



Data Project: General Qualifications Data Collection Templates

Summary of responses to our consultation on Qualifications Wales'
General Qualifications Data Collection Templates

1. Summary

Since late 2016, Qualifications Wales have been considering how best to collect data and publish statistics on regulated qualifications offered in Wales. Following a period of engagement with awarding bodies, other regulators and representative bodies, we have developed draft templates and a proposed schedule for collecting data on general qualifications (GQs) taken by learners in Wales. We will only collect data on qualifications that we regulate. For GQs, we will collect data for learners entered by centres in Wales for:

- GCSEs
- GCEs
- The Welsh Baccalaureate Skills Challenge Certificate
- Level 1/2/3 certificates in general qualifications, (alternatives or complements to GCSEs and GCEs, for example level 1/2 certificates, Extended Project qualifications)

On 4 August 2017, we launched a consultation to seek the views of stakeholders on the feasibility of the proposed templates and the associated schedule for awarding bodies. Further information about the proposals can be found in the consultation document on Qualifications Wales' website. Respondents were encouraged to complete an on-line response form before the consultation closed on 15th September 2017.

This document summarises the responses to the consultation and the decisions we have taken as a result.

2. Consultation Responses

Qualifications Wales received seven responses to this consultation; all of which were submitted through the on-line response form. All responses were from awarding bodies, of which five currently award GQs in Wales that would be impacted by the proposed GQ data collection process. All respondents to the consultation answered all the substantive questions. All comments were considered by us when making decisions regarding the consultation. In our consultation, we asked:

Question 1: Are our proposals for collecting data on general qualifications for learners entered by centres in Wales clear?

All respondents indicated that the proposals outlined in the consultation for collecting data on GQs for learners entered by centres in Wales were clear.

Question 2: Would you prefer that we (i) implement our proposed templates or a version of them amended as a result of this consultation, (ii) match Ofqual's current templates or (iii) collect all GQ data at a disaggregated, candidate level?

Most of the respondents stated that their preference was for Qualifications Wales to match Ofqual's current GQ collection templates. The remaining respondents preferred that we implement our proposed templates or a version of them amended as a result of this consultation. No respondents indicated that they would prefer us to collect all GQ data as a disaggregated, candidate level. The majority of awarding bodies who responded to the consultation and that award GQs in Wales expressed a preference for us to match Ofqual's current templates.

Respondents who indicated that they would favour Qualifications Wales implementing our proposed templates, or a version of them amended as a result of this consultation, noted that:

1. The approach demonstrated appropriate consideration of what data is required by us for our purposes. As a result, these respondents were content that they were not being asked to provide data unnecessarily.
2. The proposed templates represent a proportionate approach to data collection across various themes, but did acknowledge that the introduction of a separate data collection process would create additional burden. However, they felt that this additional burden was not unexpected or disproportionate.

Respondents who indicated that they would favour us matching Ofqual's current templates gave the following reasons for this preference:

1. Familiarity with Ofqual's templates.
2. Provision of such data is complex, particularly given the range of different products and delivery models that are in use. A joined-up approach between regulators, with the same templates and schedule being employed, would be less burdensome for awarding bodies and avoid additional workload and

duplication of effort that would be required on an annual basis if templates differed.

3. Providing the data through the templates proposed by us would require many process changes and technical redevelopments that would require significant investment (both time and money) and cannot be completed for Summer 2018.
4. Awarding bodies are providing data to Ofqual in a new format for 2017. These new reporting formats have been recently agreed and required changes to data collection systems. Awarding bodies do not yet have a clear picture of any major issues that may arise as a result of these new reporting formats and consider that providing the same data in a different format for us would significantly increase workload. Making additional changes to systems to fulfil our requirements might impact on the ability of awarding bodies to provide data to Ofqual in its required formats as some of the changes may run counter to the current processes established for Ofqual.

Question 3: Will providing the data in the proposed templates that are similar to those used by Ofqual present your organisation with significant difficulties?

The majority of respondents indicated that the proposed templates that are similar to those used by Ofqual will present their organisation with significant difficulties. This included all of the awarding bodies who responded to the consultation that award GQs in Wales.

