

Full OCR response to DfE/Ofqual [consultation](#): How GCSE, AS and A Level grades should be awarded in summer 2021

The following responses were submitted via the on-line response form.

Consultation questions

What the grades will mean

Question 1. To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?

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

Comments:

Prolonged discussions with stakeholders have revealed uncertainty and underlying concerns about the approach proposed in this question. There are real tensions between the need for simplicity, the need for solid evidence to justify grading decisions and the need for a fair process that takes into account the fact that many learners, through no fault of their own, will have suffered varying degrees of disruption to their education. These tensions are not easily reconciled.

There are clear advantages to the proposed approach which states that *“Grades this year should be based on teachers’ assessments of the evidence of the standard at which their students are performing; it should indicate their demonstrated knowledge, understanding and skills.* This appears relatively simple and also provides for a strong evidence base to support judgements.

Simplicity is crucial in a year when schools and colleges are stretched beyond capacity by the multiple impacts of the pandemic on their institutions. A principle which requires teachers to make assessments about the standard at which students are performing at the time of assessment is relatively clear cut, and it will be possible to develop firm guidance based on this principle.

An approach which is strongly evidence-based can promote public confidence and can also help with justifying decisions to students and parents in the face of appeals.

The approach also has the benefit of enabling teachers to make some allowances for the fact that their students may not have completed all the learning required for a given qualification. (*“Teachers should assess students on the areas of content they have covered and can demonstrate their ability”.*) Given the huge variation in levels of lost learning, this is a welcome feature of the proposal.

However, there are undeniable difficulties presented by the approach. Firstly, the facility to make assessments of only that content which has been covered comes with a caveat: *while ensuring sufficient breadth of content coverage so as not to limit progression.* Making judgements about what constitutes sufficient breadth is not simple. Teachers will need to

make judgements, not only as to what constitutes sufficient coverage of a subject, but also about what constitutes sufficient evidence for any given topic *within* a subject. Deciding at what point a topic has been sufficiently evidenced is particularly difficult. We think it will be necessary to allow teachers to make holistic judgements and to fill some gaps in evidence by drawing on their knowledge of a student's overall performance across time. They may need to point to evidence of performance in other areas that show similar skills or and levels of aptitude. All of this requires teachers to make inferences. The proposals are silent on the extent to which this is permitted, or even whether it should be permitted at all.

The proposal is very clear that teachers should not be asked to decide the grade a student might have achieved had the pandemic not occurred, and the reasons for this are clearly set out. However, many stakeholders feel that by ruling this out altogether the proposal introduces a significant unfairness. It is not any student's fault if their learning has been severely disrupted so that they are performing at a lower level than they would have in a normal year. We have also heard many examples of students who appeared to be on course for a high grade but whose performance has stagnated or even deteriorated because their personal circumstances have been affected by the pandemic. These impacts go far beyond an inability to engage with remote learning.

Our discussions with stakeholders reveal that many students and parents are not aware that the approach this year will be different to last year's. When we explain the approach, they intuitively feel that this is unfair. They also argue that if an estimation of how a student would have performed was acceptable last year, then it is unfair to change the approach this year. We think that there is a high risk that the proposed approach will produce manifest examples of unfairness that will not be readily accepted by the general public.

In a recent article the Social Mobility Commission¹ has argued:

"...qualifications for 2021 can never be an objective measure of performance in the way we are used to, no matter how much we might wish it. And if, as the proposal suggests, we ask teachers to ignore lost learning and attempt 'objectivity' while simultaneously suggesting that the grades they award should match the inflated profile of 2020 results, we are heading for a worse disaster than last year."

It goes on to argue that *"these judgements must inevitably include some measure of a student's potential"*.

Worryingly, the commission also anticipates that the proposed approach will mean that: *"the destinations gap between the disadvantaged students most impacted by COVID-19 and their peers will yawn wider than ever."*

We recognise that there is no easy answer to this question. However, we argue that the proposed commission to look at ways of approaching differential learning should be set up as a matter of urgency to consider these issues. We urge policy makers to give some thought to putting in place a strategy to support learners who aren't ready or don't feel they are ready to progress which should include the opportunity to retake their lost year of learning or some other form of 'catch up'. We also argue that, since many stakeholders feel intuitively that what is proposed is unfair, the proposed approach should be communicated

¹ https://www.gov.uk/government/news/2021-exams-a-bigger-disaster-than-last-year?utm_medium=email&utm_campaign=govuk-notifications&utm_source=df1ff326-02a3-4dcb-90d5-272b1cc623d8&utm_content=immediately

clearly and widely so that there can be a public conversation ahead of results being issued. Without this, some of the severe difficulties faced last year will be repeated.

When teachers should assess the standard at which students are performing

Question 2. To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

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

Comments:

It is difficult to disagree with the question as it is framed. However, although assessment can play an important role in incentivising people to engage with study, it can also have a negative impact, so care must be taken. The final months or weeks of learning that we hope will take place in schools later this year will be very precious. Young people should be focussing on their aspirations and planned progression routes and studying those areas which will help them most in their planned next stages of study or training.

This precious time must not be spent on evidence-gathering activities, nor in taking tests and completing assignments where a student already has a strong foundation of knowledge and understanding.

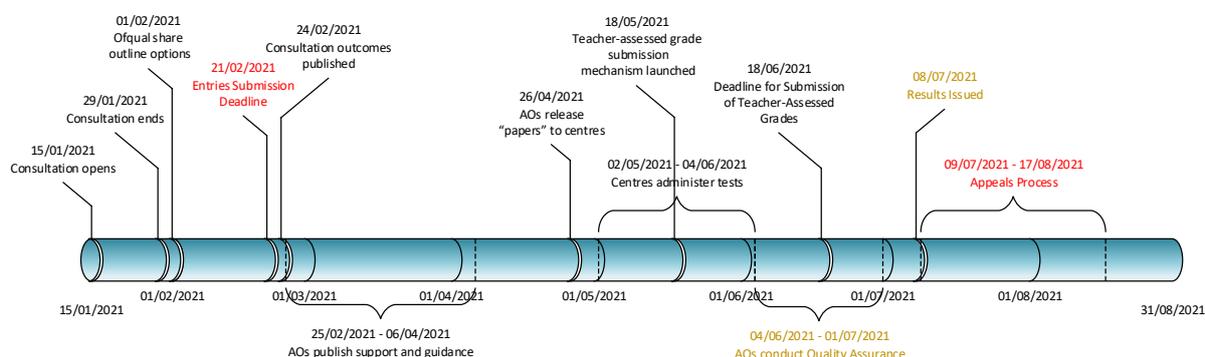
Evidence gathering should be kept to a minimum but can't be avoided altogether – especially as we are asking schools to back up their assessed grades with records of the decision-making process and all the evidence used – records that must be able to stand up to appeal and to legal scrutiny.

