

e-Assessment Association response to the Ofqual consultation on the Regulation of On-Screen Assessment

The e-Assessment Association welcomes Ofqual's consultation and supports the intent to strengthen public confidence, protect standards and ensure fairness as on-screen assessment expands.

Our response draws on:

- Member survey feedback on the operational delivery of on-screen assessment
- Webinar polling and industry discussion
- Contributions from senior representatives delivering high-stakes digital assessment in practice.

The transition to digital assessment for high-stakes qualifications in other countries is evidence that the secure delivery of high-stakes on-screen assessment at scale is achievable within regulated national qualifications systems. Feedback we have received shows strong support for a regulated pathway to wider on-screen assessment in England. What comes through consistently is that the key challenges are not about whether on-screen assessment *can* work, but about how it is introduced, supported and scaled in ways that are operationally realistic, trusted by students, and resilient under pressure. An overly cautious approach risks delaying the wider adoption of on-screen assessment and the benefits it could bring across general qualifications.

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

We support Ofqual's four guiding principles and encourage Ofqual to retain them as the foundation for the framework. Our members' evidence suggests the principles should be applied in a way that is explicitly *progressive*: able to expand as capability, confidence and evidence builds, rather than locking the system into early constraints.

A core theme from our webinar was that this discussion has been live for more than 25 years, yet progress in regulated general qualifications has been slow. At the same time, digital delivery has matured significantly in other high-stakes contexts. Pearson's experience shared on our webinar was clear: on-screen assessment is not novel, and that it is already being delivered at scale in high-stakes settings, with learning that can be shared across the sector.

Crucially, we recommend that the guiding principles make learner experience and student voice more explicit. Pearson reported very strong student preference for on-screen assessment, with students describing it as "more engaging" and "easier to demonstrate their best". It was also reported that students are spending revision time practising handwriting for high-stakes assessment because much of their learning and working lives are increasingly digital. This feedback aligns with RM's research, which found a clear preference for digital assessment (59%) over pen-and-paper (22%), a positive impact on learning experience, and strong learner confidence (68%) that digital assessment can assess them accurately and prepare them for a digital workplace.

We therefore recommend that Ofqual's guiding principles are supplemented (in principle, not in detailed technical requirements at this stage) by a commitment to:

- systematic inclusion of student feedback in accreditation and ongoing monitoring, and
- a "growth pathway" approach, where early constraints are treated as transitional and reviewed against evidence and centre capability.

We encourage Ofqual to develop a roadmap for change as part of the recommendations following the consultation. This would provide greater clarity on how on-screen assessment could be expanded over time as operational capability develops and confidence in delivery grows.

Question 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)?

We understand the rationale for a controlled approach to implementation. However, a fixed limit of two specifications per awarding organisation appears somewhat arbitrary and may unintentionally constrain progress where delivery capability exists. The consistent message from our members is that the principal constraint is centre readiness rather than the validity of on-screen assessment itself. Challenges most frequently cited relate to centre infrastructure, access to suitable devices, staff capability, system reliability and incident handling under peak pressure. Delivery fragility is linked to operational resilience in centres, particularly during high-volume windows, not to inherent weaknesses in digital assessment.

It is therefore not clear that a numerical limit is required, provided implementation remains controlled and aligned to demonstrable delivery readiness. Criteria for enabling progress could instead relate to subject suitability and delivery feasibility. Smaller-entry subjects may provide a lower-risk route to scaling, enabling awarding organisations and centres to build operational experience without placing undue strain on the system, while extending the benefits of on-screen assessment to more learners. Similar phased approaches have been adopted by other national regulators.

Where pilots or early specifications involve smaller cohorts, it will be important to consider how evidence of validity, reliability and comparability is evaluated. Clear expectations about statistical sufficiency and how evidence from pilots should be aggregated over time would support confidence in scaling decisions.

Consideration should also be given to encouraging greater collaboration between awarding organisations in identifying suitable subjects for early on-screen delivery. Coordinated subject coverage or shared pilot approaches could help manage infrastructure pressure, strengthen statistical robustness where cohorts are small, and support system-wide learning. Such collaboration would enable scaling to be managed strategically rather than through fixed numerical caps.

Regulatory limits should therefore be explicitly linked to evidence of delivery performance, statistical robustness and centre readiness, rather than becoming a fixed constraint on expansion. The framework should create confidence to scale responsibly, rather than hardening assumptions that on-screen assessment must remain niche.

Question 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?

Any proposal to limit the number of on-screen specifications should be kept under regular review. However, it is not clear that specifying a fixed numerical limit is necessary if implementation is demonstrably controlled and evidence-led.