A few respondents commented on the differences between the templates proposed by Qualifications Wales and the current templates used by Ofqual in relation to Entries, Late Entries and Awards, and Entries by Year Group:

1. Ofqual have dropped the requirement for 'Preliminary entries by year group' in the recent series. If we wish to continue to collect this data, the dates proposed for providing it do not give awarding bodies adequate time to amend their processes.
2. The addition of extra levels of data for reporting on the 'Entries, Late Entries and Awards' template will mean the design of a different extract of data and duplication of effort from the Ofqual return. This return already requires manual adjustment due to the ways in which linear and modular products are held within processing systems, and requires business knowledge to

determine which data in common fields needs to be interpreted and adjusted for different qualification types.

3. The split of entries and awards to unit level would require a significant change as new reports will need to be developed.

The following difficulties in providing the data in relation to the other proposed templates that are similar to those used by Ofqual were also identified by respondents:

1. Linking individual units to specification codes and QANs is difficult and not always feasible since there is not always a one-to-one relationship between them.
2. In 2017, Ofqual required awarding bodies in England to remove the Extended Review Service for schools. As a result, awarding bodies do not currently collect this data.

Question 4: Will providing the data in the proposed templates that are substantially different to those used by Ofqual present your organisation with significant difficulties?

The majority of respondents indicated that providing the data in the proposed templates that are substantially different to those used by Ofqual will present their organisation with significant difficulties. This included all of the awarding bodies who responded to the consultation that award GQs in Wales.

Many of the respondents with this view noted that data would need to be collected, extracted and analysed separately for Ofqual and Qualifications Wales, using different processes. A few respondents stated that some of the data required to fulfil the requirements of our proposed templates is not currently captured. The majority noted that to facilitate the collection and processing of the required data, they would need to redevelop their systems for conducting these tasks, albeit to varying degrees. A few respondents stated that they have recently undergone similar redevelopment to meet the requirements of the Ofqual templates, which required significant investment, whilst others noted that such a redevelopment would present their organisation with a workload capacity burden. A few respondents specifically commented that they would need advance notice of the templates and the proposed dates would not provide adequate time to accommodate such changes.

A few respondents noted difficulties that they would encounter with specific templates:

1. Unit grade and sub-unit data for the Review of marking (ROM) and Appeals templates is not currently captured.
2. Reporting on review of marking and moderation is problematic, and requires significant manual manipulation of data. There will need to be an ongoing dialogue about how different scenarios need to be reflected within these data returns.
3. The malpractice template would require a reanalysis of existing data for which the fields are specified differently to Ofqual.

Question 5: Are there any aspects of the proposed collection templates that you feel could be improved?

The majority of respondents indicated that the proposed collection templates could be improved. This included all of the awarding bodies who responded to the consultation that award GQs in Wales.

The following considerations for improvement to the proposed templates were noted by respondents to this question:

1. Clarification was sought in relation to the 'Entries, Late Entries and Awards' template on why data is being requested at both specification and unit/component level for linear entries and awards. It was suggested that Qualifications Wales only need to collect the specification code at syllabus level, which would make the entry code and unit/component code columns redundant.
2. Consider bringing the columns in the 'Entries by Year Group' submission into the same name and order as the Ofqual template.
3. The terminology is not always clear and is open to interpretation. The distinction between linear and unitised qualifications is not always adequately reflected in templates, for example, a component grade in a linear qualification is, at best, a notional concept. Although boundaries are set at that level, awarding bodies do not report component grades to centres.
4. Ofqual requirements are set out alongside detailed validation rules. It would be useful for awarding bodies to explore the possibility of replicating this with us.

5. It would be useful for us to set out their preferred approach to working with awarding bodies to clarify queries during the data collection and reporting process.
6. Revise the data collection for the 'Access arrangements referrals process' to join up with the Joint Council for Qualifications (JCQ) annual release on Access Arrangements. It was considered that the request for regional referrals in our proposed templates would not provide an indicator of total arrangements for Wales, and that a more informative report could be produced by providing a full view of the use of examination access arrangements across the region/country.
7. Consider separating the types of malpractice and outcomes, as defined in the JCQ Suspected Malpractice document. This has been used by Ofqual in an attempt to present a more workable and meaningful dataset.

Question 6: Do you consider the proposed collection schedule to be reasonable and achievable?

Slightly over half of respondents indicated that they consider the proposed collection schedule to be reasonable and achievable. Responses from awarding bodies who award GQs in Wales differed.

Of those who did not feel that the proposed collection schedule is reasonable and achievable, a concern was noted about managing the submission of data to both Ofqual and Qualifications Wales, via different templates, when the two schedules overlap. It was also noted that an awarding body would not have adequate time to provide the required data due to their current processes for receiving and managing data. Another respondent reiterated the concern about the burden on awarding bodies to provide data using different formats to those required by Ofqual.