The best way of keeping students engaged is not necessarily to present them with a barrage of tests on their return to school or college – for some this may deter them from returning at all. Also, it might be in some students' best interests to spend the time focused on only those subjects they will need a strong foundation in when they progress to their next stage of learning. Certain subjects are more vital for progression and future life opportunities than others – maths and English at GCSE for example. Where students are very behind, it might be that schools and students should focus on those areas of study that will be most important for their future.

Question 3. When would you prefer that teachers make their final assessment of their students' performance?

The period when students stop formal learning and begin their own largely independent preparation for exams would normally be quite early in the summer term, but this is no normal year. On one side, we would want to maximise the time available for teaching and learning. However, on the other, we must leave time for teachers to undertake their internal assessment processes, for schools to manage appeals, for exam boards to carry out and complete their processes, and for HEIs and others to manage their access arrangements.

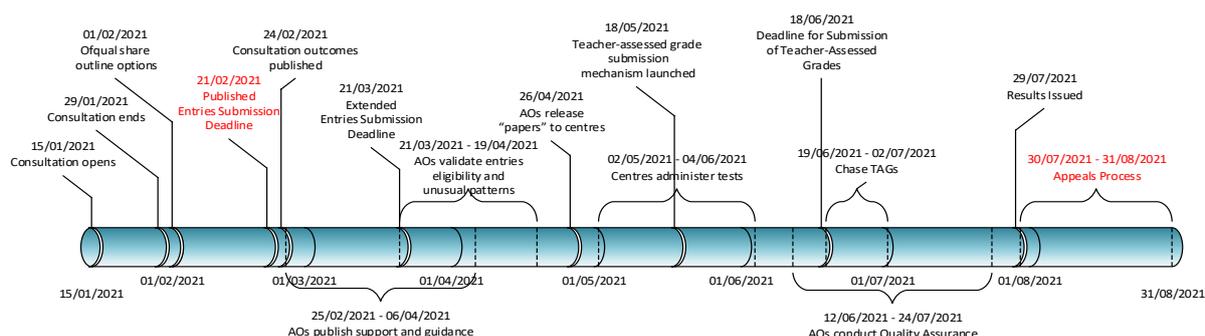
Unfortunately, it seems that the proposed timelines do not make this possible. The diagram below is an attempt to identify likely timelines in the consultation and to make an initial assessment of deliverability of the models and approaches outlined in this consultation.



Challenges highlighted in the diagram:

- Entries submission. With the outcome of the consultation being published in w/c 22 February and schools still not open, it seems unlikely that we could enforce a deadline of 21 February.
- Quality Assurance. It seems improbable that exam boards could deliver what is required, as outlined in the consultation document, in 4 weeks (and in parallel with centre submissions of CAGs).
- Given the above, a full results release on or around 8 July could not be delivered.
- Appeals. A two-stage appeals process as described in the consultation (centre challenge over judgement and process; AO investigation into process, together with bias/discrimination and other grounds) could not be completed within this window.

Given the short length of time available to respond to this consultation, the following diagram is only a very preliminary and high-level suggestion of the minimum period needed to conduct all the processes outlined in the consultation:



This timeline builds on the one described in the consultation to reflect:

- the need to **move out the entries deadline** and **validate entries** received
- a realistic expectation that not all Teacher Assessed Grades (**CAGs**) will be submitted by the deadline
- the need for a **longer window for External Quality Assurance**.

We have worked on these timelines in discussion with JCQ colleagues. They are from an exam board's perspective and time has not allowed a full analysis of the needs of centres and other stakeholders.

We also looked at how these timelines would operate alongside the proposed processes for Cambridge Nationals and Cambridge Technicals. The requirement to externally moderate units submitted in the summer means that it would not be possible to align a formal results day for GQs with VQs. We think it is important that results for both types of qualifications should be issued as close together as possible. Nearly all students taking a National or a Technical will also be taking GCSEs or A Levels, so they would otherwise get some results and have to wait for the rest. Secondly, if results for VQs came later, there is a risk that those GQ candidates who already had a full set of results would be in a position to start accepting offers of university places before their peers who were waiting for a VQ result. Given that approaches to VQs must not, as far as possible, advantage or disadvantage learners over their peers taking GQs, and given that there is no requirement to externally moderate non-examined components of GQs, the best way forward might be to waive any expectation that VQ NEA should be externally moderated.

All of the above must be carefully caveated. As we have said, it is preliminary work based on a set of assumptions, but we hope it illustrates some of the possible options, trade-offs and dependencies. Further work will be needed to establish how and when quality assurance takes place, what the optimal appeals window is and to confirm the approach to external moderation in both GQs and VQs.

It is also worth noting that even in a normal year, appeals are not completed in August. We aim to complete GQ appeals as quickly as possible but they go through the RoR stage first (which, in some ways, is comparable to the centre based appeal process in the consultation). This means we don't tend to receive any appeals until quite late in August and we work on them through the autumn. Certainly for GCSE, there is no obvious rationale for this extremely pressured timeline when it is not what we provide in a normal year.

At a recent JCQ meeting with teacher associations and teacher unions, a number of the attendees expressed an interest in returning to a set of timelines that are similar to a 'normal' year. They weren't persuaded that bringing some aspects forward solved any more problems than it created. We share this view.

Question 4. To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student's performance from throughout their course?

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

Comments:

Given that we anticipate there will be many occasions when the available evidence is in short supply, it is essential that teachers should be able to draw on the widest range of evidence available to them.

Also, evidence of performance over time and from a range of sources provides a stronger basis for making valid and reliable judgements. Fairness should be the guiding principle and achieving this means allowing teachers to make holistic judgements, informed by evidence from throughout a period of study and from their extensive knowledge of a pupil and, possibly, the potential they have shown. Without this flexibility there is a risk that public confidence in the process will be lost.

A stakeholder commented:

Quite important to be able to base judgement on a range of available evidence that the teacher feels appropriate. The access to education is going to be varied – and will continue to be – a fair outcome would enable students to showcase what they can do from across the context they've been placed under.