Feedback from our members indicates that the principal constraint to wider adoption is centre capability, including infrastructure and technical support, rather than assessment validity or platform maturity. These

factors sit largely outside the control of awarding organisations and Ofqual. As such, scalability may depend on developments in school and college infrastructure over time.

There should be clear criteria for reviewing and raising the limit. These might include:

- evidence of reliable delivery at scale,
- statistical evidence of comparability and stability of outcomes,
- demonstrated incident resilience, and
- centre readiness indicators.

In addition, clarity would be helpful on how evidence from pilots — particularly those involving smaller cohorts — should be interpreted and aggregated to inform policy decisions. Without this, there is a risk that small sample sizes could either unduly constrain progression or be misinterpreted.

Awarding organisations should be encouraged to pilot and expand on-screen assessment in a controlled way, building and publishing evidence of reliability, validity and fairness. Regulatory constraints should be reviewed regularly in light of that emerging evidence.

Further work to understand what may be required to support scalable implementation would also be helpful in informing future policy decisions in this area.

Question 4. To what extent do you agree or disagree with Ofqual's proposed subject restrictions?

Our members recognise that subject suitability is an important consideration. However, the evidence we gathered suggests that the most decisive determinants of successful implementation are centre readiness, system reliability, accessibility and incident management, rather than subject characteristics alone.

On-screen delivery also presents opportunities for assessment design that better align to contemporary constructs of knowledge and skill, rather than replicating paper-based formats. In this context, criteria for enabling progress could usefully relate to the suitability of particular curriculum subjects for digital delivery. There may be a number of smaller-entry subjects that could be implemented successfully without placing undue strain on the system, while extending the potential benefits of on-screen assessment to a broader group of learners.

We therefore recommend that subject restrictions are treated as a pragmatic starting point. The longer-term regulatory aim should be to enable wider subject coverage where evidence supports validity and centres can deliver assessments securely and reliably.

Question 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?

We agree mode effects must be taken seriously. However, our webinar discussion highlighted a risk in treating “on-screen assessment” as a single, uniform mode. As Pearson noted, there is a spectrum: from “paper behind glass” at one end to fully innovative digital items at the other, and even within a “paper-based” system there is increasing use of typed responses.

Requiring separate specifications has delivery and cost implications, particularly where awarding organisations are required to operate parallel paper and on-screen systems. As schools and colleges have a choice of awarding organisations, dual paper and on-screen provision within a single specification may not be required to maintain choice of assessment mode.

Beyond the scope of this consultation and our remit, but relevant to longer-term scalability, this may also present an opportunity to consider whether examinations taken at the end of a course for all students

represent the only model through which secure and valid assessment can be delivered at scale. Ensuring that digital delivery is not constrained to replicate paper-based approaches may support more flexible models of assessment in future, as system capability develops.

Question 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?

We recognise Ofqual's responsibility to ensure that assessments are valid and reliable, and that outcomes are comparable across different modes of delivery. Approaches to assessment design should therefore mitigate any potential disadvantage arising from mode effects.

However, we do not consider it necessary to specify that substantially different questions must always be used. Assessment content should be determined according to what is appropriate for skills or knowledge being assessed and the way the exam is taken, ensuring that no group of candidates is disadvantaged.

Appropriate assurance will be required to demonstrate that outcomes are comparable when grading is carried out. Provided this can be evidenced, awarding organisations should have flexibility in how they design assessments.

Question 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?

The eAA recognises that this could present a risk in some circumstances. However, the range of subjects offered by awarding organisations is already influenced by decisions relating to the viability and demand for individual specifications.

Feedback shared by Pearson during our recent webinar also highlighted that students who have taken a GCSE on screen in one subject often do not understand why they are then unable to take the corresponding A level on screen. This suggests that inconsistent availability across subjects or qualification levels may create confusion or frustration for learners as digital assessment becomes more familiar in some areas but not others.

Where on-screen assessment is introduced for particular subjects, decisions about availability will continue to be shaped by awarding organisations' assessments of market demand and deliverability. As such, the potential impact on subject choice should be considered in the context of existing market dynamics within the qualifications system.

Question 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?

We agree that mandating a single assessment platform would be neither practical nor desirable. A diverse platform market supports innovation, avoids concentration risk and enables awarding organisations to build on existing investment. However, the evidence gathered from our members suggests that consistency in *outcomes* across platforms will be critical if confidence in on-screen assessment is to be maintained as adoption grows.

