rank 3 (Category C)

Since category A evidence is mandatory for all learners, Trinity will offer registered Centres two sets of papers for the Reading and Writing award and two sets of Speaking Tasks for the Speaking and Listening awards which will need to be administered as end of course exams to all Learners receiving TAGs. These papers/tasks will be made available towards the end of a Learner's course to be used as end-of-course tests and need to be completed under timed conditions and Centre supervision, either remotely or in class.

1.2 Centre responsibilities

Centres need to facilitate the collection of a strong body of evidence from categories A and B as far as possible. The evidence collected should be consistent across all cohorts of Learners and should accurately reflect the Learners' KSAs. The evidence needs to be robust and reliable to ensure the validity of the Learners' certificates awarded under the VCRF. Centres should make their Learners aware of the sources of evidence that will be used to determine TAGs and should provide them with feedback about their progress and performance.

1.2.1 The 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 (TAGs).
- They are familiar with the process outlined in this document and with any other associated materials supporting the TAGs process (ie the *Supporting Teacher Assessed Grades for Skills for Life: Evidence sheet instructions*, the criteria used by Trinity to assess the Writing and Speaking and Listening components, the pass marks for each SFL component and level, the benchmarked samples and rationales).

- The tutors as well as Heads of Centres involved in providing TAGs participate in the Assessment and Quality Assurance training workshops to be provided by Trinity.
- Tutors refer to the benchmarked samples and rationales to align themselves with the Trinity standards and requirements.
- There is sufficient **valid** evidence (from the types of evidence listed in *Supporting Teacher Assessed Grades for Skills for Life: Evidence sheet instructions*) available to advise and inform the TAGs to be made by the tutors **before** any Learner's outcome and result is estimated.
- All Learners eligible for TAGs take a Trinity set exam as an internal end-of-course test (Category A evidence) and their marks are submitted to Trinity.
- If more than one tutor is involved in teaching any Learner for any component, these tutors will standardise their judgements **before** working together to arrive at TAGs.
- Tutor judgement takes into account any reasonable adjustments that were made to the assessment in respect of a Learner with special needs ([SEND](#)).
- Where a tutor or member of staff might have a personal interest in a Learner (ie close friend, relative, neighbour etc.), and where this tutor must be involved in the TAGs process, the TAGs are reviewed independently.
- Judgements are evidence-based and are as far as possible an accurate reflection of the Learners' knowledge, skills and abilities (KSAs), and are not influenced by the Learners' appearance, social background or special educational needs (SEND). More guidance on [making objective judgements](#) is provided by Ofqual
- **All** Learners are registered for the pertinent SfL award following the normal Trinity registration processes and procedures.
- Learners self-isolating and/or shielding **must** provide evidence in support of their requirement of TAGs.
- Tutors **do not** select which Learners will be certificated through the use of TAGs, if social distancing measures and/or other local restrictions prevent the Centre from being able to run the required number of exams. In such circumstances **Level 1 and Level 2 Learners are always prioritised to take an exam**, unless there are reasons prohibiting such Learners to safely access the Centre.
- TAGs **are not** estimated by tutors who have not taught the Learner for the component the TAG is submitted (ie a TAG is submitted for the Writing component of SfL Entry 1, must be submitted by the tutor preparing the Learner for that component).
- TAGs **are not** submitted for any Learner where there is **no valid evidence** on which to base the estimations.
- TAGs **are not** submitted for any Learner who has not completed the course and who does not perform at the targeted level satisfactorily.
- All TAGs undergo an internal quality assurance process **before being** submitted to Trinity.

1.2.2 The role of tutors

The Teacher Assessed Grades process for SfL qualifications requires that tutors make evidence-based judgments using the sources of information required to meet the minimum evidential threshold for the determination of results. The tutors need to ensure that:

- TAGs are offered *only* for Learners they have taught.
- They are familiar with the process outlined in this document, participate in the training sessions conducted by Trinity and are versed in any other associated materials supporting the TAGs process (ie the *Supporting Teacher Assessed Grades for Skills for Life: Evidence sheet instructions*, the criteria used by Trinity to assess the Writing and Speaking and Listening 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 throughout the TAGs process.
- If tutors are teaching any Learner for any component with other tutors, then they need to standardise their judgements before arriving at TAGS.
- The TAG is based on sufficient, valid evidence (from the ones listed in the *Supporting Teacher Assessed Grades for Skills for Life: Evidence sheet instructions*).
- Their judgements are evidence-based and as far as possible an accurate reflection of the Learners' knowledge, skills and abilities (KSAs) and are not influenced by a Learner's appearance, social background or special educational needs (SEND).
- Their judgements take into account any reasonable adjustments that were made to the assessment in respect of a Learner with special needs ([SEND](#)).