Question 5. Should there be any limit on the period from which previous work could be drawn?

No, but there should be guidance that should include the following points:

- Evidence that is not recent and shows a lower level of performance than more recent evidence should not be used without taking account of subsequent improvements in performance.
- Evidence should be taken from the key stage in which the learner is studying, and preferably the year in which they are studying. However, it would be wrong to rule out evidence from earlier where it shows relevant performance at a standard that can inform a teacher's final judgement.
- More recent evidence will not always indicate the level of performance a student has demonstrated overall. Stakeholders have given accounts of students whose performance has degraded as a result of lockdown, other impacts caused by the pandemic, or for other personal reasons.

Guidance will need to be nuanced to reflect the nature of different subjects. For example, sport and music need particular types of performance evidence. With maths it is often the case that some students can achieve at high levels from the outset, while in English literature the trajectory is very different – a process of maturation is important to how students ultimately respond.

A similar approach must be applied to those vocational qualifications used in performance tables. We believe that, with VQs, where 'banked evidence' is a feature, we should also include guidance that warns that achievements that were banked at an early point in a student's study may no longer reflect the level a student is performing at. Under these circumstances, that banked assignment should not be used to inform the final grade.

Question 6. If you answered 'yes', what should that limit be?

We answered 'no' to an absolute limit. It would be better to give guidance that allows teachers the flexibility they need to decide which evidence should be taken into account. This also prevents an incentive to go for the lowest amount of evidence required.

Question 7. Do you have any comments on when students should be assessed?

Students can and should be assessed on an ongoing basis. However, we assume the intention was to ask when teachers should make final determinations of the standard of their students' performance, bringing together all evidence available, participating in a quality assured standardisation process and agreeing, at centre level, a final grade. The consultation suggests late May to late June. This is a very short window to complete all that would be required across a whole centre (especially large centres). Nor does it allow much time for collection of new or 'current' evidence.

The learner is the most important person in this process and the principled answer as to when final grades should be submitted has to be 'as late as possible to allow for maximum

learning time'. However, the proposed timescales will put considerable pressure on the underpinning processes.

How teachers should determine the grades they submit to exam boards ***The use of exam board papers***

Question 8. To what extent do you agree or disagree that the exam boards should provide a set of papers to support teachers in assessing their students' work?

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

We have witnessed a level of uncertainty about the purpose and nature of the proposed 'set of papers'.

Although there is no explicit statement about the purpose of these papers, we have extrapolated the following from the relevant section in the consultation:

1. To generate additional, current evidence for teachers to use when deciding on a final grade for their students.
2. To provide students with an opportunity to show what they can do, without penalising them for any gaps in their learning caused by the pandemic.
3. To support teachers to assess their students objectively.
4. To support consistency between teachers and different centres and reduce the risk of appeals

There is a tension between the first two purposes and the second two, although we believe they are not irreconcilable.

The priority which is given to each of these 'purposes' drives the design, content and quality assurance arrangements of the proposed papers. We think the proposition should lean towards providing a set of optional, locally tailored papers which can be used alongside a basket of other evidence when seeking to make judgements about a student's grade.

Centres can use the papers within their own internal quality assurance activities to promote consistency and objectivity. However, we think it is unrealistic to suggest that the papers could be highly standardised, consistently marked, taken by everyone, and heavily weighted towards determining a student's final grade.

The primary unfairness impacting on students this year has been the huge differences in amounts of lost learning. It will not be acceptable if some learners are penalised because they had less access to education than others. For this reason, the way any tests are used *must* be capable of recognising, for each individual, those areas of learning he or she has covered and of filtering out those which have not been studied.

We think it is likely that teachers would most prefer a bank of questions, organised by topic, with which they could create their own papers – just as they already do for mock exams and practise papers using exam boards' own services.

If this flexibility is a primary requirement, then the level of consistency between the questions one student answers and another will be low. Even if students were sitting the same papers it would be challenging to provide grade boundaries for teachers to use ahead of papers

being sat. There is also a broader question about which standard – 2019 or 2020 – we would want teacher marking to align with. If the requirement was to create a set of high stakes assessments where the outcome resulted in a consistently marked and robustly awarded grade, then exams for this summer should not have been cancelled.

The consultation states that teachers should not treat the results of these papers as definitive, but as something that should be considered alongside a range of evidence. We fully support this. Although we can see a value in the papers proposed, we think there is a risk that their importance will be overstated. It must be made clear that the results of any papers taken are not the key determinant of what the final grade should be.

The creation of papers may bring benefits but it is far from essential. It also comes with a risk that the purpose, value and usefulness of the papers will be misunderstood to the extent that the papers are given far more significance and importance than is remotely realistic. It is important to understand that the papers will help generate a consistency of approach and provide some commonality of judgement in limited areas of a specification, **but** they are not an instrument that can create a national standard.

Question 9. Do you think the use of the papers provided by the exam boards should be compulsory or optional, for GCSEs, AS and A levels?

There needs to be flexibility for teachers. For example, if students have already completed multiple mock exams using past papers, and teachers feel these reflect well the students' overall performance, there is no benefit in requiring the teacher to do more assessment. Many schools have been assessing students with multiple tests this year in anticipation of exams being cancelled.

Question 10. To what extent do you agree or disagree that any papers provided by the exam boards should include questions that are of a type that is familiar to students?

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

Introducing new question styles at this stage would seem an unfair hurdle / barrier for students (and teachers). Familiar approaches will be reassuring for students, and have the benefit of having been tested on large numbers of candidates in previous years.

Question 11. To what extent do you agree or disagree that if teachers use exam board papers they should have choice about the topics covered in the questions their students answer, for example through choice of which papers they use with their students from the set of papers provided?

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

The primary unfairness impacting on students this year has been the huge differential in amounts of lost learning. It will not be acceptable if some learners are penalised because

they had less access to education than others. For this reason, the tests *must* be capable of assessing, for each individual, those areas of learning he or she has covered and of filtering out those which have not been studied.

Question 12. To what extent do you agree or disagree that teachers should be required to assess (either by use of the exam board papers or via other evidence) a certain minimum proportion of the overall subject content, for each subject?

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

Comments:

It will not be easy to determine what an appropriate proportion might be. Current conversations suggest that it may be necessary to have a different requirement for different subjects. The following comments from an OCR colleague about Classics subjects illustrates this:

I agree but this is going to be complicated as the percentage may differ between subjects and then between exam boards within subjects depending on the specification design. For example, for GCSE Latin and Classical Greek, it might be vital that candidates cover at least 50% of the qualification to ensure that they have demonstrated knowledge and understanding of the language component of the qualification which is vital for progression to A Level. For A Level Latin and Greek this could be 33% as this aligns with the weighting of paper 1.