Ofqual's identified priorities of usability, familiarisation, accessibility, security, infrastructure and technical support reflect the issues that practitioners experience in live delivery. In particular, members emphasised

that platform usability and opportunities for student familiarisation are essential to ensuring candidates can demonstrate their knowledge effectively under exam conditions. Pearson's experience shared during our recent webinar highlighted the importance of enabling students to practise with assessment platforms in advance of high-stakes use, which aligns with RM's learner research indicating that students expect meaningful familiarity with digital assessment environments ahead of assessment.

Security and reliability were also consistently identified as central to successful delivery. Members reported that identity assurance, malpractice detection and evidence retention are among the most challenging aspects to implement consistently. As one member said, "Fraud detection mechanisms must be the primary concern... As fraudulent actors continuously adapt... regulatory frameworks must evolve accordingly."

We therefore support Ofqual's intention to focus on these platform properties. In our view, regulatory arrangements should prioritise demonstrable capability in:

- enabling candidate familiarisation and accessibility;
- maintaining assessment integrity through secure identity verification and malpractice detection;
- supporting reliable infrastructure and live technical support; and
- capturing robust audit trails and evidence where incidents occur.

Ensuring that platforms can deliver consistently against these outcomes will support secure, fair and accessible assessment while allowing awarding organisations to innovate and improve delivery over time.

Question 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?

Feedback from our members indicates that the use of personal devices introduces variability in device configuration, security settings, connectivity and performance that cannot be consistently controlled in a high-stakes assessment environment. This creates challenges for maintaining fairness, managing malpractice risk and ensuring consistent candidate experience across centres.

Operationally, centre-managed devices provide greater assurance in relation to identity verification, system compatibility and secure delivery. They also support the consistent application of monitoring and invigilation arrangements during live assessment. However, the use of student-owned devices could support scalability in some contexts, as long as measures are in place to ensure that any system used is fair for students and technically robust.

Question 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?

Devices used for on-screen assessments should not be required to be used exclusively for assessment.

Requiring devices to be reserved solely for assessment would place additional cost and logistical burden on centres and could limit their ability to develop the familiarity and confidence with digital platforms that students require ahead of high-stakes use. Allowing school-managed devices to be used for both teaching and assessment supports opportunities for students to practise and build confidence with the assessment environment as part of normal learning activity.

There are also practical considerations in maintaining devices that are used only periodically for assessment purposes. Ensuring that such devices are correctly set up, updated with the latest software and maintained in a state where they will function reliably when required may introduce avoidable risks to delivery.

This approach aligns with member feedback that student familiarisation is critical to ensuring candidates can perform effectively in on-screen assessments and helps mitigate risks associated with unfamiliarity during live delivery. It also supports a more sustainable implementation model for centres by enabling existing infrastructure to be used flexibly across learning and assessment contexts.

Concerns about delivering on-screen assessments to large cohorts in high-entry subjects may also be addressed through the use of parallel versions of the same assessment. Given that multiple awarding organisations already offer different examinations within the same subject, this approach could help stagger candidate sittings and reduce peak demand on platforms and network infrastructure during live delivery.

Question 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?

Providing clarity around technical expectations for devices, while allowing flexibility for centres to deploy locally appropriate solutions, will be important in supporting scalable and reliable implementation of on-screen assessment.

Feedback from our members consistently highlights that reliable device performance is fundamental to candidate experience and confidence in digital assessment. System reliability was identified as a key operational challenge in both our survey and webinar polling, with open responses referencing the need for platforms to “ensure reliability and performance” and noting that even minor technical issues can negatively affect candidate experience during live delivery.

In addition to the priorities identified by Ofqual, our evidence suggests that consideration should also be given to:

- opportunities for students to become familiar with devices and assessment environments ahead of high-stakes use; and
- the availability of technical support within centres during live delivery to respond to device or connectivity issues as they arise.

Both were highlighted as practical requirements for ensuring assessments can be delivered securely and fairly in real-world settings.

Question 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?

Our members recognise that on-screen assessment offers significant security advantages over paper-based delivery, including reduced risks associated with the transport and storage of confidential materials, enhanced traceability of candidate activity, and the use of digital monitoring tools to support human invigilation. In particular, digital delivery enables more comprehensive audit trails and the use of data analytics to identify anomalous candidate behaviour that may indicate malpractice.

However, members also highlighted that the most difficult aspects of implementing security consistently in practice relate to identity assurance and the detection of malpractice during live delivery. These challenges are not solely technical in nature; they depend on the interaction between platform capability, invigilation practice and candidate behaviour within centre environments.

In addition to the proposals, we recommend that regulatory arrangements consider:

- the need for real-time monitoring capability;

- robust audit trails to support post-assessment investigation; and
- resilience and incident recovery processes in the event of technical disruption or data compromise.

Ensuring that platforms can consistently deliver against these requirements in live centre environments will be critical to maintaining standards and public confidence as on-screen assessment adoption increases.