Question 7: Are there any aspects of the proposed collection schedule that you feel could be improved?

The majority of respondents indicated that the proposed collection schedule could be improved. This included all of the awarding bodies who responded to the consultation that award GQs in Wales.

The following suggestions for improvements were provided:

1. Aligning the collection schedule more with the Ofqual submission schedule, including data cut off dates and return dates, would reduce the workload as files could be prepared at the same time. It would also enable statistics to be compared historically, across regions and between awarding bodies.
2. The provision of precise dates, rather than monthly time slots, would be helpful to aid with planning of data collections and submissions.

Question 8: Please provide feedback on the feasibility of collecting data on the language or languages in which candidates respond to assessment tasks at a component level. What changes, if any, would be required in order to achieve this? How long would such changes take?

A mix of responses were received to this question.

Around half of respondents noted that they do not offer Welsh medium assessment so it would not be applicable to them. However, they requested that Qualifications Wales consider only asking for this information from awarding bodies that do offer Welsh-medium assessment to avoid the proliferation of nil returns.

One respondent noted that they have considered, in principle, how such information could be captured, and that it would be necessary to make changes to a number of IT systems and related processes to capture this data accurately. The respondent is unclear how long would be required for such changes, in part because the requirements would be determined by the nature of the assessment and marking processes, but stated that it is unlikely to be possible for the implementation of the GQ data collections.

One respondent noted that data on the language or languages in which candidates respond to assessment tasks at a component level is currently only captured for some submissions, (Entries by Year Group and ROM), and only for assessments where a distinct entry code has been created for learners wishing to take the assessment in Welsh, (usually only externally assessed examinations).

Another respondent noted that information on language of assessment is not held in their systems, and when centres request Welsh-medium papers, they are often completed in English. This causes confusion around how to record this data.

Question 9: If you have any comments or questions about the approach proposed, or feel that something has not been explained sufficiently well, please use this space to let us know.

A few respondents took the opportunity to provide further comments. One respondent requested further information on how data should be submitted to Qualifications Wales and how security will be maintained, whilst another respondent noted that the approach proposed by us appears to be appropriate and proportionate, particularly in relation to candidate-level data, and welcomed the high level of engagement with us through the development of this approach.

One respondent noted that consultations relating to data collection, analysis and reporting processes are normally best undertaken for consideration in the period post-summer awarding. This ensures that resources are not diverted from delivering on the summer awarding series and that there is adequate time to redevelop systems to facilitate any changes, prior to the following summer awarding series.

3. Statement of decision

Responses to the consultation demonstrated a divergence in opinion regarding the proposed GQ data collection templates. As a result of these differences, Qualifications Wales completed additional engagement with awarding bodies known to certificate general qualifications in Wales (appendix 1) to gain further understanding of the responses. Following this engagement, we completed analysis of the options for GQ data collection.

A key factor in relation to our decision is that we are now responsible for collecting data to publish GQ statistics for Wales. Therefore, a solution is needed quickly as well as clarity for all involved.

Upon consideration of all responses, we have made a decision to pursue option 2: to match Ofqual's current data collection templates as far as possible. However, the implementation of these templates will include some necessary differences in process:

1. The submission of data to us via our QiW portal.
2. We will work towards encouraging the use of QiW qualification numbers on awarding body systems.
3. There will be additional scheduled collections for us, where relevant for Wales due to the different assessment opportunities available here compared to England.
4. We will not implement the regular collection of some of the templates on Ofqual's published schedule via QiW i.e. Errata, Missing Scripts, Number of Referrals and Examiner/Moderator Posts. Where data is needed, this will either be captured by regulation as business as usual or via an ad-hoc data request.

Most of the respondents to the consultation stated their preference for this option. The decision to use Ofqual templates for GQ data collections will remain for the period of qualification reform, defined here as the period until all reformed general qualifications have been awarded for the first time, including GCSE resits in post 16. This period runs until the Autumn of 2019, and we will have reviewed this position by the start of first quarter of 2020.

The decision was made to reject option 1, implement our proposed templates or a version of them amended as a result of this consultation, due to the burden that implementing the proposed templates will create on awarding body systems and processes in the short term. Additionally, following further discussion with awarding

bodies, it was considered that the proposed templates required further clarity. No respondents to the consultation expressed a preference for the collection of fully disaggregated, candidate level data, therefore, this option (3) was rejected. Due to the responses received, we thought about whether an additional option could be considered involving a combination of options; however, this option was rejected due to issues with clarity and workload as well as the fact that this had not been consulted upon.