For A Level Ancient History, the percentage has the possibility of being smaller as one could argue that although the topic content differs, the historical skills needing to be demonstrated could be done so through a narrow percentage of the overall content, for example 25% of the overall qualification.

This also illustrates the difficulty in knowing what metrics to use when defining coverage. It does not address how much evidence is required to cover any particular topic and the level of sampling that might be acceptable. Our experience is that teachers tend to collect far more evidence than they need to for any one topic. In an exam, a student's knowledge, skills and understanding are only sampled. The same principle should apply here – not all the content of a specification needs to be evidenced. A sufficient sample should allow a teacher make inferences and 'join up the dots'.

The size of that sample will need careful consideration – teachers will ask what the minimum requirements are. For example we know that some centres will struggle to find evidence that covers more than 20% of total content. Where the evidence is high quality and some key concepts and skills have been demonstrated, we think it should be possible for a student to receive a grade under such circumstances. We wonder, however, what the consequences would be for learners with even less evidence.

The parallel VQ consultation includes a set of principles. Principle 3 states "Adaptations must ensure the validity and reliability of qualifications is *sufficiently* maintained". Exam boards are left to work with centres to identify where there is sufficient evidence to justify issuing a result. It is suggested that a process is followed to identify:

- what evidence is missing,
- whether the missing evidence is critical to the award of the qualification,

- whether the missing evidence is duplicated elsewhere,
- whether the missing evidence needs to be assembled in full or whether a sample should be provided.

This seems more burdensome than the approach suggested for GQs but we would argue that whatever the approach, it should be the same for both GQs and those VQs that are typically used on performance tables. The focus, we believe, should be on what learners need to progress to, and be ready for, in their next phase of learning

If a minimum amount of evidence is to be an absolute requirement, then it is important to consider what should be done for those students who, through no fault of their own, have missed so much learning that they do not have sufficient evidence to be given a grade in one or all of the qualifications they were to have taken.

The internal and external quality assurance arrangements will need to include guidance on processes and criteria for checking that there is sufficient evidence over a sufficient range of content.

JCQ has proposed, with our support, that the centre uses a proforma to capture their rationale for the choices they have made for each candidate. The proforma will then be provided to the candidate before the grades are submitted to the exam board, so they can appeal to the centre at that stage if they have any concerns.

Question 13. To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

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

Comments:

The answer to this question depends on how much desire there is to ensure that the papers are sufficiently flexible to allow for differential learning loss. If papers are to be adapted by teachers, then teachers are best placed to mark them. Training on marking could be given by exam boards to secure a level of consistency. Awarding bodies could commission senior examiners to respond to teacher marking queries, where needed.

Nevertheless, internal marking will not achieve the same level of consistency of marking as external marking in a normal series, nor even of moderated marking, because the same sampling and correction methods employed in those processes will not be available.

On a practical point, internal marking would make the assessment more flexible under the current circumstances. Exam board marking of these papers would take much more time than centre marking, so centre marking seems beneficial to allow results to be returned in July, as is currently proposed. We would specifically rule out any kind of test that had been marked by a student's peer.

Question 14. Do you have any comments on the use of exam board papers?

These should be made up of material taken from past papers. This is because past papers are the only material where exam boards can provide guidance to teachers about the marking standard (derived from past standardisation activities, exemplar scripts etc).

Guidance could be provided based on that provided to examiners in normal years. It seems unlikely that students will consistently take the same set of papers or answer the same range of questions, but training and standardisation on the marking of questions will be beneficial and will help with securing a level of consistency in marking.

***How teachers should determine the grades they submit to exam boards
Subjects with non-exam assessment and separately reported results and grades***

Question 15. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in full for a subject?

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

Comments:

Where NEA has been completed in circumstances where the student has been able to perform without disadvantage, that NEA should be included in a teacher's judgement of what final grade to submit.

This is crucial for all practical subjects, but particularly for Music which is 60% NEA (and where performance on the exam tends to be weakest, and a poor indicator of overall performance); and Art and Design which is 100% NEA.

Question 16. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in part for a subject?

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

Comments:

Students should not be penalised if they have been unable to complete their non-exam assessment.

We have already agreed with the proposal that teachers should be able to draw on a range or basket of evidence and we expect that this would often include evidence from incomplete coursework.

For some subjects, 'incomplete' coursework would provide substantial amounts of evidence of performance. For example, NEA for PE is completed over the full two year course and not in a fixed window.

Question 17. To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?

- **Strongly agree**

- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Almost by definition, teachers usually mark their students non-examined assessments. The issue is about what choices we make about the use of internal or external moderation.

Question 18. To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?

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

Moderation could not be completed in time to inform teacher assessed grades. Teachers should use existing and recognised internal assessment to inform their teacher assessments. At subject-level, though, AOs have a role in guiding centres on how to use what NEA they have and can complete.

The parallel consultation on VQs proposes that the external moderation of NEA in VQs should continue. It is not clear why there is this inconsistency. In the interests of meeting the principle that GQs and VQs taken by the same students and age groups should be aligned, we recommend that the requirement for external moderation should be waived for both GQs and VQs.

Question 19. Do you have any comments on the use of non-exam assessment and separately reported results and grades?

This is one of the areas where a subject by subject approach is needed. For example:

- In science we have already introduced modifications which lower the amount of evidence required for meeting all of the Common Practical Assessment Criteria in order to be awarded a Pass.
- NEA for Media and Film Studies can require access to specialist equipment and software which has been disrupted over the last year. The option to submit a prototype of the NEA production available for 2021 should largely address that, but there may still be instances where this a barrier. As the approach to prototypes allows students' understanding of the subject content to be assessed through their intentions, it may be helpful to give guidance around reducing the amount of supporting evidence/prototype content to support students in completing this. Some centres may decide to focus on preparing for any exam-based assessment at the expense of the NEA, and it would be helpful to have clear guidance on whether centres should complete the NEA and in what circumstances they may decide not to.

How teachers should determine the grades they submit to exam boards
Other performance evidence

Question 20. To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?