Consideration should also be given to allowing awarding organisations the flexibility to develop equivalent parallel forms of an assessment where appropriate, to help manage technical delivery capacity for large cohorts.

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

The consistent message from our members is that the primary risk sits with centre readiness.

Issues such as access to suitable devices, staff technical capability and the ability to manage incidents during peak delivery were all identified as key pressure points in live environments. In practice, delivery risk is more likely to arise from variability in centre infrastructure and support than from the assessment method itself.

Centre-level operational readiness should therefore be recognised explicitly as a delivery consideration.

Question 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?

Feedback from our members, including those delivering vocational and workplace assessments, indicates that many of the considerations identified in this consultation are already routinely managed in these contexts. On-screen assessment has been implemented more extensively within vocational and technical qualifications, often at scale, reflecting differences in delivery models and operational flexibility compared to national academic examination systems.

Vocational and technical assessments are more likely to include:

- on-demand or flexible scheduling rather than fixed exam windows;
- performance-based or scenario-based assessment tasks; and
- assessments delivered across distributed environments.

These delivery models may place different demands on platform availability, identity assurance, invigilation approaches and technical support arrangements.

While the underlying principles of maintaining standards, fairness, accessibility and secure delivery remain appropriate, their implementation may therefore require greater flexibility in vocational and technical settings, particularly where assessments are delivered on-demand or outside traditional examination centres.

Equality impact assessment

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

In addition to the impacts identified, feedback from members suggests that performance may be affected by students' familiarity with the assessment platform itself.

Where students have limited experience of using on-screen assessment environments, additional cognitive load associated with navigation, input method or interaction with digital tools may affect their ability to demonstrate subject knowledge under exam conditions. This may disproportionately affect students with SEND or those from centres with less routine access to digital devices during teaching and learning. This potential performance impact is distinct from accessibility or socio-economic factors and should be considered when evaluating mode effects across student groups.

However, it is equally important to recognise the potential positive impacts for students with SEND if on-screen assessment is designed and implemented effectively. Digital assessment environments can support:

- compatibility with assistive technologies;
- reduced handwriting burden for students who experience difficulties with written fluency or motor control;
- adjustable presentation features such as font size, colour contrast and layout;
- text-to-speech and embedded accessibility tools; and
- greater control over pacing and interaction with content.

The equality impact assessment should therefore consider not only the risks of disadvantage, but also the opportunity for improved accessibility and outcomes where platforms are accessible by design and thoroughly tested with diverse users.

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

Providing structured opportunities for students to practise using on-screen assessment platforms ahead of high-stakes use would help mitigate the risks associated with unfamiliarity.

Allowing school-managed devices to be used for both learning and assessment can support this by enabling students to build confidence with digital assessment environments as part of normal classroom activity.

Ensuring that there is adequate support for the set-up of devices in schools, alongside troubleshooting and staff training, will also be important.

In addition, platforms should be accessible by design, with built-in accessibility tools available as standard rather than solely as reactive reasonable adjustments. This includes compatibility with assistive technologies, adjustable presentation features and flexible interaction options.

In addition, providing case study information to demonstrate successful delivery of on-screen assessments in other sectors may help schools and colleges understand how the issues and concerns identified here have been addressed in practice.

Question 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.

Our members highlighted that running paper and on-screen assessments concurrently may increase operational complexity during peak delivery periods, particularly in relation to scheduling, space, technical support and invigilation. This may place additional strain on centre infrastructure and staff capacity beyond that associated with either delivery model in isolation. There will also be additional costs for AOs and centres running parallel on-screen and paper exams.

Innovation

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

Overly restrictive entry conditions or prescriptive equivalence requirements may unintentionally constrain innovation, particularly during the early stages of implementation.

Member feedback consistently emphasised the importance of maintaining assessment integrity and preventing malpractice, while also supporting positive candidate experience.

To support innovation alongside confidence in standards, regulatory arrangements should focus on defining clear outcomes in areas such as security, reliability, accessibility and incident response, rather than specifying delivery models in detail. This would enable awarding organisations to develop and test new approaches to on-screen assessment within a controlled framework, supporting evidence gathering and iterative improvement over time.

Consideration should be given to enabling awarding organisations to pilot assessments in a non-live environment, working with Ofqual to build system-wide confidence in the transition to greater use of on-screen assessment. Clear expectations about how evidence from pilots, including smaller cohorts, should be evaluated and aggregated would strengthen confidence in progression decisions.

This would support a managed transition as centre capability develops, recognising growing learner expectations for digital assessment while enabling a confident and progressive move towards wider on-screen delivery, as demonstrated in other national systems.