1.2.3 Internal quality assurance arrangements expected of Centres

Trinity will take all reasonable steps and will provide Quality Assurance workshops to support the Heads of Centre to put in place effective arrangements to quality assure the Teacher Assessed Grades before submission to ensure that:

- a clear approach to making judgements in relation to each Teacher Assessed Grade was adopted and how evidence was used,
- a high-level cross-check of the Teacher Assessed Grades against results for previous cohorts is completed. The Teacher Assessed Grades should be compared with the Centre results of those Learners who took assessments for the same qualification in previous years. This comparison will provide an indication that Teacher Assessed Grades overall are not overly lenient or harsh. Any variance between pass/fail rates resulting from TAGs and historical pass/fail rates should be accounted for as part of the submission,
- the Teacher Assessed Grade **has been reviewed** by both subject Teachers or Assessors, and the relevant Head of Department or equivalent or, where there is no person in such a role, the Head of Centre or equivalent,
- each Learner's Teacher Assessed Grade was determined by the specific performance of that Learner in relation to the relevant qualification.

1.2.4 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 together with the *TAGs TCL_SfL form for data collection*. The declaration should include confirmation that the principles outlined in this document have been followed, the TAGs are an accurate reflection of the Learner's knowledge and that the TAGs have undergone the internal quality assurance process as this is described in this document. The declaration form can be downloaded from <https://learn.trinitycollege.co.uk/sfl/tags>.

1.3 Appeals Process

Learners can instruct the centre to conduct a centre review or to submit an appeal to Trinity in relation to their TAG. The centre must conduct the review or submit the appeal. The Learner can request a review for procedural and administrative errors and can appeal for:

- a. procedural and administrative errors
- b. academic judgement.

Should a learners' review or appeal be delayed because of actions of the centre Trinity will extend the appeal deadlines accordingly. Learners must be made aware that the outcome of the appeal process may change their final results, implying their scores and/or results may go up or down.

1.3.1 Grounds of appeal

If a Learner wishes to appeal a TAG derived by the Centre, the Learner must first explain the reasons for their appeal to the Centre. Namely the Learner appealing for:

- A. **A Centre procedural or administrative error** must explain:
 - what the Centre failed to do in relation to the Centre's written and documented processes
 - why that was a failure
 - why the failure affected the TAG result
- B. **A Trinity administrative error** must explain:
 - what the error is
 - the difference the error made to the TAG
- C. **A Centre error in academic judgement** must explain whether the error was:
 - in the selection of evidence used to determine the TAG (ie the tutor did not select the materials the learner was told would be used as evidence)
 - in the determination of a TAG from the selected evidence (ie the Learner feels that the selected evidence was assessed too harshly)

In all cases the Centre is responsible for submitting a completed appeals application form, if applicable, on behalf of the Learner, to Trinity.