- **Strongly agree**

- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

We have said in a number of our responses why it is important that teachers should have a wide range of types of evidence they can draw on when judging a student's final grade. This helps where there might otherwise be a shortage of evidence. A 'broad' picture of performance over time and from a variety of sources gives a stronger basis for making valid and reliable judgements than a smaller range of evidence from a single period of time.

Question 21. To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student's deserved grade?

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

Comments:

Training should be offered to support consistent approaches and similar standards across the country. However, we must take into account the considerable pressures that schools and colleges are facing, which means they have little time to spare for additional training. We also want teachers to have as much time to spend with their students as possible to make up for lost learning time. The amount of training that teachers will be able to access will be limited, so it must be carefully targeted at the right people and must focus on the essential content they need.

The essentials would seem to be guidance on:

- marking set questions (which could include parallels with the normal standardisation process used with examiners),
- judging a range of performance evidence, and
- internal processes for agreeing fair and standardised assessments.

Some of the training would need to be designed with an understanding that the level and nature of appeals last summer was problematic and stressful. It would be useful to provide advice on the best way processes can shield centres from appeals.

Question 22. To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?

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

Comments:

The term 'other evidence' has been introduced without explanation. Does it mean evidence other than the results of the proposed set papers, completed NEA and evidence from incomplete NEA? We believe teachers should use a broad range of evidence in arriving at a

final grade for a student but there should be no category of evidence described as 'other'. Guidance should set out suggested types and sources of evidence together.

The forms of evidence listed in the consultation are:

- formal tests
- mock examination results
- substantial candidate work (which relates to the qualification specification, and where the school or college are confident it was completed without support / external support).

It is interesting to compare this with the proposals for all VQs:

- a portfolio of learner work
- learner achievement on an awarding organisation or centre designed standardised task
- and, in the case of internal assessment, partially completed units or assessments.

The same list of evidence should be used for GQs and VQs typically taken alongside A Levels and GCSEs, such as Cambridge Technicals and Cambridge Nationals. We see no reason why the lists of suggested evidence should be different for GQs and for those VQs that feature on performance tables.

We suggest the following, which could be used to varying degrees for both GQs and VQs:

1. Exam board standardised assessment (for GQs an exam board paper, for VQs, banked units)
2. NEA
3. Mocks
4. Termly assessments
5. Practical performances or creations – where different to NEA
6. Classwork
7. Ephemeral evidence – observed performance
8. Teacher testimony
9. External tests which provide wider contextual information.

Question 23. To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student's final grade?

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

Comments:

Trying to weight evidence in this way introduces unhelpful complexity. Much of this needs to be down to the teacher's discretion according to their learner's individual circumstances. If schools do not reopen until after Easter, teachers will struggle to generate 'new' evidence in the time available. That could disadvantage them in relation to schools which opened earlier.

The nature of some qualifications is that students may sit end of module/topic tests or mock exams through the course of the year, and it seems inappropriate that teachers should not be able to use evidence from these to inform student grades.

The evidence of an assessment following a period of learning 'in school' should provide the most value in terms of consistency across a cohort. Centres may well have set assessments following these periods of learning such as Year 10 summer exams (up to March 2020) and a Year 11 autumn term mock exam (before the November lockdown).

Although the intention may be to keep students engaged by offering greater reward for work done most recently, there is a danger of creating an incentive for students to submit the same piece of work over and over in an attempt to improve the grade of a heavily weighted piece of work. The ideal is that a student who has worked consistently need not worry that the final assessment is too high stakes, while one who has not worked consistently knows that they have a chance to redeem themselves. A rule either way may cause stress, unfairness, and in extreme cases, harm to individuals.

Question 24. Do you have any comments on the use of other performance evidence?

No

The assessment period

Question 25. To what extent do you agree or disagree that all students should be assessed within a given time period for each subject – whether or not their school or college must or is using exam board papers?

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

Comments:

The benefit of limiting the period during within which a student can be assessed is not clear (except in the case where assessment materials must be kept secure). The only necessary time limit should be the final date for submission of grades.

Fixed assessment windows provide challenges if centres are closed or students are isolated and would therefore threaten the resilience of the system.

Question 26. To what extent do you agree or disagree that exam boards should publish all of their papers shortly before the assessments in order to manage the risk of some students being advantaged through papers being leaked?

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

Comments:

There is a need to be realistic about how effective a control this would be. Once one centre has completed an assessment at the start of the window there is a high probability that some of the content will be leaked. These papers should not be viewed as live assessment material subject to the same controls that would normally apply: it is not possible to replicate

that level of control in a window of time however tight that may be. The exams have been cancelled and cannot be reinstated by the means of the proposed set of papers. Given this is not a normal exam series, there should not be a list of requirements that would mean we had to monitor leaks and pursue malpractice investigations against learners who, for example, discuss the contents of their assessments with their friends in other centres.

If the intention is to have secure assessment materials, then the risk should be mitigated by agreeing a flexible approach to the use of a variety of existing, published material (albeit repackaged) which create a volume of material available that is broad enough that the actual tools a school uses can't easily be predicted by an individual student. This is why other evidence in the 'basket' is really important and too much weight should not be placed solely on the outcome of sitting the proposed papers.

The proposals for a set of papers as set out in the section preceding question 8 suggests an approach which does not require the level of security implied by this question.

Question 27. Do you have any comments about the assessment period for the use of exam board papers or teacher devised assessments?

Questions 25-27 do not seem to align with the information that exams have been cancelled. Only teachers / centres know how much content has been delivered and the amount of learning their students have been able to engage with. One result of standardised tests sat by students who have all had different access to learning is that responses will vary in ways that cannot be predicted and impact on the reliability of the 'tests'.

The conditions under which students should be assessed

Question 28. To what extent do you agree or disagree that the assessments should, if possible, be taken within the student's school or college?

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

Comments:

If a learner takes these assessments at their centre, then there can be confidence that it is their own work and a valid reflection of what they know and can do. However, public health guidance and student safety must be the first priority. If students are isolating or schools closed, alternatives will have to be found (assuming that a decision is made to make these assessments mandatory).

Question 29. To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?

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

Comments:

This would need to be considered in the light of other available performance evidence and whether an exam-board provided paper is really necessary. In this context, would the student be able to demonstrate what they know, understand and can do better than they could through other evidence the teacher may have access to? This is another reason why using the tests should be at the discretion of teachers.

Question 30. Do you have any comments on the conditions under which students should be assessed?