During the process of consultation and engagement, we received a number of suggestions in relation to improving the process as well as in relation to collecting more data on Welsh medium assessment. We will consider this information further between now and the start of 2020.

4. Next steps

Following the publication of this report, Qualifications Wales will contact awarding bodies to clarify GQ template details and provide a collection schedule for the 2017/18 academic year.

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Appendix 1: Additional Engagement Responses

As a result of the differences of opinion expressed in our consultation, we invited those awarding bodies known to certificate general qualifications in Wales to engage further with us. Four awarding bodies agreed to this request. These discussions took place between 16 October 2017 and 19 October 2017; three were Skype conversations and one a face-to-face meeting. During these discussions, awarding bodies were asked to describe the systems and processes that they would need to use to provide data to us, and to give more detail on aspects of their consultation responses.

On discussion of their information systems and processes, the majority of awarding bodies who participated in this additional engagement activity noted that more than one system is used to extract data. This extraction, and the subsequent processing of the data to meet data collection requirements, often included several manual processes. Some examples of additional systems given were: spreadsheets; systems for onscreen marking; appeals databases; and access arrangement portals. One awarding body commented that submissions for the 'Entry by Year Group' template is a manual process where candidate level data is collated offline and, therefore, with their current system, they would be unable to extract the data required for our proposed 'Entry by Year Group' template. However, one awarding body stated that their current data collection system would be able to manage collation for the proposed templates. A comment made by one awarding body noted that changes to their system and processes would be resource intensive and may pose a risk to achieving deadlines.

A few awarding bodies who participated in this engagement activity indicated that significant amendments had already been made to their information systems in order to capture the data required by Ofqual's new, candidate level data collection templates¹. On discussion of 'malpractice' templates, one awarding body stated that providing data for our proposed templates, which are similar to Ofqual's previous templates, would not be a simple process. Another awarding body noted that Ofqual made the decision to collect disaggregated data due to queries that were being raised in relation to the accuracy and comparability of aggregated data in relation to what was being measured.

All awarding bodies who contributed to these discussions commented on the complexities of data structures. These complexities were often discussed in relation

¹ These four templates have been implemented in stages over the last 2 years.

to the collection of meaningful data for unitised specifications versus linear specifications, including between reformed and unreformed/legacy specifications. In particular, awarding bodies reflected on some of the challenges of relating entry information to reviews of marking and extended appeals. More specifically, the following difficulties were highlighted:

1. Lack of specific definitions of unit, sub-unit and component, in relation to the collection templates, could result in inconsistencies across awarding bodies.
2. Awarding bodies do not necessarily store this sort of information in their systems in a consistent way across all qualifications. There may, for example, be inconsistencies between legacy and reformed qualifications in terms of how this information is held.
3. An inability to link unit entries within a given awarding series to cash-in entries in later series, especially for units that contribute to more than one qualification. One awarding body noted that this could create a risk of double counting of units in our proposed templates over time (i.e. unit entries and ROMs collected in one series, but collected again when the qualification cash in entry for a unitised spec is made in a later series).
4. One awarding body commented that reviews of marking for unitised qualifications are applied per unit, however, there could be a number of components within a unit (and therefore it wasn't clear if data was required to be duplicated across components).
5. Changes have been made to the Extended Review service. One awarding body stated that they were uncertain if they were collecting the relevant data for provision to Ofqual.

When requested to confirm if QiW codes were held against qualifications on their systems, the majority of awarding bodies commented that they do not necessarily record QiW codes against qualifications. This means that rules based on QiW code cannot be used at this time to extract data for approved and designated qualifications.

Half of the awarding bodies who participated in this engagement stated that the proposed special consideration templates would create additional work for them. For example, one awarding body noted that they would need to complete manual work to populate the templates and another stated that the additional rows in the proposed templates would require more data to be extracted.

The majority of awarding bodies spoken to expressed a preference for us to match Ofqual's collection schedule as closely as possible. One awarding body commented

that similar timelines would be beneficial in terms of planning and scheduling, as well as aiding the management of resources at cut-off dates.

In discussion, one awarding body commented that it would be important to consider data governance for the regular and ad-hoc collections. There was particular emphasis on the importance of data governance for the collection of disaggregate, candidate level data.