1.3.2 Dealing with reviews and appeals

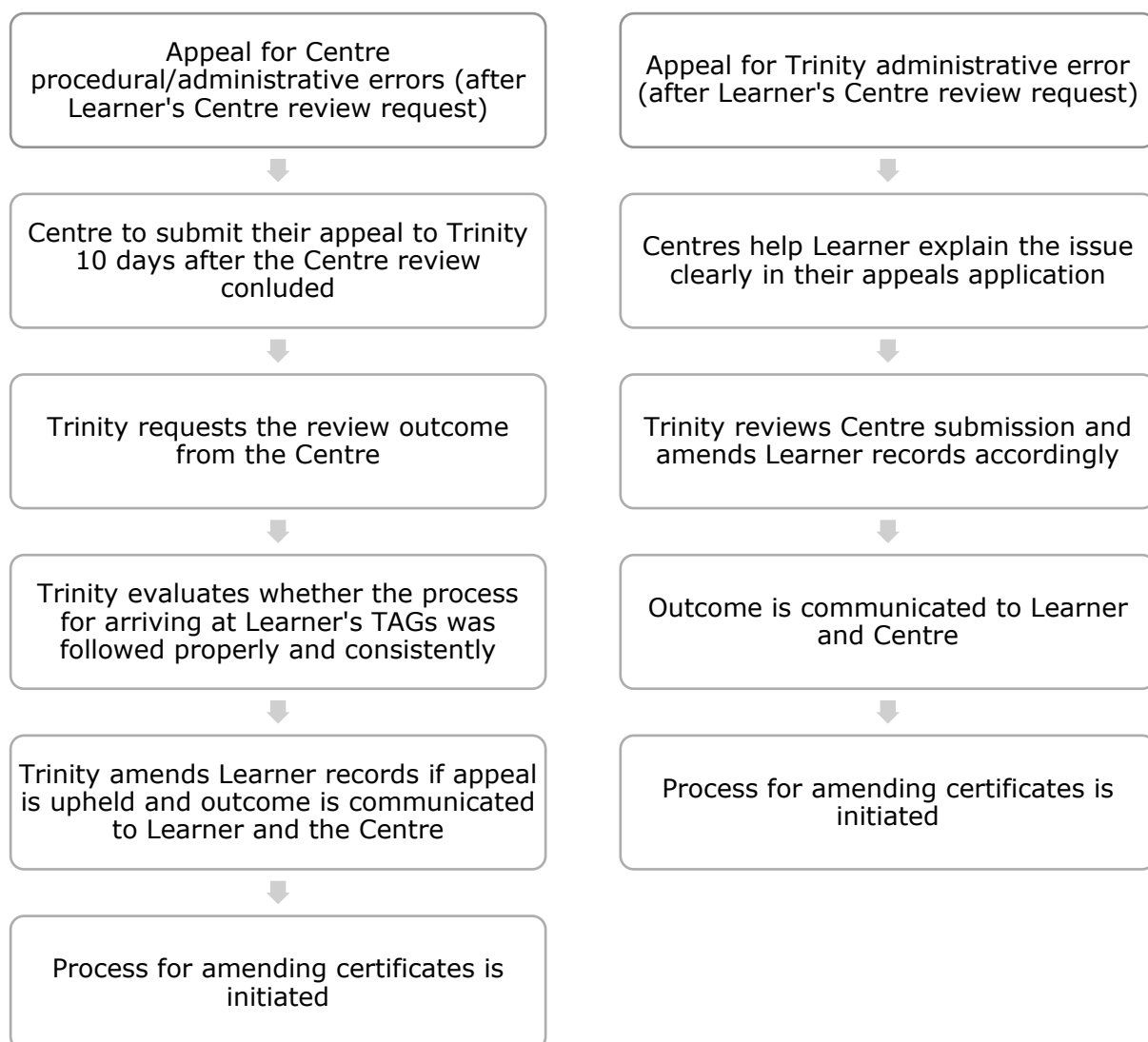
Centre's procedural or administrative error

If a Learner requests a review for a Centre procedural and administrative error this will be managed by the Centre. If a Learner decides to appeal to Trinity on procedural grounds, the Centre should first review the appeal to identify whether it agrees with the grounds for appeal. This review may entail the Centre re-evaluating the initial TAG and proposing a new one to Trinity. In the case that the Learner's appeal for procedural grounds reaches Trinity, Trinity will examine whether the process for arriving at TAGs was followed by the Centre appropriately.

Trinity's administrative error

If a Learner requests a review for a potential Trinity administrative error this will be dealt by Trinity's Post Results Services team (PRS). In such case the Centre is expected to help the Learner clearly explain the administrative error to the PRS team which, with the Centre's help, will review the Centres submission and will amend the Learner records accordingly.

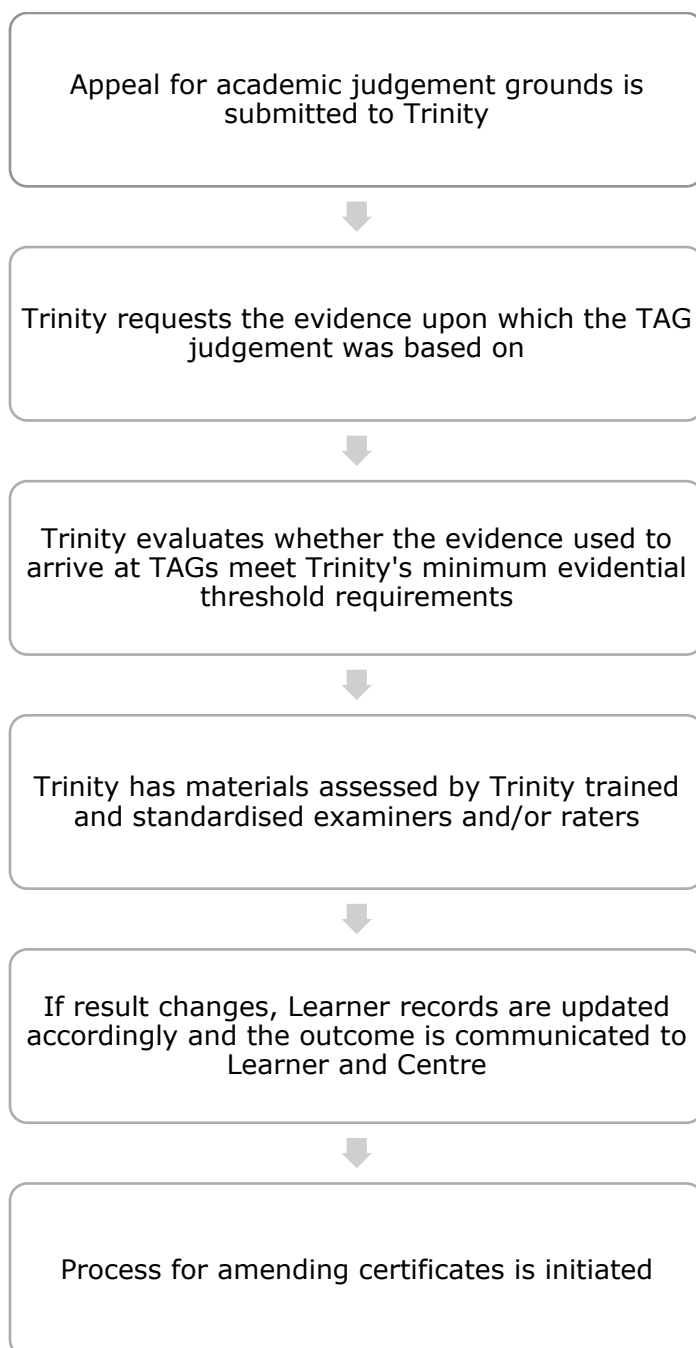
Trinity's appeal process for procedural and administrative errors is outlined below:



Centre's error in academic judgement

Trinity has put in place an appeals process which includes arrangements for an appeal on the basis that the result reflects an unreasonable exercise of academic judgment.

Trinity's appeal process for potential errors in academic judgement is outlined below:



1.4 Trinity's External Moderation Model

As part of the Quality Assurance process Trinity will evaluate the appropriateness of the procedures to be followed by a Centre to arrive at TAGs and the internal QA processes adopted by each Centre and will moderate a percentage of all submitted results based on TAGs. Trinity will collect the evidence that has contributed toward a TAG. This evidence will be subject to review by an ESOL marker or examiner. The objective of the moderation is to ensure that:

- Centres used the sources of information required to meet the minimum evidential threshold
- the evidence submitted to Trinity corroborates the submitted Learner result based on TAGs

Moderation may be undertaken either before or after results and/or certificates have been issued and as such the Centres should keep Learners' records and evidence until six months after the date of the issue of the result, or the conclusion of any appeal in relation to that result, whichever is later.

Trinity is committed to moderating **all** centres participating in the TAGs process. Trinity may request to see the evidence for the entire cohort of Learners for whom results were based on TAGs or for a proportion of Learners (ie 10% of the cohort or ten (10) Learners, whichever is the greater number).

1.4.1 Centre submission of evidence

Centres participating in the TAG process will be informed by email and given a 'Moderation Excel file', listing the Learner details and the evidence that needs to be submitted to Trinity. The evidence to be submitted will be derived from the sources of information required to meet the minimum evidential threshold.

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

1.4.2 Digital evidence submission

Once centres are notified for moderation, they will be asked to upload the specified evidence for specific Learners to the Trinity Portal in the form of PDFs or recordings in the case of Speaking and Listening.

This may include:

- scanned copies (or photos), or recordings of the Trinity-set, end-of-course exam documents relating to listed evidence,
- scanned copies (or photos) of other assessment tasks and Progress tests completed during the course of study,
- scanned copies (or photos) of work completed in class.

All evidence for the Writing and Reading components **should be signed by the Learner** declaring the authenticity of their work and the conditions under which the work was completed (ie classwork completed in class with the teachers' help, assessed supervised work under exam time conditions, assessed unsupervised work etc.). For the Reading award, Learners **must record** their answers **on the Trinity exam booklet** and not a marksheet or a piece of paper.

All evidence should be named with the:

- candidate number,
- candidate full name,
- SfL award,
- type of evidence

Example: '1-12345678_John.Smith_Writing_Trinityendofcourse exam.

In the event a centre is unable to submit the required evidence in the specified timeframe, please contact your Trinity representative. **In the event a centre does not hold any sources of the specified evidence, Trinity reserves the right to withhold certificates.**

Once evidence is received, Trinity will allocate moderators (Trinity ESOL examiners or markers) to review the evidence submitted.

Figure 2: 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 TAGs and flag any security issues (ie inconsistency in handwriting or voice inconsistencies in case of recorded evidence). Centres will be informed of the outcomes of the external moderation activities. Trinity retains the right to withhold certificates if the Moderators deem that Learners' work does not demonstrate the KSAs required at the targeted level and/or if there are malpractice concerns.