Teachers would need to have confidence that the work reflected the students' own, independent ability. Equivalent/existing expectations for NEA completion would provide a useful benchmark. In our view, such assessments should not be thought of as a high stakes terminal exam. The work will be assessed by a teacher who knows the student, so they are better placed to identify anomalous performance and challenge it.

It has been suggested that it would be possible to monitor students taking papers from home using a remote learning platform such as Microsoft Teams, Zoom, Google Classroom video calls, etc. However, this would be difficult to manage where whole schools were closed or in very large schools and colleges. Some centres have also suggested to us that this could potentially introduce safeguarding issues.

Supporting teachers

Question 31. To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

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

Comments:

This is essential. Even if the way in which centres are being asked to approach assessment is very different to that taken in summer 2020, there is merit in drawing on the best practice that many centres used in standardising their judgments, recording decisions and 'signing off' the final grades. It should be taken into account that most teachers have long experience of monitoring students' progress against grades, predicting grades and working closely with qualification specifications and supporting materials – we are not starting with nothing.

Although there should be room for flexibility, the extent to which standard processes are adopted and set out in clear guidance will help to mitigate some of the risks of there being a high number of appeals and answer some allegations of malpractice.

Exam boards can provide sample scripts and information and training about how to mark particular items. This can only be done with assurance where items are drawn from past papers. Newly-created questions or papers won't have a standardised mark scheme, any data on performance or any examples of real student responses. Exam boards couldn't provide grade boundaries for anything less than full question papers and we would not recommend the use of full papers in this context.

Exam boards can provide assignments and tasks which would generate evidence of performance directly related to the requirements of topics within a given specification. This could include advice on marking and criteria that help to indicate the level of performance of the students.

Guidance will be needed on sufficiency of evidence, coverage of subject content, potential weighting of evidence and what to do where the evidence shows erratic or inconsistent performance. It is particularly important that such advice should be consistent between boards and in line with any emerging regulatory requirements. The proforma proposed by JCQ, which is designed to capture for each student how their grade was arrived at, the evidence used and the rationale for decisions will be key to how the guidance is structured.

The exam board should check that school and college senior leaders know what is expected of them and their teachers and that they have secured the necessary training for their staff. It will be necessary to define what the minimum level of training required should be.

We also think that clearer guidance should be provided to centres about how they might apply a special consideration adjustment for eligible candidates. This is especially important if it is decided that the assessments must be delivered in a specific timeframe, but even if that is not the case there may be an expectation that some form of special consideration should apply.

Internal quality assurance

Question 32. To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and should provide guidance on these requirements to support centres?

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

Comments:

Our answer to question 31 (above) indicates our views in more detail. We believe there should be an element of prescription regarding the high level processes that centres must follow and the training that they should undertake. Although we would wish to allow for considerable flexibility to allow for the different sizes and types of centres and the ways in which Covid may have impacted on them differently, it may be helpful to provide some standard documents and proformas outlining the processes to be followed.

This is important for managing appeals and as a benchmark against which we can consider any allegations of malpractice. Centres will need to know what we expect of them if we are going to judge their delivery of processes in any way.

The more consistency that can be demonstrated, the better the grades will stand up to scrutiny by individual students and the public more generally. It also enables more clarity on subsequent external quality assurance.

Question 33. To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had

been followed and teachers had regard to the guidance and support materials provided?

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

Comments:

A key part of the internal quality assurance arrangements should be a declaration by the head of the school or college confirming:

- that the exam boards' requirements have been met,
- that they support the grades submitted for their school or college, and
- that all teachers who had assessed students had regard to the guidance and support materials that had been provided.

This declaration should also say that all learners have received their proforma (as recommended in the JCQ proposals on appeals). We also recommend that all learners have been given the opportunity to appeal their grade before it is submitted to the board.

Question 34. Do you have any comments about internal quality assurance?

In addition to comments made in response to other questions about quality assurance:

- Any process must generate a clear audit trail of how judgements were arrived at and be supported by records of the evidence used.
- Any process must include steps designed to minimise the risk of unconscious bias and all judgements must be subject to review by a 'second pair of eyes'.
- Centres are used to following regulations published by JCQ and it would help with consistency if all boards worked with JCQ to create a single set of requirements.

External quality assurance

Question 35. To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

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

In our view the process for determining grades is part of the 'overall approach' asked about in question 36 (below) and we have not commented separately here.

Question 36. To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

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

- Strongly disagree

Comments:

Strong, clear, early guidance from exam boards will be essential, but the approach should be one of support and collaboration. In our response to question 31 we set out the forms of support and guidance that centres will need. The external quality assurance should be one that checks that a centre has followed the processes set out in this guidance and asks the question, 'How did you arrive at these grades?'

Checks should also be undertaken to confirm that centres have taken account of the full range of evidence available to them, as described in our answer to question 22.

Question 37. To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

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

Exam boards will need to have robust external quality assurance arrangements in place, but these should be limited to checking that processes have been followed. Exam boards are not in a position to override the academic judgements of teachers who have arrived at their decisions based, in part, on their knowledge and familiarity with the students they have assessed and the performances they have witnessed.

Sampling can be used holistically to ensure that schools and colleges **do** have evidence and that they have followed the processes required to ensure this evidence is sufficient, authentic, and has been internally standardised. One OCR centre described the method of quality assuring the processes undertaken by a centre as starting with the question, "Show me how you arrived at this grade."

If exam boards were required to review judgements made by teachers, such reviews would have to be limited to assessments created by the board in question (e.g. mocks/live exam marking/NEA).

Question 38. To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

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

Comments:

We agree that targeting centres for more in-depth quality assurance makes sense. However, the timescales and the numbers of schools and colleges (and the large size of some of these institutions) means that the capacity to carry out such activity will be limited.

There will need to be AO/Ofqual/DfE agreement about criteria for sampling centres to ensure some consistency of approach. The criteria need to be such that the volume of more in-depth checks is manageable, not only in terms of conducting the checks, but in terms of

resolving the issues that they will inevitably identify. Any more in-depth targeting is likely to result in some candidates not having results on results day. It will be important that the public/end users are aware of and accept this risk.

Question 39. To what extent do you agree or disagree that exam boards could only change a student's grade after a review of the evidence and discussion with the school or college?

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

Comments:

We have already stated that exam boards should not be reviewing evidence but should be looking at the quality assurance processes used by a centre to arrive at the grades that they have signed off. If exam board checks revealed that the required internal quality assurance processes had not been followed, or an error has been made in the submission of grades, leading to a conclusion that one or more grades are unsafe, centres should be asked to re-grade.

Question 40. Do you have any comments about external quality assurance?

There is a question about whether or not a centre would have an opportunity to challenge the outcome of the external quality assurance via either appeals or another route. It seems problematic that we (as an exam board) would expect centres to accept our judgement on their process and their results without giving them a chance to object. For cases that end up as malpractice the appeals route is clear, but for all other scenarios there does not seem to be an alternative and we feel this is a significant gap.

Appeals

Question 41. To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

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

Comments:

In determining how and when students might be informed of their final grade, we would propose a process that involves ongoing discussion between a teacher and a student about the potential grade to be awarded. This provides transparency and prevents any sudden surprises. In our view, this in turn has the potential to significantly reduce the risk of appeals and gives the student some agency in the process. The steps in such an approach might look like this:

- 1) Set out the sorts of evidence that teachers will be expected to use to determine grades (as planned)
- 2) Encourage teachers to immediately talk to their students about the performance evidence that they have to hand NOW and have an honest conversation about how

this might inform their grading of them – set expectations early, and be realistic: ‘On the basis of the evidence we have available currently, we believe you are currently...’

- 3) Provide clarity to students about the other sources of evidence that will be reviewed before teachers make their grade determinations (this might include the sitting of some tests) providing them with opportunities to demonstrate their ability.

Question 42. To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student’s performance?

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

Comments:

It is reasonable to allow learners to appeal to their school on this basis and, as set out in the JCQ proposed appeals process, each learner will have a pro forma which tells them which assessments their grade was based on as well as clarifying how any access arrangement and special consideration requirement has been considered. Learners could use this pro forma as the basis of an appeal to the centre about their grade before that grade is submitted to the board.

Also, we need to consider ‘errors’ as being broader than marking errors, eg administrative errors like transposing the names of candidates or using the wrong mark from an assessment that has been sat.

There may be grounds for appeal against the conditions under which a test was sat and marked. For example:

- Different classes being given different lengths of time and some being given time in a subsequent class, allowing time to check answers
- Use of tests online without training in how to use the system (specific example is missing a grade by one mark, but not being able to work out the graph drawing software for a two mark question, so unfamiliar online test costs one grade).

These are all not ‘marking errors’, but lead to errors in the final mark.

Question 43. To what extent do you agree or disagree that the school or college should consider the appeal?

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

Comments:

Given that centres are generating the marks this year it follows that the first stage of the appeals process is with them as it will give them the opportunity to critically review their own decisions before awarding bodies are involved.

Question 44. To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student's school or college who was not involved with the original assessment?

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

Comments:

The independence of the reviewing body/individual is a key principle of any appeals process and should apply to any centre-based appeals. However, our conversations with centres suggest that some of them struggle with the practicalities of sourcing such an independent overview. It may be that schools with only one subject teacher or shared teacher resource could work with other schools to achieve this, or go further and share a common process. This might help small schools in particular where key staff such as the Head of Centre are absent due to Covid or other health issues.

Question 45. To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

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

Comments:

This might help schools with the manageability of the process. It might be the only avenue for some centres who have one person departments and no one else in the school with the necessary subject knowledge to review the assessment (and other materials).

It is difficult to construct an argument against allowing centres to appoint such a person if they need this additional support.

Question 46. To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

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

Comments:

We do not accept the implication here that there is such a thing as an illegitimate exercise of academic judgement. It is established that exam boards are not in a position to overrule the academic or professional judgement of a teacher. If the judgement has been arrived at without using required quality assurance processes, or if there is concrete evidence that the teacher has exercised bias against an individual, this would be grounds for changing a grade.

Question 47. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not follow the exam board's requirements when it assessed the student's performance?

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

Comments:

We have significant concerns about learners coming directly to boards with these appeals. It would seem more reasonable for such appeals to be considered at the centre first so that the centre has the opportunity to explain their process to their learners (with whom they have a direct relationship) before contacting the board. In the JCQ appeals proposal, it is envisaged that the first stage of a post-results appeal would be to the centre. If learners remained dissatisfied following that, they can appeal to the board. That board appeal would focus on process rather than academic judgements. Indeed, we might hope that clear direction to learners from the outset about how grades will be determined would mitigate this risk to a great extent.

We are also concerned about the parallels with the malpractice process. Currently, if we receive an allegation/concern/complaint that a centre is not following our requirements, this is most likely to be treated as suspected malpractice/maladministration. It will be managed in line with our published malpractice policies or, in some cases, our complaints process. It is insufficiently clear how this stage of the appeals process, as described in the consultation, would differ from a malpractice investigation. However, we feel that with further work at JCQ we should be able to bring greater clarity to the two processes and the point at which an appeal might need to move into the malpractice process.

Finally, we know from experience that establishing whether a centre had a process that met our requirements or not can be quite a time-consuming process. The consideration needs to be thorough, given the implications for the centre if we find against them. It will not always be possible to resolve appeals in the desired timescales.

Question 48. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student's appeal?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Comments:

The concerns expressed in our response to question 47 apply to this question as well.

Question 49. To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?

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

Comments:

Our response to question three outlines the various options and challenges with the proposed timelines and suggests some alternatives. We also report that many stakeholders are not convinced that bringing this date forward would really help.

Question 50. To what extent do you agree or disagree that if results day(s) are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

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

Comments:

This may be achievable on an administrative level, but there is nothing to prevent students who know their grade approaching universities and accepting offers ahead of any timetable set by UCAS. This carries a particular risk for vocational students, who may receive their results later, and who would find that some university places had already been taken by the time they received their results.

Question 51. To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

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

Comments:

There is a role for JCQ in providing a single source of consistent advice.

Question 52. Do you have any comments on the proposed appeal arrangements?

In addition to the points made previously, we would welcome a consideration of whether a two stage appeals process is required for 2021. Given that centres are generating the grades and running the processes that lead to these grades taking place, it should be acceptable to deem that the awarding body is sufficiently independent that, following the centre based appeals processes, a one stage appeals process (delivered by awarding body staff rather than independent appeals panels) would be sufficient.

There is no mention of grade protection in the consultation at the awarding body stage of the appeals process and we would welcome confirmation that at all stages of the appeals process results can go down as well as up. This will go some way to managing down the volume of appeals (which we anticipate will be very high). We also think it is very important

that the policy on grade protection is the same for GQ and those VQ qualifications that are similar to GQ.

We also need clarification about what we would do with results if we did find that a centre had not acted in line with our procedural requirements.

We would also welcome clarification about whether we would have to accept appeals from learners' parents, or whether we would have to ensure the learner was aware and supportive of the appeal.

Private candidates

Question 53. To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?

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

It is not clear from the proposal where it is envisaged that private candidates would, in this scenario, complete the papers set by exam boards: at home; in schools; or at other proscribed venues.

To enable private candidates to complete the papers set by exam boards independently of a registered examination centre, and for exam boards to mark those papers, presents a number of challenges. The logistics of doing this within the required timelines is not feasible.

Any scenario in which private candidates are to complete the papers set by exam boards outside of usual examination centre arrangements, for example in their homes, would require a logistical capability of a scale and complexity that is beyond the capacity of current delivery arrangements.

In such a scenario, exam boards would be required to enter into direct contractual relationships with private candidates. This would mean they had to obtain and securely store personal information (for example financial information) about individual learners that would not normally be held by exam boards. This represents a significant administrative burden and a heightened data protection risk, which may require the implementation of additional / new data security systems and protocols.

We conclude, therefore, that the sitting of standardised tests should be managed through centres as a matter of course – including the marking.

We believe that the standardised assessment should be the baseline evidence for private candidates to be given a CAG by a centre, although we would advise that other evidence should be used whenever centres feel able to validate it.

Question 54. To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students?

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

Comments:

We much prefer this option to the one proposed in question 53. However, we need to acknowledge that there would be little incentive for many centres to do this additional work and we query whether there will be enough capacity in the system to accommodate all private candidates in this way.

Ways must be found to incentivise mainstream centres, probably involving the DfE, to ensure that private candidates are not almost wholly reliant upon the limited numbers of distance learning providers registered as centres.

Question 55. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

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

Comments:

We are aware that there are many learners and schools and colleges who would have preferred it if exams had not been cancelled. It would be iniquitous to make the option of taking exams available to private candidates but to no one else. Such an exam series would have very low entries which always creates problems in awarding to a secure standard. This is exacerbated by uncertainty over what the standard should reflect – 2020 or 2019.

There are questions about what this would mean for the appeals process. Exam boards would have to create an RoR and appeals process for these candidates in parallel with the modified version of appeals as proposed in the consultation which, again, creates an unmanageable workload.

From an operational perspective, the challenges associated with establishing a network of geographically spread examination venues in the time available are insurmountable within the constraints of exam boards' resources.

From a public confidence perspective, it would not be possible to achieve parity of standards – real and perceived – between the two differing routes to the award of grades.

Question 56. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021?

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

This proposal carries all of the disadvantages set out above, with the addition that the timing of the series would prevent (or severely impair) private candidates from accessing progression opportunities on a basis that was equitable to their main-schooled peers.

Question 57. Do you have any comments on the options for how grades should be made available to private candidates?

There will probably be some private candidates for whom none of these proposals will be sufficient to enable them to achieve a grade this summer. Exam boards will seek to work flexibly with providers in order to identify novel solutions that are not considered in the above.

Question 58. If the preferred option for private candidates is an exam series, should any other students be permitted to enter to also sit an exam?

Either there needs to be a change of policy and exams should be available for all who want to take them, or they should be cancelled. If exams were reinstated alongside the alternative route proposed in this consultation, students would rightly expect to take both routes and receive the best outcome (as happened with the autumn 2020 re-sits). We strongly recommend that the proposal to run a series for private candidates is ruled out.

Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

Question 59. Should the exam boards be prohibited from offering GCSE, AS and A level exams in any country in 2021?

Yes

Question 60. If you answered no, which students should be allowed to enter for them?

N/A

Equality impact assessment

Question 61. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

No

Question 62. If you have answered 'yes' please explain your reason for each proposed arrangement you have in mind.

N/A

Question 63. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?

The removal of external assessment will have a negative impact on any group of students that may have high levels of actual or perceived bias against them.

Question 64. If you have answered 'yes' please explain your reason and suggest how

the negative impact could be removed or reduced for each proposed arrangement you have in mind.

Based on the current timeline there is not enough time for exam boards to create modified variants of “standardised assessments” such as enlarged, braille and accessible PDFs. The logical conclusion is that centres would be asked to do this, which would put a potentially significant burden on them at an already busy time.

The differential impact of school closures and self-isolation on candidates who lack technology and/or internet access to access fully remote learning means that the proposal that grades be based on demonstrated attainment will have a negative impact on this group of candidates. The higher any bar for minimum content coverage is, the greater this negative impact will be. Greater flexibility about coverage, and in the evidence that can be used, will help to minimise this.

There may be a minority of candidates where the impact is so great that their grades would not support progression, and it is either not possible to award a grade, or where the grade falls very far below their potential. Consideration needs to be given as to the best way of supporting such learners.

Regulatory impact assessment including costs

Question 65. Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above? If yes, what are they?

Our experience of the volume of summer 2020 appeals, complaints and bias and discrimination malpractice indicates that we will need additional resourcing at middle and senior management level to manage these processes for summer 2021. Our current view is that the proposals will lead to a significant increase in these volumes, which are already very high.

Question 66. What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting?

There will be significant extra costs associated with training and supporting centres on their approaches to quality assurance and then quality assuring those approaches externally. The creation of papers or a bank of questions (common tests) for each subject, even if these are drawn from existing papers, will incur costs.

A further cost would be incurred in developing systems for appeals so we can receive and process these directly from learners. Given we don't currently have a direct relationship with learners, we would need functionality in place to check their identity and ensure they understand the ramifications of the process they are signing up to.

Question 67. What costs would you save?

It seems likely that there will be no marking undertaken by exam boards and no external moderation of NEA which represents a significant saving. Any such savings would be rebated from our entry fees and returned to centres.

Question 68. We would welcome your views on how we could reduce burden and costs while achieving the same aims.

Aligning processes as closely as possible with those for applicable VQs would strip out complexity and streamline costs.

There is a general point that what we are all seeking to achieve this year has occurred at very short notice and this creates an additional burden on all involved. It seems likely that we will be facing similar challenges in summer 2022 because students taking exams next year will also have suffered from the impact of lost learning. We need to give consideration to this now, because what we do this year will inevitably impact on our approach for 2022, and because we need to maximise the time available to plan for next year. OCR submitted a report to Ofqual outlining some of the queries we are already receiving from centres about arrangements for 2022 (RT1685 Enquiries from centres re: 2022 communications (Intel)).

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